



Acupuncture and Herbal Medicine Coalition Federal Regulatory Update for the AHM Profession

July 6, 2026

Introduction: Members of the Acupuncture and Herbal Medicine (AHM) profession may be following the quickly moving timeline on several federal regulatory and legal developments affecting student loan access, institutional accountability, and public service loan forgiveness. As this situation continues to evolve, CCAHM and the AHM Coalition will provide updates as information becomes available. For background information on the Federal Regulatory process, please visit www.AHMCoalition.org for access to legislative and regulatory updates provided to the profession, as well as recordings from the AHM Coalition Town Hall Series addressing current events impacting the AHM profession (March, April and June 2026).

Please note: This communication is provided for informational purposes only and does not constitute legal advice, nor is it a complete summary of ALL current regulatory issues that may be impacting the profession. The AHM Coalition includes reputable references below for convenience but does not guarantee the accuracy or completeness of any of these resources, nor does it necessarily endorse these businesses, agencies, or organizations.

1. RISE Rule (Student Loan Limits | Professional Degree Definition): Final Rule, Court Stay, ED Interim Guidance, and What It Means for AHM

The RISE (Reimagining and Improving Student Education) final rule, published May 1, 2026 and effective July 1, 2026, implements the student loan provisions of the One Big Beautiful Bill Act ("OBBBA", now re-branded to be called the Working Families Tax Cuts Act). The RISE final rule eliminated the Grad PLUS loan program and created a two-tier borrowing system distinguishing "professional" students (eligible for up to \$50,000 annually and \$200,000 aggregate) from "graduate" students (capped at \$20,500 annually and \$100,000 aggregate). The Department of Education's rule narrowed the previous statutory definition of "professional degree" to just 11 fields by adding additional criteria not found in the original statute, including that the degree be at the doctoral level, require six years of postsecondary education, and not lead to a profession supervised by someone with more training. This effectively converted Congress' previous illustrative list of qualifying degrees (which included AHM degrees) into an exclusive one. Litigation was filed (among other arguments) to challenge the timelines for implementation, as well as that narrowing as an unlawful exercise of agency authority under the Administrative Procedure Act, arguing that Congress, by incorporating the preexisting regulatory definition from 34 C.F.R. § 668.2, froze that definition in place and the Department acted outside of statute in creating new definitions and criteria.



On June 24, 2026, U.S. District Court Judge Beryl Howell issued a preliminary stay under Section 705 of the Administrative Procedure Act, blocking two components of the RISE final rule: the Department's expanded criteria for determining which programs qualify as "professional degrees," and the "free-from-supervision" requirement the Department of Education (DOE) added to justify excluding certain programs. According to the National Association of Independent Colleges and Universities (NAICU) and other sources, the court's analysis confirmed that because the stay is issued under Section 705 of the Administrative Procedures Act (APA), it is a universal stay, therefore applying to all institutions and students, not only the plaintiffs in the case. The operative test reverts to the pre-existing three-part statutory test from 34 C.F.R. § 668.2.

On June 29, 2026, in response, the Department of Education [published interim guidance](#) listing 29 programs it will treat as professional degrees for the duration of the stay, as well as a list of programs it will treat as excluded programs during the stay. Programs now eligible for professional-level loan limits (\$50,000 annually, \$200,000 aggregate) include physical therapy, occupational therapy, athletic training, physician associates, audiology, speech-language pathology, anesthesiologist assistants, registered nursing, nurse anesthetist, nursing practice, and additional Psy.D. subfields.

AHM programs are not on DOE's interim list, nor its excluded list. The Department issued no explanation for AHM's absence. Notably, several programs whose professional organizations were named plaintiffs in the winning lawsuit, including education, public health, and marriage and family therapy, also do not appear on the interim professional degree list, suggesting the Department is continuing to exercise discretionary judgment about which programs qualify under the three-part test, an exercise the court's ruling appears to be calling into question.

As of July 1, 2026, the loan limit situation for AHM programs remains unsettled. AHM programs do not appear on ED's interim lists, neither the 29 programs now designated professional, nor the programs explicitly excluded, leaving their status under the court's stay potentially unclear. ED's guidance recommends that institutions with programs temporarily reclassified as professional consider capping disbursements at the graduate level (\$20,500 annually, \$100,000 aggregate) to protect students from disruption if the classification changes again on appeal. Thompson Coburn, a law firm with a specialty practice in higher education, has advised that institutions with programs not addressed in the guidance should consider contacting ED directly to seek a determination under the operative three-part statutory test. As always with substantive matters, institutions should consult an attorney for direct legal advice related to their own situation and programs. CCAHM is monitoring this closely and will share further guidance for member financial aid offices as the situation becomes clearer. The elimination of Grad PLUS loans for new borrowers proceeds as scheduled. On this matter, the court was explicit that this statutory change, enacted by Congress, is outside the scope of any remedy it can provide.



The stay is preliminary. The government retains the right to appeal, and the court's designation of programs as professional may change as litigation proceeds. ED's own guidance recommends that institutions consider capping disbursements at graduate-level amounts even for temporarily reclassified programs, to protect students from disruption if the stay is later reversed.

CCAHM and ACAHM, founding members of the AHM Coalition, are both voting members of the [Advanced Professional Workforce Alliance \(APWA\)](#). The APWA has noted that even a fully favorable litigation outcome would not substitute for congressional action on behalf of the full range of affected professions. APWA's appropriations and authorization strategy, including directing DOE and Department of Labor (DOL) to track workforce impacts of the RISE rule, continues on a parallel track. Several legislative efforts have been pursued alongside litigation, though none have succeeded in reversing the RISE rule's professional degree definition to date. Rep. Mike Lawler (R-NY) introduced the [Professional Student Degree Act](#) to expand the professional degree definition, drawing broad support from higher education and healthcare associations including APWA coalition partners, though it did not specifically include AHM. [A Congressional Review Act resolution](#) introduced by Rep. Suzanne Bonamici (D-OR) and Sen. Jeff Merkley (D-OR), supported by nearly 200 organizations including AHM Coalition and APWA partners, sought to repeal the RISE rule entirely but was blocked by Senate Republicans.

CCAHM, ACAHM, and the AHM Coalition are actively seeking and evaluating guidance and options related to AHM's status under RISE final rule, the stay, the interim list, and will update members as this situation develops.

Relevant excerpt from [Thompson Coburn's July 1st update](#): *The list of professional degrees in the guidance was not all-inclusive. Many degrees were not addressed at all. Institutions with programs that were not mentioned should consider a letter to ED seeking its determination under the three-part statutory test as to whether a program meets the "professional degree" definition under that test. Even if ED previously determined in the preamble to the Final Rule that a degree was not a professional degree, and even if it determined the three-part test was not met at that time, the institution should seek clarification from the Department because so often, ED used at least some now unlawful extra-statutory requirements in making that "not a professional degree" determination. If ED now determines, using the statutory three-part test, that an institution's program is not a "professional degree," and the institution believes that it is, it should consider filing suit against the Department.* For more information:

- [ED Electronic Announcement GENERAL-26-42](#)
- [NAICU Analysis of the Court Ruling](#)
- [StudentAid.gov Big Updates FAQ](#)
- [Thompson Coburn June 2026 Litigation Summary](#)



2. AHEAD STATS: Earnings Accountability Final Rule — General Effective Date July 1, 2027

On July 1, 2026, the Department of Education released the final rule establishing the Student Tuition and Transparency System (STATS) earnings accountability framework, implementing provisions of the OBBBA/Working Families Tax Cuts Act. The rule replaces the prior debt-to-earnings metric with a new "earnings premium" measure that evaluates graduates' income in the 4 years after graduation. Programs that fail the earnings standard in two of three consecutive years would lose Direct Loan eligibility, subject to appeal rights.

The rule's general effective date is July 1, 2027. Because two consecutive failures of an institution's graduate cohorts to meet or exceed the earnings metric within a three-year window are required before any program would face eligibility consequences, the practical enforcement timeline extends several years beyond that date. The final rule delays consequences for programs preparing students for tipped-income occupations, and adds new exemptions for institutions not currently participating in the Direct Loan program and for programs that agree to restrict Direct Loan borrowing for at least five years.

One provision with a faster implementation timeline is a new requirement for institutions to certify compliance with the earnings accountability framework through their Program Participation Agreement, which takes effect 60 days after formal Federal Register publication of July 1, 2026. Member schools should monitor for updated guidance from ED on that specific requirement.

The rule was scheduled for public inspection June 30 and formal publication July 1, 2026. CCAHM is reviewing the final rule for implications to AHM programs and will share analysis and training opportunities as soon as possible. In addition, as part of its strategic plan, CCAHM has invested in federal legislative advocacy to address the implications of this rule with lawmakers. For more information:

- [AHEAD STATS Final Rule](#)
- [NASFAA: ED Publishes Final Regulations Implementing OBBBA Accountability Framework](#)

3. Public Service Loan Forgiveness: Two Courts Vacate New PSLF Rule

On June 30, 2026, two federal district courts vacated the Department of Education's final rule redefining "qualifying employer" for Public Service Loan Forgiveness, just hours before it was set to take effect July 1. The rule, issued in response to a March 2025 Executive Order, would have allowed the Secretary to disqualify nonprofit employers found to have a "substantial illegal



purpose," a category the courts found had no basis in the statute establishing PSLF. Both courts agreed the Department exceeded its authority; the Massachusetts court also found the rule arbitrary and capricious and unconstitutional under the First Amendment. The rule is vacated nationwide, and the pre-existing qualifying employer framework, which includes all 501(c)(3) nonprofits and government employers, remains in effect while any appeal proceeds.

For AHM graduates working in qualifying nonprofit or public health settings and pursuing PSLF, the practical guidance is straightforward: continue certifying employment and confirming payment counts with your loan servicer as you normally would.

For more information:

- [NASFAA — Federal Court Vacates PSLF Final Rule on Employer Eligibility](#)
- [National Council of Nonprofits — PSLF Resources and Litigation Update](#)
- [The College Investor — Federal Judge Strikes Down PSLF Employer Rule](#)
- [StudentAid.gov — PSLF Help Tool](#)

4. SAVE Plan Ending: What Current Borrowers Need to Know

The Saving on a Valuable Education (SAVE) repayment plan was permanently ended by court order on March 10, 2026. Borrowers will begin receiving 90-day notices from their loan servicers starting July 1, 2026, instructing them to switch to a new repayment plan. No borrower will be required to move off SAVE before September 29, 2026 at the earliest, and since the Department is transitioning borrowers in tranches, some may have additional time beyond that. Borrowers who do not enroll in a new plan within their 90-day window will be automatically reassigned to the Standard Repayment Plan.

Starting July 1, 2026, the Department is introducing the Repayment Assistance Plan (RAP) as a new income-driven option. Current SAVE borrowers working toward Public Service Loan Forgiveness must switch to another income-driven repayment plan to remain eligible for forgiveness. The Income-Contingent Repayment and Pay As You Earn plans remain available to current borrowers but will be phased out on July 1, 2028.

AHM graduates considering their options should review their individual loan situation carefully.



Resources for borrowers:

- [NASFAA — SAVE Plan Resource Page](#) (ongoing coverage and updates)
- [NASFAA — SAVE Ends: What Borrowers Can Do](#)
- [NASFAA — Federal Student Aid Changes from the One Big Beautiful Bill Act](#) (summary chart)
- [NAICU — Frequently Asked Questions About the One Big Beautiful Bill Act](#)
- [StudentAid.gov — Repayment Plans and Loan Simulator](#)
- [StudentAid.gov — Court Actions and SAVE Updates](#)
- [Student Loan Borrower Assistance \(National Consumer Law Center\) — SAVE Plan Ending: What Borrowers Need to Know](#)
- [CFPB — Student Loan Resources](#)

Conclusion and What's Next:

The AHM Coalition, and its individual member organizations independently, will continue to seek additional expert guidance, and will monitor all of these regulatory and legislative tracks and will provide updates as information becomes available. Please do not hesitate to reach out with questions as you and/or your institutions navigate these issues.

One thing is clear from the pace and scope of these developments: the AHM profession cannot afford to sit on the sidelines. The regulatory and legal landscape is shifting rapidly, and future outcomes will be shaped in part by how engaged and unified our profession is in its response.

We encourage every member of the AHM community, from institutions, practitioners, students, businesses and supporters, to stay connected and ready to act. That includes joining and engaging with your American Society of Acupuncturists (ASA) chapter, responding when CCAHM and other coalition partners share opportunities for coordinated action, and being prepared to contact your lawmakers, sign on to letters, and endorse legislation when called upon. These moments of collective action will be most effective when the entire profession shows up together.

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Contact:

Kristin Richeimer, CAE
CCAHM Executive Director
Email: contact@ahmcoalition.org