March 2, 2026

Ms. Tamy Abernathy
Office of Postsecondary Education,
U.S. Department of Education
400 Maryland Ave. SW, 5th Floor
Washington, DC 20202

RE: Concerns with "Professional" Definition in Proposed Rule Reimagining and Improving Student Education, RIN 1840–AD98

Dear Ms. Abernathy,

The First State Health Leaders Alliance (FSHLA), a group of leading health advocates who have joined forces to strengthen healthcare in Delaware, appreciates the opportunity to comment on the U.S. Department of Education's proposed rule *Reimagining and Improving Student Education*. We are concerned that the proposed rule excludes vital healthcare professions – including nurses, physician assistants, social workers, physical therapists, public health professionals and occupational therapists – in the definition of "professional" students and degrees that would be eligible for a higher loan limit for student loans. We respectfully request that these important healthcare professionals be included in the definition in the final rule.

FSHLA's key advocacy priorities include advancing the health workforce and ensuring access to care. Formed in March 2025, the alliance issued a joint agenda with a focus on collaboration and coordination across sectors, emphasizing that solutions for healthcare are shared, not siloed**.** The advocates have expertise across the healthcare continuum including nursing and physician practice, public health and medicine, advocacy for persons with disabilities, home care, long-term care, and hospitals.

Our healthcare system is facing significant challenges - there are workforce shortages across professions while at the same time demand for healthcare is increasing. Delaware is home to the 5th oldest and 6th fastest growing population in the nation, so our organizations see these challenges firsthand. A full team of health workers is essential to providing robust access to care throughout the healthcare continuum. Policies that limit access to education and training will not help to grow the healthcare workforce at a time when we critically need it.

Thank you for the opportunity to provide comments on the U.S. Department of Education's proposed rule Reimagining and Improving Student Education. On behalf of our members, FSHLA requests that the Department consider a broader definition of "professional degree" programs to include nurses, physician assistants, social workers, physical therapists, public health professionals, and occupational therapists. Thank you again for the opportunity to comment and for your consideration of this request.

Sincerely,

First State Health Leaders Alliance

Carolyn Petrak, Executive Director
Ability Network of Delaware

Kate Smith MD, MPH, Executive Director
Delaware Academy of Medicine and Public Health

Susan R. Getman, MA, Executive Director
Delaware Association for Home & Community Care

Brian Frazee, President & CEO
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Kevin Musto, BSPharm, FAPhA, DPEC Executive Director **Delaware Pharmacists Society**

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