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**810 Vermont Ave. NW**  
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**RIN 2900-AQ63- Specialty Education Loan Repayment Program**

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On behalf of the American Psychiatric Association (APA), the medical specialty society representing 38,800 psychiatrists, thank you for the opportunity to comment on the proposed rule released by the Department of Veterans Affairs (VA) to create a Specialty Education Loan Repayment Program (SELRP). The APA has long advocated for better recruitment of psychiatrists in the VA through the Clay Hunt Suicide Prevention for American Veterans Act, which included a pilot project encouraging more psychiatrists to choose a career with the VA by offering medical school loan repayments on par with those offered by other government agencies and private practices. While the program was never implemented, we are encouraged by the release of the proposal and its potential to incentivize more psychiatrists to pursue careers with the VA.

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The goal of the program is to meet the staffing needs of VA physicians in medical specialties for which VA has determined that recruitment or retention of qualified personnel is difficult. We strongly encourage you to ensure the program is open and accessible to psychiatry residents. Under the Clay Hunt Act, the VA was to recruit at least 10 psychiatrists into the loan repayment program each year; the VA would hire these physicians permanently to fill full-time vacant positions. We strongly urge for SELRP to meet the requirements of the Clay Hunt Act and go beyond given the level of need for psychiatric services in the VA. According to the 2019 National Veteran Suicide Prevention Annual Report, approximately 17 veterans die by suicide each day. This is a public health issue that needs urgent attention and more psychiatric expertise in the VA to address.

**Administration**

Saul Levin, M.D., M.P.A.  
*CEO and Medical Director*

In addition to ensuring slots for psychiatric residents, we urge you to consider the following recommendations:

- Provide flexibility in the eligibility requirements to allow for fellows to be eligible. Fellows could also benefit from the program and may only have one year

left of training; the current requirement for this program, however, limits participation to physicians currently in training who have more than two years remaining to complete such training. Fellows could deepen the applicant pool for the program, helping to facilitate participation by more psychiatrists during this time of critical need.

- We also urge for scholarships to be portable to sites where specialty is needed instead of the recipient being placed in one location.
- Special protections or a continuation of eligibility should also be included for parental leave to encourage women to participate. Given that this is early career, such protections are necessary to support applicants. Federal guidelines on parental leave should be followed as a minimum.
- Ensure the Veterans Affairs Administration is coordinating with local VAs to announce and connect potential loan repayment recipients with local vacancies.
- Develop a process to comprehensively evaluate and track the application and placement process for accountable and equitable disbursement among the applicants, to ensure that psychiatrists are receiving equivalent consideration for this program among the specialties. This process could also include a mechanism to ensure the application process is not too burdensome for prospective candidates, thus streamlining the process overall.

Thank you again for the opportunity to comment on this important program. Please use the APA as a resource to distribute details about SELRP to our members. If you have questions, you may contact APA's Director of Practice Management and Delivery Systems Policy, Michelle Dirst, at [mdirst@psych.org](mailto:mdirst@psych.org). We look forward to working with you on this important program.

Sincerely,



Saul M. Levin, M.D., M.P.A., FRCP-E, FRPsych  
CEO and Medical Director