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Department of Education
Office of Postsecondary Education
400 Maryland Ave, SW, 5th Floor
Washington, DC 20202

Reimagining and Improving Student Education (ED-2025-OPE-0944)

Dear Secretary McMahon,

The American Psychiatric Association (APA), the national medical specialty society representing over 39,200 psychiatric physicians and their patients, appreciates the opportunity to comment on the Department of Education (DOE) proposed amendments to the federal student loan programs authorized under title IV of the Higher Education Act (HEA), which implement the statutory changes enacted in H.R. 1 and signed into law of July 4, 2025. APA recognizes that the DOE is mandated to make changes to a complex system, however, we urge the DOE to exclude psychiatrists and other physician specialties facing documented workforce shortages from the proposed changes to annual and aggregate loan limits.

If finalized as written, beginning July 1, 2026, students enrolled in professional degree programs, including all physicians, will be permitted to borrow up to \$50,000 per year, with an aggregate cap of \$200,000. This policy will have an immediate chilling effect on medical school students and applicants. The United States is already experiencing a worsening shortage of psychiatrist. Current workforce projections estimate a shortage of 21,000 psychiatrists by 2030, with demand continuing to outpace supply.¹ While Congress and the Administration have taken important steps to address the dire workforce issues, such as expanding graduate medical education slots, substantial barriers remain that prevent medical students from entering medical specialties such as psychiatry. One of the reasons most mentioned by prospective students is the financial burden and costs to attend medical school. The American Medical Association reports that 27 percent of psychiatry medical school graduates have a debt of \$200,000 or more, not including undergraduate education.²

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¹ <https://www.columbiapsychiatry.org/news/rethinking-psychiatry-education-medical-students#:~:text=The%20United%20States%20Health%20Resources%20and%20Services,psychiatric%20care%20is%20often%20limited%20or%20nonexistent.>

² American Medical Association, The top 5 medical specialties with the highest student debts, https://www.ama-assn.org/medical-students/specialty-profiles/top-5-medical-specialties-highest-student-loan-debts?utm_source=chatgpt.com

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This debt increases as psychiatrists attend subspecialty fellowship, like child and adolescent psychiatry, due to limited earning capacity during these training opportunities. Policies that further restrict access to federal student loan risk discouraging students from pursuing psychiatry, hence exacerbating workforce shortages even more. Any reduction in the physician workforce will place additional stress on the existing psychiatrists, accelerating burnout, and ultimately leading to longer wait times and reduced care for patients with unmet mental health needs.

Thank you for the opportunity to provide comments. We look forward to working with you on ways to improve access to post graduate education for psychiatrists and meeting the needs of patients across the country. Please contact Brooke Trainum (btrainum@psych.org) with any questions or for more information.

Sincerely,



MD, MBA, FAPA

Marketa Wills, MD, MBA, FAPA
CEO and Medical Director
American Psychiatric Association