

HealthFORCE: ED's Proposed Rule Will Shrink the Healthcare Workforce

The Board of Directors of HealthFORCE, a national alliance of leaders dedicated to addressing the root causes of our nation's healthcare workforce crisis, raised serious concerns with the U.S. Department of Education's proposed rule, *Reimagining and Improving Student Education*.

Leaders from HealthFORCE warned that as written, the rule would undermine the nation's healthcare workforce by excluding many graduate-level healthcare programs from access to the higher federal professional student loan limits—limits that have proved essential to training clinicians across the care continuum.

At a time when the United States is projected to face a shortage of 3.2 million healthcare workers by 2026, this proposed rule represents a major step backward for the healthcare workforce. A professional program is one that requires graduate-level education, prepares students for professional practice, and leads directly to licensure. Many healthcare education programs, across multiple professions, unquestionably meet this definition. The Department's interpretation is inconsistent with the statute and disconnected from how today's healthcare system actually functions.

Beyond the legal inconsistency lies the serious unintended consequence of shrinking the pipeline of professionally trained healthcare providers at the exact moment the nation can least afford it. The healthcare workforce crisis has been decades in the making—driven by an aging population, rising chronic disease burdens, and workforce burnout that preceded the pandemic. Too many providers are retiring, while the number of prospective students entering healthcare fields falls short of demand.

Limiting access to federal student loans will deter qualified students from entering healthcare fields, disproportionately affect those from rural and lower-income backgrounds, and further strain communities already struggling to access care.

Education and workforce policy is inextricably linked to patient access. When we erect financial barriers to healthcare education, we delay care, close clinics, and leave communities without providers.

The Department's reliance on tying 'supervision' to its rationale for excluding certain professions from the professional tier is concerning. In today's healthcare system, care is delivered by interdisciplinary teams, and team-based care is the gold standard. Team

structure does not, and should not, delineate professional status.

Team-based care is not a weakness of today's healthcare system—it is its backbone. Clinicians across a wide range of disciplines routinely serve as clinical leaders, supervisors, and department directors across hospitals, health systems, and community-based settings.

Limiting access to federal student loans would have far-reaching consequences beyond any single profession. Restricting financing options will narrow the pipeline of future clinicians, disproportionately affect students from lower-income and rural backgrounds, and ultimately reduce patient access to care where it is needed most.

We call on the Department of Education to revise the rule to align with the law, the realities of modern healthcare delivery, and the Administration's stated commitment to strengthening the healthcare workforce.

We stand ready to work with partners across the healthcare and policy landscape to ensure this rule supports—not undermines—the nation's healthcare workforce. The stakes are too high for patients, communities, and the future of care delivery to accept anything less.

HealthFORCE is an alliance of healthcare providers and administrators, business and industry leaders, advocates, educators and community-based groups working to rebuild, expand and diversify the U.S. healthcare workforce.

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