

February 20, 2026

Linda E. McMahon  
U.S. Department of Education  
Office of Postsecondary Education  
LBJ Building, 400 Maryland Avenue, S.W.  
Washington, DC 20202

**Re: *Reimagining and Improving Student Education* [Docket ID ED-2025-OPE-0944]  
RIN 1840-AD98**

Dear Secretary McMahon:

On behalf of the American Health Care Association and National Center for Assisted Living (AHCA/NCAL), the nation's largest association of long term and post-acute care providers, we appreciate the opportunity to comment on the Education Department's proposed rule focused on loan limits for graduate students and professional students. **AHCA/NCAL has concerns about this proposal, which includes a change to the definition of what counts as a professional degree.**

Our members provide essential care to millions of individuals in more than 15,000 nursing homes, assisted living communities, and centers for individuals with intellectual and developmental disabilities. Guided by our mission to improve lives by delivering solutions for quality care, AHCA/NCAL remains committed to enhancing resident care while also strengthening the long-term care (LTC) workforce.

While significant progress has been made on the LTC workforce front, challenges remain as competition for skilled caregivers remains stiff in the healthcare sector according to [updated data](#) we recently released. While other healthcare settings have gained new jobs compared to early 2020, the nursing home workforce is 1.7 percent below pre-pandemic levels. Ninety percent of providers say staff recruitment remains difficult.

If this proposed rule is finalized, certain types of health practitioner degrees, such as those for being an advanced practice nurse or physical or occupational therapist, would be excluded from the professional degree determination, which would significantly and adversely impact loan amounts. At a time when our country desperately needs more nurses and other critical healthcare professionals, this is a missed opportunity. Nurses are the beating heart of LTC, and advanced practice nurses, like nurse practitioners, are helping to revolutionize our sector.

Furthermore, excluding advanced practice nurses from the professional degree determination for federal student loan purposes will directly exacerbate the national shortage of nursing faculty and, in turn, worsen workforce instability in LTC. Graduate-prepared nurses are the primary pipeline for nursing instructors; limiting their access to student loans increases financial barriers to advanced education, making academic careers less attainable than higher-paying clinical roles. This constrains enrollment capacity in nursing programs at the exact moment demand for new nurses is accelerating.

LTC providers—already facing disproportionate vacancy rates, higher acuity residents, and limited staffing flexibility—will be among the first and most severely affected by reduced graduate output. The policy also undermines preparedness for the next decade, during which the population aged 65 and older is projected to grow rapidly, driving sustained increases in demand for long-term services and supports. Fewer nursing instructors today translate into fewer licensed nurses tomorrow, creating predictable access gaps in assisted living, skilled nursing, and home- and community-based care, particularly in rural and underserved areas where recruitment is already constrained.

We hope to work with your agency and lawmakers on meaningful ways to strengthen the LTC workforce. Over the last several years, AHCA/NCAL has promoted workforce enhancement through various legislative packages and thoughtful quality improvement policies, including our most recent workforce initiative, [Caregivers for Tomorrow](#). This initiative specifically calls for incentive programs to build the next generation of caregivers, including loan forgiveness programs.

If you have any questions related to our comments and concerns, please do not hesitate to contact Dana Ritchie, AHCA's Associate Vice President of Workforce & Constituency Services, at [dritchie@ahca.org](mailto:dritchie@ahca.org).

Sincerely,



Clifton J. Porter II  
President & CEO



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Executive Director, NCAL