

**From:** Dr. Cheryl Lovell <cdlovell@[REDACTED]>  
**Sent:** Tuesday, November 19, 2013 11:57 PM  
**To:** Kolotos, John  
**Cc:** chipbloc@[REDACTED] Wilson, Amy  
**Subject:** feedback from NRM on Gainful Employment

Dear Mr. Kolotos:

I feel compelled to follow up in writing to express the feedback we discussed today and in previous written communication in a letter from Rocky Vista University sent on Sept 16, 2013. As noted, RVU has graduated classes with 100% residency placements AND have national board scores at the 98% passing rate. Our graduation completion rate is over 90%. This is a very high achieving medical school with outcomes that many medical schools with decades of experiences have not achieved. It is also the only medical school in the US to which these gainful employment regulations apply. We ask that you eliminate RVU from these regulations for the following reasons:

First, there is no evidence that medical students do not repay student loans and thus there is no need for these gainful employment regulations to apply to graduate medical schools such as Rocky Vista University. This one size fits all approach is not evidence-based nor needed practice. Medical students have excellent track records of repaying their student loans and have presented no example of inability to repay. Graduate and professional institutions have not presented any concerns for the Department and do not have a track record of violating or abusing Title IV programs. No policy discussions have ever mentioned graduate and professional programs and thus applying these regulations to graduate medical programs is not necessary or evident.

Second, most osteopathic medical students will select family medicine as their specialty which unfortunately has the lowest salary earnings of all medical specialties. Sadly this will create an environment in which institutions will be forced to gear student interests and choices towards other, greater salary earning specialties. This trend will have a negative impact on the US which is already in dire need of primary care doctors with a family medicine focus. The Affordable Care Act will create even greater pressure of the physician workforce demanding even more family care doctors. These gainful employment regulations will force institutions and students to rethink practice environments to meet randomly set debt to earnings ratio test as some remote "measure" of "quality" when there is no evidence that there is an established repayment problem for medical students.

Third, degree credential level has been ignored and completely eliminated from the regulations. Associate level or certificate level students who complete a two year or shorter program have ten years to repay their student loans; however, medical students, who complete a four year graduate program plus have three to five years of a residency program and another year or two for fellowships have the identical repayment period. The illogical and random repayment period creates unnecessary burdens on institutions. At a minimum, the same ratio of years should apply thus allowing medical students to have a longer repayment period equal to the years of completion to repay their loans as certificate students have (2 year certificates have 10 years; 8 year+ medical students should have at least 20 or 30 year repayment periods).

Fourth, RVU will be required to place warnings on their websites that no other medical schools in the US will be required to do. RVU is the only medical school in the US to which these gainful employment regulations apply thus by their very nature, these regulations, will be discriminatory to RVU. A warning will cause prospective students to look at other medical schools which will never have such a warning even though their program could be providing poor outcomes on the same metrics. Discriminatory practices by the US Department of Education by applying these regulations to the only tax paying medical school in the US could result in additional, needless legal action. The focus of the Department's

resources should be focused on eliminating programs and institutions that have an established pattern of low repayment performance or poor institutional outcomes on typical student success metrics regardless of tax status.

Finally, there is no ability of the institution to limit the amount a student borrows so it is unfair to hold the institution responsible for the total loan. The Department must only count the amount of the student loan that covers the required tuition, fees, and books. The additional loan amounts students are allowed to borrow according to Title IV regulations should not unnecessarily so be a burden for the institution. If an institution is going to be responsible for the loan behavior of its students then the department should allow institutions control over loan limits.

Thank you for your willingness to receive additional feedback. I welcome the opportunity to discuss these concerns with you.

**Cheryl D. Lovell, Ph.D.**  
**President**  
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**8401 S. Chambers Rd**  
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#### **RVU MISSION STATEMENT**

**Rocky Vista University provides quality healthcare education while inspiring students to serve with compassion, integrity and excellence.**

#### **CORE VALUES**

**Integrity** -The quality of living a unified life in which one's convictions are well-considered and match one's actions, demonstrating fairness, honesty, sincerity, professionalism, and a consistent commitment to our mission, vision, and values.

**Collegiality** -Mutual respect, collaboration, and the open exchange of ideas advance mutual goals and facilitate individual growth.

**Compassion** -The willingness to be engaged with the needs of others.

**Diversity** - An awareness and dignity for all, regardless of culture, race , ethnicity , gender , religion , sexual orientation , physical ability , socioeconomic status or individual life experiences.

**Excellence** - The commitment to exceed expectations in education.

**Service** - Through active service, we support one another and seek to meet the needs of the larger community.

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