

August 27, 2025

Re: ED-2025-OPE-0151-0001, Negotiated Rulemaking Committees

On behalf of the American Student Dental Association (ASDA), I am writing with recommendations in response to ED-2025-OPE-0151-0001, to implement statutory changes to federal student loan programs.

ASDA members represent over 23,000 dental students, or about 82 percent of the nation's dental student population, at 76 dental schools nationwide. As the voice for dental students, we urge the new rulemaking bodies to consider the following:

- Ensure professional students pursuing careers in healthcare are represented in rulemaking discussions. The new caps to federal borrowing fall over \$100,000 short of the \$312,000 average student debt for new dentists.
- Lower interest rates for Federal Direct Loans. Affordable student loans will allow more dentists and healthcare professionals to practice in rural and underserved areas.
- Protect Public Service Loan Forgiveness for dentists pursuing public health, who play a critical role in early detection of many medical issues.
- Prioritize a smooth transition to new repayment plans for existing borrowers. Clearly
 communicate any changes in payment processes with limited interruptions to monthly
 payments.

Student loans are a key resource for addressing the growing dentist shortage in the United States, expanding access to oral healthcare, and early detection of medical issues—thus, fewer taxpayer dollars spent in the healthcare system.

ASDA considers the growing student debt crisis a top priority and advocates for financially sustainable, long-term solutions that enhance the pipeline to careers in dentistry. If you need additional information, please contact ASDA Executive Director, Nancy Honeycutt at EC@ASDAnet.org.

Sincerely,

Payal Patel, Arizona '26 2025-26 ASDA President

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