



P.O. Box 16041, Albany NY 12212 ❖ info@nydha.org ❖ 518.477-0343

March 1, 2026

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

Document ID: ED-2025-OPE-0944-0001

Re: Comments on the Proposed Definition of “Professional Degree” — Docket ID ED-2025-OPE-0944-0001

Dear Under Secretary Kent:

On behalf of the New York Dental Hygienists' Association (NYDHA), I respectfully submit the following comments regarding the U.S. Department of Education's proposed rulemaking to define the term “professional degree” for purposes of federal student loan limits, as required by Public Law 119-21.

NYDHA, the statewide professional association for dental hygienists, is dedicated to fostering quality dental hygiene education, licensure, practice and research; advancing access to oral health care; and working to enable dental hygienists to maximize their education and experience in preventive care.

The proposed \$20,500 annual borrowing cap for graduate students would limit access to master's-level dental hygiene education for many qualified students. In many states, dental hygiene programs rely on master's-prepared educators to train the next generation of oral health professionals. Research conducted by ADHA found that among dental hygiene faculty, 19 percent of program directors held a doctoral degree and 73 percent held a master's degree. Additionally, research found that among the top challenges facing dental hygiene programs in the near future are the recruitment of qualified faculty and budgetary concerns. Limiting access to sufficient federal student loans will further strain an already limited faculty pipeline and restrict program capacity.

According to the American Dental Education Association (ADEA), tuition for Master of Dental Hygiene programs frequently exceeds \$30,000 per year, and most programs require two years of full-time study.

Under the proposed borrowing cap, students would be forced to rely on private loans with higher interest rates and less favorable repayment options — or forgo advanced education altogether. This would directly impact our ability to recruit and retain qualified faculty and meet workforce needs.

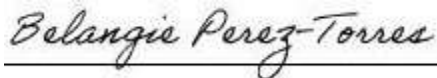
Dental hygienists play a critical role in preventing and managing oral disease and supporting overall health. Graduate education strengthens clinical expertise, public health capacity, and evidence-based practice — all of which are essential to meeting community needs.

Furthermore, post-baccalaureate dental hygiene programs meet the proposed criteria of a “professional degree.” These programs require prior licensure and prepare graduates for advanced professional roles that are foundational to the oral health system.

For these reasons, I respectfully urge the Department to include Master of Dental Hygiene degrees within the definition of a “professional degree” and reconsider the proposed graduate loan caps for fields that require advanced professional training.

Federal student aid policy should strengthen — not restrict — pathways into the health workforce. Ensuring access to adequate federal loan support is critical to maintaining the dental hygiene educator pipeline and protecting access to care.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Belangie Perez-Torres". The signature is written in dark ink and is positioned above a horizontal line.

Belangie Perez Torres, RDH
NYDHA President