

February 10, 2026

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

Rachel Oglesby
Chief of Staff
Center for the American Worker at the America First Policy Institute
1001 Pennsylvania Ave NW, Suite 510
Washington, D.C. 20004

Dear Honorable Kent and Ms. Oglesby,

The American Dental Hygienists' Association (ADHA) respectfully submits comments regarding the Reimagining and Improving Student Education (RISE) Committee's proposed revisions to the definition of a "professional degree" and the related federal graduate loan borrowing limits under Public Law 119–21. Our primary concern is that the proposed cap on federal graduate student loans would make master's-level dental hygiene education financially inaccessible and would significantly worsen the nationwide shortage of dental hygiene educators — a shortage that directly limits the capacity of dental hygiene programs and the future workforce they train.

ADHA is the nation's largest organization representing more than 220,000 dental hygienists. Advanced education is central to our profession's ability to meet growing national oral health needs. Most faculty positions in dental hygiene education require a master's degree, yet the cost of these programs continues to rise. According to the American Dental Education Association (ADEA), tuition for a Master of Dental Hygiene program typically exceeds \$30,000 per year, with most programs requiring two years of full-time study. Under the proposed \$20,500 annual borrowing cap for graduate students, these programs would be financially out of reach for many qualified applicants. Students would be forced into private loans with higher interest rates and riskier terms, creating long-term debt burdens that deter entry into graduate education altogether.

This financial barrier comes at a time when the oral health workforce is already under strain. As of January 2026, the Health Resources and Services Administration (HRSA) reports that approximately 64 million Americans live in designated Dental Health Professional Shortage Areas, with more than 10,000 additional practitioners needed to meet current demand. The Bureau of Labor Statistics projects a 7 percent growth rate for dental hygiene employment—faster than the average for all occupations—demonstrating strong public demand. Yet dental hygiene programs across the country report difficulty recruiting and retaining qualified faculty, limiting their ability to expand enrollment and train the workforce needed to close these gaps.

Graduate education in dental hygiene not only prepares future educators but also strengthens the profession's scientific foundation, public health competencies, and evidence-based practice skills. Dental hygienists play a critical role in preventing and managing oral and systemic diseases, including oral cancer, periodontal disease, diabetes-related complications, and cardiovascular conditions. Without accessible pathways to advanced education, fewer hygienists will be prepared to lead, teach, conduct research, and support the delivery of high-quality preventive care.

We also urge the Department to recognize that post-baccalaureate dental hygiene programs meet the committee's proposed definition of a "professional degree." These programs provide training beyond the bachelor's degree, require prior licensure, and prepare graduates for advanced professional roles foundational to the functioning of the oral health system.

For these reasons, ADHA strongly recommends that the Department include Master of Dental Hygiene degrees within the definition of a "professional degree" and reconsider the proposed graduate loan caps for health-related fields. Federal financial aid policy should expand, not restrict, pathways into the health workforce. Ensuring access to affordable federal loans is essential to maintaining a strong pipeline of dental hygiene educators and supporting the nation's oral health.

Thank you for considering the perspective of the dental hygiene profession. We look forward to continued collaboration with the Department to ensure that federal policies align with our shared commitment to improving health for all Americans.

Sincerely,



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