



March 2, 2026

The Honorable Nicholas Kent, Under Secretary of Education
U.S. Department of Education
Attention: Docket ID ED-2025-OPE-0944, Reimagining and Improving Student Education
400 Maryland Ave SW
Washington, D.C. 20202

Dear Under Secretary Kent:

On behalf of the National Association of Rural Health Clinics (NARHC) and the over 5,700 federally certified Rural Health Clinics (RHC), we are pleased to offer the following comments on the Department of Education's proposed rule, Reimagining and Improving Student Education.

Since 1977, the Rural Health Clinics program has provided quality, outpatient care to rural, underserved communities across the country. CMS-certified RHCs require the use of team-based care in their facilities, relying heavily on physicians, Nurse Practitioners (NPs), Physician Assistants/Associates (PAs), social workers and other behavioral health professionals with various post-baccalaureate degrees.

Pursuant to H.R. 1 (Public Law No. 119-21), beginning July 1, 2026, graduate students are limited to borrowing \$20,500 annually and \$100,000 in the aggregate while professional students are limited to \$50,000 annually and \$200,000 in the aggregate. While these limits are statutorily established, the Department of Education's strictly limiting proposed list of professional degrees risks the accessibility of adequate funding mechanisms for all post-baccalaureate degreed individuals.

Given the immense value of all of these health care professionals, the NARHC urges the Department of Education to revise its proposed "professional degree" definition to include post-baccalaureate healthcare degrees, including those mentioned above. These individuals serve as rural America's providers, as well as the faculty and educators training the next generation of the health care workforce.

Your consideration of these comments is appreciated. We look forward to working with the Department to ensure that federal student aid policies support, rather than constrain, the development of a strong and sustainable workforce for rural communities. Should you have any questions or need any additional information, please do not hesitate to contact Sarah Hohman, NARHC Director of Government Affairs at Sarah.Hohman@narhc.org.

Sincerely,

A handwritten signature in black ink that reads "Nathan Baugh".

Nathan Baugh,
Executive Director, NARHC
Nathan.Baugh@narhc.org

A handwritten signature in black ink that reads "Sarah Hohman".

Sarah Hohman, MPH
Director of Government Affairs, NARHC
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