



U.S. Secretary of Education Linda E. McMahon
Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0944

Dear Secretary McMahon:

On behalf of the more than 4,300 members of the American Art Therapy Association (AATA), I write to express our concerns regarding the Department of Education's proposed definition of a professional degree for federal student loan purposes and the exclusion of art therapy and other mental health degrees in the Reimagining and Improving Student Education proposed rule (Docket ID ED-2025-OPE-0944). I respectfully urge the Department to explicitly include art therapy degrees (master's and doctoral) as professional degrees in the final rule—or adopt an inclusive definition of “professional degree program” in alignment with the law's reference to the definition of professional degree found at [34 CFR § 668.2](#), which delineates degrees as those ‘including but not limited to’ those specified.

Our nation is experiencing an ongoing mental health crisis: [23.4% of adults](#) (or 61.5 million people) had a mental illness in 2024, according to the Substance Abuse and Mental Health Services Administration (SAMHSA). At the same time, the Health Resources and Services Administration estimates a current [mental health workforce shortage of nearly 71,000](#) psychologists, addiction counselors, and mental health counselors—a number that is expected to grow in the next decade to a 310,000 shortfall. (HRSA does not track the demand for art therapists.)

It is essential that federal policies support the development and sustainability of a strong workforce of future mental health care providers. A narrow definition of “professional degree program” for student loan purposes would create a system that favors certain mental health professions over others. ***Lower loan limits for some professional degrees would significantly discourage students to enter certain programs, particularly those that are new and innovative such as art therapy—ultimately reducing patient access and choice for mental health care options.***

Art therapy is a mental health profession that enriches the lives of individuals, families, and communities through active art-making, the creative process, and applied psychological theory within a psychotherapeutic relationship. It offers a means of communication for people who cannot find the words to express anxiety, pain, trauma, or emotions. Art therapists are highly educated and trained clinicians, educators, and researchers with master's-level degrees or higher, trained in art and psychotherapy. Art therapy is a licensed mental health profession in many states, while in other states, art therapists seek other mental health licenses. They work in private practice, as well as hospitals, including VA hospitals, schools, substance treatment programs, community clinics, and correctional facilities.

Art therapists are required to complete a master's-level or doctoral degree through rigorous programs lasting two to four years. These programs typically include 700+ supervised clinical hours through practicum and internship during graduate school. Because of practicum and internship demands, many students are unable to work full time or at all during their graduate program—and federal loans often help sustain them while completing required clinical training.

Upon completing their degree (or education requirements), they must apply for an “Art Therapist Provisional” (ATR-P) credential through a test offered by the Art Therapy Credentials Board (ATCB). Next, they must complete at minimum 1,000 hours of clinical work in order to apply for the “Art Therapist Registered” (ATR) credential. ATRs can then pursue board certification by passing the ATCB Exam, [“demonstrating expertise, enhancing career prospects, building trust, and supporting continued professional growth in art therapy.”](#) Additionally, art therapy licensure in many states require upwards of 4,500 supervised clinical hours prior to independent practice. Art therapists are also required to complete ongoing continuing education (100 hours) and recertification every five years to maintain clinical competency and licensure.

The One Big Beautiful Bill Act (OBBBA) permits professional students to borrow up to \$50,000 per year and \$200,000 in total. The statute defines professional students as those enrolled in programs that (1) provide education beyond the bachelor’s level, (2) prepare students to meet the academic requirements for professional practice, and (3) lead to licensure. **Art therapy programs meet all three criteria.** *They are rigorous, graduate-level programs specifically designed to prepare students for national certification and state licensure.*

Art therapy educational programs are accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP). These programs have educational standards managed by the Accreditation Council for Art Therapy Education (ACATE) and undergo an annual review process which ensures their resources, curriculum, faculty, and policies meet the educational needs of the profession as well as post-graduate board certification. Excluding art therapy students—as well as other mental health professionals and allied licensed health professionals—from the professional student category directly contradicts the plain language and intent of OBBBA. Such an interpretation undermines the purpose of professional education and disregards the realities of preparing a licensed health care workforce. Furthermore, the elimination of GraduatePLUS loans and the lower annual and lifetime loan caps proposed by this rule will directly threaten the financial viability of art therapy programs, which are relatively new. (The first graduate-level art therapy program in the United States was established at what is now Drexel University in 1967.) Currently, there are 39 accredited art therapy programs nationwide with tuition costs ranging from \$17,000 to \$68,000 per year. The Department of Education’s proposed changes will deter qualified applicants and reduce enrollment, thereby placing existing and future programs at risk.

According to our own survey of art therapists and art therapy students taken in 2026, nearly all (95%) reported that they relied on federal student loans to pay for their art therapy graduate education. **Among those who took out federal student loans, 78% said that they borrowed more than \$20,500, which is the proposed limit for post-baccalaureate students not otherwise defined as “professional students.”** *Additionally, 39% of art therapists and art therapy students reported they would have postponed enrolling in an art therapy program if these changes were already in place—and 58% said they may “may have chosen an entirely different career path” outside of art therapy or a related mental health career.*

By excluding art therapy degrees from the definition of professional degrees and limiting future art therapists’ access to appropriate federal loan levels, this rule would significantly undermine our nation’s mental health workforce pipeline. The proposed rule would have created a financial shortfall for nearly eight out of ten art therapists and art therapy students, according to our own internal survey—before accounting for housing, food, books and art supplies, and other required costs. *This would force many art therapy students to turn to private lenders with higher interest rates and fewer repayment options, making graduate education more expensive and less attainable for future art therapists.*

Individuals of all ages, and especially children and older Americans; as well as individuals who have experienced trauma, including our military service members and veterans, rely on art therapy as a particularly effective mental health care option. At a time when our mental health care is already

stretched thin with limited availability and provider shortages this proposed rule would only exacerbate these barriers to care.

Thank you for the opportunity to comment and for your consideration of the vital role mental health professionals play in maintaining health care outcomes and wellbeing of all Americans.

Sincerely,

Raquel Farrell-Kirk, MS, ATR-BC
President, American Art Therapy Association