



March 2, 2026

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Re: Docket ID ED-2025-OPE-0944—*Reimagining and Improving Student Education*

Dear Secretary McMahon:

On behalf of the 16,000 members of the American Society of Landscape Architects (ASLA), I am writing to strongly oppose the recommendations in the Department of Education's Notice of Proposed Rulemaking, *Reimagining and Improving Student Education* (Docket ID ED-2025-OPE-0944), that limit federal student loan borrowing for landscape architecture graduate students and many other students seeking advanced degrees. Instead, ASLA urges you to maintain current student loan borrowing policies—cost-of-attendance borrowing structure—that allow all students equal access to federal funding sources.

This proposed rule would cap annual federal student loans at \$20,500 for graduate students but would allow an unfair carve-out for students enrolled in so-called professional degree programs to borrow up to \$50,000 annually. The proposal also limits the definition of professional degrees to only include pharmacy, dentistry, veterinary medicine, chiropractic, law, medicine, optometry, osteopathic medicine, podiatry, and theology, providing these students with special access to federal student loans not afforded to all other graduate students.

Landscape architecture is a professional degree because it is a requisite for state licensure.

Landscape architects **are design professionals** licensed and regulated in all 50 states and the District of Columbia to protect the public's health, safety, and well-being. They plan and design community and large-scale infrastructure across the United States, including complex water management systems, transportation networks, public parks and plazas, and more. Entry into professional practice requires completion of a landscape architecture degree accredited by the Landscape Architectural Accreditation Board (LAAB)—at either the undergraduate or graduate level—followed by supervised experience and successful completion of the national Landscape Architect Registration Examination (LARE). Obtaining a landscape architecture degree is a prerequisite for professional licensing, making it an essential professional credential rather than an optional elective. As such, landscape architecture degrees must be deemed professional degrees.

Relying on a restrictive definition of professional degrees misclassifies landscape architecture and does not acknowledge the realities of our nation's current workforce. ASLA strongly urges the Department of Education to adopt a criteria-based definition of "professional degree," recognizing

accredited programs that lead to state licensure in professions charged with protecting public health, safety, and welfare, including landscape architecture.



Limiting access to federal student loans weakens the professional pipeline that supports our nation's infrastructure.

According to the 2025 LAAB Annual Report, 55 of 102 accredited landscape architecture programs (54 percent) are graduate degree programs, and 30 percent of all landscape architecture students are enrolled at the graduate level.¹ The survey further shows that 41.5 percent of landscape architecture graduate students rely on federal loans. Because a substantial portion of the accredited educational pipeline is delivered through graduate programs and support from federal student loans, any federal policy that disproportionately constrains graduate borrowing would directly affect more than half of the landscape architecture pipeline, weakening the professional pipeline that supports nationally significant infrastructure projects.

Federal student loan caps are not cost controls. Static caps that do not adjust for inflation or regional cost variation shift financial burden to students and families rather than reducing educational expenses. Further, students in professional tracks, such as landscape architecture, need stable, predictable access to federal financing. As drafted, this proposed rule would reduce higher education access for many landscape architecture students, forcing them to incur costly private financing or forgo higher education and career goals, which would lead to a dearth of design professionals who are adequately trained to create and maintain our nation's infrastructure. ASLA strongly urges the Department of Education to maintain the cost-of-attendance borrowing framework for all students, rather than imposing static or discipline-specific caps that create inequitable treatment among disciplines.

Landscape architecture students are needed to create a steady stream of design professionals to help ensure a safe, resilient, and efficient national infrastructure. Federal student loan policy should strengthen—not restrict—the pipeline of professionals needed for today's workforce. Any final rule should reflect that reality and preserve stable, predictable access to federal graduate education financing. Thank you for the opportunity to submit these comments.

Sincerely,

Torey Carter-Conneen, Hon. ASLA
Chief Executive Officer
American Society of Landscape Architects

¹ Landscape Architectural Accreditation Board (2025). *Summary of 2025 Annual Reports Submitted to the Landscape Architectural Accreditation Board by Accredited Academic Programs*. <https://www.asla.org/getcontentasset/98ef39be-1e98-439e-93ce-031877ad7629/547f34a1-c94b-4748-b717-f9bca7683a68/2025laabannualreportsumm.pdf>