

February 25, 2026
Office of Postsecondary Education
Department of Education
Attention: RIN 1840-AD98

Submitted via regulations.gov

RE: Reimagining and Improving Student Education (RIN 1840-AD98)

On behalf of The Ohio Council of Behavioral Health and Family Services Providers (The Ohio Council), thank you for the opportunity to comment on the Department of Education notice of proposed rulemaking (NPRM), Reimagining and Improving Student Education, at 91 Federal Register (“FR”) 4254 (Jan. 30, 2026). The Ohio Council is a statewide trade association representing more than 170 private and not-for-profit businesses providing community-based mental health, alcohol and other drug addiction treatment, and family services throughout Ohio. We advocate for policies to ensure access to high-quality services, build the capacity of mental health and substance use treatment organizations, and promote a greater understanding of brain health as a core component of comprehensive health and health care. Our member organizations employ nearly 45,000 individuals that provide care for over 2.5 million Ohioans.

As required by statute, H.R.1 included changes to adjusted annual and lifetime federal loan caps for graduate students, setting borrowing limits for most traditional graduate programs at \$20,500 per year and \$100,000 total. For students pursuing “professional” graduate degrees, those limits increase to \$50,000 annually and \$200,000 overall. A “professional” degree is defined as one that prepares graduates to begin practicing in a specific profession and requires advanced skills beyond a bachelor’s degree, typically accompanied by professional licensure. The NPRM explicitly recognizes medicine, law, pharmacy, dentistry, optometry, podiatry, chiropractic, veterinary medicine, theology and clinical psychology as “professional” degrees eligible for higher federal public federal loan limits.

The NPRM excludes graduate degrees in social work, mental health counseling, addiction counseling, marriage and family therapy, nursing, school counseling, occupational therapy, and other behavioral health professions from the professional degree category. Excluding behavioral health graduate programs from the professional degree designation will have significant consequences for Ohioans experiencing mental health and substance use challenges and for the stability of Ohio’s healthcare workforce. Ohio continues to face substantial behavioral health workforce shortages, particularly in rural and Appalachian regions of the state where recruitment and retention remain persistent challenges.

Many of Ohio’s counties are designated Mental Health Professional Shortage Areas (HPSA), and providers report ongoing vacancies for counselors, social workers, marriage and family therapists, school-based clinicians, and addiction treatment professionals. According to 2025 data from the Health Resources and Services Administration (HRSA), 75 out of Ohio’s 88 counties are designated as mental

health HPSAs, impacting more than 5.5 million Ohioans. These shortages reflect a widespread lack of access to behavioral healthcare. [Workforce data from the Ohio Department of Mental Health and Addiction Services](#) (OhioMHAS) show a 353% increase in demand for behavioral health treatment between 2013 and 2019 with an average annual increase of 29%. OhioMHAS predicted an annual rise in statewide demand of 5.6% per year over the next decade. Notably, these projections were developed prior to the COVID-19 pandemic, which significantly intensified behavioral health needs, suggesting that current demand is likely greater than initially projected.

By 2037, the Health Resources and Services Administration projects national shortages of nearly 88,000 mental health counselors, 114,000 addiction counselors, more than 34,000 marriage and family therapists, and nearly 38,000 school counselors. At a time when behavioral health workforce shortages are being felt acutely in Ohio and across the country, it is critical that federal policy remove barriers rather than create new ones. Including these and other behavioral health graduate programs in the professional degree designation would help maintain adequate access to federal student loans for individuals entering these essential fields. Ensuring sufficient financing for graduate education is a necessary step in strengthening the workforce pipeline and addressing the staffing shortages that continue to strain our health care and education systems.

Ohio has made substantial investments in expanding access to community-based behavioral health services, crisis response systems including 988 and mobile crisis services, school-based services, and integrated care models. These initiatives depend on a trained and licensed workforce to deliver high-quality care. Reducing borrowing capacity for students entering these essential professions risks undermining Ohio's efforts to strengthen the community healthcare infrastructure, prevent mental health and substance use crises, and ensure timely access to care across the state.

The Trump administration and Congress have made clear commitments to expanding access to mental health and substance use treatment, including by rebuilding and strengthening the behavioral health workforce through programs like Certified Community Behavioral Health Clinic-Expansion grants, the National Health Service Corps, Behavioral Health Wellness and Education Training, and the Substance Use Disorder Treatment and Recovery Loan Repayment Program. Reducing access to graduate education financing could undermine the impact of these priorities and other federal programs designed to increase behavioral health capacity.

Given these concerns, we respectfully urge the Department of Education to reconsider the classification of behavioral health graduate programs, recognizing them as professional degree programs and essential health and human services pathways. Maintaining or establishing higher loan limits for behavioral health graduate training programs will help to ensure affordability and continued workforce development.

The Ohio Council appreciates the opportunity to provide these comments. We welcome any questions or further discussion about the recommendations described here. Please contact Soley Hernandez at hernandez@theohiocouncil.org. Thank you for your time and consideration.

Sincerely,

Soley Hernandez

Associate Director of Community Services

The Ohio Council of Behavioral Health and Family Services Providers