

## Submitting Effective Comments to Department of Education: A Guide

The Department of Education (ED) has opened public comment on a new and deeply flawed proposed rule that would not recognize PA programs — and many other graduate healthcare programs — as being recognized as professional degrees. If finalized, future PA students would be limited to \$20,500 in federal loans per academic year versus \$50,000 for professional degree programs.

**Now is the moment for action. AAPA Constituent Organizations are urged to submit comments on behalf of their state, specialty organization, caucus or SIG, as are PA program directors and educators.**

By submitting a comment before March 2, 2026, at 11:59 p.m. EST, PA advocates, leaders, and educators can urge the agency to honor the definition of professional students as contained in the One Big Beautiful Bill (H.R. 1) and safeguard access to financial resources at the higher professional degree limit to make PA careers possible for so many future PAs.

Your voice matters. Submitting a personalized, thoughtful comment can help influence the outcome of this rulemaking process. While AAPA has created an easy way to submit comments using a prepared template on our [Advocacy Action Center](#), CO leaders, PA educators, and others are also encouraged to submit formal comments directly to [www.regulations.gov](http://www.regulations.gov).

### Why Your Comment Matters

Agencies are legally required to review and consider all substantive comments before finalizing a rule. A well-written, personally specific comment letter will carry far more weight than an identical form letter submitted by hundreds of people. Your story and insight help show real-world consequences the proposed rule might have.

### Writing Your Comment: Step-by-Step

#### **1. Briefly introduce yourself.**

- Are you a PA, PA student or pre-PA? CO leader or educator?
- Are you in a rural or underserved area that depends on PAs to expand access to health care?

## **2. Share why the proposed rule concerns you.**

Excluding PAs could drastically reduce PA student enrollment and exacerbate workforce shortages. And labeling PA programs as anything other than professionals ignores the rigor, cost, and purpose of PA education. You might elaborate on:

- Why you decided to become a PA, and whether access to student loans did or will impact your decision.
- Whether (and how) you benefitted from loans for PA school.
- How much you anticipate needing to borrow for PA school.
- How this rule will impact PA programs in your state.
- How this change could impact the future pipeline of PAs and, thus, patients in your community, especially in rural and underserved areas.

## **3. Focus on the issue, not politics.**

Comments should stay respectful and focused on the potential impact on the PA profession, increased costs for students, and less access to care for patients along with your specific examples. Avoid partisan-appearing statements.

## **4. End with a clear ask.**

Urge the Department to revise the proposed rule to align with statute and Congressional intent by explicitly clarifying that PA and other graduate-level health care programs leading to professional licensure meet the criteria for professional preparation and qualify for the \$50,000 annual/\$200,000 aggregate loan limit.

## Submitting Your Comment

- Submit your comment: [www.regulations.gov/commenton/ED-2025-OPE-0944-0001](https://www.regulations.gov/commenton/ED-2025-OPE-0944-0001)
- If you represent an AAPA Constituent Organization or PA program, consider putting your comments on letterhead.



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- You can upload a document or simply type your text in the box provided on the website.
- Aim for 2 to 4 paragraphs.
- **Please share a copy of your letter with AAPA, at [advocacy@aapa.org](mailto:advocacy@aapa.org).**

## Getting Started

Here's a sample opening paragraph, in case you need help getting started:

*“My name is [Your Name], and I am a [Your Role] working in [Location/Community]. I am writing to express my strong concern that the Department of Education’s proposed rule, “Reimagining and Improving Student Education (RISE),” inappropriately excludes physician assistants/associate (PAs) student borrowers from the definition of “professional program.”*  
*[Elaborate on your concerns and share your story, using the prompts from section 2 above.]*  
*Thank you for considering my comments.”*