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RISE Committee Members
U.S. Department of Education
Office of Postsecondary Education
Washington, DC 20202

Re: Department of Education Docket No. ED-2025-OPE-0944, Reimagining and Improving Student Education (RISE) Committee

The Center for Law and Social Policy (CLASP) submit this comment in response to the U.S. Department of Education’s Reimagining and Improving Student Education (RISE) Committee’s ongoing rulemaking to implement student financial aid provisions under Public Law 119–21 and the Office of Postsecondary Education’s Notice of Proposed Rulemaking (NPRM) issued on January 30, 2026.

As a national, nonpartisan, nonprofit organization with over 50 years of advancing anti-poverty policy solutions for people with low incomes, we strongly oppose the RISE Committee’s decision to omit many post-baccalaureate degrees from the regulatory definition of “professional degree.” The Department of Education’s decision caps loan limits for a large share of post-baccalaureate degrees deemed to not fit within this regulatory definition of “professional degree,” excluding open access to career paths that provide vital services to communities and families and require years of study, training, and certification. By only designating 11 degrees as “professional,” this administration risks putting critical services - like healthcare that supports our seniors and others, education provided to children, and social work that addresses youth in foster care - out of reach for many communities and families. Further, by limiting access to critical funding pathways, these changes will have severe consequences for degree access and completion, especially for women and Black students.¹

On July 4, 2025, President Trump signed the One Big Beautiful Bill Act (“OBBBA”) into law. This legislation included substantial changes to the federal student loan system that will prevent many students from pursuing postsecondary education. This includes new limitations on graduate loans, including the elimination of the Graduate PLUS Loan

¹ Judith Fox, 36 Loy. Consumer L. Rev. 309 (2025), “Student Loan Debt: The Long-Term Economic Consequences,” <https://lawcommons.luc.edu/lclr/vol36/iss3/2>

program, and new borrowing limits for borrowers pursuing graduate and professional degrees. While making no new investments in grant aid for graduate students, the OBBBA sets annual and cumulative loan limits of \$20,000 and \$100,000 for graduate degrees, and \$50,000 and \$200,000 for “professional” degrees.

Subsequently, on November 6, the Department of Education proposed a new framework to define what qualifies as a professional degree program and to cap loan amounts for students pursuing what the Department considers “non-professional” degrees. This proposed framework will limit access to advanced degrees for nurses, physician assistants, physical therapists, audiologists, architects, accountants, educators, and social workers, among many others. Along with the loan caps, the RISE Committee has proposed significant changes to student loan repayment plans. For loans dispersed on or after July 1, 2026, the proposed rule would only allow two repayment options: 1) a tiered standard repayment plan based on the loan balance or 2) a new income-driven plan called the Repayment Assistance Plan (RAP) for new borrowers, with loan forgiveness after 30 years (360 repayments). According to the latest *Quarterly Report on Household Debt and Credit* done by the Federal Reserve Bank of New York, apart from mortgage debt, student loan debt is higher than any other type of household debt.² According to the Government Accountability Office’s data, most students repay their loans.³ These changes are not positive measures for borrowers, institutions, communities, or workforce sectors, but only a means to the administration’s end of decimating postsecondary education and socioeconomic pathways for all except the white and wealthy. The increased amount of student debt and inability to borrow from the government will not only increase predatory lending, but the aggregate of student loan debt will get the country closer to a financial crisis.⁴

The Department of Education’s proposed changes will have a direct role in destroying the economies of entire communities, states, and industries. At the same time, the Department is exacerbating existing workforce shortages even within those 11 sectors deemed “professional.” For example, the country’s severe shortage of physicians is only expected to grow to over 86,000 in the next decade, and a severe shortage of mental health professionals, which is projected to increase to 88,000 mental health counselors and

² Federal Reserve Bank of New York, “HOUSEHOLD DEBT AND CREDIT REPORT (Q4 2025),” <https://www.newyorkfed.org/microeconomics/hhdc>

³ Judith Fox, 36 Loy. Consumer L. Rev. 309 (2025), “Student Loan Debt: The Long-Term Economic Consequences,” <https://lawecommons.luc.edu/lclr/vol36/iss3/2>

⁴ Ibid.

114,000 addiction counselors by 2037.⁵ The Department of Education is openly limiting training pathways with these rule changes. An estimated 43,000 incoming law students are already being targeted by private loan lenders seeking to take advantage of the new loan limits, which only serves to force prospective lawyers from underserved communities away from the profession or trapping them in severe debt.⁶ Deterring prospective teachers and childcare providers by cutting off loan access for early childhood education programs will decimate the long-term health of the childcare industry, along with the entire national economy, purely for short-term cost reductions.⁷ Similarly, shrinking the pathways for social workers to obtain necessary advanced credentials will only reduce critical support services for vulnerable populations.⁸

While the administration's stated intent of the loan caps is to "reign in" inflated prices for graduate programs,⁹ the proposed rule changes do nothing but fuel the ongoing "enrollment cliff" crisis due to denying federal support for students who otherwise cannot afford graduate programs. As institutions become more tuition-dependent due to the continued illegal federal funding cuts of this administration and the decades-long trend of state-level disinvestment in higher education, every prospective student priced out of education from these proposed loan changes inches institutions around the country closer to financial insolvency.

Most concerning, the Department of Education is disrupting educational access, upward socioeconomic mobility, and the mental health of women and students of color with surgical precision. Most of the professional degree programs excluded from the RISE Committee's definition of "professional" are predominantly held by women. Overall, women hold 63 percent of the master's degrees and 57 percent of the doctorate degrees across the impacted professions.¹⁰ The percentages are even more dramatic when broken down individually, with women holding over 75 percent of master's and doctorate degrees

⁵ National Coalition for Mental Wellbeing, "A Workforce Under Pressure: Preparing the Behavioral Health Workforce for Today and Tomorrow," <https://www.thenationalcouncil.org/behavioral-health-workforce-under-pressure-preparing-today-tomorrow/>

⁶ Karen Sloan, Reuters, "US law schools, students fear rising costs from new federal loan cap," <https://www.reuters.com/legal/legalindustry/us-law-schools-students-fear-rising-costs-new-federal-loan-cap-2026-02-17/>

⁷ Sarah D. Sparks, EducationWeek, "Some Teachers Could Lose Out on Loan Forgiveness Under Trump Admin. Proposal," <https://www.edweek.org/teaching-learning/some-teachers-could-lose-out-on-loan-forgiveness-under-trump-admin-proposal/2025/08>

⁸ David Kilmnick, NY Daily News, "Feds' proposal will hurt social workers," <https://www.nydailynews.com/2026/02/21/feds-proposal-will-hurt-social-workers/>

⁹ U.S. Department of Education, "Myth vs. Fact: The Definition of Professional Degrees," <https://www.ed.gov/about/news/press-release/myth-vs-fact-definition-of-professional-degrees>

¹⁰ National Women's Law Center, Legal Defense Fund, Lawyers' Committee for Civil Rights Under Law, <https://nwlc.org/wp-content/uploads/2026/02/Sign-On-Letter-NWLC-LDF-LCCRUL-Feb-2026.docx-1.pdf>

for registered nursing, dental hygiene, occupational therapy, audiology, social work, teaching, and public health.

It is evident that women will be significantly harmed by these abrupt changes to program classifications and student loan repayment changes, and that this harm is deliberate.¹¹ Women rely on professional and post-baccalaureate programs for career advancement. Reclassifying or leaving these programs in the nonprofessional category threatens their access to stable professions, self-sufficiency, and career advancement. And, although the above data shows that women will be most impacted, cutting funding and stripping these programs of their professional designation will harm all students, regardless of gender, by making education more expensive for everyone. Ultimately, these changes by the Department harm everyone and exacerbate inequitable access to certain professions, as women and students of color will be hit the hardest by the changes to program classifications.

This will also have a disproportionate impact on students of color, especially Black borrowers. Black borrowers rely on loans more than other groups to pursue both undergraduate and graduate education—with Black women borrowing at the highest rates.¹² Further, because of societal and cultural factors, women and students of color are also more likely to pursue professions that will fall under the lower proposed limits. The Department’s proposal will ensure that fewer women and students of color, and particularly Black women, are able to pursue graduate study in these programs because they will not be able to cover the cost of these degrees. The only option for many students will be private loans, which often have less favorable terms and protections than federal loans, compounding the effects of the gender and racial pay gaps and gender- and race-based wealth disparities.

This rule also diminishes the financial health of students by steering them towards predatory private lenders and cutting off some students from undergraduate and graduate education entirely. These changes would have a disproportionate impact on the financial health of Black women, who carry substantially higher student debt, including graduate loan debt.¹³ While streamlining income-driven repayment plans sounds like a good idea, the proposed changes will only deepen gender and racial inequities. Women, especially Black and Latina women, are more likely to have lower earnings and are more likely to need

¹¹ Monica Potts, The New Republic, “Trump’s War on Higher Ed Is an Attack on Women,” <https://newrepublic.com/article/205897/trump-higher-education-attack-women>

¹² Oluwasekemi Odumosu, WorkRise, “The Impact of Student Debt on the Low-Wage Workforce,” <https://workrisenetwork.org/working-knowledge/impact-student-debt-low-wage-workforce>

¹³ American Association of University Women, “Deeper in Debt,” 2021 https://www.aauw.org/app/uploads/2021/05/Deeper_In_Debt_2021.pdf

time out of the workforce or to reduce work hours due to caregiving, which makes longer repayment timelines especially punishing. Locking borrowers into decades of repayment will only deepen inequities when earnings are constrained by gender and racial pay gaps. These changes are especially concerning given that student loan delinquency rates rose from roughly zero to nearly 25 percent as a direct result of the administration's actions during their first year back in office.¹⁴

The stress of navigating student loan debt also directly affects the physical and mental health of borrowers :1 in 14 borrowers experienced suicidal ideation due to the financial stress of student loans, with 1 in 8 borrowers unemployed or making less than \$50,000 experiencing said ideation.¹⁵ Student loan debt is also a significant driver of problematic drinking¹⁶ and gambling addictions¹⁷, with additional negative impacts stemming from student loan debt delaying life milestones.¹⁸ These negative health outcomes, like the overall consequences of the Department's proposed rule, are also disproportionately experienced by Black and Latino borrowers.

Students who hold these degrees go on to become healthcare professionals, educators, and public servants who perform some of the most essential work in our society. Excluding these degrees from the professional definition—and to cap their loans on that basis—disproportionately sacrifices women, Black students, and other people of color in the service of enriching private lenders and politicizing campuses across the country. Even as we grapple with the unsustainable cost of graduate education, we must not deny students access to federal support based on an arbitrary distinction that devalues essential women-dominated fields that provide much needed services and expertise to communities and the economy.

Given the lack of evidence to support the claim that restricting access to and capping student loans will lower the cost of postsecondary and graduate education, we urge you to

¹⁴ Peter Granville, Eduard Nilaj, Jennifer Zhang, Aissa Canchola Banez, "Trump's Student Loan Delinquency Crisis, Unmasked," The Century Foundation, February 2026 <https://tcf.org/content/report/trumps-student-loan-delinquency-crisis-unmasked/>

¹⁵ J Geiman, Center for Law and Social Policy, "The Psychological Toll of Student Debt," <https://www.clasp.org/blog/psychological-toll-student-debt/>

¹⁶ Kristen P Lindgren, Ty Tristao, Clayton Neighbors, National Library of Medicine, "The Association Between Student Loan Debt and Perceived Socioeconomic Status and Problematic Drinking and Mental Health Symptoms: A Preliminary Investigation," <https://pmc.ncbi.nlm.nih.gov/articles/PMC9848461/>

¹⁷ Matt Zalaznick, University Business, "1 in 6 college students are literally gambling with their financial aid," <https://universitybusiness.com/gambling-in-college-students-use-financial-aid-sports-betting/>

¹⁸ Mike Cook, American College of Education, "The Long-Term Effects of Student Loans," <https://ace.edu/blog/the-long-term-effects-of-student-loans/>

withdraw the proposed rule. We also request that the Department of Education cease making arbitrary judgements on which professions are most “deserving” of federal support. If you have questions about this comment please reach out to Elyse Shaw (eshaw@clasp.org) and Christian Collins (ccollins@clasp.org).

Thank you,

Center for Law and Social Policy (CLASP)