AICCU
ASSOCIATION OF INDEPENDENT CALIFORNIA COLLEGES AND UNIVERSITIES

February 26, 2026

Ms. Tamy Abernathy
Director, Policy Coordination Group
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Subject: Docket ID ED-2025-OPE-0944

Dear Director Abernathy:

The Association of Independent California Colleges and Universities (AICCU) is the organizational voice for over 85 nonprofit, accredited, degree-granting institutions across California. Together, our campuses enroll over 187,000 undergraduates and nearly 163,000 graduate students. Of those undergraduates, more than 47,500 are Pell Grant recipients, highlighting our sector's deep commitment to access, affordability, and student success. Our campuses serve as vital pillars in their communities by driving economic growth through employment, supporting local businesses through substantial spending, and enriching the cultural landscape with impactful programs that engage K-12 schools and beyond.

We appreciate the opportunity to comment on the proposed regulations put forth by the Reimagining and Improving Student Education (RISE) negotiated rulemaking committee. As you are aware, H.R. 1 (2025) makes significant alterations to graduate and professional student borrowing under the Federal Direct Unsubsidized Stafford loan program, primarily through the implementation of borrowing caps for graduate and professional students.

The RISE committee proposes to narrowly define "professional degree programs" to only 11 programs and places a $50,000 per year/$200,000 aggregate lifetime cap on borrowing, while "graduate degree programs" have a $20,500 per year/$100,000 aggregate lifetime cap. Coupled with the elimination of the Grad PLUS Loan program, the narrow definition of professional degrees and the strict cap on other borrowing dramatically curtails access and undermines workforce development goals in high-need fields, particularly for students from economically disadvantaged backgrounds.

For example, if graduate nursing programs are not determined to be "professional degree" programs, this may result in lower enrollment in nursing programs overall, including post-bachelor's programs. This, in turn, would lead to further shortages in the nursing profession and harm the delivery of medical services nationwide. Further, the borrowing caps may create a disincentive for students to consider pursuing professional degree programs entirely, particularly if they are from economically disadvantaged backgrounds, if they cannot rely on or utilize federal borrowing to assist in the entry and completion of their professional degrees.

Additionally, we are concerned that the combination of eliminating Grad PLUS and the strict caps on other federal loans will increase borrowing costs for students, not decrease. Students will have to rely upon the private loan marketplace, where borrowing is often more expensive and less flexible. This shift would be especially prohibitive to students who have minimal credit history or are from economically disadvantaged backgrounds, the very students the federal loan programs were designed to support.

AICCU encourages the Department of Education to take the following steps to maintain access and preserve the education pipeline to critical, high-need fields, within the framework of H.R. 1 and the RISE committee's proposal:

- *Maintain flexibility in determining which programs are considered "professional":* The regulations proposed by the RISE committee went beyond what Congress intended by imposing a strict limitation on professional degree programs. Greater flexibility can be accomplished by identifying *any* program that 1) awards a degree signifying both completion of the academic requirements for beginning practice in a given profession and a level of professional skill beyond what it normally required for a bachelor's degree and 2) requires professional licensure as a condition of professional practice in any jurisdiction in the United States as a "professional degree" program for purposes of federal borrowing limits This will allow for the proper inclusion of emerging and developing programs within the scope of the statutory definition.

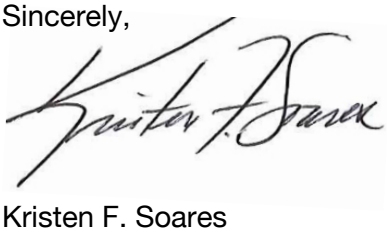
  Alternatively, the number of identified programs, as suggested in the proposed regulations, can be expanded. H.R. 6718 (Lawler, 2025) seeks to codify the 11 programs proposed by the RISE committee into law and establishes another 13 programs and gives the Secretary of Education the ability to establish more. This flexibility is important if the nation is to respond quickly to evolving workforce needs.

- *Provide flexibility within the borrowing caps for graduate degree programs:* The annual cap for graduate degree programs could be increased from the proposed $20,500 per year to $33,000 per year, while maintaining the $100,000 aggregate lifetime amount. Raising the annual cap would allow students in two- or three-year graduate programs to access the same aggregate amount of federal borrowing which they would otherwise qualify for, but within a shorter timeline tied to their program schedule. Doing so would help mitigate

workforce pipeline risks that could be created under this policy change, preserve the negotiated rulemaking framework, and incentivize timely completion of graduate degrees.

Thank you for the consideration of our concerns and recommendations on how to maintain access to critical graduate and professional degree programs while aligning with the RISE committee's recommendations and Congress' intent with H.R. 1.

Sincerely,



Kristen F. Soares
President