

March 2, 2026

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

Submitted via www.regulations.gov

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

Dear Secretary McMahon:

On behalf of the American Association for Dental, Oral, and Craniofacial Research (AADOOCR), we appreciate the opportunity to comment on the Department's proposed rule "Reimagining and Improving Student Education". AADOOCR represents the nation's oral health research and scientific community and strongly supports investment in education, graduate training, and research pathways that prepare the next generation of future dental professionals and scientists.

We are deeply concerned about several provisions of the proposed rule. Specifically, AADOOCR opposes:

1. Elimination of the Grad PLUS loan program;
2. Narrowing of the federal definition of "professional degree programs"; and
3. New annual and lifetime caps on federal loans for graduate students.

These changes will restrict access to oral health education and careers, weaken professional training and workforce development, and exacerbate existing provider shortages.

Grad PLUS Program

Dental education is among the most resource-intensive graduate-level training in the United States. Tuition, clinical training costs, equipment, and licensure preparation frequently exceed unsubsidized federal loan limits. The Grad PLUS program has enabled dental students to bridge this financing gap.

According to the American Dental Education Association (ADEA), the average educational debt for dental students graduating with debt in 2025 was approximately \$297,800. They also estimate that 82% of students with dental school debt finance their education through federal loans and 76% use Grad PLUS loans.

Without access to federal loans that cover the full cost of attendance, many prospective dental students will be unable to enroll in dental school or complete their training. Private lenders do not offer the same favorable rates, borrower protections, income-driven repayment options, or public service incentives available through federal programs.

As of January 2026, more than 63.7 million Americans live in Dental Health Professional Shortage Areas (HPSAs), and HRSA estimates that 10,744 additional dental practitioners are needed to eliminate the current shortages. The elimination of Grad PLUS will constrain the pipeline of future dentists needed to address these shortages, particularly in rural and underserved communities, and ultimately reduce access to care in those areas.

Narrowed Definition of “Professional Degree Programs”

The proposed narrowing of “professional degree programs” under the *One Big Beautiful Bill Act* will exclude students pursuing oral health careers beyond the DDS/DMD and PhD pathways from eligibility for higher federal loan limits. This includes students pursuing master’s degrees in dental hygiene, public health, dental therapy, oral biology and craniofacial sciences, and graduate-level training for dental faculty and researchers. This exclusion will make education in these fields financially inaccessible for aspiring oral health professionals and will significantly worsen nationwide workforce shortages.

Dental graduate education strengthens the scientific foundation of the profession, reinforces evidence-based practice, advances public health and improves patient outcomes. Further, graduate dental programs should meet the proposed definition of a “professional degree” because they require prior professional education and licensure and provide rigorous, specialized training that prepares graduates to assume essential clinical, academic, and leadership roles within the oral health system.

The Department’s approach fails to recognize the interdisciplinary nature of research-informed oral health care, which relies not only on practicing dentists but also on dental hygienists, public health professionals, and clinician-scientists. Restricting loan access to these career pathways will weaken professional training and undermine the infrastructure that supports the oral health care delivery system.

New Student Loan Caps

The rule also introduces new borrowing limits on federal student loans for both graduate students (\$20,500 annual, \$100,000 lifetime) and professional degree students (\$50,000 annual, \$200,000 lifetime), as well as a lifetime total borrowing limit of \$257,500 for most students.

These loan caps will be harmful to dental students across the board whose tuition and associated costs often far exceed what the federal loan limits will cover. A recent survey by the American Dental Association shows that the total 4-year tuition at many U.S. dental schools often exceeds \$200,000–\$400,000 or more, not including fees, equipment, and living costs, which can add substantially more. Meanwhile, ADEA has

found that tuition for dental hygiene degrees often exceeds \$30,000 per year, well above the proposed borrowing limit for graduate students, making these training programs financially out of reach for many qualified applicants.

Faced with a debt burden they cannot reasonably finance through federal loan programs, some students will undoubtedly choose to forego graduate education in dentistry and related fields altogether, reducing the number of qualified professionals entering the workforce. This contraction in the educational pipeline would be particularly harmful given existing workforce shortages and projected gaps in preventive and community-based oral health care settings. It has been well established that preventive care is critical to reducing overall health costs and expanding access to services in underserved communities.

AADOOCR respectfully urges the Department to maintain the Grad PLUS program, preserve an inclusive definition of “professional degree programs,” and not impose new student loan caps, which together, will make oral health graduate education financially inaccessible for so many. Federal student aid policy should strengthen, not constrict, the educational pipeline that sustains the dental and oral health workforce, especially at a time when there are substantial unmet needs and workforce gaps.

We appreciate the opportunity to provide these comments and stand ready to assist the Department in developing policies that provide accountability and responsible stewardship of federal student aid.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Christopher H. Fox".

Christopher H. Fox, DMD, DMSc
Chief Executive Officer