



March 2, 2026

Submitted via Regulations.gov

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

RE: ED-2025-OPE-0944; Reimagining and Improving Student Education

Dear Under Secretary Kent:

On behalf of the more than three million members of the National Education Association (NEA), we submit the following comment in response to the Department of Education’s proposed changes created by the Reimagining and Improving Student Education (RISE) rulemaking committee and published in the Federal Register on January 30, 2026. We have serious concerns that provisions in the proposed rule undermine educators’ professionalism and create additional barriers for individuals pursuing advanced degrees. These changes represent a fundamental step backward from established policies that effectively support students, borrowers, and public service workers, including educators.

At a time of persistent educator shortages and workforce instability, reducing access to federal student aid, narrowing eligibility for higher loan caps, and weakening loan forgiveness pathways would exacerbate recruitment and retention challenges.¹² Federal aid policy should expand access to the profession and support career advancement, not restrict it. **We urge the Department to revise this proposed rule to ensure it promotes affordability, equity, and workforce stability in public education and other critical public service fields.**

Graduate Loan Caps and the Restrictive “Professional” Designation

The NEA strongly opposes the Department’s use of a narrow definition of “professional student” to create a two-tiered graduate financial aid system that relies on a historically arbitrary list of degrees that excludes advanced credentials in education, nursing, and many other public service fields. Capping loans at \$20,500 annually and \$100,000 in aggregate for programs not designated as “professional” will significantly harm borrowers, particularly aspiring educators.

¹ <https://www.nea.org/advocating-for-change/new-from-nea/6-charts-explain-educator-shortage>

² <https://learningpolicyinstitute.org/product/teacher-shortages-subjects-across-states-factsheet>

By tying “professional” programs and their associated increased maximum loan limits to a largely antiquated list of professions, the Department ignores the modern reality of the educator workforce. Public school educators and education support professionals are highly skilled practitioners that our students, schools, colleges, and universities depend on. Many pursue graduate degrees to deepen their expertise, advance their careers, and meet requirements for higher compensation and continued licensure.

The proposed caps would force some educators to take out private loans with less favorable terms, while placing advanced degrees out of reach for others. **This exclusion is not a neutral administrative decision; it reflects a value judgement that effectively de-professionalizes education, nursing, and other graduate-trained fields. Notably, these restrictions disproportionately affect professions that are predominantly staffed by women.**

Statutory Overreach and Improper Narrowing of Congressional Intent

The Department's proposed rule imposing a two-tier structure of loan caps on professional and graduate students are beset with errors. Broadly, the Department has exceeded its authority by imposing restrictions beyond those enacted by Congress in the One Big Beautiful Bill Act (OBBBA).

More narrowly, the Department's conclusion that advanced education degrees do not satisfy the proposed definition of "professional degree" is based on inaccuracies and a failure to understand the required educational path of our country's educators.

Graduate Education and Licensure Requirements in the Education Workforce

The proposed definitions of “professional student” and “professional degree” impermissibly restrict who would have access to the higher loan caps. In the OBBBA, Congress made clear that individuals would have access to the higher caps if they were a “professional student,” defined as “a student enrolled in a program of study that awards a professional degree, as defined under section 668.2 of title 34, Code of Federal Regulations (as in effect on July 4, 2025), upon completion of the program.”³ That regulatory definition requires that the degree (1) “signifies ... completion of the academic requirements for beginning practice in a given profession”; (2) requires “a level of professional skill beyond that normally required for a bachelor's degree”; and (3) generally requires professional licensure.”⁴ The definition then provides a list of examples of a professional degree, making clear that the examples “include but are not limited to” degrees in Pharmacy, Dentistry, Law, Theology, and many others.⁵

Although Congress lent statutory weight to this regulatory definition in the OBBBA, in the proposed rule the Department seeks to impose additional restrictions, thereby narrowing the degree programs that would qualify students for the higher loan caps applicable to “professional students.” Most notably, although it adds several degrees to those named – adding Clinical Psychology (Psy.D. or Ph.D.) – it rechristens that list from *examples* of professional degrees to an *all-inclusive list*. In other words, degrees that were not listed as examples under the definition adopted by Congress but that

³ 20 U.S.C. § 1087e(a)(4)(C)(ii).

⁴ 34 C.F.R. 668.2(b).

⁵ *Id.*

otherwise met that definition would be excluded under the proposed rule. The Department also proposes to add additional requirements to meet this definition, including that a program must be at the doctoral level and include a four-digit Classification of Instruction Program (CIP) code.

In the education setting, as the Department notes, a master's degree is generally not required to obtain one's licensure and begin one's career as a classroom teacher. But critically, many states only grant new teachers a conditional license, of sorts, which expires after a set period unless that teacher completes a master's degree.⁶ If many states require graduate degrees to maintain or achieve full licensure, they clearly see these employees as "professionals" given their licensure requirements. Why would the US Department of Education set up a circumstance where educators, as part of their professional practice responsibilities, are treated differently than other professions that must on an ongoing basis pay for continuing education and satisfy additional degree requirements to remain in the profession? **Driving educators to higher-cost private loans in order to maintain the professional qualifications needed to remain in their jobs, while not doing so for other professions, is discriminatory and will exacerbate the educator retention problem that far too many school districts face across the country.**

To be more specific, the Department fails to address the many educator roles that, in fact, *require* a graduate degree as a condition of licensure. Educators, including Reading Specialists and Instructional Coaches, as well as Specialized Instructional Support Personnel (SISP), including School Librarians and Media Specialists, School Counselors, Social Workers, Nurses, and Speech-Language Pathologists require in many states either a postgraduate degree and/or a minimum number of years of licensed teaching experience, which would necessitate obtaining a graduate degree. For instance, Virginia requires Reading Specialists to have a master's degree, subject practicum, and at least three years of classroom teaching experience.⁷ Iowa's requirements for Reading Specialists include a master's degree and specific classroom instruction on curricula, instruction, assessment, and administration and supervision of reading programs.⁸ Approximately 20 states, including Maryland,⁹ North Carolina,¹⁰ and Arkansas¹¹ require a master's degree for initial licensure to become a school librarian or media specialist. To become a school counselor, an individual generally must hold a Master's Degree in school counseling and meet state licensure requirements.¹² To become a Speech-Language Pathologist eligible to work in schools, an individual generally needs to complete a Master's Degree and satisfy additional requirements, which include completing a clinical fellowship and obtaining state licensure.¹³ These positions would appear to meet the existing OBBBA definition

⁶ <https://www.wested.org/resource/guide-on-teacher-workforce-credentialing/>

⁷ <https://law.lis.virginia.gov/admincode/title8/agency20/chapter23/section660/>

⁸ <https://www.law.cornell.edu/regulations/iowa/Iowa-Admin-Code-r-282-13-28>

⁹ <https://marylandpublicschools.org/about/pages/dee/certification/areas/library-media-specialist.aspx>

¹⁰ <https://www.dpi.nc.gov/076/open>

¹¹ https://dese.ade.arkansas.gov/Files/Library_Media_K-12_Oct_2021_20211006131724.pdf

¹² *Become a School Counselor*, American School Counselor Association, <https://www.schoolcounselor.org/About-School-Counseling/Careers-in-School-Counseling>; U.S. Bureau of Labor Statistics, Occupational Outlook Handbook – School and Career Counselors and Advisors, <https://www.bls.gov/ooh/community-and-social-service/school-and-career-counselors.htm>.

¹³ Sarah Keller, *SLP Licensing Requirements by State: Complete 2025 Guide* (Feb. 18, 2026),

<https://www.speechpathologygraduateprograms.org/state-licensing-overview/#state-overview>; U.S. Bureau of Labor Statistics, Occupational Outlook Handbook – Speech-Language Pathologists, <https://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm#tab-1>.

of “professional degree” but potentially fall short of the Department’s proposed rule because these programs are not expressly listed and are not at the doctoral level.

Program Length and Clinical Training Inconsistencies

If the argument is that the higher loan limit should be available for doctoral equivalent focused education, which generally includes 4-6 years of postgraduate training and/or clinical work, then including law programs that generally require only 3 years of instruction would also seem not to fit this definition. Many SISIP positions not only require a master’s or doctoral degree, but also frequently require clinical experience as well. Many specialists require extensive classroom experience in addition to educational requirements, with significant postgraduate work required for licensure.

Supervision Does Not Negate Professional Status

The Department argues that because educators are supervised by administration, their degrees do not fit under the professional degree categorization. That position is inconsistent with how professional degrees function in other fields.

In medicine, individuals who hold an M.D. or D.O. recognized professional degrees, complete residencies under the supervision of senior physicians. Likewise, individuals who earn a J.D. cannot practice law without bar admission, and even then, junior associates typically work under the supervision of partners. In both professions, supervision is common and does not undermine the professional status of the degree.

Professional classification is based on specialized education, preparation for licensure, and entry into a regulated field, not on whether the degree holder practices without oversight. By comparison, licensed educators with master’s or doctoral degrees largely manage their classrooms and instruction independently. The proposed rule therefore applies an inconsistent standard by treating supervision as disqualifying in education but not in other recognized professions.

Economic and Equity Impacts of Proposed Loan Caps

The Department asserts that federal loan caps “could provide an incentive to institutions to limit tuition increases, benefitting current and future students.”¹⁴ This assertion is speculative at best. This supposition is based on a nearly 40-year old (1987) opinion piece in *The New York Times* entitled “Our Greedy Colleges,” authored by President Ronald Reagan’s Secretary of Education William Bennett, who asserted that “[i]ncreases in financial aid in recent years have enabled colleges and universities blithely to raise their tuitions, confident that Federal loan subsidies would help cushion the increase.”¹⁵ This assertion was highly speculative and has never been proven true. **Of course, even if it is assumed true that increases in aid resulted in increased tuition, it cannot be assumed that the reverse is true, that capping aid will result in higher education institutions decreasing, or slowing the increase, of tuition. And in any event, while the Bennett Hypothesis has been the subject of much research in the intervening decades, the only conclusion that can fairly be drawn is that it is unknown**

¹⁴ NPRM at 4299.

¹⁵ William Bennett, *Our Greedy Colleges*, NY TIMES (Feb. 18, 1987), <http://www.nytimes.com/1987/02/18/opinion/our-greedy-colleges.html>.

what impact increased aid has on tuition.¹⁶ This is because of the “myriad factors thought to be playing some role in contributing to the escalation of college prices.”¹⁷ Those factors include general inflation and declines in state subsidies to public higher education institutions, and many more.¹⁸ A 2014 review of existing studies addressing the so-called Bennett Hypothesis showed mixed results at best:

The review of studies presented in this report suggests the body of research on the relationship between federal financial aid and college prices does not provide conclusive results in any direction. In fact, there are often contradictory findings *within* a single study and there is certainly no consensus on the existence, and certainly not the magnitude, of causal relationship between aid and price.¹⁹

What is not speculative, however, is the harm these caps will impose on graduate students, particularly those pursuing advanced degrees in education. This regulatory proposal will severely harm part-time students who must work while pursuing an advanced degree. And it will harm students who come from families with less wealth.

A significant share of graduate students already borrow above the proposed limits to complete their programs.²⁰ For example, 24% of Doctorate in Education students take out federal loans that exceed the proposed limits, borrowing an average of \$15,400 above the proposed limits.²¹ Moreover, 17% of Master’s in Education students take out federal loans that exceed the proposed limits, borrowing an average of \$14,900 above those limits.²²

The impact would be even more severe for part-time students, many of whom are working professionals. The Department’s proposal to prorate loan caps for part-time enrollment ignores the reality that many educational costs, such as housing, health insurance, and technology fees, do not decrease proportionally with course load.

Data shows that the percentage of students who take out loans above the proposed limits rises dramatically when comparing full-time students with those attending school on a half-time basis. One study found that, overall, 21.9% of students pursuing master’s degrees full-time, and 27.7% of students pursuing Doctoral degrees full-time take out loans that exceed the proposed caps.²³ These

¹⁶ See, e.g., Richard Pallardy, *History of Student Loans: The Bennett Hypothesis*, Saving for Coll. (Mar. 11, 2022), <https://www.savingforcollege.com/article/history-of-student-loans-the-bennett-hypothesis> (“Examinations of the literature on the Bennett hypothesis reveal a startling lack of consensus.”); Robert Kelchen, *An empirical examination of the Bennett hypothesis in law school prices*, 73 *Econ. of Educ. Rev.* 101915 (2019), <https://www.sciencedirect.com/science/article/abs/pii/S0272775718306630> (finding recent data on law school enrollment to be inconclusive in regards to law school tuition and enrollment); Grey Gordon & Aaron Hedlund, *Do Student Loans Drive Up College Tuition?*, *Econ. Brief* (Aug. 2022), https://www.richmondfed.org/publications/research/economic_brief/2022/eb_22-32 (concluding that economic and policy conditions impact enrollment more than increases or decreases in loan amounts).

¹⁷ David Bradley, et al., *Overview of the Relationship Between Federal Student Aid and Increases in College Prices*, *Cong. Rsrch. Serv. Rep.* (updated Aug. 22, 2014), <https://www.congress.gov/crs-product/R43692>.

¹⁸ *Id.* at 16–20.

¹⁹ *Id.* at 31.

²⁰ See Adam Looney, et al., *How OBBA reshapes student learning*, *Brookings* (Jan. 28, 2025), <https://www.brookings.edu/articles/how-obba-reshapes-student-lending>.

²¹ These calculations are based on students who have a credit file and enrolled in a graduate program during 2015-2024. See Tomas Monarrez, Jordan Matsudaira, and Dubravka Ritter, *Student Loans for Graduate School: Who Will Be Affected by the New Federal Lending Limits?*, *Federal Reserve Bank-Philadelphia* (Dec. 2025).

²² *Id.*

²³ Matsudaira, et al, *How Will Graduate Student and Parent Borrowing Be Affected by New Federal Loan Limits?*, *Postsecondary Education & Economics Research Center* (Oct. 2025).

figures climb to 61.7% and 67.7%, respectively, for those pursuing degrees half-time.²⁴ Prorated limits would therefore push working students into the private loan market.

Eliminating Grad PLUS loans and imposing strict borrowing caps of \$20,500 per year for programs that are not “professional degrees” ignores the reality of credit distribution and the systemic wealth gap in the United States. Federal student lending was designed specifically to decouple educational opportunity from familial wealth. Unfortunately, this proposed rule would do the exact opposite, by pushing borrowers towards private loans to pay for their education. Those private loans typically carry higher interest rates and other less generous terms.²⁵ The private loan market also potentially subjects students to predatory lending practices, including collusive price-fixing with some higher education institutions.²⁶ Putting a cap on these loans is unlikely to substantially reduce the cost of attendance but is likely to lead to tuition still above the federal loan maximum and programs that still require private lenders to cover the gap.

By returning a significant portion of the cost of attendance to the private market, the proposed rule also serves to reintroduce creditworthiness as a gatekeeper to obtain entry into a profession. This will leave some borrowers ineligible for private loans. Of individuals pursuing a Doctorate degree in Education, for example, 30% have either no credit risk score or scores characterized as “subprime” or “near prime.”²⁷ This number jumps to 51% of individuals pursuing a Master’s degree in Education.²⁸ If a student does not have the required credit to obtain private loans, a cosigner - often a parent - may be required.

This structure advantages wealthier families and penalizes lower-wealth households, effectively tying access to professional degrees to family resources. Parents who may already be struggling will have to make an onerous choice: help their child get a degree that will hopefully allow them to attain financial security, while at the same time taking on responsibility for student debt themselves, or have their child unable to pursue such opportunities.

Students unable to secure private loans may be forced to abandon graduate study altogether. This has direct professional consequences. For instance, 15 states require school districts to pay teachers more once they acquire an advanced degree.²⁹ In the states that do not require these premiums, they are nevertheless provided at the school district level, and 88% of large districts have graduate degree attainment factored into teacher compensation.³⁰ These increases average between 10-15%.³¹ Certain states condition teacher licensure on the requirement that teachers obtain a Master’s degree within several years. If a teacher is unable to secure a degree that costs less than the proposed caps and is precluded by their credit history from obtaining private loans, they could be forced to leave their position or relocate to a state that does not impose this degree requirement.³²

²⁴ *Id.*

²⁵ *Id.*

²⁶ <https://www.highereddive.com/news/university-chicago-135m-dollar-settlement-financial-aid-price-fixing/690816/>

²⁷ Monarrez, *supra*.

²⁸ *Id.*

²⁹ <https://www.wested.org/resource/guide-on-teacher-workforce-credentialing/>

³⁰ <https://www.nctq.org/research-insights/how-do-school-districts-compensate-teachers-for-advanced-degrees/>

³¹ <https://gsep.pepperdine.edu/blog/posts/how-much-could-a-masters-degree-increase-your-teaching-salary.htm>

³² <https://www.ecs.org/teacher-license-reciprocity-state-profiles/>

These impacts will fall disproportionately on educators of color and first-generation students, who are more likely to come from lower-wealth backgrounds.³³ Research consistently shows that students benefit from having educators who reflect their communities.³⁴ Policies should aim to reduce barriers to entry into the profession, not create new ones by shifting financial risk onto those least able to bear it.

Repayment Assistance Plan Concerns

We have concerns about changes to the income-driven repayment (IDR) system and the proposed Repayment Assistance Plan (RAP). As drafted, RAP would create a largely regressive program, disproportionately burdening low-and-middle-income borrowers. Extending repayment to 30 years would leave many borrowers making payments for most of their working lives, effectively prolonging their time in debt rather than providing a meaningful path to relief. Additionally, calculating payments based on Adjusted Gross Income (AGI) rather than discretionary income would likely increase costs for middle-class households, including educators working in high-cost areas.

Impact on Public Service Loan Forgiveness

In addition to higher interest rates and stricter credit requirements, steering borrowers toward private lenders would significantly harm educators because private loans are not eligible for the Public Service Loan Forgiveness (PSLF) Program. **Borrowers who are forced to rely on private lending would forfeit access to a congressionally established pathway to loan forgiveness, potentially extending repayment by decades.** This is a slap in the face to anyone who dedicates their professional lives to public service and seems to contradict the law that created the PSLF program in the first place.

Congress created the PSLF program as a bipartisan promise: if borrowers dedicate a decade of their careers to public service, the government will forgive the remainder of their federal student loans. The statute is clear, and the program has demonstrated meaningful impact. In January 2025, the Department of Education's Office of the Chief Economist reported that a substantial share of borrowers receiving PSLF work in education, with K-12 educators representing the largest group of participants at 28% of all borrowers, while employees at higher education institutions represent the second most common group at 15%.³⁵ Forgiveness has meant thousands of educators are staying in the classroom and contributing to the country's economic engines by regaining disposable income, buying homes, and supporting their families. It has allowed schools to retain experienced teachers amid shortages. It has given hope to new educators that their service will not consign them to a lifetime of financial hardship. This rule was designed for objectivity, predictability, and stability. Borrowers can plan their careers around it. Undermining PSLF now would betray this promise to them and have devastating consequences for millions of public service workers. PSLF is not a perk or a loophole. It is a carefully designed investment in America's workforce, ensuring that highly trained professionals can afford to dedicate their careers to public service. For educators, it is a

³³ <https://www.pewresearch.org/social-trends/2021/05/18/first-generation-college-graduates-lag-behind-their-peers-on-key-economic-outcomes/>

³⁴ <https://www.npr.org/sections/ed/2017/09/29/552929074/if-your-teacher-looks-like-you-you-may-do-better-in-school>

³⁵ <https://www.nea.org/sites/default/files/2025-03/where-do-borrowers-who-benefit-from-pslf-work.pdf>

lifeline. Undermining it will not only harm individual educators but also undermine the stability and quality of public education nationwide.

Under current rules, borrowers must certify qualifying employment, but they can receive PSLF credit for prior qualifying payments, even if they initially enrolled in the standard 10-year repayment plan and later switched to an IDR plan. This structure ensures that public servants are not penalized simply because they were unaware of the program at the outset of repayment.

The proposed rule would disrupt this framework. The new Tiered Standard repayment plan would not qualify for PSLF, yet borrowers who take out loans after July 1, 2026, would be *automatically* placed into this plan. In these proposed changes, borrowers must *first* switch to a PSLF-eligible plan like RAP *before* their payments are eligible for credit. Borrowers who graduate from school and begin employment for a PSLF eligible employer may not be aware of the program while repaying loans under the Tiered Standard plan. If they do not switch plans and go through the PSLF process, the payments made will not count toward PSLF. This creates an administrative trap that undermines Congress's 10-year forgiveness promise.

If the Department's goal is to streamline and improve the federal student loan system, the default repayment pathway should support, not obstruct, progress toward PSLF. **Public service workers, including educators seeking advance training, should not face additional procedural hurdles that jeopardize earned debt relief.**

The Department's proposal to eliminate PSLF credit for periods of administrative and hardship forbearance, while simultaneously removing the PSLF buyback option for RAP borrowers, is fundamentally at odds with the goal of supporting the public service workforce. Illness, family emergencies, and servicer errors may occur through no fault of the borrower themselves, creating more roadblocks to forgiveness – and that is not the right move by the Department. By stripping these months of their PSLF value, the Department is transforming a 10-year promise into a multi-year penalty for the most vulnerable public servants.

Under the proposed rule, the Department significantly narrows the definition of a "qualifying month" for PSLF, particularly for those enrolled in the RAP plan. We are concerned that while the proposed rule allows for up to 36 months of general hardship forbearance for illness or financial distress, these months will no longer count toward PSLF progress. This policy would pause borrowers' progress toward debt relief during times of medical crises or family emergencies, converting hardship into a multi-year financial penalty. We also strongly oppose the exclusion of administrative forbearances from PSLF credit. Educators should not be penalized for their dedication to public service because the Department's own systems require a pause to process paperwork or resolve internal errors. The strict definitions in the proposal of "on time payment" for RAP and its impact on borrowers using PSLF could be significant if loan servicers experience delays or mistakes.

This penalty is made permanent by the proposed rule's explicit exclusion of the reconsideration credit for borrowers enrolled in the RAP plan. Currently, the buyback option allows borrowers to retroactively pay for months spent in deferment or forbearance to keep their forgiveness timeline on

track. By excluding RAP borrowers from this safety net, the Department is creating an administrative trap where any period of temporary hardship results in a permanent delay of earned debt relief.

Taken together, these changes would weaken PSLF's reliability, impose new administrative barriers, and undermine a program that has been central to recruiting and retaining educators and other public service professionals. We urge the Department to preserve the integrity, predictability, and accessibility of PSLF as Congress intended.

Effect of Prorated Maximum Award

Many students and aspiring educators pursue their degrees part-time while balancing employment and other responsibilities. The proposed rule includes provisions that would significantly limit these students' ability to afford their education and effectively penalize those who work while enrolled. Specifically, prorating loan limits for part-time students reduces their access to federal aid compared to the prior policy, which granted full annual loan limits to students enrolled at least half-time.

This approach fails to account for the reality that educational and living costs do not decrease proportionally with enrollment intensity. A student taking six credits instead of twelve still pays the full cost of their rent, health insurance premiums, technology fees, and other fixed expenses. By prorating the cap while costs remain fixed, the Department would push part-time, working students toward predatory private loans for even small amounts above the maximum allowed cap for their full-time equivalent.

Students who take out loans after July 1, 2026, would face these reduced federal loan limits before institutions have had sufficient time to adjust tuition or restructure programs in response to the new caps. As a result, new borrowers entering these programs shortly after implementation would likely encounter unchanged program costs but diminished federal support, creating significant affordability challenges and increasing financial risk.

The purpose of the federal student loan programs is to benefit students, not enrich banks. By pushing more and more students out of the federal direct loan programs and into the private loan market, it seems that the Department is more concerned about helping banks and loan service companies make money than helping students pursue higher education.

Conclusion

The NEA strongly urges the Department to revise and reverse the restrictive and regressive provisions within this proposed rule. At a time when schools across the country face persistent educator shortages, federal student aid policy should expand access to the profession, not narrow it. Loan limits and repayment structures must reflect the real costs of obtaining credentials, licensure, and advanced training required of today's educators.

If this rule is finalized as proposed, it will increase financial barriers, destabilize educator pathways into the profession, and undermine the federal government's longstanding commitment to supporting public service careers. The Department has the responsibility to ensure that federal aid policies promote affordability, equity, and workforce stability. We urge the Department to align its final rule

with those principles and protect pathways into public education and other critical public service professions.

Please do not hesitate to contact me or Daaiyah Bilal-Threats, Senior Director for Policy, at DBilal@nea.org, should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca S. Pringle". The signature is written in black ink and is positioned below the word "Sincerely,".

Rebecca S. Pringle
President
National Education Association