



March 2, 2026

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Delaware Healthcare Association
Brian W. Frazee
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Ms. Tamy Abernathy
Office of Postsecondary Education,
U.S. Department of Education
400 Maryland Ave. SW, 5th Floor
Washington, DC 20202.U.S.

RE: DHA Concerns with “Professional” Definition in Proposed Rule *Reimagining and Improving Student Education*, RIN 1840–AD98

Dear Ms. Abernathy,

On behalf of the Delaware Healthcare Association, representing Delaware’s hospitals, health systems, and related healthcare organizations, we appreciate the opportunity to comment on the U.S. Department of Education’s proposed rule *Reimagining and Improving Student Education*. DHA is concerned that the proposed rule does not appropriately include vital healthcare professions – including nurses, physician assistants, social workers, physical therapists, and occupational therapists -- in the definition of “professional” students and degrees that would be eligible for higher loan limits for student loans. We respectfully request that these important healthcare professionals be included in the definition in the final rule.

Like the rest of the nation, Delaware is facing a healthcare workforce shortage at a time when the demands on our healthcare system are increasing. Delaware is home to the 5th oldest and 6th fastest growing population in the nation, so we feel this increasing pressure even more acutely. DHA is focused on strengthening Delaware’s healthcare workforce to continue to ensure access to high-quality affordable care for all Delawareans. With that in mind, we need policies that aim to grow and not limit access to education and training for our current and future healthcare workforce.

The Department of Education (DOE)’s Jan. 29 [proposed rule](#) would define the terms “professional student” and “graduate student” for purposes of determining the amount of federal student loans available to students enrolled in certain degree programs. These professional students would be eligible for a higher -- \$50,000 per year – amount in federal student loans. While DHA is pleased to see that physicians and pharmacists are included in the “professional” definition, we are



concerned that other vital healthcare professionals are excluded.

Specifically, we are concerned that nursing, physician assistants, social work, occupational therapy, and physical therapy are excluded from the higher federal student loan limit amounts. Without federal loans to cover the full costs of their education, these healthcare professionals may be unable to pursue the degrees that are needed to meet our healthcare workforce needs.

Delaware hospitals are the largest private sector employer in Delaware, providing over 30,000 jobs in the state and supporting 51,000 indirect jobs. Labor expenses for Delaware hospitals have increased 30% from FY20 to FY24 due to healthcare workforce shortages and an increasing demand for healthcare services due to our growing and aging population. Delaware hospitals are doing everything we can to recruit and retain a strong healthcare workforce -- including through Undergraduate and Graduate medical education programs, “earn while you learn” programs, career ladder programs, scholarships and tuition assistance, and more -- but we need federal policies to complement these efforts.

Nurses are a vital part of the hospital and health system workforce. In a recent survey of DHA members, the number one critical healthcare workforce need for Delaware hospitals was consistently registered nurses. At the national level, HRSA projects an 8% shortage of registered nurses (RNs) in 2028. The U.S. Bureau of Labor and Statistics projects that employment of registered nurses will grow 5 percent from 2024 to 2034, faster than the average for other occupations.

In addition to registered nurses, Delaware needs more primary care providers. Supporting nurses to continue their education to become Advanced Practice Registered Nurses including Nurse Practitioners is an important way to increase access to primary care. Similarly, Physician Assistants have helped to support access to primary care in Delaware and across the nation. APRNs and PAs also serve in Delaware hospitals in the delivery of high-quality, high-value healthcare to meet patient needs.

As Delaware’s population continues to grow and age, the demand for social workers, physical therapists, and occupational therapists will also increase. The U.S. Bureau of Labor Statistics projects that between 2024 to 2034, employment for social workers will increase by 6%, employment for physical therapists will increase 11%, and



employment for occupational therapists will increase by 14%. Hospitals and health systems rely on these professionals as critical components of the healthcare team. As the demand for these healthcare professions grows, we need to increase access to their educational opportunities.

DHA respectfully requests that the Department consider a broader definition of “professional degree” programs to include nurses, physician assistants, social workers, physical therapists, and occupational therapists. Ensuring access to the loans needed for these professions to complete their education and training will help support the robust healthcare workforce we need to meet the increasing healthcare needs of our state and our nation. Thank you again for the opportunity to comment and for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads 'Brian Frazee'. The signature is written in a cursive style and is positioned above a thin horizontal line.

Brian Frazee
President & CEO
Delaware Healthcare Association