

February 25, 2026

U.S Department of Education
400 Maryland Avenue, SW
Washington, DC 20202
Docket ID: ED-2025-OPE-0944

Re: Comments on Proposed Regulations Addressing Professional Degree Programs

Dear Secretary of Education and Members of the Department of Education:

On behalf of the American Academy of Audiology (the Academy), the world's largest professional organization of audiologists, we appreciate the opportunity to submit comments to the U.S. Department of Education regarding the proposed regulations addressing the definition and treatment of professional degree programs for federal student aid purposes.

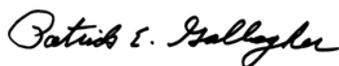
The Academy strongly urges the Department to explicitly recognize and include audiology as a professional degree program within these regulations. Audiologists are licensed healthcare professionals who complete rigorous doctoral-level education, extensive supervised clinical training, and comprehensive practicum experiences before entering independent practice. The Doctor of Audiology (AuD) is the required entry-level degree for the profession. It is comparable in scope, duration, and clinical intensity to other healthcare doctorates already recognized as professional degrees.

Failure to clearly include audiology within the regulatory framework governing professional degree programs would create unnecessary financial barriers for students pursuing this essential healthcare career. Exclusion would limit access to appropriate federal loan eligibility, increase student debt burdens, and weaken the audiology workforce pipeline at a time when demand for hearing and balance services continues to grow, particularly in rural and underserved communities.

Explicit regulatory recognition of audiology as a professional degree program would promote consistency, equity, and predictability in federal student aid policy. It would also ensure that students pursuing doctoral education in audiology are treated comparably to peers in other healthcare professions with similar educational and clinical requirements.

The Academy respectfully urges the Department to clearly include audiology within the definition and treatment of professional degree programs in the final regulations. Doing so will support students, strengthen the hearing healthcare workforce, and advance access to essential hearing and balance healthcare services nationwide.

Thank you for your consideration.



Patrick E. Gallagher, MBA
Executive Director
American Academy of Audiology