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The mission of ADEA is to develop an inclusive, future-ready oral health workforce prepared to improve the health of all people and communities through leadership, education and collaboration.

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Date: March 2, 2026

Submitted via Regulations.gov

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; RIN 1840-AD98; Reimagining and Improving Student Education NPRM

Dear Under Secretary Kent:

We respectfully submit the following comments in response to the U.S. Department of Education's (Department's) *Reimagining and Improving Student Education (RISE)* Notice of Proposed Rulemaking (NPRM), 91 FR 4254.

Effective Date

The NPRM states that the One Big Beautiful Bill Act (OB BB) "directs the Department to implement roughly a dozen provisions by July 1, 2026," and that many of those provisions are not self-executing, requiring the Department to promulgate regulations to implement them. 91 FR 4257. The preamble further explains how this effective date would differ from the Higher Education Act (HEA) master calendar, which provides that regulations affecting programs under Title IV must be published in final form by November 1 in order to take effect the following July 1.

Because negotiated rulemaking could not be completed by November 1, 2025, and because the OB BB provisions are not self-implementing, the Department stated that "the OB BB implicitly waives the master calendar" for those provisions. 91 FR 4257.

We understand the difficult position in which the statute places the Department. However, an effective date that results in substantial regulatory changes becoming operational only weeks or months after

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publication of a final rule would create serious challenges for borrowers and institutions.

The proposed changes are sweeping. They include:

- New repayment plans,
- Phase-out of the Graduate PLUS Program,
- New loan limits for graduate students, professional students and parents and
- New distinctions between graduate and professional students.

Borrowers will need adequate time to understand these changes and make informed financial decisions. Implementing reforms of this magnitude on a compressed timeline increases the likelihood of confusion, administrative errors and unintended consequences.

Students are already applying to programs for the 2026–27 academic year and determining how they will finance their education. For borrowers who do not qualify for any interim exception allowing continued access to legacy loan limits, the proposed timeline creates uncertainty and potential confusion. For example, the Federal Student Aid website still includes information about how to obtain a Graduate PLUS loan that does not also mention the forthcoming phase-out of the program. *Direct PLUS Loans for Graduate or Professional Students*. Federal Student Aid.

<https://studentaid.gov/understand-aid/types/loans/plus/grad> (accessed February 24, 2026). This illustrates the operational and consumer-facing complexity involved in implementing these changes on an accelerated schedule.

Proposed Approaches to Effective Dates and Implementation Flexibility

To address the practical and legal complexities associated with the statutory deadlines, we encourage the Department to consider the full range of tools available to ensure orderly, lawful and minimally disruptive implementation of the OBBB provisions. Specifically, the proposals focus on reducing legal risk, supporting regulated entities and safeguarding student access to critical educational and workforce pathways.

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1. Align Effective Dates With the Master Calendar and Permit Early Implementation

The Department has authority under the HEA master calendar framework to set **July 1, 2027**, as the date for full operational implementation of Section 81001 of the OBBB, while permitting institutions to begin implementation on **July 1, 2026**, through early implementation authority under section 482(c)(2) of the HEA.

Section 81001 repeatedly states that the new loan-limit rules apply “Beginning July 1, 2026.” That phrase is best understood as marking the legal effective date of the new statutory framework, not as a requirement that the Department complete all operational, regulatory and systems changes by that date. Nothing in Section 81001 directs the Department to fully implement the new limits on that July 1, 2026, date. Congress did not use implementation-forcing language such as “the Secretary shall implement,” “shall enforce” or “without regard to section 482,” nor did it override the master calendar, which governs the timing of regulatory and operational changes to Title IV programs. Moreover, the plain meaning of the term “beginning” reinforces this reading: in ordinary usage, a rule that applies “beginning” on a certain date identifies the point at which the new legal regime starts to operate, not the point by which it must be fully effectuated. Interpreting “beginning July 1, 2026” as a full implementation deadline would invert that plain meaning and impose obligations Congress did not express, as well as put the Department out of compliance with a congressional mandate (the master calendar). Early implementation that begins July 1, 2026, allows the Section 81001 regulatory scheme to begin July 1, 2026, consistent with the statutory text and the master calendar.

The structure of the Graduate PLUS termination clause reinforces this reading. That clause states: “Subject to paragraph (8) and notwithstanding any provision of this part or part B, for any period of instruction beginning on or after July 1, 2026, a graduate or professional student shall not be eligible to receive a Federal Direct PLUS Loan under this part.” The “notwithstanding” clause is narrow: it applies only to “this part or part B.” The master calendar, however, is located in Part G of the HEA. Because Congress did not include Part G in the “notwithstanding” clause, the master calendar remains fully operative. And because the clause is expressly “subject to paragraph (8),” which creates a multiyear transition period, this supports that Congress clearly envisioned a tiered, phased implementation rather than a single-day switch on July 1, 2026. A textual read that harmonizes statutory provisions supports phased implementation,

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including that necessary to implement the master calendar. This interpretation also aligns with the Department's long-standing practice under the HEA's early implementation authority.

Consistent with the Department's position, Section 81001 is not self-executing. Thus, its implementation requires a regulatory framework that harmonizes the statute's effective date with the master calendar's operational timelines.

Under a harmonized approach:

- **July 1, 2026**, would mark the date the statutory framework takes legal effect.
- **July 1, 2027**, would mark full operational implementation under the master calendar.
- Institutions or other appropriate entities prepared to adopt the new requirements on July 1, 2026, could do so voluntarily under early implementation authority. Note: Proposed § 685.203(m)(2) would also allow for institutions to make individualized determinations about applicable student loan caps.

Practical Benefits of This Approach

A July 1, 2027, effective date and early implementation could:

- Reduce the risk of errors in the Common Origination and Disbursement (COD) website, National Student Loan Data System (NSLDS) and institutional systems;
- Allow institutions adequate time to update systems, policies, publications and financial models, as well as retrain staff;
- Avoid mid-cycle packaging changes that could create confusion or errors; and
- Allow the Department to issue clear, comprehensive guidance.

This structure respects the statutory text, preserves Departmental flexibility and promotes responsible, student-centered implementation.

2. If July 1, 2026, Is Retained, Establish Delayed Compliance or Implementation Dates

With respect to Section 81001, if the Department retains the July 1, 2026, effective date for the implementing regulations, it would have discretion to establish later compliance or operational implementation dates.

This approach would provide additional time for institutions to come into full compliance.

A delayed compliance structure would:

- Provide meaningful relief to regulated parties;
- Allow institutions adequate time to update systems, policies, publications and financial models, as well as retrain staff;
- Reduce inadvertent noncompliance and associated enforcement burdens; and
- Promote thoughtful, consistent adoption of complex student aid reforms.

This approach still respects the statutory requirement that implementation “begin” on July 1, 2026, while recognizing that full operationalization of complex provisions cannot reasonably be instantaneous.

Why a Phased Approach Serves the Department’s Interests

Both approaches—master calendar alignment with early implementation, or a July 1, 2026, effective date with delayed compliance—advance the public interest and the Department’s institutional interests.

Reducing Legal Risk

A structured, phased implementation may minimize the risk of:

- Arbitrary or capricious rulemaking challenges,
- Claims of insufficient notice or unworkable timelines and
- Operational failures that could undermine public confidence.

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Demonstrating use of available statutory tools strengthens the Department's legal posture.

Ensuring Statutory Compliance

These approaches:

- Respect the master calendar framework,
- Honor the statutory "beginning on" language,
- Provide a clear path to full implementation by July 1, 2027, and
- Avoid forcing institutions into rushed or incomplete compliance.

Protecting Access to Education and the Workforce Pipeline

Students cannot simply defer enrollment in medicine, dentistry, nursing and other high-demand fields. A rushed implementation risks:

- Disrupting admissions cycles,
- Limiting program availability and
- Reducing the pipeline of essential health care and technical professionals.

A phased approach would allow reforms to proceed without undermining national workforce priorities.

Maintaining Affordability Without Disrupting Academic Cycles

Institutions set tuition and aid structures well in advance. Adjusting implementation timelines:

- Does not undermine the cost-containment goals of the OBBB. The NPRM preamble states that the OBBB "limits excessive borrowing by graduate and professional students due to the elimination of unlimited borrowing under the Graduate PLUS Program." 91 FR 4255. In at least the near term, however, students must still finance established tuition and fee levels at their institutions. These costs are unlikely to adjust as quickly as the proposed loan limits.
- Ensures institutions have sufficient time to responsibly adjust pricing and aid models for the 2027 cycle.

Institutions would still have clear notice that the new limits apply no later than July 1, 2027, preserving intended cost-containment incentives.

Conclusion

By using the tools Congress has provided—master calendar alignment, early implementation authority and delayed compliance where appropriate—the Department can:

- Comply with statutory mandates,
- Reduce legal and operational risk,
- Support responsible implementation of complex reforms,
- Protect student access to essential educational and workforce pathways and
- Preserve the cost-containment goals of the OBBB without unnecessary disruption.

A balanced, phased implementation approach would enable the Department to meet both its legal obligations and its practical responsibilities to students, institutions and the public.

Professional Student Definition

- 1. The definition of “professional student” should be revised to be more flexible, to account for the detailed realities of different professions.**

We encourage the Department to make the proposed definition of *professional student* in proposed § 685.102 more flexible, specifically by making the list of fields in paragraph (2)(i) non-exhaustive. Relying on a specifically enumerated list of degrees does not adequately reflect the intricacies of many professions, particularly health and dental professions. The closed list could have the unintended consequence of excluding degrees that would meet the criteria in the definition or should otherwise be included, leading to unnecessary financing challenges for students pursuing those degrees and disincentives for students to enter high-demand fields. Once a degree is excluded from the final list, the consequences to students would be immediate, while

the process to correct an omission could take years, especially if additional regulation is required. A more flexible definition with a non-exhaustive list of degrees would allow for programs to be assessed based on their characteristics, to make sure that they are properly categorized and protect students from losing access to funding they may need to finance their education.

In addition, the OBBB definition of “professional student” expressly incorporates the definition of “professional degree” from current 34 CFR 668.2. The “professional degree” definition in current § 668.2 states that “[e]xamples of a professional degree include but are not limited to” those expressly listed in the definition, so a non-exhaustive structure would be consistent with the statute, that is, comparable to the definition that Congress expressly referenced. A definition similar to the statutorily incorporated one would ensure that congressional intent was upheld.

- 2. Whether or not the definition is made more flexible, master’s degrees in dental hygiene should be included.**
 - a. Master’s degrees in dental hygiene are critical roles in health care and health education.**

The master’s degree in dental hygiene (M.S.D.H., M.D.H.) is a degree with unique characteristics that distinguish it from other degrees in the field of dental hygienics. While dental hygienists may obtain licensure to practice and perform their critical and in-demand work with an associate’s or bachelor’s degree, professionals with a master’s degree in dental hygiene fulfill specific and in-demand roles in both the health care and educational workforce. Graduate-level programs in dental hygiene typically prepare graduates for careers as educators, administrators, researchers, or in public health, with curricula focusing on research methods and applications, health education, leadership and legal/ethical issues in dental hygiene.¹ In fact, a master’s degree in dental hygiene is required for administrators of dental hygiene programs, as well as for certain educators, meaning that access to this degree is vital to the future of the dental hygiene field. While tuition and fees can vary, the yearly total cost of attendance for a master’s degree in dental hygiene program can easily exceed the

¹ See *Dental Hygiene Programs*. ADEA GoDental®.

<https://www.adea.org/godental/explore-dental-hygiene/dental-hygiene-programs> (accessed February 25, 2026).

\$20,500 loan limit for graduate students. Imposing this cap on master's-level dental hygiene degrees would likely create barriers to entry and unintended consequences.

b. Master's degree hygienists are critical to the future of the dental hygiene profession, and dental hygiene is critical to total body health.

Barriers to master's-level education in dental hygiene could hurt workforce pathways to dental hygiene more broadly, potentially reducing opportunities for future education—and, therefore, future workforce—in the field. This is a demonstrably real and significant problem. For example, a 2024 survey of 214 dental hygiene programs found a shortage of 150 dental hygiene faculty. American Dental Education Association, *Survey of Allied Dental Program Directors, 2024*. Master's-level dental hygiene graduates are critical to filling these types of vacancies. Meanwhile, the Bureau of Labor Statistics states that employment of dental hygienists is projected to grow seven percent from 2024 to 2034, much faster than the average for all occupations. Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook, Dental Hygienists*, <https://www.bls.gov/ooh/healthcare/dental-hygienists.htm> (accessed February 27, 2026). Again, because administrators and certain educators in this field must hold master's degrees, restricting access to that degree would likely negatively impact the profession as a whole.

Dental hygienists perform work that has far-reaching benefits. For example, in a five-year claims analysis of adults enrolled in Medicaid, adults who received preventive dental care every year had 43% lower dental costs than those who received none.² Further, people with no preventive dental visits were eight times more likely to have a nontraumatic dental emergency department visit, seven times more likely to undergo oral surgery and six times more likely to receive a dental-related opioid prescription.³ Among Medicaid members with diabetes, preventive dental care has been associated with lower medical utilization and cost, including an estimated 11% lower inpatient admission rate per additional preventive dental visit and \$407 lower inpatient costs per

² Okunev, I., Tranby, E. P., Jacob, M., Diep, V. K., Kelly, A., Heaton, L. J. & Frantseve-Hawley, J. (2022). The impact of underutilization of preventive dental care by adult Medicaid participants. *Journal of Public Health Dentistry*. 82(1):88–98. doi: [10.1111/jphd.12494](https://doi.org/10.1111/jphd.12494)

³ Id.

member.⁴ In other words, it is critical to protect workforce pathways to dental hygiene and master's-level dental hygiene education is central to that goal.

c. Even as proposed, the definition of “professional student” should be revised to expressly include master’s degrees in dental hygiene.

At a minimum, even if the definition of “professional student” is not made more flexible, we urge the Department to expressly include the master’s degree in dental hygiene (M.S.D.H., M.D.H.) degree in the definition. Even as the definition was proposed, this degree should be included because it:

- Signifies the completion of academic requirements for the unique and advanced professional roles these individuals hold and a level of professional skill beyond what is required for a bachelor’s degree;
- Generally requires six academic years of postsecondary education coursework for completion, including two years of post-baccalaureate work; and
- Represents an advanced level of education in a field that requires professional licensure to begin practice (dental hygiene generally).

⁴ Lamster, I. B., Malloy, K. P., DiMura, P.M., Cheng, B., Wagner, V. L., Matson, J. M., Proj, A., Xi, Y., Abel, S. N. & Alfano, M.C. (2022) Preventive dental care is associated with improved healthcare outcomes and reduced costs for Medicaid members with diabetes. *Frontiers in Dental Medicine*. 3:952182. doi: [10.3389/fdmed.2022.952182](https://doi.org/10.3389/fdmed.2022.952182)

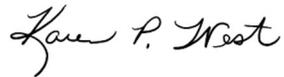
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Master's degree hygienists are a critical part of a growing and important profession and access to this degree should be protected and promoted, not diminished. We encourage the Department to protect and strengthen the dental hygiene workforce by including the master's degree in dental hygiene degree in the definition of "professional student."

Sincerely,

A handwritten signature in cursive script that reads "Karen P. West".

Karen P. West, D.M.D., M.P.H.

President and CEO