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**Via Electronic Submission**

February 27, 2026

Tamy Abernathy  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Ave. SW, 5th Floor  
Washington, DC 20202

**Re: Docket ID: ED-2025-OPE-0944, Reimagining and Improving Student Education: Proposed Rule, Fed. Reg. Vol. 91, No. 20, (January 30, 2026).**

Dear Ms. Abernathy:

This letter represents the collective comments of the Alliance for Physical Therapy Quality and Innovation (the “APTQI”) to the Department of Education regarding the above referenced “Proposed Rule for Reimagining and Improving Student Education,” published in the Federal Register on January 30<sup>th</sup>, 2026.

By way of introduction, we are among the nation’s leading providers of outpatient rehabilitation care and collectively employ or represent over 30,000 physical and occupational therapists and furnish physical and occupational therapy services on an annual basis to tens of thousands of Medicare beneficiaries throughout the United States. The APTQI membership consists of affiliate and board member entities of varying size and geographic scope, which in aggregate provide patient care services in over 8,000 practice locations.

We appreciate the opportunity to comment on the Proposed Rule. The APTQI applauds the Department’s commitment to simplify Federal student loan lending as well as the Administration’s promotion of physical activity as an integral part of the Make America Healthy Again agenda. Physical and occupational therapists are at the heart of this agenda as they are the clinical experts in body movement.

**For the reasons stated below, the APTQI urges the RISE Committee to classify degrees in the field of Physical Therapy (DPT) and Occupational Therapy (MOT and OTD) as professional degrees.**

- I. **The Annual Cap for Graduate Degrees is not sufficient for full-time students in therapy programs.**

Under provisions of the One Big Beautiful Bill Act (OBBBA), students pursuing degrees classified as graduate programs will be limited to a \$20,500 annual cap for federal student loans. The rigor of the curriculum for a therapy program involves a full time courseload as well as clinical rotations that are often in multiple locations away from the student's primary residence. These conditions make it difficult, if not impossible, for many students to find or keep employment that allows them to attend school and fulfill their obligations. Consequently, federal student loans are the only way for students to pay for the cost of attendance, which includes living and school expenses, unless they have financial contributions from their family. The APTQI believes that the path to becoming a therapist should be open to all who are qualified, not just those who have the financial means to attend.

The member companies of the APTQI are also experiencing a shortage of therapists in the workforce. Any policies that would decrease application to therapy degree programs would exacerbate this problem and have a negative effect on access to therapy care for patients. As therapy is non-invasive and non-pharmacological in nature, decreasing access to therapy does not align with the Make American Healthy Again agenda.

## **II. Therapy Degrees Meet the Elements for Professional Degrees as Listed in the Proposed Rule**

The Proposed Rule states that professional degrees “meet the following elements: signifies both completion of the academic requirements for beginning practice in a given profession and a level of professional skill beyond that which is normally required for a bachelor's degree; is generally at the doctoral level; requires at least six academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework; generally requires professional licensure to begin practice. . .” Therapy degree programs meet all of these requirements.

APTQI appreciates the opportunity to provide comments to CMS on the Proposed Rule. APTQI looks forward to continued dialogue about these and other issues affecting therapy services. If you have any questions, or would be interested in further collaboration, please feel free to contact Nikesh “Nick” Patel, PT, DPT Executive Director, at 713-824-6177 or [npatel@aptqi.com](mailto:npatel@aptqi.com).

Very truly yours,

**ALLIANCE FOR PHYSICAL THERAPY  
QUALITY AND INNOVATION**



By: \_\_\_\_\_  
Nikesh “Nick” Patel, PT, DPT  
Executive Director