

February 18, 2026

Dr. David Barker  
Assistant Secretary  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**SUBMITTED VIA REGULATIONS.GOV**

*RE: Notice for Proposed Rulemaking - Reimagining and Improving Student Education (RISE) [Docket ID ED-2025-OPE-0944]*

Dear Assistant Secretary Barker:

As the world's largest professional not-for-profit organization exclusively representing over 62,000 mental health counseling professionals and students nationwide, the American Counseling Association (ACA) appreciates the opportunity to submit comments on the Department of Education's (ED) proposed changes to the federal student loan program. We strongly urge ED to adopt a more inclusive and expansive definition of professional programs, particularly for mental health counseling and other essential provider programs. Excluding these programs would significantly limit borrowers' access to federal student loans, undermine efforts to address critical workforce shortages, and jeopardize access to mental health care nationwide.

**Background on Mental Health Professionals**

Tens of millions of Americans are living in health provider shortage areas and the mental health care provider shortage is particularly dire. As of December 2025, 137 million people in the U.S. live in areas with a mental health provider shortage<sup>1</sup>, which exacerbates the ongoing mental health crisis. The Substance Abuse and Mental Health Services Administration (SAMHSA) found "[i]n 2024, 84.3 million Americans were diagnosed with a mental illness or substance use abuse."<sup>2</sup> The Centers for Disease Control and Prevention (CDC) found that in 2023, 40% of students reported persistent feelings of sadness or hopelessness; 20% seriously considered suicide; and 9% attempted suicide.<sup>3</sup> Given these conditions, policies that directly affect the mental health education and training pipeline carry significant and foreseeable consequences for workforce capacity and public health, particularly where an existing provider shortage already limits access to care. ED must thoroughly analyze these impacts before implementing a rule with such implications.

Counselors are the second largest profession in the U.S. mental health workforce and are critical in addressing the mental health crisis. They provide essential mental health services including mental

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<sup>1</sup> <https://data.hrsa.gov/topics/health-workforce/shortage-areas/dashboard?tab=hpsaHeader>

<sup>2</sup> <https://www.samhsa.gov/newsroom/press-announcements/20250728/samhsa-releases-annual-national-survey-on-drug-use-and-health>

<sup>3</sup> <https://www.cdc.gov/healthy-youth/mental-health/index.html>

health treatment, addiction counseling, crisis intervention and relationship counseling. On an annual basis, counselors are frontline workers who treat millions of individuals in various settings such as schools, private practices, hospitals and medical centers, correctional facilities, and mobile crisis units. Furthermore, counselors are the definition of highly trained professionals who must have extensive education and clinical experience. Specifically, state licensure requirements include: (1) graduating with a master's in counseling from a regionally accredited institution; (2) completing coursework in mental illness, substance use, and treatment planning; (3) passing a nationally recognized exam, such as the National Counselor Examination (NCE); (4) participating in thousands (2,000-3,000 hours) of supervised post-graduate clinical experience; and (5) executing ongoing adherence to a strict code of ethics and continuing education.

These extensive requirements carry significant financial costs. According to ACA's Counseling Workforce Survey Report released in 2024, average student loan debt amounted to \$79,434, more than double the national average. The "high cost of education" and associated student loan debt was among the top three challenges for students wishing to pursue the mental health counseling profession.<sup>4</sup> In addition to tuition expenses, counseling students must often rely on student loans to cover additional living costs such as housing, food, transportation, books and required fees while completing their full coursework and thousands of hours of clinical training, which often offers limited or no compensation. It is for these reasons that students depend on having access to the higher student loan limits in order to successfully meet these high standards of education and professional qualifications. ED's designation of mental health counseling and other essential health care provider programs as "professional degree" programs is essential in addressing the persistent mental health workforce shortages. Excluding counselors from ED's "professional degree" definition would only intensify existing shortages and further weaken the mental health care workforce pipeline.

### Changes to the Definition of Professional Degrees

Counseling programs are actively training students to meet critical mental health needs in communities across the nation. The proposed rule would directly undermine the profession by:

- **Forcing current students to abandon programs mid-completion.** Students who relied on Grad PLUS loans, which are now not eligible for these programs, will face impossible choices: predatory private debt, indefinite educational pause or complete program abandonment.
- **Increasing burnout.** Counselors already face an enormous amount of pressure in their daily work across client populations and care settings, including clients experiencing active mental health crises. Forcing more students to take on expensive private loans increases the risk of program abandonment, worsening existing provider shortages and increasing burnout among practicing counselors.
- **Harming professional sustainability.** Prospective students who cannot afford program completion will choose other professions, threatening the long-term workforce sustainability of counselors. ACA is already hearing serious concerns from students about financing their counseling education following ED's proposed rule framework.

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<sup>4</sup> [https://www.counseling.org/docs/default-source/default-document-library/public-policy-resources-reports/workforce-survey-report\\_final.pdf?sfvrsn=e4ab45d0\\_1](https://www.counseling.org/docs/default-source/default-document-library/public-policy-resources-reports/workforce-survey-report_final.pdf?sfvrsn=e4ab45d0_1)

Under the Administrative Procedure Act (Pub.L. 79–404), ED has a responsibility to thoroughly analyze workforce and public health implications before implementing a rule with such significant consequences. ACA urges ED to:

- **Delay implementation until ED can adequately assess workforce consequences** and consider policy alternatives to protect student access to affordable federal loans.
- **Establish clear, objective criteria for the “professional degree” classification** based on accreditation standards, clinical training requirements, licensure mandates, terminal degree status and scope of independent practice—applied consistently across all programs.
- **Conduct a comprehensive workforce impact analysis** to examine the mental health provider supply, healthcare access in underserved areas, program viability and alignment with federal mental health policy priorities.
- **Consult with workforce development and healthcare access experts**, including those at the Health Resource and Services Administration (HRSA), SAMHSA, state mental health authorities and professional counseling organizations before finalizing the rule.
- **Add counseling programs to the definition of a “professional degree”** to ensure students can utilize the updated federal loan limits (\$50,000 annually/\$200,000 lifetime).

Counseling students are committed to serving critical mental health needs, often in careers with modest compensation. They need and deserve federal financial aid policies that make education accessible and do not create unnecessary and arbitrary barriers. This proposed rule would price many students out of counseling education, threaten professional sustainability, and worsen the national mental health workforce shortage, ultimately harming communities that rely on counseling services in schools, community mental health centers, veterans’ programs, and other essential settings.

## Conclusion

ED has the authority and responsibility to support workforce development in critical shortage areas while ensuring responsible stewardship of federal resources. Including counseling programs within the “professional degree” definition achieves these goals and aligns with ED’s stated priorities for mental health and workforce preparation.

Thank you for your time and thoughtful consideration of our feedback. We appreciate the opportunity to share our perspective and stand ready to work with ED to help ensure all Americans have access to the mental health support they need and deserve. If you have any questions about these comments or if ACA can be of service, you can reach me at [Gtodd@counseling.org](mailto:Gtodd@counseling.org).

Sincerely,

Guila Todd, Director of Government Affairs and Public Policy  
American Counseling Association