

**Written Comments re: providing advice and recommendations on the implementation of
the changes to the Title IV, HEA programs included in [Pub. L. 119-21](#)
*Aviation Stakeholder Coalition***

August 28, 2025

Submitted via Regulations.gov - Docket ID ED-2025-OPE-0151

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

**Re: Comments on implementation of Title IV, HEA programs in the One Big Beautiful
Bill Act, Docket ID ED-2025-OPE-0151**

Dear Under Secretary Kent,

As a broad coalition of aviation and aerospace stakeholders, we write to express our strong support for a targeted regulatory clarification under the One Big Beautiful Bill Act (OBBBA) to ensure that students enrolled in qualified undergraduate and Federal Aviation Administration (FAA)-certificated Part 141 flight training programs have appropriate access to federal student loan limits for professional students in professional degree programs.

The nation is facing a pilot workforce crisis that poses serious consequences for transportation access, economic vitality, and national competitiveness. Over the next 15 years, nearly 50% of commercial airline pilots will be forced to retire due to mandatory age requirements.¹ At the same time, the current training pipeline is insufficient to meet projected demand. Since the pandemic, more than 250 airports—representing nearly half of all U.S. airports with commercial air service—are still operating below their pre-2020 flight levels, with dozens experiencing declines of 50% or more in scheduled flights.² This is not just a transportation concern—it is an economic emergency, particularly for small and rural communities.

We are taking decisive steps to address this shortage. Airlines and operators have raised starting salaries, created education, training, and development programs, and expanded partnerships with high schools, training providers, and higher education institutions. However, this challenge cannot be solved by stakeholders alone. There are structural impediments to accessing the pilot profession because of its incredibly high cost. The solution requires strong, sustained collaboration with higher education and federal policymakers, particularly to address affordability and access to education and training.

¹ See 2024 Regional Airline Association Annual Report, <https://raa.org/content-hub/raa-2024-annual-report/>.

² See OAG Published schedules May 2019 vs. May 2025.

FAA flight training programs³—accredited and federally regulated—represent the foundation of the pilot workforce pipeline. **While these programs equip students with the professional skills and licenses necessary to begin flying commercially, they are offered exclusively at the undergraduate level or at FAA-certificated Part 141 pilot schools. After graduation from either, students must continue training to earn the FAA-required Airline Transport Pilot (ATP) certificate, which requires up to 1,500 flight hours.**

These requirements result in education and training costs that often exceed \$80,000 to \$100,000 beyond standard tuition. Yet federal student aid policies currently limit these students to standard undergraduate loan caps, leaving them without access to the same federal support available to students pursuing other professional degrees in fields like law, medicine, and veterinary science.

The OBBBA restructured the federal loan system by eliminating the Grad PLUS loan program and implementing new lifetime borrowing caps for graduate and professional students. The Act defines “professional students” by referencing the existing regulatory definition at 34 CFR §668.2, which describes a professional degree as one that requires professional licensure and a level of skill beyond that normally required for a bachelor’s degree. **As outlined above, accredited and FAA-certificated Part 141 flight training programs fit squarely within this definition. However, because the regulation fails to expressly identify such programs and is written ambiguously, further regulatory clarification or guidance from the Department is urgently needed to ensure they are explicitly included.**

Therefore, we respectfully urge the Department to issue clarifying regulations or guidance that explicitly include qualified undergraduate and FAA-certificated Part 141 flight training programs—those accredited by an accreditor recognized by the U.S. Department of Education and certified by the FAA—within the definition of a “professional degree” under 34 CFR §668.2. The specific language should ensure that “accredited programs providing the training described in 14 CFR §141 (or any successor regulations)” are covered.

This clarification would allow students in these programs to access the professional student loan limits established under the OBBBA, enabling them to complete training, enter the workforce, and repay loans with strong earnings in a high-demand profession. According to the Bureau of Labor Statistics, as of May 2024, the median salary for airline pilots now exceeds \$226,000.⁴

This is not a request for new authority or special treatment. It is a narrowly tailored clarification that aligns longstanding regulatory language with the realities of pilot education and training and supports the nation’s economic competitiveness. These students—and the communities that will ultimately rely on them for air service—deserve equitable access to the same federal tools already available to peers in other professions that require professional licensure and advanced training beyond a bachelor’s degree. We are not asking to create new programs or schools eligible for student loans. Rather, we are requesting clarification that existing accredited and FAA-certificated Part 141 programs fall within the definition of a “professional degree,” more

³ 14 CFR §141.

⁴See <https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm#tab-5>.

accurately reflecting the level of commitment and competency certification required of student pilots in these programs.

We urge the Department to act swiftly and decisively to make this requested clarification in support of student pilots, to strengthen the pilot pipeline, and to uphold the integrity of the nation's air transportation system.

Sincerely,

Airlines and Other Related Businesses

Air Wisconsin Airlines
Alaska Airlines
American Airlines
Atlas Air
Cape Air
CommuteAir
Delta Air Lines
Endeavor Air
Empire Airlines
Envoy Air
GoJet Airlines
Hawaiian Airlines
Horizon Air
JetBlue Airways
Piedmont Airlines
PSA Airlines
Republic Airways
SkyWest Airlines
Southwest Airlines
Textron Aviation
United Airlines

Education and Training Institutions

California Aeronautical University
Delaware State University
Indiana State University Aviation
Leadership in Flight Training Academy LLC
Lewis University - Department of Aviation and Transportation
The University of Memphis - Herff College of Engineering
University of Dubuque – Department of Aviation
University of Oklahoma School of Aviation
Vaughn College of Aeronautics and Technology

Trade Associations

Airlines for America (A4A)
American Association of Airport Executives (AAAE)

Association of Value Airlines (AVA)
Cargo Airline Association (CAA)
General Aviation Manufacturers Association (GAMA)
International Air Transport Association (IATA)
National Air Carrier Association (NACA)
National Air Transportation Association (NATA)
National Association of State Aviation Officials (NASAO)
National Business Aviation Association (NBAA)
National Flight Training Alliance (NFTA)
Regional Air Cargo Carriers Association (RACCA)
Regional Airline Association (RAA)
University Aviation Association (UAA)
Vertical Aviation International (VAI)