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American Board of Cardiovascular Perfusion (ABCP)
555 E. Wells Street, Suite 1100
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March 2, 2026

Submitted electronically via Regulations.gov

U.S. Department of Education
Office of Postsecondary Education

Re: Reimagining and Improving Student Education (RISE) NPRM — FR Doc. 2026-01912; Docket ID ED-2025-OPE-0944-0001

To Whom It May Concern:

On behalf of the Board of Directors of the American Board of Cardiovascular Perfusion (ABCP), and in coordination with the perfusion organizations listed below, that have endorsing this letter, we appreciate the opportunity to comment on the Department's Notice of Proposed Rulemaking, Reimagining and Improving Student Education (published January 30, 2026). ([FSA Partner Connect](#))

ABCP respectfully requests that the Department explicitly recognize cardiovascular perfusion ("perfusion") education programs as "professional" programs for purposes of the NPRM's professional-student loan framework, and that the Department's final rule and associated guidance clearly include perfusion programs within any list(s) or criteria used to identify professional programs eligible for the higher professional-student loan limits. The NPRM explains that the term "professional student" is used in this rulemaking to distinguish programs eligible for higher loan limits and is not intended as a value judgment. We agree with that framing, and urge the Department to ensure perfusion is included under the NPRM's operational definition and implementation.

Why perfusion should be recognized in the final rule

1. Perfusion is an essential, distinct healthcare profession. Perfusionists operate and manage extracorporeal circulation (including cardiopulmonary bypass and related life-support modalities) that is fundamental to modern cardiac surgery and other complex procedures. The profession requires specialized didactic and intensive clinical preparation and carries direct patient-safety responsibilities.
2. Perfusion education is structured, clinically intensive, and aligned with high-stakes practice. Perfusion programs require supervised clinical training and competency development that is comparable in rigor and responsibility to other disciplines commonly treated as professional pathways.

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3. Affordability and access are directly tied to workforce readiness. Many perfusion students incur significant educational and living costs during time-intensive clinical training. Excluding perfusion from “professional” program treatment for federal loan purposes may unintentionally constrain access to the profession and negatively affect the pipeline of qualified clinicians entering a critical area of healthcare.

Requested change

ABCP requests that the Department adopt one (or both) of the following approaches in the final rule and implementation materials:

- Explicit inclusion: Add “cardiovascular perfusion / perfusion science” (and substantially similar program titles) to the Department’s enumerated examples or lists of professional programs used to implement the professional-student loan limits; and/or
- Clear criteria that capture perfusion: If the Department uses definitional criteria rather than a list, confirm in regulatory text and/or preamble that perfusion programs meet those criteria and are treated as professional programs for Title IV loan-limit purposes.

Conclusion

ABCP supports the Department’s stated goal of simplifying repayment and improving affordability. Ensuring that perfusion programs are recognized and appropriately categorized within the NPRM’s professional-student framework will better align federal student-aid policy with real-world healthcare workforce needs and patient-safety priorities.

Thank you for considering these comments. We would welcome the opportunity to provide additional information or technical assistance as the Department finalizes this rule.

Respectfully submitted,

Board of Directors
American Board of Cardiovascular Perfusion (ABCP)

Endorsed by:

- Perfusion Program Directors’ Council (PPDC)
- American Academy of Cardiovascular Perfusion (AACP)