



Via online submission to <http://www.regulations.gov>

August 25, 2025

The Honorable James Bergeron  
Deputy Under Secretary  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202-1100

**RE: Docket ID ED-2025-OPE-0151-0001**

Dear Secretary Bergeron and Members of the Rulemaking Committees:

The American Physical Therapy Association (APTA) submits the following comments providing our recommendations to the Department of Education’s (ED) Reimagining and Improving Student Education (RISE) Committee as they begin their work on the negotiated rulemaking to implement the student financial aid provisions under Public Law 119–21, the One Big Beautiful Bill Act.

APTA is dedicated to building a community that advances the physical therapy profession to improve the health of society. As experts in rehabilitation, prehabilitation, and habilitation, physical therapists play a unique role in society in prevention, wellness, fitness, health promotion, and management of disease and disability for individuals across the age span, helping individuals improve overall health and prevent the need for avoidable health care services. Physical therapists’ roles include education, direct intervention, research, advocacy, and collaborative consultation.

APTA urges ED to ensure that physical therapist degree programs, as well as all post baccalaureate health professions programs required for state licensure or certification, are included in the regulatory definition of “professional degree program.”

### **The Doctor of Physical Therapy (DPT) Degree Meets the Definition of “Professional Degree” Programs**

As ED considers its implementation of new loan limits under the One Big Beautiful Bill Act, it is critical that physical therapy degree programs are explicitly included within the scope of “professional degree programs.”

In order to become a licensed physical therapist, an individual must receive a Doctor of Physical Therapy degree from an accredited physical therapist education program before taking and passing a national licensure exam that permits them to practice. The physical therapist’s educational and clinical experience in an accredited DPT program includes an average of 3,000 hours of instruction,

covering anatomy, histology, physiology, biomechanics, kinesiology, neuroscience, pharmacology, pathology, clinical sciences, clinical interventions, clinical applications, research, ethics, imaging, screening, practice patterns, and professional practice as applied to physical therapy. Of the average 3,000 contact hours of required education, more than 1,050 hours on average are spent on directed clinical education.

Physical therapists are licensed in all 50 states, the District of Columbia, and U.S. territories.

Physical therapists must pass the [National Physical Therapy Examination](#) in order to become a licensed PT in the United States.

An important requirement for licensure is graduation from an accredited physical therapy educational program. The [Commission on Accreditation in Physical Therapy Education](#) (CAPTE), is the accrediting agency that is nationally recognized by the US Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). CAPTE grants specialized accreditation status to qualified entry-level education programs for physical therapists and physical therapist assistants.

### **Ensuring Loan Parity and Access to Care**

We encourage ED to do as much as possible to address shortages in our critical healthcare workforce. ED must ensure that the definition of “professional degree programs” does not create winners and losers among healthcare professions. The application of an inconsistent standard, where some health professional programs have higher loan limits, and others have lower limits, would create an imbalance in the competitiveness of these programs, ultimately decreasing patient access and choice.

Excluding certain accredited, state licensed or certified health professions programs from the “professional degree” designation could unintentionally create an inequitable tiered system within the healthcare education landscape. We strongly believe that all students pursuing accredited post-baccalaureate health professions degrees required for licensure or certification—such as physical therapy—should be treated equitably in loan eligibility, borrowing limits, and access to repayment programs.

### **Recommendations**

We offer the following specific recommendations to the Department of Education and the RISE Committee:

1. ED should adopt a clear and inclusive regulatory definition of “professional degree programs” that encompasses any master’s or doctoral degree education required for state licensure or certification in health professions.
2. Such definition must maintain alignment with state and federally recognized licensure- or certification-based credentialing pathways. All health professions where a state license or

certificate to practice is required, as recognized by both the state and federal level, should be treated consistently with other health professions in all relevant student aid regulations.

### **Conclusion**

Any ambiguity in defining eligible professional degree programs could jeopardize access to financing for future health profession students, ultimately threatening workforce supply in schools, hospitals, and community settings where demand for health services continues to grow. Again, APTA urges ED to ensure that physical therapist degree programs, as well as all post baccalaureate health professions programs required for state licensure or certification, are included in the regulatory definition of “professional degree program.”

APTA appreciates the opportunity to share our perspective and recommendations. Should you have any questions, please contact [justinelliott@apta.org](mailto:justinelliott@apta.org). Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Covington", with a long horizontal flourish extending to the right.

Kyle Covington, PT, DPT, PhD  
APTA President