



## **Reimagining and Improving Student Education (RISE) Comments Guide** **Submit your personalized comment by March 2, 2026**

On January 30, 2026, the U.S. Department of Education published a proposed rule that would reshape how new borrowers pay for college and graduate school starting July 1, 2026. AAUW's position is clear: these changes would make it harder for many women to finance the degrees that lead to economic security and leadership, especially in women-majority fields and for borrowers without family wealth to cover new funding gaps.

**This proposal will change who can still afford to enroll, persist, and finish an advanced degree.**

When federal borrowing is capped below real program costs, the remaining gap is filled by family wealth, private loans, extra work, or not filled at all. The impact will fall hardest on borrowers who have the least ability to cover new shortfalls out of pocket, including Black and Hispanic/Latina women, first-generation students, and student parents.

**Comments opposing this rule (Docket ID: ED-2025-OPE-0944) are due by March 2, 2026**

[Click here to submit your comment now.](#)

### **What's at Stake**

- Inequities in higher education access may deepen. Higher education can strengthen women's economic security and graduate and professional degrees can open doors to higher earnings. But opportunity isn't evenly shared: Black and Hispanic/Latina women remain underrepresented in many graduate and professional programs, and even with advanced credentials, they often face larger pay gaps than similarly educated peers.
- Women in women-majority fields may be priced out. Many essential workforce pathways (education leadership, nursing, and other health-related graduate programs) can fall under the lower "graduate" loan cap even when program costs exceed it.
- Women of color are more likely to face difficult financial decisions. When federal borrowing does not cover real costs, wealth gaps mean less ability to pay out of pocket.
- Student parents and caregivers, who are disproportionately women, may be pushed out. These students are more likely to attend part-time or need flexible pacing, so rules that reduce borrowing for less-than-full-time enrollment can increase their likelihood of dropping out.
- More borrowers may be pushed toward private loans with fewer safeguards. First-generation and working students often depend on federal aid and consumer protections.

### **What You Can Do**

1. [Submit a personalized public comment](#) by March 2, 2026 (Docket ID: ED-2025-OPE-0944). Comments that are clearly individualized are more likely to be fully considered.



2. Ask the Department of Education to revise the proposal so women, especially Black, Hispanic/Latina, Native, and other women of color, student parents, and first-generation students, are not priced out of advanced degrees.
3. Share this guide with colleagues and community partners.
4. Affirm our values. AAUW, the nation's largest non-institutional funder of women's graduate education, knows that access to higher education is essential to gender and racial equity.

**Prompts to personalize your comment (you may copy talking points verbatim):**

- Graduate/professional student or alum: What did federal loans make possible for you? What would you have done if you could not borrow enough to cover required costs?
- Education or health workforce: How does your degree support essential services in your community? What happens if fewer people can afford these credentials?
- Student parent or caregiver: How did flexibility make completion possible? How would reduced loan access for part-time enrollment affect you?
- First-generation student: What role did federal loans play in making your degree possible?
- Community impact: How would fewer credentialed professionals affect schools, clinics, hospitals, and local economies?

[Background on the Proposed Rule](#)

[Messaging and Talking Points](#)

[Sample Letter](#)

[Click here to submit your comment through AAUW's action page.](#) This is a public comment that will be published with your name. If you wish to submit a comment anonymously, [visit regulations.gov](#).

**Stand with AAUW. Speak out. Submit your comment by March 2, 2026.**



## **Background on the Proposed Rule**

### **“Professional” versus “graduate” definition and loan caps**

The proposal sets different borrowing caps for new borrowers beginning on July 1, 2026, depending on whether a program is defined by the U.S. Department of Education as “professional” or “graduate.” It limits the “professional” degree category to 11 fields. All other graduate-level programs are defined as “graduate” and are subject to a lower cap.<sup>1</sup>

### **The 11 “professional degree” fields in the proposal**

1. Pharmacy (Pharm.D.)
2. Dentistry (D.D.S. or D.M.D.)
3. Veterinary medicine (D.V.M.)
4. Chiropractic (D.C. or D.C.M.)
5. Law (J.D. or LL.B.)
6. Medicine (M.D.)
7. Optometry (O.D.)
8. Osteopathic medicine (D.O.)
9. Podiatry (D.P.M. or related podiatric degrees)
10. Theology or divinity (M.Div. or M.H.L.)
11. Clinical psychology (Psy.D. or certain licensure-linked Ph.D. programs)

While many fields on the “professional” list are already majority women, including medicine, pharmacy, veterinary medicine, optometry, and law,<sup>23456</sup> even the higher \$200,000 cap can still leave a significant gap, including at state schools, especially once living expenses are included.<sup>7</sup> At the same time, many women-dominated fields that are not on the list would fall under the lower \$100,000 cap, including education leadership, nursing, social work, counseling, and public health. This creates a counterintuitive problem: some majority-women professional fields get the higher cap, while other women-majority pipelines that communities rely on can be left under the lower cap even when program costs exceed it.

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<sup>1</sup> U.S. Department of Education. (2026, January 30). *Reimagining and Improving Student Education (RISE)* (Proposed rule). *Federal Register*.

<sup>2</sup> American Hospital Association. (2026, January 29). *Department of Education issues proposed rule updating definition of professional student*.

<sup>3</sup> Association of American Medical Colleges. (2025). *You can afford medical school: Costs for the class of 2026*.

<sup>4</sup> American Association of Colleges of Pharmacy. (2024). *Academic pharmacy’s vital statistics*.

<sup>5</sup> American Veterinary Medical Association. (2024). *Workforce and graduate demographics reporting*.

<sup>6</sup> Association of Schools and Colleges of Optometry. (2024). *Annual student data report: 2023–24*.

<sup>7</sup> Association of American Medical Colleges. (2025). *You can afford medical school: Costs for the class of 2026* (public COA median).



### **Examples showing how the graduate cap can bind students in women-majority programs**

- Occupational therapy: Washington University in St. Louis lists total tuition of \$108,000 for its MSOT program cohort referenced on its tuition page.<sup>8</sup>
- Occupational therapy doctorate: George Washington University lists an MOTD program cost of roughly \$124,235 to \$127,959.<sup>9</sup>
- Physical therapy (DPT): The American Physical Therapy Association's PTCAS cost comparison shows many programs with total education costs exceeding \$100,000.<sup>10</sup>

### **Example showing the higher cap can still fall short**

- Medicine (public schools): The Association of American Medical Colleges reports the median 4-year cost of attendance at public medical schools is \$297,745 (Class of 2026).<sup>11</sup>

### **Parent PLUS loan caps**

The proposal would cap Parent PLUS borrowing at \$20,000 per year per student and \$65,000 total per student, replacing today's ability to borrow up to cost of attendance.<sup>12</sup>

### **Why this raises equity concerns**

- A flat cap does not make tuition cheaper. It can shift costs onto families who cannot pay out of pocket.
- Families who already have the least flexibility will feel this first, especially where wealth gaps mean fewer options to cover remaining costs.
- Financial aid administrators warn caps can push families toward private loans or reduce access to certain institutions.<sup>13</sup>
- Policy analyses emphasize that uniform caps may miss who relies on Parent PLUS and how price variation across institutions affects access.<sup>14</sup>

### **Repayment changes**

For loans dispersed on or after July 1, 2026, the proposal would replace most current repayment options with two plans:

- A tiered standard repayment plan based on balance, and

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<sup>8</sup> Washington University in St. Louis. (n.d.). *Tuition and financial information (Occupational Therapy)*.

<sup>9</sup> George Washington University. (n.d.). *eOTD tuition and financial aid*.

<sup>10</sup> American Physical Therapy Association. (n.d.). *PTCAS total cost of education comparison*.

<sup>11</sup> Association of American Medical Colleges. (2025).

<sup>12</sup> National Association of Student Financial Aid Administrators. (2026, January 30). *ED publishes NPRM to implement student loan changes enacted under OBBBA*.

<sup>13</sup> National Association of Student Financial Aid Administrators. (2025, September 24). *Capping the wrong problem: Why Parent PLUS loan limits may miss the mark*.

<sup>14</sup> Brookings Institution. (2025, September 24). *Capping the wrong problem: Why Parent PLUS loan limits may miss the mark*.



- A new income-driven plan called the Repayment Assistance Plan (RAP) for new borrowers, with forgiveness after 30 years (360 payments).<sup>15</sup>

While AAUW supports streamlining repayment plans when it improves access and outcomes, the real test is whether the new system is *actually* affordable in practice. Research shows that Black and Hispanic/Latina women have higher cumulative graduate loan debt than white women.<sup>16</sup> And because women with advanced degrees still face pay gaps, higher balances are harder to repay, and longer repayment timelines can prolong financial strain.

### **Reduced loan limits for part-time students**

The proposal would require annual loan limits for new borrowers to be reduced proportionally for students enrolled less than full-time.<sup>17</sup>

If loan eligibility shrinks for part-time students, many will be forced to cut credits, stop out, or drop out altogether. For student parents and family caregivers, part-time enrollment isn't a choice, it's the only workable path to a degree.

### **Messaging and Talking Points**

Imposing caps and restrictions do not lower the price of education. They determine who can keep going when costs exceed what federal aid allows. That is why AAUW is urging the Department to revise this proposal.

### **Loan caps and women's economic security**

- When federal loans stop short of real costs, the gap does not disappear. It gets paid with family wealth, private loans, and extra work, or degrees go unfinished.
- The equity issue is not only what is on the "professional" list. It is that women-majority graduate pathways like education leadership can be left out and capped at levels that do not reflect real costs.
- Many women are already completing more education for less payoff because pay gaps persist even at advanced degree levels. Cutting off financing does not fix affordability. It narrows opportunity.

### **Women, especially Black women, carry more student debt**

- AAUW research shows Black women carry substantially higher cumulative student debt, including on graduate loans. One year after graduation, AAUW's research showed

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<sup>15</sup> National Association of Student Financial Aid Administrators. (2026, January 30).

<sup>16</sup> American Association of University Women. (2021, May 20). *Women doubly squeezed by student debt* (press release summarizing *Deeper in Debt 2021*).

<sup>17</sup> National Association of Student Financial Aid Administrators. (2026, January 30). *ED publishes NPRM to implement student loan changes enacted under OBBBA*.



cumulative graduate debt of \$75,085 for Black women compared with \$56,098 for white women.<sup>18</sup>

- When the policy response to affordability is a cap rather than cost reduction, borrowers with less family wealth are more likely to face a hard stop. Those wealth gaps are not gender-neutral or race-neutral.
- Repayment design matters. Streamlining income-driven repayment can help, but an approach that locks borrowers into decades of repayment can deepen inequities when earnings are constrained by gender and racial pay gaps.

### **Parent PLUS caps**

- Parent PLUS caps do not make college cheaper. They can make it out of reach for families who cannot pay upfront.
- Financial aid administrators have warned that limiting federal options can push families into private loans with fewer protections.<sup>19</sup>

### **Repayment changes**

- Simplifying repayment should make it easier to enroll and stay enrolled in affordable repayment, not make people carry debt for 30 years.
- Women, especially Black and Hispanic/Latina women, are more likely to have lower earnings as well as needing time out the workforce or reduced hours due to caregiving, which makes long repayment timelines especially punishing.

### **Reduced limits for part-time students**

- Part-time is often the only way working parents and caregivers can stay enrolled. Cutting borrowing for less-than-full-time students can punish working parents and caregivers and increase the risk of leaving school.
- Student parents and caregivers need flexibility. Women are disproportionately caregivers and student parents, and many must enroll part-time. The proposal would reduce annual loan limits for less-than-full-time enrollment and allow program-level limits, which risks penalizing the very students who need flexibility to complete.

## **Sample Comment Letter**

**If you want a sample comment to customize, [you can download one here](#).** Once you've customized, [submit your public comment through AAUW's action page](#). If you wish to submit a comment anonymously, you can do so on [regulations.gov](#).

*Have questions or need help? Reach out to [advocacy@aauw.org](mailto:advocacy@aauw.org).*

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<sup>18</sup> American Association of University Women. (2021, May 20).

<sup>19</sup> National Association of Student Financial Aid Administrators. (2025, September 24).