

May 13, 2026

The Honorable Tim Walberg
Chairman
Committee on Education & Workforce
U.S. House of Representatives
2176 Rayburn House Office Building
Washington, DC 20515

Re: Reimagining and Improving Student Education—Federal Student Loan Program Final Regulations, 91 Fed. Reg. 23,768 (May 1, 2026)

Dear Chairman Walberg:

We are 16 organizations and individuals writing to express our strong support for the U.S. Department of Education’s (“Department”) final rule, published in the *Federal Register* on May 1, 2026, and entitled “Reimagining and Improving Student Education—Federal Student Loan Program Final Regulations” (“RISE Rule”).¹ In advance of her testimony before your committee on May 14, we wish to applaud Secretary of Education Linda McMahon’s faithful implementation of the Working Families Tax Cuts Act (“WFTCA”)² by defining “professional student” according to the law’s clear meaning, furthering Congress’s goal of helping students by addressing runaway tuition rates and student-loan debt for higher education.

The RISE Rule reflects the painstaking work of a negotiated rulemaking committee appointed by the Department to negotiate regulations implementing the WFTCA,

¹ U.S. Dep’t of Educ., *Reimagining and Improving Student Education—Federal Student Loan Program Final Regulations*, 91 Fed. Reg. 23,768 (May 1, 2026).

² Pub. L. No. 119-21 (2025).

signed into law on July 4, 2025. That law sets annual and aggregate limits on student-loan borrowing for graduate and professional programs and directs the Department to differentiate between students pursuing “graduate degrees” and those pursuing “professional degrees” for the purpose of the amount they may borrow in Federal Direct loans to attend these programs.³

The RISE negotiated rulemaking committee—representing a broad spectrum of students, borrowers, institutions, state officials, financial aid administrators, loan servicers, and consumer and civil rights organizations—**reached consensus** regarding the definition of “professional students” entitled to greater federal loans to pursue their degree. That consensus definition included a non-exhaustive list of such programs reflecting Congress’s desire, operationalized in the WFTCA, to reverse tuition inflation and prevent massive student-loan burdens. The RISE Rule, as issued, incorporates that consensus definition of a “professional student.”

The RISE Rule carries out WFTCA through objective, administrable criteria in keeping with congressional intent and which appropriately address runaway student-loan debt. From the introduction of the legislation in the House through Senate enactment, Congress made specific choices about how “professional student” would be defined and how closely that concept would track existing regulatory frameworks. As enacted, the law deliberately replaced an open-ended graduate lending regime with differentiated caps, reserving the highest borrowing limits for a narrow category of programs that require extended, mandatory training as a prerequisite to enter a regulated profession. As you correctly assessed just after passage of the bill, it seeks to reform the student-loan system to “help drive down out-of-control college costs.”⁴ Similarly, as Representative Virginia

³ Beginning on July 1, 2026, the law permits students pursuing graduate degrees to borrow up to \$20,500 in such loans annually with an aggregate limit of \$100,000; it allows students pursuing professional degrees to borrow up to \$50,000 annually with an aggregate limit of \$200,000. 20 U.S.C. § 1087e(a)(4).

⁴ <https://edworkforce.house.gov/news/documentsingle.aspx?DocumentID=412615>

Foxx noted, the law “fixes the nation’s broken student loan system” and “ends uncapped lending . . . to increase simplicity and drive down tuition costs so students are not saddled with excessive debt that they can never repay.”⁵

The RISE Rule reflects that deliberate, balanced congressional approach. The regulations advance access to necessary professional education while restoring discipline, accountability, and fiscal restraint to the federal lending system. By drawing clear, objective distinctions between standard graduate programs and a narrow category of licensure-based, professional degrees, the consensus framework promotes program integrity, enhances institutional clarity and compliance, and curbs the structural drivers of runaway student debt.

The RISE Rule also protects taxpayer dollars by ensuring that higher federal loan limits are narrowly targeted to clearly defined, licensure-oriented degrees that serve as the required entry point into regulated professions. This approach prevents the reemergence of open-ended lending that previously exposed taxpayers to unchecked risk. The Department has estimated that the final rule saves taxpayers \$409 billion and will reduce student-loan debt by \$224 billion by simplifying loan repayment, ending expensive and illegal student-loan-cancellation schemes, and protecting students from excessive borrowing.⁶

Importantly, the RISE Rule makes institutions that once reaped the rewards of unlimited graduate-student loans accountable for alternative mechanisms to lower the cost of their programs for students. In fact, some institutions are already responding to this long-overdue incentive. For instance, the University of California at Irvine has announced that it is cutting the tuition of two of its business-degree programs by more than 20 percent in response to the

⁵ <https://foxx.house.gov/news/email/show.aspx?ID=ZJBPWOTQTJALJAPNQOFE2AOJJPY>

⁶ <https://www.ed.gov/about/news/press-release/us-department-of-education-finalizes-landmark-rule-lower-college-costs-and-simplify-student-loan-repayment>

Department's loan limits.⁷ This is a welcome, institution-initiated assistance program that will avoid excessive federal student-loan debt.

The loudest voices objecting to the RISE Rule have sought to distract their target audiences from the abject legal and policy failure of student-loan cancellation by criticizing the Department for supposedly denigrating certain programs by not classifying them as “professional” in the proposed regulations. But the historical record shows that expanded loan limits accommodated institutional pricing decisions more than genuine educational need. Critics ignore that the regulatory “professional student” definition will have *no impact* on 78 percent of graduate-level nursing programs, 94 percent of graduate-level teaching programs, and 100 percent of graduate-level fire-service programs.⁸ Undoing the Department's implementation of Congress's sensible loan limits for graduate programs would only “succeed” in saddling vulnerable students with higher debt levels despite no evidence that the additional loan amounts lead to demonstrably better outcomes.

For the reasons described above, the undersigned organizations and individuals believe the RISE Rule's definition of “professional student” furthers common sense as embodied in the WFTCA. By codifying the consensus framework into regulation, Secretary McMahon and the Department have faithfully implemented Congress's intent to curb excessive graduate borrowing, aggressively attacked tuition inflation, and thoughtfully reserved higher loan limits for a category of licensure-based programs with demonstrated value and unavoidable cost structures. We wholeheartedly support the Department's logical, well-reasoned, and fiscally responsible regulations that honor congressional language and intent.

Should you have any questions, please contact Robert S. Eitel at robert.eitel@dfipolicy.org.

⁷ <https://www.chronicle.com/article/a-university-cut-tuition-by-over-20-after-republicans-sharply-limited-grad-school-aid>

⁸ <https://www.dailysignal.com/2026/05/08/democrats-college-cost/>

Sincerely,



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cc: Honorable Linda McMahon
Secretary of Education