

March 2, 2026

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

**RE: RIN 1840-AD98: Reimagining and Improving Student Education**

Dear Secretary McMahon,

On behalf of the Mental Health Liaison Group (MHLG), a coalition of national organizations representing consumers, families, mental health and addiction providers, advocates and other stakeholders committed to strengthening access to high-quality mental and behavioral health care, we appreciate your efforts and the opportunity to work with you on the Department of Education's recently issued Notice of Proposed Rulemaking, [RIN 1840-AD98: Reimagining and Improving Student Education](#) (NPRM).

As you well know, H.R.1 included changes to adjusted annual and lifetime federal loan caps for graduate students, setting borrowing for most traditional graduate programs at \$20,500 per year and \$100,000 total. For students pursuing professional graduate degrees, those limits increase to \$50,000 annually and \$200,000 overall. A "professional degree" is defined as one that prepares graduates to begin practicing in a specific profession and requires advanced skills beyond a bachelor's degree, typically accompanied by professional licensure. The NPRM explicitly recognizes medicine, law, pharmacy, dentistry, optometry, podiatry, chiropractic, veterinary medicine, theology, and clinical psychology as "professional degrees" eligible for higher public federal loan limits.

Excluding graduate degrees in social work, mental health counseling, addiction counseling, marriage and family therapy, nursing, school counseling, occupational therapy, and other behavioral health professions from this category could have serious implications for those experiencing mental health and substance use challenges and the broader health workforce, particularly in rural areas already facing acute shortages. This change risks limiting access to essential federal financial aid and weakening efforts to train the workforce responsible for protecting community health, preventing individuals from experiencing mental health and substance use crises, and advancing wellbeing.

Currently, [more than 163 million Americans](#) live in Mental Health Professional Shortage Areas. By 2037, the Health Resources and Services Administration projects shortages of [over 15,000 social workers, nearly 88,000 mental health counselors, 114,000 addiction counselors, over 34,000 marriage and family therapists, and nearly 38,000 school counselors](#). At a moment when the behavioral health workforce shortage is being felt

acutely across the country, it is critical that we continue to remove barriers for students pursuing these careers. Including these and other professional behavioral health programs in the forthcoming rulemaking would help to maintain sufficient access to student loans for those entering these critical fields and ensure that we can continue to address the staffing gaps already straining our healthcare system.

The Trump administration and Congress have made clear commitments to expanding access to mental health and substance use treatment, including by rebuilding and strengthening the behavioral health workforce through programs like Certified Community Behavioral Health Clinic (CCBHC) expansion grants, the National Health Service Corps, Behavioral Health Wellness and Education Training, and the STAR-LRP program. Reducing access to graduate education financing could risk undermining the impact of these priorities and other federal programs designed to enhance behavioral health capacity.

Given these concerns, we respectfully urge the Department to reconsider the classification of behavioral health graduate programs, recognizing them as professional degree programs and essential health and human services pathways. Maintaining or establishing higher loan limits for behavioral health graduate training programs will help to ensure affordability and continued workforce development.

We appreciate your leadership and continued efforts to improve access to lifesaving mental health and substance use services across our country.

Sincerely,

American Art Therapy Association

American Association on Health and Disability

American Association for Marriage and Family Therapy

American Association of Psychiatric Pharmacists (AAPP)

American Association for Psychoanalysis in Clinical Social Work

American Dance Therapy Association

American Foundation for Suicide Prevention

American Group Psychotherapy Association

American Psychiatric Nurses Association

Association for Behavioral Health and Wellness

Centerstone

Children and Adults with Attention-Deficit/Hyperactivity Disorder (CHADD)

Clinical Social Work Association

DBSA: Depression and Bipolar Support Alliance

Global Alliance for Behavioral Health and Social Justice

IC&RC

Inseparable

International OCD Foundation

International Society of Psychiatric-Mental Health Nurses

Legal Action Center

Mental Health America

National Alliance on Mental Illness

National Association of County Behavioral Health and Developmental Disability Directors  
(NACBHDD)

National Association of Pediatric Nurse Practitioners

National Association for Rural Mental Health (NARMH)

National Association of Social Workers

National Association of State Mental Health Program Directors

National Council for Mental Wellbeing

National League for Nursing

National Register of Health Service Psychologists

Network of Jewish Human Service Agencies

PsiAN

REDC Consortium

The American Mental Health Counselors Association

The National Alliance to Advance Adolescent Health

The Trevor Project

Wounded Warrior Project