



March 2, 2026

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Reimagining and Improving Student Education – Docket No. ED-2025-OPE-0944

Dear Secretary McMahon:

On behalf of the American Psychological Association (APA) and the American Psychological Association Services, Inc. (APA Services), I am writing to offer public comments to the Notice of Proposed Rulemaking (NPRM) on Reimagining and Improving Student Education, published by the Department of Education on January 30, 2026, Docket No. ED-2025-OPE-0944. Specifically, I write to express our support for the proposed definition of professional degree for the purposes of the newly established federal student loan borrowing limits, and to convey our hope that the proposed rule will be finalized as soon as possible.

APA Services is the companion organization of APA, which is the nation's largest scientific and professional nonprofit organization representing the discipline and profession of psychology, as well as over 190,000 members and affiliates who are clinicians, researchers, educators, consultants, and students of psychological science.

We recognize the difficult task put before the Department to implement the higher education provisions of the One Big Beautiful Bill Act (OBBB), which in totality represents the largest transformation of the sector in decades. None more so than the changes to federal student loans, particularly the implementation of new federal student loan borrowing limits for postbaccalaureate study. The proposed definition for professional degree was a product of rigorous and thoughtful debate, and understandably a compromise. We greatly appreciate the Department's willingness to listen and engage in good-faith negotiations with the committee.

APA Services strongly supports the inclusion of Clinical Psychology (PhD/PsyD) among the 11 programs explicitly listed in the proposed definition of professional degree. Further, we support the inclusion of additional criteria in the proposed definition, that would allow other health service psychology and some applied psychology programs within the same four-digit CIP Code as Clinical Psychology to also qualify for this designation, so long as they are generally doctoral programs and generally require licensure. As cited in the NPRM, this includes programs in Counseling Psychology, School Psychology, Industrial and Organizational Psychology, Educational Psychology, and Performance and Sports Psychology.

As the proposed rule notes, OBBB established a three-part test for the definition of professional degrees—(1) signify completion of the academic requirements for beginning practice in a given profession; (2) the profession the graduate enters must require a level of professional skill beyond what is normally required for a bachelor's degree; and (3) the profession that a degree holder would enter after graduating generally requires professional licensure—all of which are requirements that the aforementioned psychology fields clearly meet.

In addition, we strongly support the clarification provided by the Department that current students, so long as they are enrolled in a degree program and are receiving federal student loans as of June 30, 2026, will be able to borrow under current policies for up to three academic years. This includes the retention, for the duration of this same time period, of the higher annual and aggregate unsubsidized loan limits for students in certain fields of health professions, including clinical psychology, which the Department had previously provided.

We greatly value the Department's recognition of the rigorous, practice-oriented nature of these psychology programs. Specifically, APA Services strongly aligns with the Department's reasoning that Clinical Psychology (PhD/PsyD), and by extension the other health service psychology and applied psychology programs listed in the NPRM, are uniquely positioned among behavioral health professions. The requirements for doctoral-level training for professional licensure, independent scope of practice, and longstanding federal recognition across major health programs authorized in the Social Security Act and the Public Health Service Act, which often place clinical psychologists alongside physicians, underscores psychology's critical role in integrated health care, public health, and national health care workforce initiatives.

The decision to classify these psychology programs within the professional degree category for the purposes of the new student loan limits reflects both the reality of the field's training requirements and the longstanding structure of federal policies. This designation is essential to ensure that students preparing to be licensed in psychology can complete the advanced, multi-year education and supervised training necessary for licensure and competent practice.

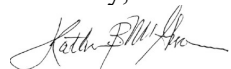
While APA Services acknowledges that the Department did not necessarily consider this as part of its justification in crafting the proposed definition, we must note the critical role that psychology plays in addressing the nation's significant behavioral health workforce shortages. The higher loan limits for professional degrees established under OBBB, combined with the Department's decision to include Clinical Psychology along with other health service psychology programs within the professional degree category, will help ensure that students can continue to pursue careers in this essential field. At a time when nearly half of Americans live in a mental health professional workforce shortage area, we must be doing everything possible to ensure the entry of future psychologists into the workforce.

APA Services strongly supports the Department's proposed definition for professional degree and urges swift finalization of the rule. A timely final rule will help provide clarity and stability for institutions and students as academic programs prepare for the upcoming award year and as prospective graduate and professional students make decisions about their educational pathways.

We look forward to ongoing collaboration with the Department as it implements OBBB and considers future policy updates impacting the behavioral health workforce, student financial aid, and access to high-quality higher education. Ensuring that graduate and professional students have viable financing options remains a top priority for APA Services.

Thank you for the opportunity to provide comments. If APA Services can be of further assistance, please contact Kenneth Polishchuk, Deputy Chief for Education and Training Policy, at kpolishchuk@apa.org.

Sincerely,



Katherine B. McGuire
Chief Advocacy Officer