



COLLEGE of AMERICAN PATHOLOGISTS

September 24, 2021

Miguel Cardona, Ed.D
Secretary of Education
U.S. Department of Education,
400 Maryland Ave. SW,
Washington, DC 20202

**Re: Request for Information Regarding the Public Service Loan Forgiveness
Program [Docket ID ED—2021—OUS—0082]**

Dear Dr. Cardona,

The College of American Pathologists (CAP) appreciates the opportunity to comment on the request for information regarding the Public Service Loan Forgiveness Program. As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide. Pathologists are physicians who specialize in the diagnosis of disease through laboratory methods, and their primary mission is the delivery of high-quality diagnostic services to patients and other physicians.

Federal loan forgiveness programs have been important to address workforce shortages in public service. There is a national shortage of forensic pathologists (FP) so a federal loan forgiveness program specifically structured for practicing forensic pathologists is needed. Forensic pathologists are experts in the investigation of sudden, unexpected, suspicious, and unnatural deaths, and most work as governmental employees in medical examiner/coroner (ME/C) offices at the local (county) or state levels.

A public health workforce loan repayment plan for forensic pathologists will help to ensure an adequate supply of, and encourage recruitment of, these public health medical professionals to eliminate critical ME/C workforce shortages in local, State, and Tribal jurisdictions. As medical school loan debt is a significant deterrent to choosing a career as a government FP, funding loan forgiveness programs would encourage medical students to choose forensic pathology as a career.

ME/C offices provide essential services that cannot be delayed and must be performed according to established guidelines and standards. Families need remains in a timely manner for funeral arrangements. To properly investigate and certify the cause and manner of death, autopsies are required in many deaths, such as homicides, sudden infant deaths, a variety of traumatic deaths, and drug intoxication cases.

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There is a significant shortage of FPs due to decreasing supply (i.e., not enough forensic pathologists) with an increasing demand (i.e., increasing workload). The increasing demand involves acute drug intoxication deaths, homicides, and COVID-19. There are currently about 500 FPs practicing full time in the US; however, there would need to be over double that number to ensure a forensic pathologist performs these investigations in all jurisdictions of the US.

There are fewer medical students entering the field of pathology. This translates into fewer forensic pathologists since forensic pathologists must first be trained in pathology before specializing in forensics. Two financial factors are worsening this situation: salaries and student loan debt. Forensic pathology is the only subspecialty in medicine in which the physician earns a lower salary after doing an additional year of specialized training than if they had not subspecialized and simply work as a hospital pathologist. If governments cannot compete with the private market of pathology, or the larger market of heavily indebted medical students weighing a variety of career options, there will continue to be a shortage of FPs.

Lower salaries, compared to other pathologists, and medical school loan debt represent significant deterrents to choosing a career in forensic pathology. For comparison, salaries for forensic pathologists are significantly lower than hospital pathologists. It is easy to see why pathology residents completing training do not choose forensic pathology as a specialty. The average medical school debt is \$215,900, excluding premedical and other educational debt. The average medical school graduate owes \$241,600 in total student loan debt. 76-89% of medical school graduates have educational debt. 43% of indebted medical school graduates have premedical educational debt.

The CAP looks forward to discussing establishment of a forgiveness program specifically for FPs. Please contact Helena Duncan at hduncan@cap.org with any comments.

Sincerely,

The College of American Pathologists