



March 2, 2026

The Honorable Nicholas Kent, Under Secretary  
The Honorable David Barker, Assistant Secretary, Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

**Re: Request to adopt RISE Committee member recommendations to include Audiology among Professional Degree programs for federal student loan purposes under Docket ID: ED-2025-OPE-0944**

Dear Under Secretary Kent and Assistant Secretary Barker,

The Academy of Doctors of Audiology (ADA) represents audiologists who diagnose and treat auditory and vestibular disorders and improve the health and quality of life for millions of Americans each year. ADA appreciates the opportunity to comment on the William D. Ford Federal Direct Student Loan (Direct Loan) Program Definitions (§ 685.102) contained in the U.S. Department of Education (Department) proposed rulemaking under Docket ID: ED-2025-OPE-0944 (Proposed Rule).<sup>1</sup>

The Department stated that it expressly seeks comments on its analysis and rationale for the Professional Degrees that were included in (or excluded from) the professional student definition contained in the Proposed Rule and the Department's application of the operative definition of the list of Professional Degrees, using recommendations from the Reimagining and Improving Student Education (RISE) committee, through the negotiated rulemaking process.

**ADA urges the Department to include audiology as a recognized program of study and the Doctor of Audiology (Au.D.) degree to the list of Professional Degrees recognized by the Department under 34 CFR 668.2 going forward.<sup>2</sup>**

According to a 2004 Integrated Postsecondary Education Data System (IPEDS) technical review panel, "Since the 1950s, the degree classification pertaining to the first-professional degree has remained unchanged in both its definition and in the list of included degree programs."<sup>3</sup> The degree classification is outdated. The 2025 RISE Committee record clearly reflects that

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<sup>1</sup> <https://www.govinfo.gov/content/pkg/FR-2026-01-30/pdf/2026-01912.pdf>

<sup>2</sup> <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-A/section-668.2>

<sup>3</sup> [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/trp\\_Technical\\_Review\\_04052004\\_26.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/trp_Technical_Review_04052004_26.pdf)

audiology aligns with Congressional intent and regulatory precedent. Committee members expressly acknowledged that audiology programs are classified as 100 percent Professional Degrees within IPEDS, are comparable in structure and purpose to other recognized clinical doctoring professions, and that Congressional intent would likely have been to include programs such as audiology.

The Professional Degree framework aligns with the required length, cost, and intensity of required audiology training and the value and impact of audiology services for patients from birth through end of life. Adding audiology to the list of designated Professional Degree programs recognized by the Department and allowing audiologist trainees to obtain federal loans of up to \$50,000 annually/\$200,000 aggregate will help protect patient access to hearing and balance services and mitigate audiology workforce shortages that lead to higher costs and reduced access to care, particularly in underserved areas.

According to the U.S. Bureau of Labor Statistics, there are fewer than 16,000 practicing audiologists in the United States.<sup>4</sup> Fortifying the audiology workforce is a federal priority that will be supported by categorizing audiology as a Professional Degree.

**RISE Committee members specifically recommended that audiology should be added to the list of Professional Degrees recognized by the Department, based on objective criteria, and inferred Congressional intent.**

Members of the 2025 RISE Committee, charged with developing the Proposed Rule, specifically recognized the merits of expanding or modifying the list of recognized Professional Degrees to include audiology.

During the negotiated rulemaking meeting on the afternoon of November 4, 2025, RISE Committee Member, Alexander Holt, Senior Advisor on Higher Education for the Committee for a Responsible Federal Budget, a nonpartisan, non-profit organization committed to educating the public on issues with significant fiscal policy impact<sup>5</sup>, stated,

“The concern I had was that there are certain health degrees that show up in that IPEDS test that I mentioned that sort of seem really, kind of obviously should be included [as Professional Degrees], for example, audiology, which is just not really any different than podiatry. It just happens to be in a different four-digit CIP.”<sup>6</sup>

Mr. Holt goes on to say during the same discussion,

“...We created a test, which is that we looked at programs and we said, what programs have at least 50% of the total number of students enrolled in a professional versus a research program? We chose 50% because it is the least arbitrary of all percentages

<sup>4</sup> <https://www.bls.gov/ooh/healthcare/audiologists.htm>

<sup>5</sup> <https://www.crfb.org/biography/staff/alexander-holt>

<sup>6</sup> <https://www.ed.gov/media/document/2025-rise-transcript-tue-11-4pm-112567.pdf>

available. And from there we got a list, and things like audiology and physical therapy, they are like 100% classified in IPEDS. ... Probably Congress at the time of enactment thought that programs classified at 100% professional degrees in IPEDS, which is based on the definition of 668.2, by the way, that's where the IPEDS definition comes from, they probably thought that was a professional degree.”<sup>7</sup>

ADA encourages careful review of the November 4, 2025, RISE Committee meeting, and respectfully encourages the Department to heed the recommendation of Mr. Holt to add audiology to the list of Professional Degree programs. Watch the [recording of the meeting](#) or [view the transcript](#).<sup>8,9</sup>

### **The Au.D. Degree meets Department requirements for Professional Degrees**

Aside from being assigned to a CIP code already recognized by the Secretary for Professional Degree Programs, The Au.D. degree meets or exceeds every other requirement for a Professional Degree as outlined in the Proposed Rule, including the following:<sup>10</sup>

1. 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;
2. Is a doctoral level degree—the Au.D. degree is the recognized degree for entry into clinical practice in all 50 states and U.S. territories;
3. Requires at least six academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework; and
4. Requires professional licensure to begin practice.

### **Audiology's CIP code description is consistent with other degrees that are recognized by the Department and the Proposed Rule as Professional Degrees**

Adding audiology to the list of Professional Degrees will simply preserve federal borrowing parity between audiology students and students training in similar clinical doctoring professions such as optometry, dentistry, podiatry, chiropractic, and clinical psychology (recognized Professional Degrees under the Proposed Rule).

For example, the CIP Code definition for Optometry (OD), CIP Code 51.1701 is as follows:

*“A program that prepares individuals for the independent professional practice of optometry and that focuses on the principles and techniques for examining, diagnosing, and treating conditions of the visual system. Includes instruction in prescribing glasses*

<sup>7</sup> See 3

<sup>8</sup> [https://www.youtube.com/watch?v=wNP\\_8rpsIYg](https://www.youtube.com/watch?v=wNP_8rpsIYg)

<sup>9</sup> See 3

<sup>10</sup> See 1

*and contact lenses, other optical aids, corrective therapies, patient counseling, physician referral, practice management, and ethics and professional standards.”<sup>11</sup>*

The CIP Code definition for Audiology (Au.D), CIP Code 51.0202 is as follows:

*“A program that prepares individuals to diagnose and treat hearing loss and other disorders involving the ear, advise patients on means to use their remaining hearing, and select and fit hearing aids and other devices. Includes instruction in acoustics, anatomy and physiology of hearing, hearing measurement, auditory pathology, middle and inner ear analysis, rehabilitation therapies and assistive technologies, and pediatric and other special applications.”<sup>12</sup>*

As this example readily demonstrates, when it comes to clinical doctoral training, audiology is to the ear what optometry is to the eye. Audiologists and optometrists are trained, prepared, and qualified for licensure and entry into clinical practice in a consistent manner. They should, therefore, be consistently recognized as Professional Degree programs under the law.

**The RISE Committee and the Department have created a precedent for expanding the list of Professional Degrees beyond those included in 34 CFR 668.2 by adding clinical psychology to the list. An examination of their rationale reveals reasoning that also applies to audiology.**

RISE Committee discussions related to the addition of clinical psychology as a Professional Degree included technical and practical considerations, many of which also apply to audiology, including the following:

- Like clinical psychologists, audiologists must complete a one-year clinical externship/residency as part of their clinical training. This intensive clinical supervision is an essential part of their doctoral training, and is also expensive and time intensive.
- The demand for mental health services, particularly within the Veterans Health Administration (VHA) factored into the decision to add clinical psychology to the list for Professional Degrees. Using comparative reasoning, audiology be added to the list to meet Veteran demand. According to the VHA, auditory health problems are by far the most prevalent service-connected disabilities among American Veterans. As of fiscal year 2020, more than 1.3 million Veterans were receiving disability compensation for hearing loss, and more than 2.3 million received compensation for tinnitus, according to the Veterans Benefits Administration compensation report.<sup>13</sup> The VHA employs nearly 1,400 audiologists, and is the largest employer of audiologists in the United States.<sup>14</sup>

<sup>11</sup> <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cipid=88830>

<sup>12</sup> <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=56&cipid=91031>

<sup>13</sup> [https://www.benefits.va.gov/REPORTS/abr/docs/2020\\_compensation.pdf](https://www.benefits.va.gov/REPORTS/abr/docs/2020_compensation.pdf)

<sup>14</sup> <https://rehab.va.gov/audiology/>

- Federal programs treat audiologists the same way as other professions on the Professional Degree list.
  - For example, like clinical psychologists, audiologists are reimbursed at 100% of the Medicare Physician Fee Schedule for the services that they deliver (as are other providers holding Professional Degrees such as M.D., D.O., O.D., D.P.M., D.D.S).
  - The Veterans Health Administration (VHA) allows Veterans to directly schedule appointments with audiology and optometry departments without a primary care referral. This demonstrates the comparative value and recognition of audiology services with others holding Professional Degrees.

**The addition of the Au.D. to the list of Professional Degree programs under 34 CFR 668.2 will significantly preserve access to affordable hearing and balance healthcare, without significantly increasing the number of eligible borrowers recognized as Professional Students or costs.**

According to the Hearing Loss Association of America (HLAA), more than 50 million Americans have some degree of hearing loss.<sup>15</sup> Hearing loss is the third most common chronic condition among adults behind only arthritis and high blood pressure.<sup>16</sup> Vestibular disorders affect 10 million Americans.

There are only approximately 730 audiology students graduating into clinical practice in any given year,<sup>17</sup> and only one clinical audiologist to serve every 20,000 Americans today. There is a recognized, critical shortage of audiologists in the United States. ADA members and their patients already understand, all too well, how workforce constraints exacerbate delays in care and lead to costly complications.

Omitting audiology from the Professional Degree classification will significantly reduce loan limits for audiology students and undermine federal priorities directed at improving healthcare affordability. Audiology students will be forced to seek out more expensive private loans or forgo training altogether, eliminating key audiology service access points across the nation, and dramatically increasing time to treatment and cost to consumers.

With fewer than 3,000 audiology trainees in any year, even at full borrowing limits, adding audiology to the Professional Degree framework will not significantly increase cost or burden on federal lending programs.

<sup>15</sup> <https://www.hearingloss.org/understanding-hearing-loss/hearing-loss-101/hearing-loss-by-the-numbers/>

<sup>16</sup> Thorman IB, Schrack JA, Schubert MC. Epidemiology and Comorbidities of Vestibular Disorders: Preliminary Findings of the AVOCADO Study. *Otol Neurotol.* 2024 Jun 1;45(5):572-579. doi: 10.1097/MAO.0000000000004185. PMID: 38728561.

<sup>17</sup> <https://www.asha.org/siteassets/surveys/csd-data-at-a-glance-summary.pdf>

**Conclusion: Addition of Audiology to the Department's Professional Degree programs is a sound approach.**

In closing, the exclusion of audiology from the Department's list of recognized Professional Degree programs would create an arbitrary and inequitable distinction between similarly trained doctoral-level healthcare providers. The Doctor of Audiology degree satisfies every substantive criterion articulated in the Proposed Rule: it is a doctoral-level credential required for entry into practice; it requires extensive post-baccalaureate education, supervised clinical training, and state licensure; and it prepares graduates to deliver essential, independently provided healthcare services.

The Department has already demonstrated its willingness to apply objective criteria and sound policy judgment in expanding the professional degree list, including the addition of clinical psychology. The same rationale applies with equal force to audiology. Further, audiology is to hearing and balance care what optometry is to vision care: A doctoral-level, licensed, independently practicing healthcare profession. The regulatory framework should reflect that reality.

Failure to include audiology will not reduce the cost of education – it will merely shift students toward higher-cost private lending, increase financial strain, and constrain the educational pipeline at a time when the nation faces a significant and growing shortage of hearing and balance healthcare providers. More than 50 million Americans experience hearing loss, millions suffer from vestibular disorders, and Veterans disproportionately rely on audiology services for service-connected conditions. Preserving appropriate federal loan access for audiology students is a matter of healthcare access, workforce stability, and regulatory consistency.

For these reasons, the ADA respectfully urges the Department to adopt suggestions by RISE Committee member, Mr. Alexander Holt to explicitly include audiology and the Doctor of Audiology (Au.D.) degree among recognized Professional Degree programs under 34 CFR 668.2. Please contact me if you have any questions or if I can assist you in any way. ADA is grateful for your thoughtful consideration of this critical issue.

Sincerely,



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