Coalition of Providers and Programs

Via online submission to http://www.regulations.gov

August 25, 2025

The Honorable James Bergeron
Deputy Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

RE: Docket ID ED-2025-OPE-0151-0001

Dear Deputy Under Secretary Bergeron and Members of the Rulemaking Committees:

We, the undersigned organizations representing a broad range of health professions, education programs, professional associations, and other interested parties, appreciate the opportunity to submit comments providing advice and recommendations to the Department of Education's (ED) Reimagining and Improving Student Education (RISE) Committee as they begin their work on the negotiated rulemaking to implement the student financial aid provisions under Public Law 119–21, commonly referred to as the One Big Beautiful Bill Act.

As organizations who are all deeply invested in ensuring our nation has a robust workforce pipeline of the next generation of health professionals, we urge ED to ensure that all post-baccalaureate health professions programs generally required for licensure or certification are included in the regulatory definition of "professional degree programs."

Post-Baccalaureate Health Professions Programs Meet the Definition of "Professional Degree" Programs

As ED considers its implementation of new loan limits under the One Big Beautiful Bill Act, it is critical that post-baccalaureate health professions programs are explicitly included within the scope of "professional degree programs." All of these programs provide degrees that are rigorous, practice-based, and require substantial clinical and fieldwork components. These degrees often lead to students obtaining the state licensure or certification required to practice.

We encourage ED to do as much as possible to address shortages in our critical healthcare workforce. ED must ensure that the definition of "professional degree programs" does not create winners and losers among healthcare professions. The application of an inconsistent standard, where some health professional programs have higher loan limits and others have lower limits, would create an imbalance in the competitiveness of these programs, ultimately decreasing patient access and choice.

Ensuring Loan Parity and Access to Care

Students pursuing careers in health fields often rely on Direct Unsubsidized Loans to finance their education. Excluding certain accredited, licensure- or certification-based health professions programs from the "professional degree" designation could unintentionally create an inequitable tiered system within the healthcare education landscape.

The undersigned organizations strongly believe that all students pursuing accredited post-baccalaureate health professions degrees generally required for licensure or certification—regardless of discipline—should be treated equitably in loan eligibility, borrowing limits, and access to repayment programs.

Recommendations

We offer the following specific recommendations to the Department of Education and the RISE Committee:

1. ED should adopt a clear and inclusive regulatory definition of "professional degree programs" that encompasses any master's or doctoral degree education generally required for licensure or certification in health professions.
2. Such definition must maintain alignment with state and federally recognized licensure- or certification-based credentialing pathways when required. All health professions where a state license or certificate to practice is generally required should be treated consistently with other health professions in all relevant student aid regulations.

Any ambiguity in defining eligible professional degree programs could jeopardize access to financing for future health profession students, ultimately threatening workforce supply in schools, hospitals, and community settings where demand for health services continues to grow.

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Thank you for your commitment to a transparent and inclusive rulemaking process. We stand ready should you require additional information. Please contact Abe Saffer at asaffer@aota.org if you have any questions or would like more information.

Sincerely,

Accreditation Commission for Acupuncture and Herbal Medicine
Accreditation Council for Education in Nutrition and Dietetics
Accreditation Review Commission on Education for the Physician Assistant, Inc. (ARC-PA)
AFT, AFL-CIO
American Academy of Audiology
American Academy of Physician Associates
American Association for Marriage and Family Therapy
American Association of Colleges of Nursing
American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy
American Association of Colleges of Podiatric Medicine
American Association of Naturopathic Physicians
American Association of Nurse Anesthesiology
American Association of Nurse Practitioners
American Association of Veterinary Medical Colleges
American Chiropractic Association
American College of Nurse-Midwives
American Council of Academic Physical Therapy
American Dental Education Association

American Music Therapy Association
American Nurses Association
American Occupational Therapy Association
American Physical Therapy Association
American Psychological Association Services
American Society of Hand Therapists
American Speech-Language-Hearing Association
Association of Accredited Naturopathic Medical Colleges
Association of American Medical Colleges
Association of Chiropractic Colleges
Association of Schools Advancing Health Professions
Association of Schools and Programs of Public Health
Association of University Programs in Health Administration
Council of Administrators of Special Education
Council on Naturopathic Medical Education
Council on Social Work Education
National Accrediting Agency for Clinical Laboratory Sciences (NAACLS)
National Association of Pediatric Nurse Practitioners
National Association of School Nurses
National Association of Social Workers
PA Education Association