Public Comment on Proposed Rule: Reimagining and Improving Student Education

Submitted on behalf of:
U.S. regional and mainline air carriers, aviation trade associations and industry stakeholders, and the communities they serve

March 2, 2026

Submitted via Regulations.gov - Docket ID ED-2025-OPE-0151; RIN 1840-AD98

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

Re: Proposed Rule: Reimagining and Improving Student Education, Docket ID ED-2025-OPE-0151

Dear Under Secretary Kent,

We write on behalf of U.S. regional and mainline air carriers, national aviation trade associations, and other industry stakeholders responsible for maintaining safe and reliable air service across the country. We respectfully request that the Department clarify the treatment of accredited FAA-certificated Part 141 flight training programs under 34 C.F.R. §§ 685.102 and 685.203 to ensure that federal student-aid policy supports, rather than inadvertently constrains, the nation's pilot workforce pipeline.

Specifically, we urge the Department to permit students enrolled in accredited Part 141 programs to access existing graduate-level federal loan limits (up to $100,000) while completing required flight training, even when such programs are structured at the undergraduate or non-graduate level. This request does not seek new authority or expanded borrowing categories; rather, it asks that current loan-limit frameworks be applied in a manner consistent with the realities of federally regulated pilot training.

Without this clarification, the proposed rule risks tightening a critical entry point into the commercial aviation workforce at a time when pilot availability directly affects route stability, regional connectivity, and economic growth. The resulting constraints would be felt most acutely in small and rural communities that depend on regional air carriers for access to national and global markets. While airlines and aviation stakeholders have expanded cadet programs, academy partnerships, and tuition-support initiatives, private-sector efforts alone cannot resolve the up-front financing barriers embedded in pilot education and training. A coordinated solution that includes the higher-education financing system is necessary to sustain a stable and equitable pilot pipeline.

I. Ensuring a Robust Supply of Pilots Is an Economic and Connectivity Imperative

A. The pilot workforce crisis threatens air service, economic growth, and national connectivity

The United States faces a sustained and well-documented pilot workforce crisis driven by mandatory retirements, demographic trends, and continued growth in passenger demand. This crisis has serious consequences for access to the air transportation system, economic vitality, and our country's 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 demand for air service. Since the pandemic, more than 190 airports—representing nearly half of all U.S. airports with commercial air service—are still operating below their pre-2020 flight levels, with almost 10 percent experiencing declines of 50% or more in scheduled flights.[2] This is not just a transportation concern—it is an economic warning sign that if not addressed will undermine workforce mobility, healthcare access, business investment, and fundamental economic development particularly for small and rural communities.

For aviation stakeholders, this workforce challenge is not a temporary hiring challenge. It is a structural constraint on growth, operational reliability, and equitable access to air transportation for small communities, particularly as mandatory retirements at age 65 for commercial airline pilots continue to accelerate attrition across the industry.[3] Further with approximately 10 percent of the airline pilot workforce under 30 years old, there is a clear and urgent need to attract the next generation into the profession.[4]

B. Stakeholders are stepping up, but cannot solve the problem alone

Airlines and aviation stakeholders are investing heavily to expand the pilot pipeline. Air carriers now operate or sponsor airline-backed cadet and academy programs enrolling thousands of students annually. Regional carriers have also expanded tuition assistance, signing bonuses, and pathway agreements.[5]

These initiatives reflect a strong, good-faith commitment by the aviation community to address its serious needs. Despite these efforts, industry investment alone cannot overcome the up-front cost barrier to pilot training, which routinely exceeds $100,000 per student before reaching airline eligibility.[6] Even airlines that have their own pilot pathway programs rely on a steady flow of qualified entrants from the broader education

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[1] RAA 2025 Annual Report, https://raa.org/content-hub/raa-2025-annual-report/
[2] See OAG Published Schedules March 2019 vs. March 2026
[3] U.S. Government Accountability Office, *Aviation Workforce: Current and Future Availability of Airline Pilots and Aircraft Mechanics (*GAO-23-105571), https://www.gao.gov/assets/gao-23-105571.pdf
[4] ibid.
[5] ibid.
[6] ATP Flight School published pricing, https://atpflightschool.com/faqs/fixed_cost_pricing.html

and training ecosystem. The current federal student-aid framework, which doesn't reflect the true cost and structure of pilot training, has repeatedly demonstrated that it is an impediment to meeting national demand for pilots. While industry's investments have been substantial, their education and training footprint isn't sufficient to resolve this problem on their own. A complementary approach that prioritizes making higher education more accessible is critical.

II. Why Student-Loan Policy Is Central to the Pilot Pipeline

A. Flight training is extraordinarily expensive and federally mandated

Training a commercial airline pilot is among the most expensive forms of workforce preparation in the United States outside of medicine and law. Across accredited, FAA-certificated Part 141 programs, the University Aviation Association has reported that the incremental cost of required flight training alone commonly ranges from $80,000 to $100,000, above and beyond standard tuition and fees.[7] These costs reflect federally mandated training requirements, including minimum flight-hour thresholds, certified flight instructors, simulator time, acquisition of licenses, certificates, and ratings, aircraft acquisition and maintenance, fuel, and FAA testing and compliance obligations. These costs cannot be reduced without compromising federally required safety and licensure standards.

Undergraduate loan limits were never designed to cover this scale or type of licensure-based training. As a result, many capable prospective pilots, particularly those from low- and middle-income backgrounds, are effectively priced out of the profession before they ever reach the hiring pipeline.

B. Part 141 programs function like graduate education in substance

Although many flight training programs are structurally undergraduate or non-graduate, they are functionally analogous to graduate-level professional education. In addition to a standard undergraduate course of study at a two- or four-year institution, or enrollment through an accredited flight school, students complete extensive postsecondary, profession-specific training. During enrollment, they obtain licenses, certificates, and ratings, comparable to law, medical, or clinical graduate programs that culminate in professional licensure, and ultimately enter a federally regulated profession in which licensure is required for employment. The distinction is one of program structure, not rigor or workforce role.

C. Programs intentionally remain at undergraduate or non-graduate levels to avoid unnecessary cost and delay

Universities and flight schools have deliberately avoided reclassifying flight training as post-baccalaureate education solely to access higher loan limits. This restraint reflects

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[7] U.S. Government Accountability Office, *Aviation Workforce: Current and Future Availability of Airline Pilots and Aircraft Mechanics (*GAO-23-105571), https://www.gao.gov/assets/gao-23-105571.pdf.

sound workforce and affordability principles that are directly aligned the Department and broader Administration's workforce goals: 1) avoiding credential inflation; 2) reducing time to workforce entry; and 3) minimizing unnecessary borrowing. Requiring institutions to convert flight training into graduate credentials simply to unlock financing would increase costs, extend timelines, and reduce access, without improving safety or competency. Programs and students should not be penalized for aligning with efficiency and affordability goals.

D. Financing constraints disproportionately harm rural and regional service

Because flight training costs are incurred during undergraduate or flight-school enrollment, students cannot wait until after graduation to access higher loan limits. The financial burdens are front-loaded. Without access to graduate-level loan limits at this stage, students are forced into high-cost private lending or abandon the profession altogether. This financing bottleneck constrains the pilot supply feeding regional carriers first, placing rural and small-community service at greatest risk. Industry stakeholders have identified the cost of pilot education as a challenge to increasing the pilot supply.[8]

From an industry perspective, this is not merely a workforce issue; it is a regional equity and national connectivity issue.

III. Borrower Outcomes and Repayment Capacity

According to the Bureau of Labor Statistics, the median annual wage for airline pilots, copilots, and flight engineers was $226,600 in May 2024, with wages increasing substantially as pilots advance through seniority systems.[9] Median wages for airline pilots substantially exceed national averages, and long-term earning potential supports successful loan repayment. From an accountability perspective, pilot training represents a high-return workforce investment. Expanding access to graduate-level loan limits for required training aligns with federal goals to support programs that lead to durable employment and economic mobility. Pilots will be able to repay their loans.

IV. Requested Regulatory Clarifications

Option 1 (Preferred): Amend the Definition of "Graduate Student" and Loan-Limit Provisions

We propose (in red) the following, which would permit access to the existing $100,000 graduate loan limit for students enrolled in accredited, FAA-certificated Part 141 programs.

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[8] U.S. Government Accountability Office, *Aviation Workforce: Current and Future Availability of Airline Pilots and Aircraft Mechanics* (GAO-23-105571), https://www.gao.gov/assets/gao-23-105571.pdf.
[9] U.S. Bureau of Labor Statistics, *Occupational Outlook Handbook: Airline and Commercial Pilots,* *https://www.bls.gov/ooh/transportation-and-material-moving/airline-and-commercial-pilots.htm*.

Proposed amendment to 34 C.F.R. § 685.102:

> Graduate student means:
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> (i) A student enrolled in a program of study that is above the baccalaureate level and awards a graduate credential (other than a professional degree) upon completion of the program; or
> (ii) A student enrolled in a non-graduate program authorized by the Federal Aviation Administration under 14 C.F.R. Part 141 (or successor regulations) that meets the definition of an accredited program under 34 C.F.R. § 600.2.

Conforming amendment to 34 C.F.R. § 685.203(b)(2)(iv):

> (D) With regard to programs authorized under 14 C.F.R. Part 141 (or successor regulations), the loan limits in this section shall be in addition to undergraduate loan amounts otherwise available under this section.

Legal justification: This approach does not expand statutory authority or disturb negotiated consensus; it clarifies how existing graduate loan limits apply to a uniquely situated, federally regulated category of programs. Courts have repeatedly held that negotiated rulemaking does not bind agencies to consensus language (USA Group Loan Services v. Riley), and that agencies must avoid arbitrary outcomes under the Administrative Procedure Act (Motor Vehicle Manufacturers Association v. State Farm).

<u>Option 2 (Alternative): Interpretive Clarification in the Preamble</u>

If the Department determines it cannot amend regulatory text, it should include explicit interpretive language in the preamble to the final rule clarifying that accredited FAA-certificated Part 141 programs may access graduate-level loan limits for required licensure training. Illustrative preamble language could include:

> Preamble Option A (Narrow and direct):
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> "The Department recognizes that accredited, FAA-certificated Part 141 flight education and training programs require extensive, federally mandated licensure training comparable in scope and cost to graduate-level professional education. Accordingly, for purposes of applying loan limits under § 685.203, the Department interprets these programs as eligible for graduate-level loan limits for required flight training."
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> Preamble Option B (Workforce-aligned):
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> "Consistent with federal workforce priorities and the structure of the OB3, the Department recognizes that certain licensure-based programs—such as accredited FAA-certificated Part 141 flight education and training programs—impose

> training requirements that substantially exceed traditional undergraduate education and therefore warrant access to graduate-level loan limits."
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> Preamble Option C (Administrative-law focused):
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> "The Department acknowledges that accredited FAA-certificated Part 141 programs occupy a unique position within higher education, combining undergraduate academic study with extensive postsecondary licensure requirements mandated by federal law. In light of these unique characteristics, the Department interprets its regulations to permit access to graduate-level loan limits for students enrolled in such programs."

The pilot workforce crisis is a national challenge with economic, regional, and connectivity consequences. Airlines and aviation stakeholders are investing aggressively to address it, but these stakeholders cannot solve this problem alone. A higher-education financing framework that reflects the realities of pilot training is essential.

We respectfully urge the Department to adopt the requested clarification to ensure that federal student-aid policy supports a robust, equitable, and sustainable pilot pipeline—particularly for the communities that depend most on reliable air service.

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

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)
Vertical Aviation International (VAI)