



March 2, 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

***Re: Notice of Proposed Rulemaking, Reimagining and Improving Student Education
(ED-2025-OPE-0944)***

Dear Under Secretary Kent,

The member organizations of the Federation of Associations of Schools of the Health Professions (FASHP) are concerned that the definitions for “graduate” and “professional” degree programs in the Reimagining and Improving Student Education (RISE) notice of proposed rulemaking do not adequately reflect the realities of the health professions workforce and threaten to weaken the nation’s healthcare workforce and patient care. As the Department of Education finalizes regulatory language, we urge you to ensure that the health professions workforce is considered a single, integrated workforce when determining loan eligibility criteria. Health professions are inherently interconnected and work collaboratively across settings to achieve the best outcomes for patients and populations. Fragmenting loan eligibility risks undermining the interprofessional fabric that defines today’s evolving health system.

It is important that the Department adopt a clear and consistent standard for defining “professional degrees” among the health professions that explicitly includes health professions degree programs that were omitted in the Department’s proposed rule. In particular, our doctoral- and masters-prepared interprofessional team members serve to elevate care in all practice settings, including rural communities across the country experiencing significant healthcare workforce shortages.

A standard definition would support, rather than hinder, federal efforts to educate, recruit, and maintain an appropriately staffed health care workforce, thereby ensuring a healthier America. The true measure should be the program’s accreditation, content, applicable licensure or certification, and alignment with established standards in the health professions, not its duration. If the Department chooses not to use this approach to define health professional degrees, it risks creating inconsistent eligibility determinations and

excluding critical health professions. This lack of clarity would leave students uncertain about their eligibility, potentially discouraging them from entering vital health fields and ultimately weakening the pipeline of multidisciplinary professionals needed across the health system to protect the American people. For example, the current proposed definition would exclude:

- Athletic Training (MA, MS)
- Audiology (AuD)
- Biomedical Sciences (MS)
- Cardiovascular Perfusion Technology (MS)
- Clinical Laboratory Science, Medical Laboratory Science, Medical Technology (MS)
- Counseling (MA, MS, PhD, PsyD)
- Cytotechnology (MS)
- Dental Hygiene (MSDH, MDH)
- Exercise Science (MS)
- Genetic Counseling (MS)
- Health Administration (MHA, DHA)
- Health Information Management (MS, PhD)
- Health Sciences, health studies, allied health sciences (MS, PhD)
- Magnetic Resonance Imaging (MS)
- Naturopathic Medicine (ND, NMD)
- Nuclear Medicine Technology (MS)
- Nursing (MSN, DNP, PhD)
- Nutrition and Dietetics (MS, MPH)
- Occupational Therapy (MA, MS, MOT, OTD)
- Orthotics and Prosthetics (MS)
- Physical Therapy (DPT)
- Physician Associate/Assistant Studies (MSPAS, MPAS, MMS, MS)
- Psychology (MA, MS, PhD, PsyD)
- Public Health (MPH, DrPH)
- Radiology, Radiography (MS)
- Rehabilitation Counseling (MA, MS, PhD, PsyD)
- Respiratory Therapy, Respiratory Care (MS)
- Social Work (MSW/DSW)
- Speech Language Pathology (MA, MS)

Established in 1968, the FASHP is a collaborative network of 19 professional organizations. As the primary sources for the nation's future healthcare workforce, they each serve as the 'cradle of their profession' to a combined 1.3 million students. The involved institutions form the foundation for healthcare delivery and innovation in the United States, providing the knowledge, skills and research that influence the future of our healthcare system.

We, the undersigned member organizations of FASHP, urge careful consideration of these recommendations to support the education and financial stability of our nation's health workforce pipeline.

Sincerely,

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 Veterinary Medical Colleges
American Council of Academic Physical Therapy
American Dental Education Association
American Occupational Therapy Association
American Physical Therapy Association
Association of Accredited Naturopathic Medical Colleges
Association of American Medical Colleges
Association of Schools Advancing Health Professions
Association of Schools and Programs of Public Health
Association of University Programs in Health Administration
Council on Social Work Education
PA Education Association