



October 2, 2025

Tamy Abernathy
Federal Negotiator
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Ms. Abernathy,

The member organizations of the Federation of Associations of Schools of the Health Professions (FASHP) have been closely following the negotiated rulemaking process and are concerned that the regulatory framework for loan repayment programs under the One Big Beautiful Bill Act (OBBBA) may not adequately reflect the realities of the health professions workforce. As the Department of Education finalizes regulatory language, we urge you to ensure that the health professions workforce is considered a single, integrated workforce when determining loan eligibility criteria. Health professions are inherently interconnected and work collaboratively across settings to achieve the best outcomes for patients and populations. Fragmenting repayment eligibility risks undermining the interprofessional fabric that defines today's evolving health system.

It is important that the Department adopt a clear and consistent standard for defining "professional degrees" in the health professions sector. As an example, the Existing National Center for Education Statistics (NCES) Classification of Instructional Programs (CIP) codes provide a well-established framework for identifying health-related degree programs. Using CIP Code 51 "Health Professions and Related Programs" and related codes would ensure clarity, fairness, and consistency across all health professions as the Department structures eligibility criteria. The adoption of CIP codes will also protect against unjustified distinctions, such as the length of programs, that do not reflect the rigor or value of a given health profession. The true measure should be the program's accreditation, content, and alignment with established standards in the health professions, not its duration.

If the Department chooses not to use this approach to define health professional degrees, it risks creating inconsistent eligibility determinations, excluding critical health professions, and increasing administrative burdens on institutions. This lack of clarity

would leave students uncertain about their eligibility, potentially discouraging them from entering vital health fields and ultimately weakening the pipeline of multidisciplinary professionals needed across the health system to protect the American people.

Established in 1968, FASHP is a forum for representatives of health professions education institutions to address education's role in organizational patterns of the health system; to encourage effective collaboration among the professions in education and practice; to prepare health professions education for the future; and to serve as a liaison with other organizations sharing an interest in health professions education. FASHP comprises 19 associations representing a health professions education community that includes 7,429 programs, institutions, hospitals, and health systems, as well as more than 1.3 million students, faculty, clinicians, administrators, residents, and researchers.

Thank you for your attention to this matter and for your continued efforts to support the education and financial stability of our nation's health workforce.

Sincerely,

Association of Schools and Programs of Public Health
Association of University Programs in Health Administration
Council on Social Work Education
Association of Accredited Naturopathic Medical Colleges
American Council of Academic Physical Therapy
American Association of Veterinary Medical Colleges
American Association of Colleges of Nursing
Association of Schools Advancing Health Professions
PA Education Association
American Association of Colleges of Podiatric Medicine
American Dental Education Association
American Physical Therapy Association
American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy