

POSITION STATEMENT

DOE's Proposed Professional Degree Definition



The American Dental Hygienists' Association (ADHA®) is deeply concerned by the Department of Education's decision to exclude dental hygiene from its proposed definition of professional degree programs.

On November 6, 2025, the U.S. Department of Education's Reimagining and Improving Student Education (RISE) Committee reached a consensus on federal student loan-related changes in response to the One Big Beautiful Bill Act (OBBBA). Beginning in July 2026, the OBBBA caps annual loans for new borrowers at \$20,500 for graduate students (\$100,000 aggregate limit) and \$50,000 for professional students (\$200,000 aggregate limit).

Under the Department's proposed narrow definition, professional degrees include pharmacy, dentistry, veterinary medicine, chiropractic, law, medicine, optometry, osteopathic medicine, podiatry, and theology—but exclude programs such as a master's in dental hygiene.

The policy would also eliminate Grad PLUS loans forcing students to seek private loans with higher interest rates.

While the Department frames these changes as a mechanism to hold institutions accountable and place downward pressure on tuition costs, ADHA voices concern that students in programs requiring additional funding may face greater financial strain. Limiting access to higher federal loan amounts could impact students pursuing advanced degrees and create barriers to entry into the healthcare field, particularly as our nation faces critical workforce shortages.

The proposed definition requires that a program: demonstrate completion of education needed to begin practice, provide training beyond the bachelor's level, generally be at the doctoral level with at least six years of postsecondary coursework, and generally require professional licensure.

ADHA urges the Department of Education to engage with stakeholders in the healthcare sector, revise its proposed definition of professional degrees, and support advanced education that promotes entry into the healthcare field.

ADHA will continue to advocate for dental hygiene students and encourages the dental hygiene community to participate in the public comment period when it opens.