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July 18, 2019

The Honorable Robert Wilkie  
Secretary  
U.S. Department of Veterans Affairs  
Office of Regulation Policy and Management (OOREG)  
Department of Veterans Affairs  
810 Vermont Avenue NW, Room 1064  
Washington, DC 20420

**Re: Veterans Healing Veterans Medical Access and Scholarship Program  
(RIN 2900-AQ54)**

Dear Secretary Wilkie:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to offer our comments on the proposed requirements for the Veterans Healing Veterans Medical Access and Scholarship Program (VHVMASP or Program). This Program, once implemented, will provide funding for the medical education of 18 eligible veterans per graduating class.

### **Eligibility**

The AMA believes that the VHVMASP is a positive step in addressing the physician workforce shortages at the U.S. Department of Veterans Affairs (VA). The VA proposes to define an eligible veteran for these purposes as one who has been discharged or released under conditions other than dishonorable from the Armed Forces for a period of not more than 10 years before the date of application for admission to a covered medical school. It is our understanding that under the current proposal, a veteran out of the military for four years with a general discharge would be eligible for this scholarship while a veteran with an honorable discharge who has been working as a health care provider, such as nurse, for 10 years and wishes to take advantage of this program and attend medical school would not be eligible. The AMA urges the VA to, at a minimum, create an exception to the 10-year rule for honorably discharged veterans, and clarify in the final rule that veterans are allowed to exempt from the 10-year rule any time in which they used the GI Bill or Vocational Rehabilitation and Employment.

### **Award Procedures**

The VA proposes to cover the actual cost of the following: tuition at the covered medical school for which the veteran enrolls for a period of not more than four years; books, fees, and technical equipment; fees associated with the National Residency Match Program; two away rotations performed during the fourth year of school at a VA medical facility; and a monthly stipend for the four-year period during which the eligible veteran is enrolled in a covered medical school in an amount to be determined by the VA. The AMA supports the VA's decision to cover the actual costs that VHVMASP participants incur.

However, given the [costs](#) of the United States Medical Licensing Examination (USMLE) we urge the VA to consider covering the actual costs of the Step 1 and Step 2 exams. The AMA also urges the VA to clarify in the final rule that the monthly stipend will be adjusted for inflation.

In 2018, 351 American Medical College Application Service (AMCAS) applicants selected “Veteran” for military status on their AMCAS application, and 175 applicants selected “Active Duty.”<sup>1</sup> As a result, we urge the VA to clarify whether the VHVMASP is only applicable to the entering class of 2020 or whether it will be extended in future years. Given the VA’s physician workforce shortages, the AMA would support the extension of this program indefinitely and its expansion to additional medical schools.

### **Agreement and Obligated Service**

The VA proposes to give participants up to 90 days, after completion of residency or fellowship training, to obtain his or her degree and medical license and that the participant must serve as a full-time clinical practice employee in the VA for a period of four years. Participants who fail to meet these requirements would be in breach of their acceptance agreement. The AMA believes that these requirements are reasonable although we urge the VA in its final rule to afford some flexibility for extenuating circumstances, life events, or other academic pursuits that may require participants to take a leave of absence.

The proposed rule outlines the terms of the agreement which are as follows: maintain enrollment, attendance, and acceptable level of academic standing as defined by the covered medical school; complete post-graduate training leading to eligibility for board certification in a physician specialty applicable to VA; after completion of medical school and post-graduate training, obtain and maintain a license to practice medicine in a State. The AMA asks the VA to clarify the definition of “a physician specialty applicable to the VA.”

The proposed rule also states that eligible veterans must ensure the State licenses are obtained in a minimal amount of time following completion of residency, or fellowship, if the veteran is enrolled in a fellowship program approved by the VA. The AMA urges the VA to clarify in its final rule whether participants will be required to enter a VA residency program to complete their training and comply with VHVMASP agreements.

### **Failure to Comply with Terms and Conditions of Agreement**

The VA proposes to require eligible veterans in breach of their VHVMASP agreement to pay the amount of damages that the United States is entitled to recover in full to the United States no later than one year after the date of the breach of the agreement. The AMA believes that this timeline is undesirable and does not take into account extenuating circumstances that the eligible veteran may be facing. The AMA urges the VA in its final rule to offer these veterans flexibility for extenuating circumstances, life events, and other issues that may impact their ability to pay the amount of damages back to the United States within one year.

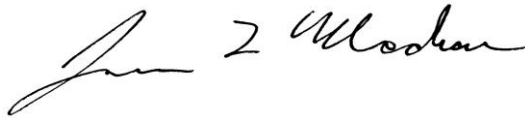
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<sup>1</sup> <https://students-residents.aamc.org/applying-medical-school/article/applying-veteran-or-current-military-member/>

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We thank you for the opportunity to provide input on the VHVMASP. If you have any questions regarding this letter, please contact Margaret Garikes, Vice President of Federal Affairs, at [margaret.garikes@ama-assn.org](mailto:margaret.garikes@ama-assn.org) or 202-789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is fluid and cursive, with a large initial "J" and a distinct "M".

James L. Madara, MD