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March 2, 2026

U.S. Department of Education

Office of Postsecondary Education

400 Maryland Ave. SW, 5th Floor

Washington, DC 20202

Re: ED-2025-OPE-0944 / RIN 1840-AD98 - "Reimagining and Improving Student Education"

Dear Secretary McMahon and Director Abernathy:

I am writing from First Focus on Children to comment on the Department of Education's proposed rule related to federal student loans, "Reimagining and Improving Student Education." Home visiting and other vital family support services must be made available to families who need them, and we are concerned that the proposed rule would limit the home visiting workforce and reduce access to children and their families. First Focus on Children is a bipartisan child advocacy organization dedicated to making children and families the priority in federal policy and budget decisions. As advocates for children, we are committed to ensuring that all children have an equal chance for success, including through access to home visiting services that support the entire family.

Home visiting connects expectant parents, new caregivers, and their young children with a support person, called a home visitor, who meets regularly and develops a connection with a family to support that family in achieving their goals and meeting their needs. Home visitors focus on strengthening the well-being of caregivers and children and connecting families to community resources. There are numerous positive outcomes of home visiting, including improved maternal/caregiver physical and mental health, infant mortality, caregiver confidence, school readiness, child development, safety, and many others. Home visiting services are delivered by a dedicated workforce that is made up of infant and early childhood professionals, social workers, peers, doulas, nurses, mental health professionals, parents, community health workers, promotoras, and other trained individuals. **We are concerned that the Department's newly-proposed, narrowed definition of "professional degree" limits access to many of the advanced degrees pursued by members of the home visiting workforce.**

Social work, behavioral health, and nursing form the backbone of multiple systems that support children and families: maternal and child health, early intervention, child welfare, behavioral health, primary care, public health, and community-based prevention. To ensure that programs like home visiting can continue serving families and advancing public health and behavioral health objectives, **we urge the Department to revise its proposed rule to include graduate nursing, behavioral health, and social work degrees within the definition of "professional degree" for purposes of federal student loan eligibility and applicable limits.**

Reduced access to federal student loans for the home visiting workforce will likely:

- **Decrease Families’ Access to Programs that Advance Federal Priorities:** Home visiting advances federal priorities including improved women’s health, increased early childhood screening and referrals, ensuring healthy homes for young children, increased access to nutrition education, support for early childhood development, and increased family linkages to health and other community services. Limiting access to student loans will limit the size of the workforce that carries out these priorities.
- **Undermine Public Investments in Families:** To advance collective public health priorities, home visiting is supported through significant federal, state, and local investments. The government saves more than \$32,000 per child served through home visiting, and over an individual’s lifetime, benefits exceed costs by at least 20% and up to more than 200%.¹² Ensuring a return on these investments of taxpayer dollars requires a large, highly-qualified workforce and strong workforce development pipelines – which in part depend on access to higher education.
- **Exacerbate Health Risks for Rural Moms:** Federal investments in rural health infrastructure, including programs supported by Health Resources and Services Administration, United States Department of Agriculture, and the Centers for Medicare & Medicaid Services, depend on a steady pipeline of social work, behavioral, and graduate nursing professionals to deliver care in communities where other women’s health providers are scarce. Policies that restrict access to the education required for licensure in these fields risk undermining those investments and widening existing disparities in rural health outcomes.
- **Exacerbate Hiring Challenges:** Many home visiting programs across the country already grapple with persistent workforce shortages, elevated caseloads, and high turnover. For example, in 2022, the average turnover rate for Early Head Start home visitors was 29%, with the highest rates reported by programs in rural areas.³ High turnover rates of home visitors negatively impacts children and their families, resulting in shorter lengths of enrollment in programs and fewer visits for families.⁴ Notably, the Department’s proposal to decrease access to student loans for home visitors could also dissuade future students from pursuing these degrees and aspiring to serve in this role of front-line, essential workers who support expectant parents. ED’s proposal risks the stability of the home visiting workforce pipeline and programs’ ability to serve families in the future.

Conclusion

If graduate nursing, behavioral health, and social work programs are excluded from the professional degree category, lower borrowing caps will likely constrain access to advanced degrees for home visitors. That lack

¹ “The Business Case For Home Visiting,” Pew Charitable Trusts, October 2011,

https://www.pewtrusts.org/~media/legacy/uploadedfiles/pcs_assets/2012/hvbusinessleadersbrieffinalpdf.pdf

² Michalopoulos, Charles, Kristen Faucetta, Anne Warren, and Robert Mitchell. Evidence on the Long-Term Effects of Home Visiting Programs: Laying the Groundwork for Long-Term Follow-Up in the Mother and Infant Home Visiting Program Evaluation (MIHOPE). OPRE Report 2017- 73. Washington, DC: Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services, <https://files.eric.ed.gov/fulltext/ED579153.pdf>

³ Heather Sandstrom, Catherine Kuhns, Dow Drukker. *Turnover Patterns Among Early Head Start Teachers and Home Visitors: A Snapshot Before and After the Height of the COVID-19 Pandemic*. 2024. Urban Institute. <https://www.urban.org/sites/default/files/2024-01/Turnover%20Patterns%20among%20Early%20Head%20Start%20Teachers%20and%20Home%20Visitors.pdf>

⁴ Kathy Falletta, Kristina Rosinsky, Sarah She Crown. *Considerations for Supporting the Home Visiting Workforce Under MIECHV Reauthorization*. February 7, 2024. Child Trends.

<https://www.childtrends.org/publications/considerations-supporting-home-visiting-workforce-miechv>

of access is likely to negatively impact workforce supply and distribution in fields like home visiting that are central to maternal health, behavioral health, and child- and family-serving systems. Many programs, including home visiting, were created to reduce long-term public costs and improve population health. Limiting access to higher education degrees that strengthen these professions and increase service quality, introduces new barriers and ultimately weakens the very infrastructure needed to deliver on federal, state, and local public investments.

In order to strengthen and support the home visiting workforce and its service to children and families, we urge the Department to revise the proposed rule to include graduate nursing, behavioral health, and social work degrees within the definition of “professional degree” for purposes of federal student loan eligibility and applicable limits.

Thank you for the opportunity to provide comment and for consideration of the home visiting workforce and service delivery implications as you revise this proposed rule.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Lesley". The signature is written in a cursive style with a large, stylized "L" and "y".

Bruce Lesley
President, First Focus on Children