

RE: Docket ED-2025-OPE-0944 Notice of Proposed Rulemaking: “Reimagining and Improving Student Education”

TESOL Comments on proposed federal Student Aid loan limits, pro-ration for less-than-full-time enrollment, and related changes

TESOL International Association (www.tesol.org) respectfully submits these comments regarding the notice of proposed rulemaking (NPRM) implementing recent statutory changes to federal student lending, with particular attention to educator preparation and the pipeline of teachers serving multilingual learners of English (MLEs).

TESOL’s members include English language educators across elementary, secondary, adult, and postsecondary education, and our association is deeply concerned about how federal financing changes may affect (1) undergraduate pathways into education and licensure and (2) graduate preparation in Teaching English as a Second or Foreign Language, including programs under 13.1401¹ of the classification of instructional programs (CIP).

Educational Context

Teacher shortages for English as a second language (ESL) educators exist across all educational levels, which has resulted in schools and programs not meeting the needs of MLE populations. Public elementary and secondary education has over 5 million MLEs², but 59% of elementary and 69% of secondary public schools report one or more vacancies for ESL teachers³. In adult education, 60% of the participants are MLEs⁴ but less than 12% of the educators have any English as a second language certification⁵. The evidence is clear that we need more individuals to pursue education, especially English language teaching to serve our MLE populations, the majority of whom are U.S. citizens or lawfully present and who contribute to and advance our nation’s social, economic, and cultural growth.

The following outline our concerns specific to the proposed federal financing changes and their impact upon the English language teaching profession:

¹ <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cipid=88191>

² <https://nces.ed.gov/programs/coe/indicator/cgf/english-learners-in-public-schools>

³ <https://ies.ed.gov/learn/press-release/most-u-s-public-elementary-and-secondary-schools-faced-hiring-challenges-start-2024-25-academic-year>

⁴ <https://nrs.ed.gov/rt/reports/aggregate/2022/all/table-3>

⁵ <https://nrs.ed.gov/rt/reports/aggregate/2023/all/table-7>

Combined effect of Parent PLUS caps and proration for less-than-full-time enrollment risks constricting undergraduate educator pathways.

The Department describes a shift from effectively uncapped Parent PLUS borrowing to limits of **\$20,000 per year per student** with a **\$65,000 aggregate cap per dependent student**. TESOL is concerned that these caps, combined with the Department’s approach to implementing required **reductions in annual Direct Loan eligibility when students enroll less than full-time**, will create financing gaps for candidates pursuing education degrees while balancing work and family responsibilities.

Many future educators, particularly paraprofessionals⁶ and career-changers, enter the profession through “earn-while-you-learn” routes that depend on part-time enrollment. If federal aid is reduced in direct proportion to enrollment intensity, institutions may see reduced yield, persistence, and completion in their educator preparation programs, especially among students without access to private credit.

2. Graduate-level impacts are likely to be acute for working educators, including TESOL candidates (CIP 13.1401).

The NPRM implements major changes to graduate financing, including the end of graduate/professional access to Direct PLUS loans for new borrowing after the transition period, and a tighter annual/aggregate borrowing structure that will interact with less-than-full-time enrollment rules. The loss of Grad PLUS combined with proration will especially constrain graduate students who attend part-time, precisely the attendance pattern common among working educators.

While national 6-digit CIP-level part-time enrollment shares are not readily available as a single public statistic, field-specific evidence underscores the magnitude of the issue: **in 2019–20, half of all education graduate students attended less than full-time**, and half-time education graduate students already borrowed amounts exceeding what they would likely be eligible to borrow under the prorated Direct Loan structure described. This indicates a real risk of affordability gaps and increased reliance on private loans (which typically lack federal protections and eligibility for key forgiveness pathways)⁷.

Graduate TESOL preparation programs (CIP 13.1401) frequently serve educators and candidates pursuing ESL endorsements, bilingual/TESOL credentials, and specialist roles

⁶ Impact extends beyond educators and includes paraprofessionals supporting educators, learners, schools, and communities. TESOL is a supporter of legislation (HR5478 and S2330) that would strengthen professional learning and pathways for our paraprofessionals – see more: <https://tesol.quorum.us/campaign/154836/>

⁷ <https://aacte.org/wp-content/uploads/2025/12/Student-Loan-Explainer-FINAL.pdf>

in schools and adult education. Reduced federal borrowing capacity for part-time graduate students could discourage enrollment and completion, at a time when schools and communities continue to need qualified educators to support multilingual learners and meet language access obligations.

3. The Department should conduct and publish a field-sensitive impact analysis and adopt implementation safeguards.

TESOL urges ED to:

- (a) analyze proration effects on enrollment, persistence, and completion in educator preparation, including programs preparing teachers for MLEs;
- (b) minimize administrative and timing risks for students by ensuring the proration schedule is clear, predictable across award years, and does not create “mid-year” financing barriers; and
- (c) ensure transition/grandfathering policies are workable and clearly communicated to protect current students and near-completers.

4. Consider educator preparation, especially in fields experiencing or anticipating shortages, as aligned with the rationale for enhanced borrowing capacity.

The NPRM describes a “professional student” category with higher annual and aggregate limits. While education is not currently included as such in the NPRM professional category, graduate education degrees, especially beyond the masters level, may meet or exceed the proposed limits at some institutions. For example, Ed.D. programs at USC, NYU, and Vanderbilt range from \$110,000 to \$200,000 in tuition alone, amounts that exceed the costs of *a priori* masters.

TESOL urges ED to consider whether educator preparation fields that serve essential public needs, including English language teaching, should be evaluated for inclusion in the professional category or for alternative safeguards, given workforce shortages and the public interest in educational access for multilingual learners.

Thank you for the opportunity to comment. TESOL stands ready to provide additional program-level examples from our membership, including how these changes may affect part-time graduate candidates pursuing TESOL preparation and credentials. We may be contacted at jhutcheson@tesol.org.