

Department of Education Rule on Access to Federal Student Loans



Position

The American Physical Therapy Association strongly opposes the U.S. Department of Education's proposed rule, which does not define the doctor of physical therapy, or DPT, degree as a professional degree, despite the DPT degree meeting the federal regulatory definition of a professional degree. The rule also establishes new annual and lifetime federal student loan caps based on degree classification. Since the DPT is now classified as a graduate degree rather than a professional degree, physical therapist students will be subject to restrictive annual and lifetime borrowing caps for federal student loans that fall short of the actual cost of pursuing a doctoral degree. As a result, the rule establishes loan limits that do not reflect the current costs, duration, and associated expenses of pursuing a doctoral degree, thereby significantly restricting access to physical therapist education, exacerbating existing workforce shortages, and undermining patient access to cost-effective, evidence-based care. APTA urges Congress to enact legislation to reverse the department's rule to prevent long-term harm to the physical therapist workforce and to the patients and communities they serve.

Background

Physical therapists are essential members of the health care workforce, providing prevention, rehabilitation, habilitation, and wellness services across the lifespan across all settings. Demand for physical therapist services continues to grow due to an aging population, the increasing prevalence of chronic disease, and a health system emphasis on noninvasive, cost-effective care that improves function and reduces downstream utilization.

Since 2016, the [DPT degree has been the required entry-level degree for licensure](#) in all U.S. states and jurisdictions. The DPT is a rigorous, postbaccalaureate clinical doctorate designed to prepare graduates to meet stringent national licensure standards.

The Doctor of Physical Therapy Degree Is a Professional Degree

Federal regulation defines a professional degree as one that signifies completion of the academic requirements for entry into a profession, requires a level of professional skill beyond a bachelor's degree, and generally requires licensure. **The DPT squarely meets each of these criteria for a professional degree.**

The DPT has been the mandatory entry-level degree for physical therapist practice since 2016, establishing it as [the credential required for professional entry](#) into the field. DPT programs require approximately six to seven years of postsecondary education, including a minimum of two years of postbaccalaureate coursework, and cannot be completed in fewer than two academic years beyond the bachelor's degree. Licensure is required in every state, and all graduates must pass the National Physical Therapy Examination to practice. Excluding the DPT from professional degree classification is inconsistent with both the regulatory definition and the educational and licensure requirements of physical therapists.

Federal Student Loans Are Essential for Prospective PT Students

APTA supports efforts to lower tuition costs and make education more affordable for more students; however, federal student loans play a critical role in ensuring prospective students' access to physical therapist education, and limiting access to this critical stream of funding would only harm them.

According to the National Student Loan Data System, the average DPT student borrows \$38,361 per course year, nearly double the proposed \$20,500 annual limit. In fact, more than 60% of DPT students borrow over \$20,000 annually. Data from the [2025 APTA Physical Therapy Profile: Demographics of the Physical Therapy Profession](#) shows that among PT borrowers who graduated in the past ten years, the mean total educational debt exceeds the lifetime borrowing cap for graduate degree programs to which physical therapist students will now be subject.

Across the country, the average annual tuition and fees for a DPT degree total \$26,267, while the mean total cost of attendance is \$74,067. These figures exclude essential cost-of-living expenses, which had historically been supported through unsubsidized and Graduate PLUS loans; however, the Graduate PLUS program was eliminated as part of H.R. 1 and will no longer be available to prospective students. The National Center for Education Statistics data show that [approximately one-third of graduate borrowing is used for nontuition expenses](#). Still, under the new loan limits, nontuition expenses are not accounted for.

Implications for Physical Therapist Workforce

The new student loan limits threaten to reduce the physical therapist workforce at a time of increasing and unmet demand. PTs have a 99.5% employment rate within 12 months of graduation, and job growth outpaces most other medical fields. [APTA's 2024 benchmark report](#) found a 9.5% vacancy rate in outpatient physical therapy practices, nearly double the national vacancy rate of 4.8% across all industries. [Supply and demand projections](#) indicate that **without policies to increase workforce entry and retention, shortages will persist and patient access challenges will worsen.**

PTs provide care across the lifespan and deliver prevention, early intervention, habilitation, rehabilitation, and palliative services across more than ten health care settings, [accounting for over 300 million PT visits annually.](#) Workforce shortages can translate into longer wait times, delayed care, reduced service availability, and increased reliance on more invasive and costly interventions.

Solution

To maintain the viability of the physical therapy profession and ensure patient access to care, APTA recommends that Congress consider the following bills to restore equitable access to federal student loans:

[H.R. 6574](#), the Loan Equity for Advanced Professionals Act (Rep. Timothy Kennedy, D-N.Y.)

[H.R. 6718](#), the Professional Student Degree Act (Rep. Michael Lawler, R-N.Y.)

[H.R. 6677](#), the Professional Degree Access Restoration Act (Rep. Ritchie Torres, D-N.Y.)

[S. 4039](#), the Professional Degree Access Restoration Act (Sen. Angela Alsobrooks, D-Md.)

Conclusion

The Department of Education has failed to realize that the doctor of physical therapy degree meets the federal definition of a professional degree. Such a change will restrict access to physical therapist education, exacerbate workforce shortages, and negatively impact patient access to care. Congress must act now to mitigate these harms and ensure that federal student loan policies support the physical therapist workforce and the patients it serves.

For more information and contact information for APTA Government Affairs staff, scan here or visit apta.org/advocacy/position-papers.

American Physical Therapy Association

The American Physical Therapy Association is a national organization representing 100,000 physical therapists, physical therapist assistants, and students of physical therapy. Our mission is to build a community that advances the profession of physical therapy to improve the health of society.

Reference

American Physical Therapy Association, "APTA Comment Letter to the Department of Education's Reimagining and Improving Student Education (ED-2025-OPE-0944)," www.regulations.gov, 2026.



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