

Submitted at www.regulations.gov

August 28, 2025

The Honorable Linda McMahon
Secretary
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue SW, 5th Floor
Washington, DC 20202

RE: Public comments on the intent to establish two negotiated rulemaking committees to prepare regulations for the Federal student financial assistance programs authorized under Title IV of the Higher Education Act (HEA) of 1965, as amended (Title IV, HEA programs); **Docket ID ED-2025-OPE-0151.**

Dear Secretary McMahon:

On behalf of the undersigned organizations representing America's physicians and other health professionals, medical and other health professions students, and academic institutions, we respectfully urge the Department of Education to preserve the long-standing federal loan exception that allows medical students and other health professions students to borrow additional Unsubsidized Direct Loans supplementing statutory limits.

Our organizations have been committed to strengthening America and actively engaged in addressing persistent health workforce shortages across rural and other underserved communities. A key component of these efforts is recruiting and retaining aspiring health professions students in health care careers, particularly students from rural America and other underserved backgrounds who often return to similar communities to practice. Federal student financial aid programs play a key role in facilitating this work to address health workforce shortages. Since 1996, the U.S. Department of Education has been a supporter in this effort and has recognized the unique financial demands of health professions education by permitting additional aggregate Unsubsidized Direct loan borrowing supplementing statutory limits for certain specialized graduate and professional degree programs. The Federal Student Aid Handbook and the 1986 reauthorization of the Higher Education Act ([P.L. 99-498](#), Section 428H(d)) reflect this long-standing policy in support of the intensive, experiential nature of health professions training, which often entails higher costs to adequately prepare students for clinical practice and service within the nation's health care workforce.

The recently enacted One Big Beautiful Bill Act (OBBBA, [P.L. 119-21](#)) does not alter the Secretary's authority to continue granting this borrowing exception to students in specific health professions degree programs. As the Department works to implement the OBBBA, **we urge you to continue exercising that authority and maintain the exception currently in place.** Doing so will allow America's future health professionals to borrow additional Unsubsidized Direct Loans supplementing statutory limits and ultimately, to contribute to America's workforce in service to the nation's most pressing health care needs. Without this exemption, our analysis

indicates that at least 55 percent of medical student borrowers would be forced to seek private loans to cover the full cost of attendance, which are loans that typically carry higher interest rates, fewer borrower protections, and limited repayment flexibility. Other health professions face a similar challenge; costs of attendance will not be fully covered by federal loans under new statutory limits. We are concerned that, as a result, students who may otherwise have practiced in rural and other underserved communities may opt to forgo a health care career altogether. Ultimately, communities will lack health care professionals, and their health needs will go unmet. Investing in health professions students has the added benefit of bolstering the healthcare workforce in every community. At a time when the United States faces shortages of health professionals across numerous specialties and geographic areas, especially in rural and underserved communities, we cannot afford to limit the pipeline of future doctors and health professionals.

We respectfully urge the Secretary to continue the current practice of a health professions exception and to explicitly preserve the ability of health professions students to borrow additional Unsubsidized Direct Loans, supplementing statutory limits. Ensuring that all aspiring students can pursue a health professions education is essential to promoting health and wellbeing among all Americans.

Sincerely,

Alliance for Academic Internal Medicine (AAIM)

American Academy of Family Physicians

American Academy of Hospice and Palliative Medicine

American Association of Colleges of Osteopathic Medicine

American Association of Colleges of Podiatric Medicine

American Association of Naturopathic Physicians

American Association of Veterinary Medical Colleges

American College of Academic Addiction Medicine

American College of Obstetricians and Gynecologists

American College of Osteopathic Family Physicians

American College of Physicians

American College of Rheumatology

American College of Surgeons

American Council on Education

American Podiatric Medical Association

American Podiatric Medical Student Association

American Psychiatric Association

American Psychological Association Services

American Society for Clinical Pathology

American Society of Cataract & Refractive Surgery

American Society of Echocardiography

Association of Accredited Naturopathic Medical Colleges

Association of American Medical Colleges

Association of Chiropractic Colleges

Association of Public and Land-grant Universities

Association of Schools and Programs of Public Health

Association of University Programs in Health Administration

College of American Pathologists

Mass General Brigham

Medical Group Management Association

Medical College of Wisconsin

Naturopathic Medical Student Association

New York Medical College

Rutgers, The State University of New Jersey

Society of Hospital Medicine

The American Academy of Pediatrics

The Ohio State University

The Society of Thoracic Surgeons

University of Colorado Anschutz Medical Campus

University of Maryland, Baltimore

Washington State University