



Submitted via <https://www.regulations.gov/> under Docket ID [ED-2025-OPE-0944](#)

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

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

**Re: Notice of Proposed Rulemaking, Reimagining and Improving Student Education (RISE) ED-2025-OPE-0944**

Dear Under Secretary Kent and Director Abernathy:

On behalf of the American Association of University Women (AAUW), we submit comments on the U.S. Department of Education's (ED) Notice of Proposed Rulemaking for the Reimagining and Improving Student Education (RISE) negotiated rulemaking. AAUW is deeply committed to the principle that educational opportunity should not be determined by race, gender, or socioeconomic background. As drafted, this proposal would narrow access to graduate and professional education by limiting federal loan options below real costs and increasing reliance on private credit, while also reshaping repayment in ways that raise costs and increase distress for many borrowers. AAUW urges ED to use every available tool within its authority to ensure these changes do not make access to graduate and professional education contingent on wealth or shaped by race and gender disparities.

**AAUW's interest and expertise**

AAUW, the nation's largest non-institutional funder of women's graduate education, has long championed equitable access to higher education. We know firsthand how a college degree, and especially an advanced degree, can open doors to leadership and economic security for women and communities that have historically faced barriers to opportunity. Since 1881, AAUW has invested more than \$146 million in fellowships and grants for more than 14,000 women scholars.

Across AAUW's fellowship network and our work with members nationwide, we see the practical reality behind cost-of-attendance budgets: when federal financing is capped below real costs, the remaining gap is filled by family wealth, private loans, or left unfulfilled. The last category is where you find the students who delay enrollment, reduce credits, stop out, or never complete. In short, these rules will predictably narrow who can access graduate and professional education, even at public universities.

**I. Graduate and professional loan caps that fall below real costs will close doors for women**

The proposed rule creates a tiered borrowing structure for graduate and professional students beginning July 1, 2026, with higher annual and lifetime caps for a narrow list of "professional" degree programs and lower caps for all other graduate programs. The effect is not merely technical. When annual federal loan



access is capped below published cost of attendance, the remaining gap does not disappear. Students must cover it through family resources, private loans with fewer protections, additional work that undermines completion, or leaving the program.

Even at public universities, published costs often exceed the proposed annual caps. The table below uses publicly posted school budgets (tuition/fees and cost of attendance) to show how quickly annual shortfalls appear.

<b>Program (public university)</b>	<b>Degree category under proposal</b>	<b>Published annual costs (examples)</b>	<b>Proposed annual cap</b>	<b>Illustrative annual shortfall</b>
Medicine — University of Michigan Medical School (in-state)	Professional	Tuition & fees: \$58,662/year; Year 1 budget (cost of attendance): ~\$97,320 (resident guideline budget). (University of Michigan Medical School, 2025)	\$50,000/year	~\$8,662 short of tuition alone; ~\$47,320 short of cost of attendance
Law — University of Michigan Law School (in-state)	Professional	Tuition & fees: \$76,680/year; Total student budget: \$103,566/year. (University of Michigan Law School, 2025)	\$50,000/year	~\$26,680 short of tuition alone; ~\$53,566 short of cost of attendance
Nursing — UTHealth Houston, Cizik School of Nursing (Graduate nursing budget; resident)	Graduate (excluded from higher cap)	UTHealth’s 2025–26 budget for “Nursing – Graduate” lists total tuition of \$7,128 and a total cost of attendance of \$50,226 for Texas residents (including living expenses). (University of Texas Health Science Center at Houston, 2025)	\$20,500/year	Approx. \$29,726 short of cost of attendance
Social Work — UNC Chapel Hill MSW (in-state; COA budgets)	Graduate (excluded from higher cap)	Cost of attendance budgets: \$45,812 (living off campus) to \$51,054 (with dependents). (UNC–Chapel Hill Office of Scholarships & Student Aid, 2025)	\$20,500/year	~\$25,312 to ~\$30,554 short of cost of attendance



This example is particularly instructive because the gap is driven less by tuition than by unavoidable living costs included in the institution’s federally required cost-of-attendance budget. With a \$20,500 annual cap, students must bridge a roughly \$30,000 annual gap through savings, private loans, or additional work that may be incompatible with clinical and practicum requirements. (University of Texas Health Science Center at Houston, 2025)

Two points matter for implementation. First, even the higher “professional” cap does not reliably cover the cost of attendance at public flagships. This means that even students in “included” professional programs can face persistent gaps that push them into private loans. Second, the lower graduate cap is far more likely to produce immediate and recurring shortfalls in excluded fields, including programs with intensive practicum or clinical requirements that limit students’ ability to work additional hours.

AAUW urges the Department to ensure that the final rule does not ration graduate education by wealth. At minimum, ED should:

- (1) Broaden the professional-degree definition so that advanced, licensure-linked programs in critical fields are not arbitrarily excluded, and
- (2) Require transparent, plain-language disclosures of expected annual financing gaps where published cost of attendance exceeds the caps.

## **II. The narrow “professional degree” list creates a two-tier system that disadvantages women and communities**

The NPRM distinguishes “professional students” solely to identify programs eligible for higher loan limits. Regardless of intent, the structure creates a two-tier financing system: one set of programs is treated as financeable through federal loans, and large sectors of graduate education are placed under lower caps that do not align with real cost-of-attendance budgets.

This structure will predictably restrict women’s access to advanced credentials in fields where women are highly represented and where communities face serious workforce needs, including education leadership, public health, social work, counseling, and many advanced nursing pathways. Even when tuition is modest, cost-of-attendance budgets often reflect unavoidable living and transportation costs, and the proposed caps do not account for those realities.

AAUW urges ED to reconsider and broaden the professional-degree definition and to avoid a system where the federal government effectively signals that only a narrow set of graduate pathways are “financeable” through federal loans.

## **III. Pro-rating for part-time enrollment will penalize student parents and caregivers and increase non-completion**

The proposed rule pro-rates federal loan limits for students enrolled less than full-time. This design choice ignores a basic reality: many costs do not scale down with enrollment intensity. Rent, utilities, transportation, health insurance, and child care are largely fixed. For many students, part-time enrollment



is not a preference. It is the only workable option due to caregiving responsibilities, work obligations, or health needs.

National enrollment data show women enroll part-time at higher rates than men at the postbaccalaureate level. In fall 2021, NCES reports 884,266 women enrolled part-time in postbaccalaureate programs compared with 496,658 men. (National Center for Education Statistics, 2022) Within specific graduate pipelines, part-time enrollment is also substantial. For example, the Council on Social Work Education reports that 39.2% of students seeking a Master of Social Work (MSW) were enrolled part-time in the 2023–2024 academic year. (Council on Social Work Education, 2025)

Pro-rating the annual cap for part-time students will predictably increase stop-outs, extend time to degree, and raise total costs for students who are already balancing work and caregiving.

***Illustrative vignette (hypothetical): educational leadership***

Tanya is a working mother and a teacher. She is pursuing a master's in educational leadership because it is the credential she needs to move into school administration.

Her program is built around the reality of schools: classes at night, but practicum hours during the school day. Tanya enrolls part-time because she cannot afford full-time child care and she cannot quit her job to go to school full-time.

Under pro-rated loan limits, Tanya's federal loan access shrinks simply because she is part-time, even though her bills do not shrink with it. Tuition and fees are still due on the same schedule. She still has to get to campus and to practicum sites. And when daytime trainings are required, her child care costs can spike.

So the "choice" in front of Tanya is not really a choice. It is private loans, dragging the degree out for extra years, or walking away from the program altogether.

AAUW urges ED to add enforceable protections for part-time students and student parents, including plain-language disclosures and guardrails that prevent pro-rating from functioning as a barrier to completion for students whose enrollment intensity reflects caregiving and work realities.

**IV. The Repayment Assistance Plan will increase borrower distress and heighten default risk**

The proposed rule implements a new Repayment Assistance Plan (RAP) for new borrowers. The RAP design raises serious borrower-protection concerns, including four issues that are particularly important for women borrowers and those with low incomes.

First, RAP requires even the lowest-income borrowers to make higher monthly payments than prior income-driven repayment options, including by eliminating the ability to have a \$0 monthly payment. Second, RAP requires a longer repayment term than prior plans. Third, the rule eliminates economic hardship and unemployment deferments that previously allowed borrowers to temporarily pause



payments during periods of acute financial distress. Fourth, the RAP payment schedule increases in tiers as income crosses specified thresholds, creating unpredictable payment spikes such that a modest raise can trigger a substantially higher monthly payment.

These design choices matter in the real world. Borrowers do not experience income in isolation. They experience wages alongside rising housing costs, child care costs, health care expenses, and periods of instability. A repayment system that increases required payments for the lowest-income borrowers, lengthens repayment terms, removes key safety valves, and creates threshold-triggered payment spikes will increase distress and raise delinquency risk.

***Illustrative vignette (hypothetical): underrepresented STEM pathway***

Aisha is an early-career electrical engineer. She is getting a master's degree so she can qualify for a better job at her local utility helping keep the power grid reliable. Engineering is still a field where women are underrepresented, and this graduate credential is the "ticket" she needs to move up.

When Aisha finishes a required set of courses, her employer gives her a small raise. But that same year, her rent and commuting costs go up, too. Under a repayment plan with income thresholds, that modest raise can trigger a noticeable jump in her monthly student loan payment, even though she is not actually better off month to month.

If Aisha then changes jobs or has a short spell of unemployment, she has fewer ways to pause payments because unemployment and economic hardship deferments are eliminated. Instead of a temporary off-ramp, she faces a faster slide toward delinquency. The result is not just stress. It can push people like Aisha to step away from advanced training in exactly the kinds of STEM fields the country needs.

AAUW urges ED to take all available steps to cushion the impact of RAP, reduce payment shocks, preserve meaningful relief during periods of acute distress, and ensure borrowers receive clear, timely, actionable information about their options.

**V. Implementation capacity and borrower protections**

The proposed rule requires major operational changes on an accelerated timeline. We are particularly concerned about the scale and speed of the changes required under this rule and ED's and servicers' capacity to implement them while protecting borrowers.

As student loan programs are overhauled, any breakdown in communication, processing, or servicing will disproportionately harm women borrowers, who are already more likely to experience economic insecurity and to rely heavily on federal student loans. Borrowers already face confusion, delays, and inconsistent servicing. A rushed transition raises the risk that borrowers are driven into delinquency due to administrative delays, servicing errors, or barriers to accessing affordable repayment options.



AAUW urges ED to adopt strong hold-harmless protections during transition, require clear and repeated borrower communications, and hold servicers accountable for errors that cause borrower harm.

## **VI. Recommendations and requests for action**

AAUW respectfully urges the Department to take the following actions in finalizing and implementing this rule:

1. Broaden the professional-degree definition used for higher loan limits so that advanced, licensure-linked programs in critical fields are not arbitrarily excluded.
2. Require transparent, plain-language disclosures of likely annual financing gaps where published cost of attendance exceeds the proposed caps, including for students with dependents.
3. Provide enhanced protections for part-time students, including guardrails that prevent pro-rated caps from functioning as a barrier to completion for student parents and caregivers.
4. Strengthen borrower protections within RAP and during transition by reducing payment shocks, preserving meaningful relief during periods of acute distress, and ensuring borrowers can access clear, timely, actionable information.
5. Closely monitor outcomes for women, student parents, and borrowers of color, and adjust implementation through guidance and other sub-regulatory actions where disparities emerge. Monitoring should include enrollment and completion impacts, shifts to private lending, delinquency and default patterns, and program-level access concerns in graduate fields excluded from higher caps.

Federal student loans have been one of the most powerful tools enabling women to access graduate education and enter the professions that strengthen our communities. The proposed rule, as currently written, would significantly undermine that promise. AAUW urges ED to do all it can, within its authority, to prevent these changes from closing doors for students based on wealth, race, or gender.

Sincerely,

Meghan Kissell, MSW  
Senior Director, Policy & Member Advocacy  
American Association of University Women (AAUW)

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