



TOWN HALL

Federal Education Policy and the Future of Acupuncture and Herbal Medicine

March 18, 2026

8 pm ET | 7 pm CT | 6 pm MT | 5 pm PT

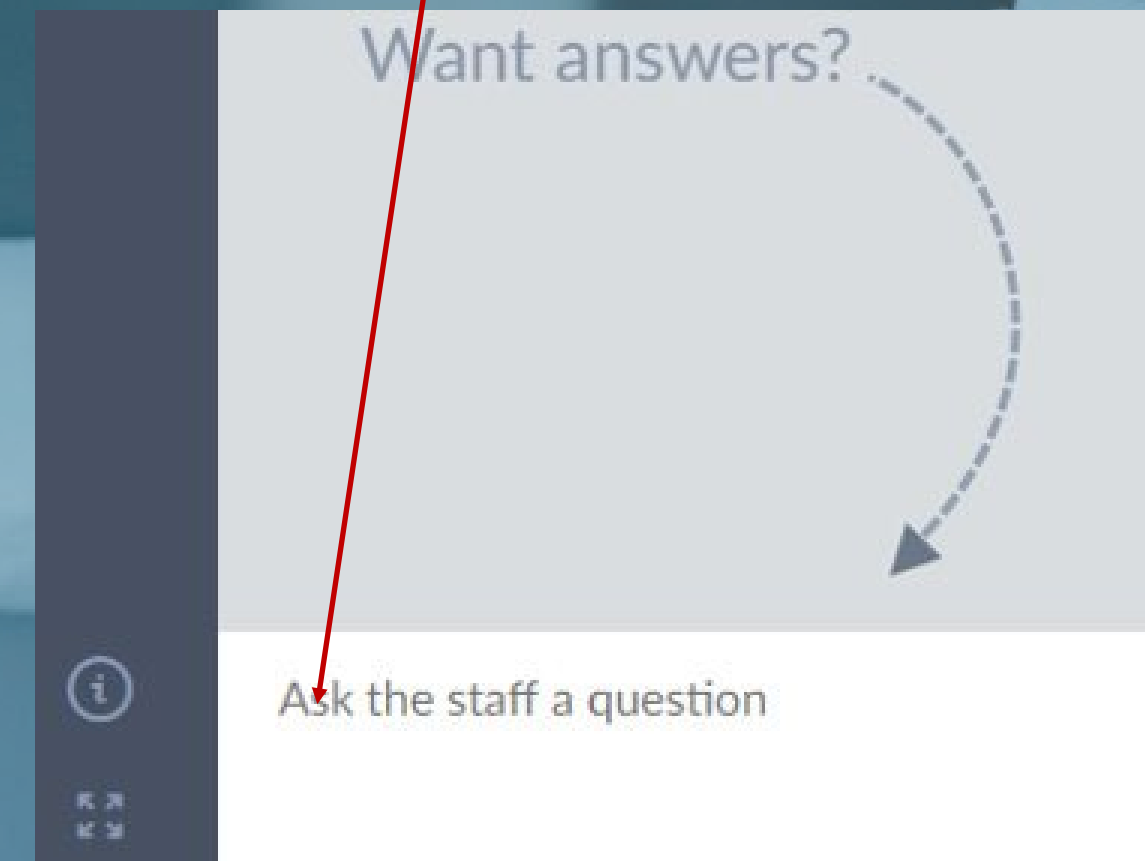
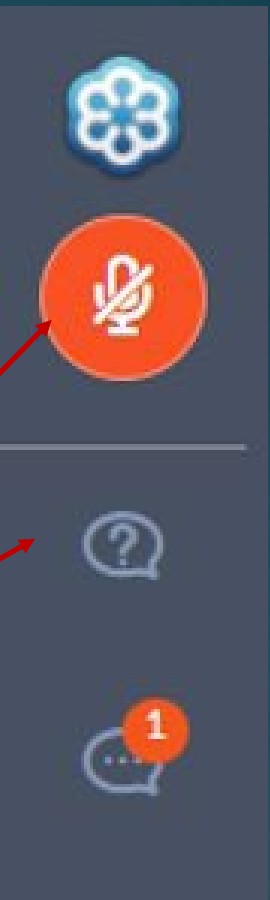
PROFESSION-WIDE EVENT

WWW.AHMCOALITION.ORG



QUICK PARTICIPATION TIPS

- ✓ All Attendees are muted
- ✓ You can ask questions using your dashboard. All questions will be answered during or after the meeting
- ✓ To ensure proper attendance: attendee must be able to see this presentation and the dashboard on their device
- ✓ PDA Certificate of Completion will be distributed within two (2) weeks from the event date
- PDA Points will be reported to Diplomate's Recertification Transcript
- In addition, PDA Certificates of Completion will be uploaded to Diplomate's Portal in the Diplomate Benefits => *My Learning Section*



QUICK PARTICIPATION TIPS

- Attention family and friends! You can watch the presentation together, but each attendee must be logged into the session separately in order to receive PDA points
- **All Attendees!** To receive PDA points, be sure you have registered with your name and NCCAOM ID number as they are recorded in your Certification account. We cannot edit any registration information.
- The webinar is being recorded and will be posted to the AHM Coalition Website.

	Diplomate Name	NCCAOM ID #
Correct	John Doe	12569
Incorrect	Dr. John Doe	NCC12569
Incorrect	John Doe, L.Ac.	12569FL
Incorrect	John Doe	Doe12569
Incorrect	John Doe, MSOM	12569

QUICK PARTICIPATION TIPS

Throughout the webinar, we'll be launching a few short polls for you to participate in. These polls are quick, easy to complete, and help us better understand the perspectives of the community.

When a poll appears on your screen, please take a moment to respond.





PRESENTERS



Mark McKenzie
LAc, PhD (China), MSOM
Executive Director
ACAHM

Kristin Richeimer
CAE
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CCAHM

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Mark McKenzie



Mark McKenzie
LAc, PhD (China), MSOM
Executive Director
ACAHM

THE AHM COALITION

The AHM Coalition is a collaboration of major national acupuncture organizations to advance professional standards of acupuncture and herbal medicine through education, advocacy, and research.

Our mission is to promote the integration of these traditional practices into modern healthcare for the benefit of all.



Council of Colleges of
Acupuncture and Herbal Medicine



WHY NOW?



WHAT'S AT STAKE?



OVERALL STRATEGY



Zi Su Geng
Porridge



Kristin Richeimer



Kristin Richeimer
CAE
Executive Director
CCAHM

FEDERAL EDUCATION POLICY OVERVIEW

H.R. 1 - One Big Beautiful Bill Act and Dept. of Education Negotiated Rulemaking



- HR1 | OB3 passed July 4, 2025.
- Two key committees — RISE and AHEAD.
- AHM Coalition and founding organizations advocating since early 2025.
- AHM programs (and other professions) exposed to unintended harm.
- Rulemaking records and public comment are critical advocacy tools.
- Every submission matters!



DOE NEGOTIATED RULEMAKING 2025-2026



The screenshot shows the U.S. Department of Education website. At the top, there is a navigation bar with the department's logo and name, a search bar, and a 'Contact Us' link. Below this is a secondary navigation bar with dropdown menus for 'Higher Ed', 'Adult Programs', 'Birth to Grade 12 Education', 'Teaching & Admin', 'Grants & Programs', and 'Laws & Policy'. The main content area has a breadcrumb trail: 'HOME / LAWS AND POLICY / HIGHER EDUCATION LAWS AND POLICY / HIGHER EDUCATION POLICY'. The title of the page is 'Negotiated Rulemaking for Higher Education 2025'. Below the title, a paragraph explains that the page provides information on the Department's negotiated rulemaking in 2025 to make regulatory changes for programs authorized by Title IV of the Higher Education Act of 1965. A list of links follows, each with a right-pointing chevron, a link icon, and a plus sign:

- > [Federal Register Notices and Fact Sheets](#)
- > [Public Hearing Information](#)
- > [Public Service Loan Forgiveness Committee](#)
- > [Reimagining and Improving Student Education \(RISE\) Committee](#)
- > [Accountability in Higher Education and Access through Demand-driven Workforce Pell \(AHEAD\) Committee](#)

A callout box at the bottom of the list contains the text: [Accreditation, Innovation, and Modernization \(AIM\) Committee](#) – to be held in April 2026



KEY EDUCATION RULEMAKING COMMITTEES



1 Reimagining and Improving Student Education (RISE) Committee

Focused on program eligibility and degree definitions. AHM licensure programs risk structural exclusion from professional degree classifications — with serious financial aid implications.



CCAHM, AHMC, APWA Coalition Comments Submitted



NPRM Public Comment Closed



Legislative Outreach Guidance - COMING SOON

2 Accountability in Higher Education and Access Through Demand Driven Workforce Pell (AHEAD) Committee

Focused on Pell Grants (first session) and accountability and earnings metrics (second session). AHM programs face unique vulnerability due to how outcomes data is collected and compared across fields.



CCAHM Comments Submitted During Committee



Workforce Pell NPRM Public Comment OPEN (not critical for AHM)



Accountability & Earnings NPRM - NOT YET Published - COMING SOON

3 Accreditation, Innovation, and Modernization (AIM) Committee

“Tasked with developing proposed regulations to reform the higher ed. accreditation system, aimed at reducing costs, increasing innovation, and shifting focus toward data-driven student outcomes rather than bureaucratic compliance.”

Neg Reg sessions scheduled: April 13-17, 2026.



RISE COMMITTEE

(REIMAGINING AND IMPROVING STUDENT EDUCATION)

Professional Degree Designation



Professional student : A student enrolled in a program of study that awards a professional degree upon completion of the program; (1) A professional degree is a degree that signifies both completion of the academic requirements for beginning practice in a given profession and a level of professional skill beyond that normally required for a bachelor's degree, where professional licensure is also generally required, and includes the following degrees Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry (D.P.M., D.P., or Pod.D .), Theology (M.Div., or M.H.L.)
(emphasis added)



RISE COMMITTEE



Key Provisions & Impacts



1

Professional Degree Designation:

- No explicit designation for AHM (and other professions)
- AHM meets criteria for length of study, program leading to licensure, etc.
- AHM programs would be subject to lower annual & lifetime loan limits
- \$20,500/year and \$100k/lifetime for non-professional grad degrees
- \$50k/year and \$200,000/lifetime for professional graduate degrees

2

Loan Availability: Changes to PLUS loan structures and definitions could reduce borrowing capacity for graduate-level AHM students. Elimination of Grad PLUS. New lifetime limit on all Title IV loans: \$257,000.

3


Downstream Effects: Reduced access to federal loans may affect enrollment, diversity of the student pipeline, and institutional financial stability.



COALITIONS, PARTNERSHIPS, RESPONSES (RISE)

Advanced Professional Workforce Alliance (APWA)

Other Professional Association Partners



March 2, 2026

Nicholas Kent, Under Secretary
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Notice of Proposed Rulemaking, Reimagining and Improving Student Education (ED-2025-OPE-0944)

Dear Under Secretary Kent:

On behalf of the Council of Colleges of Acupuncture & Herbal Medicine ("CCAHM"), we appreciate the opportunity to comment on the Reimagining and Improving Student Education ("RISE") Notice of Proposed Rulemaking ("NPRM").

I. Introduction

CCAHM represents 32 out of 46 accredited institutions offering graduate and doctoral programs in Acupuncture and Herbal Medicine ("AHM") in the United States. Our membership includes both nonprofit and for-profit institutions. Our member programs are accredited by the Accreditation Commission for Acupuncture and Herbal Medicine ("ACAHM"), which is recognized by the U.S. Department of Education, and lead to licensure in 47 states and the District of Columbia. We write to express our support for the proposed rulemaking. These sections discuss the importance of rigorous and clinically

[CCAHM Letter](#)

March 2, 2026

Secretary McMahon
United States Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Tamy Abernathy
Office of Postsecondary Education
400 Maryland Ave. SW, 5th Floor
Washington, DC 20202

Re: William D. Ford Federal Direct Student Loan Program Proposed Rule, Docket ID ED-2025-OPE-0944-0001

We, the undersigned Attorneys General of Maryland, Nevada, Colorado, New York, Arizona, California, Connecticut, Delaware, the District of Columbia, Hawai'i, Illinois, Maine, Massachusetts, Michigan, Minnesota, New Jersey, New Mexico, North Carolina, Oregon, Rhode Island, Vermont, Virginia, Washington, and Wisconsin, and the Governors of Kansas and Kentucky (the States), write in opposition to the U.S. Department of Education's (Department's) Notice of Proposed Rulemaking proposing a definition of "professional degree" for the William D. Ford Federal Direct Loan program (the Proposed Rule or Rule), published in the Federal Register at 91 Fed. Reg. 4254 on January 30, 2026. The Proposed Rule is unlawful, unnecessarily restrictive, and harmful to States. We urge the Department to abandon the proposed definition of "professional degree" in 34 C.F.R. § 685.102 or to adjust the definition so that it would include post-baccalaureate degrees in nursing, physician assistance, physical therapy, and other health professions, as well as similarly situated degrees that fall within the statutory definition.

He... (e.g., MSN, DN... researchers, faculty, clin... professionals are

[State AGs Letter](#)



Mahon, Secretary
ent of Education

is.gov

3 No. ED-2025-OPE-0026

ry McMahon:

the Acupuncture and Herbal Medicine Coalition, a collaborative alliance of major organizations including the Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM), the American Society of Acupuncturists (ASA), the Council of Colleges of Acupuncture and Herbal Medicine (CCAHM), and the National Certification Commission of Acupuncture and Herbal Medicine (NCCAOM), we appreciate the opportunity to provide feedback on the Department's rulemaking process addressing Title IV regulations.

Comment on DOE Title IV Negotiated Rulemaking

Our letter highlights the need to preserve loan forgiveness eligibility, maintain affordable repayment options, and ensure fair institutional accountability for small, specialized health professions.

[READ LETTER](#)



March 2, 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0944 – Reimagining and Improving Student Education (RISE)

Dear Under Secretary Kent:

On behalf of the Acupuncture and Herbal Medicine Coalition ("AHM Coalition"), we appreciate the opportunity to submit comments regarding the Department's proposed definition of "professional degree" under the Reimagining and Improving Student Education (RISE) Notice of Proposed Rulemaking. The AHM Coalition represents national organizations across the education and professional practice of Acupuncture and Herbal Medicine ("AHM"). Collectively, our member institutions represent, educate, accredit, certify and support graduate-level students who become licensed healthcare professionals serving patients in hospitals, oncology clinics, Veterans Health Administration facilities, community clinics, and private practices nationwide.

The graduates of accredited AHM institutions, including nearly 30,000 licensed Acupuncturists nationwide, provide essential healthcare services addressing among many other health concerns: pain management, mental health, and chronic disease, directly supporting the "Make America a Healthier Place 2030" agenda, including in underserved communities.

AHMC Public Comment Letter - DOE RISE Committee

The AHM Coalition responded to the DOE Negotiated Rulemaking Notice of Public Rulemaking (NPRM) on March 2, 2026 to address proposed rules on student loans limits and professional degree designations.

[Read the Letter](#)


March 2, 2026

Nicholas Kent
Undersecretary
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Notice of Proposed Rulemaking, Reimagining and Improving Student Education (ED-2025-OPE-0944)

Dear Undersecretary Kent,

On behalf of the Advanced Professional Workforce Alliance (APWA), we appreciate the opportunity to comment on the Reimagining and Improving Student Education (RISE) Notice of Proposed Rulemaking (NPRM). We write to express serious concern about the proposed definition of "professional degrees" in relation to other health professions programs. While the proposed change may appear technical, the change is anything but. The classification of degrees directly affects who can practice and whether the nation can sustain the workforce required in a given field. We support efforts to ensure the range of programs that fit the professional designation



[APWA Letter](#)

AHEAD COMMITTEE

ACCOUNTABILITY IN HIGHER EDUCATION AND ACCESS THROUGH DEMAND-DRIVEN WORKFORCE PELL *2ND SESSION - EARNINGS & ACCOUNTABILITY*



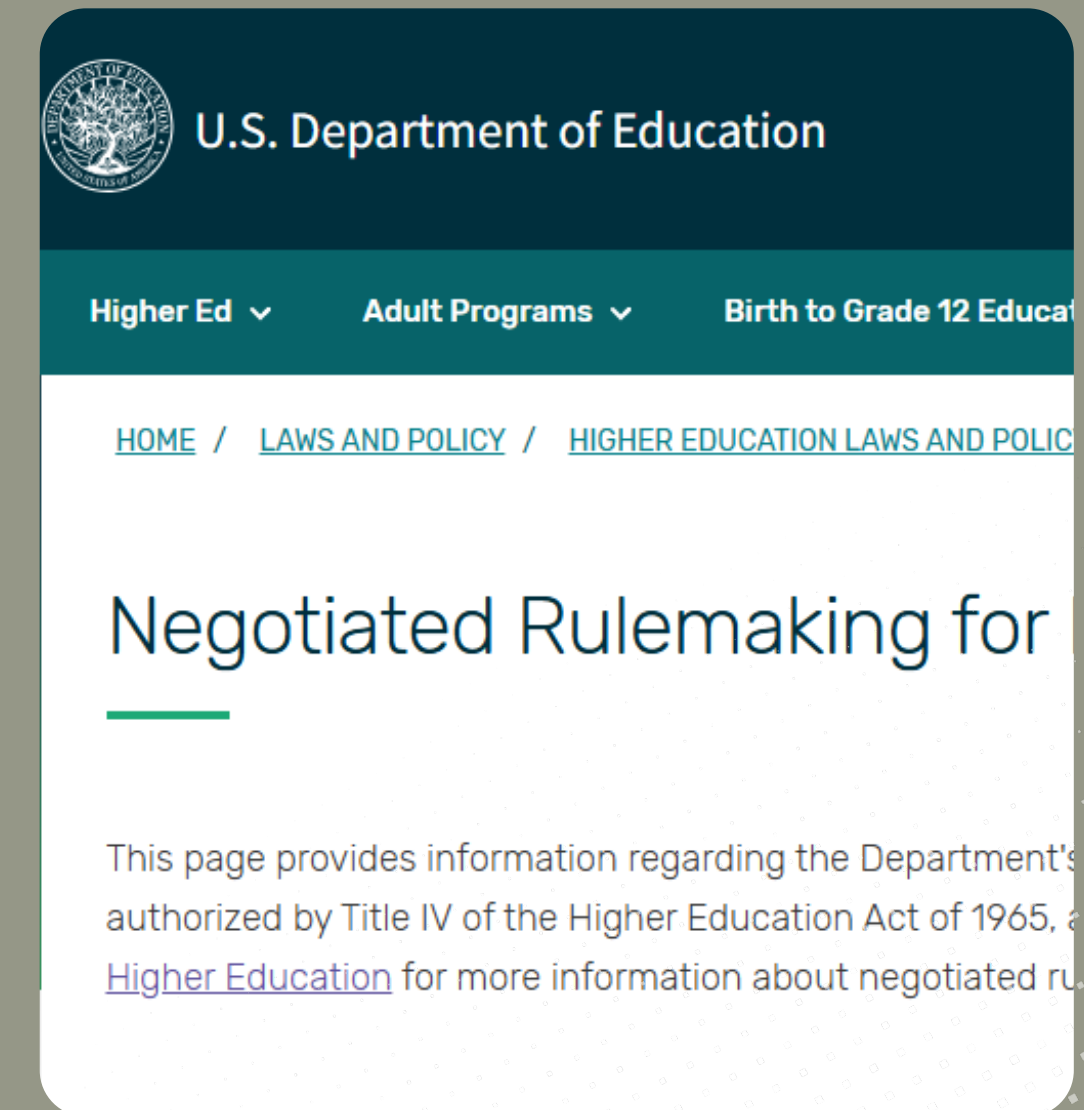
Summary

Establishes how programs are evaluated based on graduate earnings — similar to Gainful Employment metrics.

- One framework
- No carve outs

Where things stand

- Committee has concluded.
- Proposed rule (NPRM) on earnings & accountability framework expected **early April**
- CCAHM and AHM Coalition will post templates once NPRM is open





American Society *of* Acupuncturists



AHEAD COMMITTEE

EARNINGS & ACCOUNTABILITY



Metrics & Framework

Accounting & Data Overview

Timeline & Implementation

Unique Impact on Schools and the Profession

How we Address the Issues

(3) Modifications to Gainful Employment

	Current GE	Proposed GE Rule
Applies to:	GE-Programs	GE-Programs
Tests:	Earnings Test and Debt-to-Earnings Test	Earnings Test Only
Earnings Measurements:	3-year Median Earnings of Working and Non-Working Individuals	4-Year Median Earnings of Working Individuals
Earnings Benchmarks:	Earnings of individuals with a High School Diploma in the same state	Aligned with OBBB Section 84001 (The Six Earnings Benchmarks)
Process for Aggregating Small Programs:	Pooled 2- or 4-year cohorts	Aligned with OBBB Section 84001 (Up to 8 years for programs with less than 30 Title IV Completers)
Exemptions:	Foreign colleges; qualified graduate programs; substantially similar programs with fewer than 30 Title IV completers.	Aligned with OBBB Section 84001 (Programs with fewer than 30 Title IV completers after OBBB-aligned aggregation method).
Sanctions:	Loss of all Title IV aid	Loss of Federal student loans

(1) Timing of the First Earnings Test

- Under the proposed rule, **the first earnings test** would be calculated in early 2027, and colleges would be notified of the result at that time.
 - July 1, 2027 is the first year that programs could “fail” the earnings test for the first time.
- **The second earnings test** would be calculated in early 2028, and colleges would be notified of the result at that time.
 - July 1, 2028 is the first date that programs could lose access to Federal student loans.



MOBILIZING FOR ACTION



Who should act?

- Institutions
- Practitioners
- State Associations
- Acupuncture Associations
- Patients

What to do?

- Stay Informed | Join AHM Coalition Monthly Calls!
- Legislative Outreach
- Coordinated Public Comment (when NPRM is posted)



KEY TAKEAWAYS & NEXT STEPS



Coordination is Key

Messaging is Critical

AHM + Other Impacted Professions



RISE Legislative Outreach

RISE legislative outreach is the immediate priority. Act as recommended by ASA with clear targets and templates.

AHEAD Committee NPRM Responses (Coming Soon - Expected early April!)

We need everyone to coordinate on responses to public comment once it opens. Templates will be available on the AHM Coalition and CCAHM website.

AHEAD Committee Legislative Outreach (~April-May)

Coordinated strategy, templates and talking points coming soon after NPRM.



EXTERNAL RESOURCES



[\(Nat'l. Assoc. of Student Financial Aid Administrators\)](#)

Articles and webinars on current higher education events, policy trackers, daily updates published.



[\(Career Schools Private Education Network\)](#)

Webinars on current events, daily updates emailed.



[Thompson Coburn \(Attorneys at Law\)](#)

Webinars & higher education updates.



[DOE Negotiated Rulemaking](#)

Schedules, past recordings, documents, lists of negotiators

[Federal Register](#)

Notices of Public Rulemaking (NPRM); Public Comment



AHM COALITION RESOURCES



www.AHMCoalition.org



FEATURED EVENT:
AHM Coalition Announces Town Hall on Federal Education Policy and the Future of AHM

Register Now - March 18, 2026
8 pm ET

[Event Page](#) [View all News](#)

Latest News



AHM Coalition Provides Public Comment on DOE Proposed Regulations

The AHM Coalition responded to the DOE Negotiated Rulemaking Notice of Public Rulemaking (NPRM) on March 2, 2026 to address proposed rules on student loan limits and professional degree designations.

[Read the Letter](#)

Latest News



Call for Action! Protect AHM Education Public Comment due March 2nd

The U.S. Department of Education has issued a proposed rule that could affect federal student loan access for licensure-leading Acupuncture and Herbal Medicine programs. If not addressed, the proposal could significantly reduce loan limits for AHM students and create new barriers to entry into the profession. **Deadline: Monday, March 2!**

[Submit Comments Now](#)



THANK YOU!



Please stay engaged!

PDA Certificates of Completion and PDA Points will be distributed within two weeks of this event date.

WWW.AHMCOALITION.ORG

