



March 2, 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Docket ID ED-2025-OPE-0944

Dear Under Secretary Kent:

LeadingAge appreciates the opportunity to comment on the Department of Education’s proposed amendments to 34 C.F.R. § 685.102, including the proposed definition of “professional degree,” which would limit access to federal student loans for several fields essential to the aging services workforce and result in fewer workers in already understaffed professions serving older adults. LeadingAge represents more than 5,300 nonprofit and mission-driven aging services providers serving older adults and touching millions of lives every day. From our national headquarters in Washington, DC, and in collaboration with our state partners representing members active in 50 states, the District of Columbia, and Puerto Rico, we use advocacy, education, applied research, and community-building to make America a better place to grow old. Our membership encompasses the entire continuum of aging services, including skilled nursing, assisted living, memory care, affordable housing, retirement communities, adult day programs, hospice, Programs of All-Inclusive Care for the Elderly (PACE), and home-based care. We bring together the most inventive minds in the field to lead and innovate solutions that support older adults wherever they call home.

We are concerned that the proposed regulation’s approach to redefining “professional degree” would unintentionally but significantly harm the aging services workforce. In turn, it risks undermining access to care for our country’s rapidly growing population of older adults. We urge the Department to carefully consider these downstream workforce and access-to-care implications and to reverse any narrowing of the professional degree definition before finalizing the rule.

Aging services delivery is inherently interdisciplinary and there are several fields of study that are excluded from the proposed “professional degree” definition that are integral to our sector. High-quality care in both home- and community-based and residential settings depends on a range of licensed and credentialed professionals, including registered nurses and advanced practice nurses, physician assistants, social workers, and rehabilitation therapists such as physical and occupational therapists. For their part, nurses are often referred to as the backbone of the healthcare sector generally and this is no less true of aging services. They are fundamental to the delivery of care at every level. Clear and attainable career ladders – often requiring advanced education – are essential to recruiting and retaining individuals in the field. Furthermore, advanced practice nurses and

physician assistants perform critical functions, particularly in rural areas where physician shortages are most acute, and they are relied upon to meet certain regulatory requirements in hospice care and home health. Advanced practice nurses also serve as educators and mentors, vital to the development of nurses at the earlier stages of the talent pipeline.

Social workers with advanced degrees are also indispensable. Home health and hospice providers are required to employ master's level social workers (MSWs) to meet Medicare conditions of participation. In affordable housing settings, MSWs frequently serve as service coordinators, a role that is pivotal to resident stability and successful aging in place. Rehabilitation therapists, including physical and occupational therapists, are required to hold advanced degrees simply to practice, and skilled nursing facilities and home health agencies are obligated under Medicare to provide access to these services in accordance with a resident or client's plan of care. Speech language pathologists, which are another rehabilitation service offered by home health, are required to have master's or doctoral degree as well. Restricting access to federal student loans for individuals pursuing these degrees would directly constrain the supply of professionals that federal health programs themselves require.

These concerns must be viewed against the backdrop of the aging services sector's already severe and enduring workforce challenges. Across positions, providers face chronic shortages, high turnover, and persistent recruitment difficulties – especially in rural communities. At the same time, demographic trends point to massively expanding demand for services coupled with a shrinking workforce, driven by the aging of the native-born population and restrictive immigration policies. While the proposed definition affects advanced degrees, its impact will be felt throughout the pipeline. In nursing, for example, an existing shortage of nurse educators already creates a bottleneck for baccalaureate-prepared nurses. Limiting access to federal loans for advanced education will only compound these constraints. Providers' ability to serve older adults depends on an adequate and competent professional workforce, and that workforce depends on stable, affordable education pathways. In this sense, student loan policy functions as workforce policy. In an already tight labor market, providers – particularly nonprofit and mission-driven organizations – cannot absorb further shortages created upstream by restrictive student loan policy.

The likely harms are tangible. Staffing shortfalls quickly become access issues when providers are forced to limit admissions or even close their doors. These effects are most acute in rural areas and among providers serving the most vulnerable populations, where costs cannot be passed on to consumers. Importantly, these consequences will reverberate beyond long-term care. The health and social services system relies on a shared and limited labor pool, and when aging services providers cannot meet demand, unmet care needs are displaced into other parts of the system – often higher-cost acute and emergency care settings – placing additional strain on an already overburdened healthcare infrastructure.

The healthcare sector buoyed the country's employment outlook over the past year, accounting for nearly all the reported job growth in multiple months of 2025. At a time when demand for care is only growing, it is critical that federal policy work in the direction of expanding – not narrowing – the country's pipeline of highly skilled healthcare and social services professionals. LeadingAge

urges the Department to adopt a broader definition of “professional degree” programs so that otherwise qualified students are not barred from entering essential fields simply because they lack access to federal loans needed to complete advanced education.

Thank you for considering our comments and for your attention to the aging services workforce implications of this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Mead", is enclosed in a light gray rectangular box.

Amanda Mead
Director, Workforce Policy
LeadingAge
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