

Michigan Mental Health and Healthcare Coalition

December 15, 2025

Michigan Congressional Delegation

United States Senator Gary Peters

United States Senator Elissa Slotkin

United States House of Representatives

Washington, D.C.

Dear members of the Michigan Congressional Delegation,

We, the undersigned behavioral health and healthcare organizations and professional associations across Michigan, write with deep concern regarding the U.S. Department of Education's (ED) proposed definition of "professional student" and "professional degree" emerging from the Reimagining and Improving Student Education (RISE) negotiated rulemaking process. As drafted, the Department's definition would exclude several behavioral health professions despite their rigorous accreditation standards, licensure requirements, and essential role in meeting Michigan's mental and behavioral health needs. This change would restrict access to federal financial aid for thousands of Michigan students and further strain an already overstretched behavioral health workforce.

Michigan relies on social workers, counselors, school psychologists, marriage and family therapists, psychiatric nurses, substance use disorder professionals, and other licensed behavioral health providers across every community. These professionals complete accredited graduate programs, meet strict supervised practice requirements, and obtain state licensure or certification before providing vital services. Excluding behavioral health professions from the definition of "professional degree" is inconsistent with their training, competencies, and statutory requirements. Additionally, it undermines the care infrastructure that Michigan families depend upon.

Restricting federal graduate student aid, including Grad PLUS loans, would create new barriers for students pursuing behavioral health careers at a time when Michigan faces severe workforce shortages across rural, urban, and school-based settings. Women, low-income students, first-generation college graduates, and students of color—who already bear disproportionate financial burdens—would be hit the hardest. These consequences contradict Congress's long-standing intent to maintain broad access to graduate education across health and behavioral health fields.

The Department must adopt a definition that reflects the realities of today's behavioral health workforce. We support the [recommendations](#) from the Council on Social Work Education (CSWE), the Federation of Associations of Schools of Health Professions (FASHP), and the Coalition of Providers and Programs, which call for an inclusive definition aligned with accreditation, licensure, and recognized standards of practice. Using the CIP Code 51 framework for health professions and related clinical sciences provides the most consistent, transparent, and equitable approach.

To ensure Michigan's students, communities, and future workforce are not harmed, we respectfully request that you:

1. Urge the Department of Education to revise its proposed definition and explicitly include behavioral health programs that prepare students for licensed professional practice, including master's level counselors and social workers.
2. Communicate directly with the Secretary of Education and the RISE Committee to convey Michigan's acute behavioral health workforce needs and the serious consequences of excluding these programs from professional degree eligibility.
3. If the Department does not revise its approach, pursue legislative or oversight action to clarify congressional intent and protect access to federal aid for behavioral health graduate students.

Michigan is at a pivotal moment. Our behavioral health workforce shortages are among the most severe in the Midwest, and restricting access to graduate education would reduce care availability across the state. The decisions made through this federal rulemaking process will shape Michigan's behavioral health system for decades. We urge your leadership to ensure these policy choices strengthen, rather than undermine, the professionals who serve on the front lines of mental health, substance use, school-based, public health, and community care.

Thank you for your attention to this urgent matter and for your continued commitment to protecting Michigan's behavioral health workforce and the communities we serve.

Sincerely,

MI Care Council
Michigan Association of School Psychologists
Michigan Association of School Social Workers
Michigan Health & Hospital Association
Michigan Mental Health Counselors Association
Michigan Psychological Association
Michigan Speech Language Hearing Association
National Association of Social Workers - Michigan Chapter

