



August 21, 2025

**The Honorable Linda McMahon**

Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**Submitted electronically on behalf of the Association of University Programs in Health Administration (AUPHA)**

**Re: Public Comment on Implementation of Changes to Title IV, HEA Programs under the One Big Beautiful Bill Act (OBBA) via Negotiated Rulemaking [Docket ID: ED-2025-OPE-0151-0001]**

Dear Secretary McMahon and Members of the Department and Rulemaking Committees:

On behalf of the Association of University Programs in Health Administration (AUPHA), which represents accredited academic programs in healthcare management and health administration, we respectfully submit the following comments regarding the implementation of the One Big Beautiful Bill Act (OBBA), H.R. 1.

AUPHA supports the Department's commitment to enhancing access, affordability, and accountability in higher education. However, we are deeply concerned that the current federal definitions of "professional degree programs" under 34 CFR §668.2 could be interpreted to exclude graduate-level healthcare management degrees (CIP codes 51.2211, 51.0701-51.0719, and 51.0799), which are critical to preparing the next generation of leaders for our important and complex health system.

The U.S. Bureau of Labor Statistics has ranked "Medical and Health Services Managers" as one of the fastest growing professions for several years.<sup>1</sup> Their current predictions indicate 29% projected growth for 2023-2033. Comparatively, the average growth for all occupations is just 4%. Graduate degrees in the field of health administration lead to favorable employment outcomes with a moderate debt to earnings ratio; the median annual salary for the more than half a million professionals in the field was \$117,960 in 2023.<sup>2</sup>

The Master of Health Administration (MHA) and similar master's degrees are widely recognized as the needed and required degree signifying preparation for specialized leadership and practice in the profession of healthcare management. The Doctor of Health Administration (DHA) and similar doctoral programs are viewed as a terminal degree for our field and the profession.

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<sup>1</sup> Bureau of Labor Statistics, U.S. Department of Labor, *Fastest Growing Occupations*, Medical and Health Services Managers, at [Fastest Growing Occupations : Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics](#) (visited August 21, 2025).

<sup>2</sup> Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, Medical and Health Services Managers, at <https://www.bls.gov/ooh/management/medical-and-health-services-managers.htm> (visited August 04, 2025).

Both degrees focus on mastery of applied skills needed to lead healthcare organizations, rather than theoretical study. Like the MD, JD, and other professional degrees, most MHA and similar master's degrees require an administrative internship or administrative residency as a requirement of graduation. Furthermore, the most respected healthcare management and leadership credential in the U.S. - a Fellow (FACHE) of the American College of Healthcare Executives (ACHE) - requires a master's or doctoral degree in health administration or a related field in addition to an exam, community service, and regular annual continuing education credits.

### **Recommendation 1: Recognize Healthcare Management as a Professional Degree Field**

The MHA and related master's degrees are professionally oriented and prepare students for immediate entry into healthcare management roles across hospitals, health systems, long-term care, and public sector agencies. And, increasingly, professionals rising into leadership positions (CEO, COO, CFO, and their teams) across the U.S. health industry are pursuing and earning the DHA or other similar degrees at the doctoral level. Exclusion of these programs from the federal definition may restrict graduate students' access to appropriate loan limits and undermine workforce development at a time when strong, agile healthcare management and leadership is urgently needed.

### **Recommendation 2: Issue Clear Guidance on Loan Limit Changes**

As financial aid policies shift under the OBBB Act, institutions need timely guidance on implementation timelines, system updates, and communication tools to avoid disruption for current and prospective healthcare management students.

### **Recommendation 3: Include Healthcare Management Expertise in Negotiated Rulemaking**

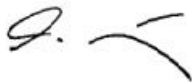
We urge the Department to include healthcare management educators and other academic leaders in its rulemaking bodies to ensure decisions are informed by those most familiar with the field's needs and the realities of Title IV administration.

### **Conclusion**

Healthcare management and leadership professionals play an essential role in ensuring that care delivery is efficient, high quality, and resilient for all. Federal higher education policies must support students pursuing careers in this vital profession. We encourage the Department to recognize healthcare management as a professional degree field and implement changes that reflect the varied pathways to serving the health of our nation.

Thank you for your consideration. For further questions or discussion, please contact me directly at [dgentry@aupha.org](mailto:dgentry@aupha.org).

Sincerely,



Daniel Gentry, PhD, MHA  
President and CEO

Association of University Programs in Health Administration (AUPHA)