

August 25, 2025

Nicholas Kent  
Undersecretary  
U.S. Department of Education  
400 Maryland Avenue SW  
5th floor  
Washington, DC 20202

Re: [Docket ID ED-2025-OPE-0151] Recommendations on Implementation of Title IV, HEA Changes – Concerns Regarding Graduate PLUS Loan Elimination and Federal Loan Caps

Dear Mr. Kent:

Thank you for the opportunity to provide input on the implementation of changes to the Title IV, Higher Education Act (HEA) programs enacted under the One Big, Beautiful Bill Act - or OBBB (Public Law 119-21). Please consider these comments in response to your public meeting held on August 7, 2025 regarding your announcement to establish two negotiated rulemaking committees to prepare regulations for the Federal student financial assistance programs authorized under Title IV of the Higher Education Act (HEA) of 1965, as amended (Title IV, HEA programs).

We write to express concern about the elimination of the Graduate PLUS Loan program and the imposition of new federal loan caps—particularly their impact on professional students in high-cost fields such as dentistry.

The cost of dental education often exceeds \$400,000. While the goal of the loan changes made in the OBBB was to bring down the cost of education so that students are able to borrow less to fund their education, that will take time to occur, if at all.

In the interim, federal loan caps and the elimination of the Grad PLUS loan program will force many students to rely on private loans, which typically carry higher, market-driven interest rates and fewer borrower protections, to finance a larger portion of their tuition and fees. This shift risks deterring qualified candidates from pursuing dental careers, exacerbating existing workforce shortages, particularly in underserved and rural areas, and influencing career decisions – potentially away from independent private practice, academic or public health settings.

As the Department moves forward with implementing these two provisions of the OBBB, we strongly encourage it to closely monitor and report to Congress within five years of implementation the following impacts:

- *Tuition costs for dental education.* A primary motivating factor behind the federal student loan program changes included in the OBBB was the belief that limiting borrower access to federal financing would lead to a reduction in the cost of tuition at higher education institutions, including dental schools. Notably, the average tuition and fees for first-year dental students during the 2023-2024 academic year was \$59,886 at public institutions and \$84,842 at private

institutions<sup>1</sup>. We urge the Department to evaluate and report to Congress on whether these policy changes have, in fact, resulted in a decline in tuition among dental schools specifically.

- *Interest rates and borrowing terms in the private loan market.* Private loans often come with higher, variable interest rates and lack many of the borrower protections associated with federal loans. We urge the Department to closely monitor and report on trends in the private student loan market, particularly as they affect graduate and professional students. More specifically, we recommend analyzing and publicly reporting the average interest rates, average loan amounts and borrowing terms for students who took out private loans to finance their graduate education. Key data points should be the average interest rate borrowers are paying five years after the passage of the OBBB as well as average loan amounts – both metrics compared to the five years preceding its implementation.
- *Access to dental education and overall enrollment trends.* It is critical to assess how the elimination of the Grad PLUS loan program and the imposition of federal borrowing caps influences enrollment in dental education programs. As previously noted, the cost of dental school is significant and reducing access to federal financing may deter qualified applicants from pursuing dental professions. We urge the Department to evaluate, which may require working with stakeholder groups that already track such information, to determine whether overall dental school enrollment has increased or decreased since these loan changes were implemented, as well as whether there has been a disproportionate adverse effect on certain demographics – for example, first-generation students or under-represented minorities.
- *Workforce distribution, especially in Health Professional Shortage Areas (HPSAs).* A critical measure of the impact of federal student loan policy is how it influences the geographic and demographic distribution of the dental workforce. Health Professional Shortage Areas (HPSAs) already face chronic shortages of dental providers, and any changes that affect how and where graduates choose to practice should be closely monitored. Factors such as higher debt burdens, limited access to federal workforce programs – particularly for specialists – and increased reliance on private loans may discourage graduates from entering lower-paying positions often associated with rural and underserved areas. We recommend that the Department work with the federal Health Resources and Services Administration (HRSA) to collect and publicly report data on dental workforce trends in HPSAs to assess whether federal loan policy is helping to alleviate—or inadvertently worsening—access disparities in vulnerable communities, and that this data be broken down by specialty, if possible.
- *The growing influence of corporate dental practice models, such as dental support organizations (DSOs).* As new graduates face high levels of private debt, they may feel compelled to seek immediate financial relief by choosing to practice in corporate models, which often offer predictable salaries and loan repayment incentives, upon dental school graduation or residency completion. The result may be a decline in the number of dentists choosing careers in independent practice, academic or public health settings – all of which are essential to serve a diverse patient population. It is important to study the potential impact that limited access to

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<sup>1</sup> 2023-24 Survey of Dental Education – Report 2: Tuition, Admission and Attrition.

<https://www.ada.org/resources/research/health-policy-institute/dental-education>. Accessed June 16, 2025

federal student loans may have on dentists' career decisions. Therefore, we urge the Department to collect and report data on hiring trends by setting (e.g., DSO, independent practice, academic and public health) over the five-year period following implementation.

Finally, as the department implements the details of the federal loan limits, we urge it to exclude previously borrowed and fully repaid federal loans from a borrower's lifetime loan cap when determining eligibility for future federal loans. Including repaid loans in the total cap would unfairly penalize borrowers who have demonstrated financial responsibility by repaying their federal debt in full.

In sum, we remain concerned about the implications of the changes to the federal student loan system made in the OBBB on the future of the dental profession, which ultimately impacts the nation's oral health well-being. We strongly urge the department to study the important issues outlined in this letter to determine whether the policy changes have had the intended impact of reducing the cost of dental education as well as to assess any additional impacts – intended or otherwise – on the dental workforce.

We welcome the opportunity to continue this dialogue and offer further insights as the Department moves forward with its implementation strategy. Please contact Jeanne Tuerk, Director of Government Affairs with the American Association of Oral and Maxillofacial Surgeons at 847-233-4321 or [jtuerk@aaoms.org](mailto:jtuerk@aaoms.org) for questions or additional information.

Sincerely,

Academy of General Dentistry  
American Academy of Oral & Maxillofacial Pathology  
American Academy of Pediatric Dentistry  
American Academy of Periodontology  
American Association for Dental, Oral, and Craniofacial Research  
American Association of Endodontists  
American Association of Oral and Maxillofacial Surgeons  
American Association of Orthodontists  
American Dental Association  
American Dental Education Association  
American Society of Dentist Anesthesiologists  
American Student Dental Association  
Society of American Indian Dentists