

MASTER TRACKING TABLE - Updated May 18, 2026

Issue Area	When It Emerged	Federal Action / Status	AANMC & AANP Actions	Impact and Next Steps
<b>Pre-emptive measures</b>	Late 2024	Anticipation and preparation for heavy use of executive orders related to education and healthcare	AANMC hired legal team and sent letter to ED Under Secretary on FVT/GE measures; follow up with ED; AANMC scenario planning; AANMC submits first of five CNME Standards proposals to decrease cost of education. Deans of AANMC members continue proactive work on curriculum flexibility and cost reduction.	No response from ED; Monitoring issues; Letter sent to Secretary McMahon fall 2025 via MAHA leadership; CNME received proposal and placed on agenda for consideration. Approved fall 2025.
<b>Administration change</b>	Early 2025	Anticipation and preparation for heavy use of executive orders, administrative turnover, layoffs and restructuring of Department of Education	AANMC included an introduction of health professions issues to new administration. AANP submitted letters to President Trump and Secretary Kennedy, and began networking with multiple HHS staff directly and through surrogates.	No response from ED & limited response/meetings with HHS; Ongoing networking & follow up meetings
<b>DEI Executive Orders and ED 'Dear Colleague Letter'</b>	Early 2025	Immediate legal compliance requirements	Coordinated response with FASHP; AANMC signed <a href="#">ACE response</a> ; tracked legal challenges; compliance coordination with CNME; guided schools on compliance.	Issued compliance updates and coordination with CNME
<b><a href="#">Research Grant Freeze / NIH / NCCIH &amp; August EO</a></b>	Early-mid 2025	Delays, uncertainty, reprioritization	Reviewed and supported <a href="#">ACE</a> letter; coalition support for NCCIH; monitored NCCIH task force actions	Ongoing; Continue monitoring <a href="#">legal</a> & coalition engagement

**GradPLUS Loans**      Early-Mid 2025      Threatened elimination in budget reconciliation discussions (which became the OBBB)      Monitored reconciliation closely; coordinated with FASHP; supported congressional advocacy efforts; AANMC/AANP added defense of GradPlus to DC FLI; AANP issued action alert June 9, 2025, generating 1700 emails to Congress. AANP/AANMC signed onto [joint healthcare professions](#) letter with 56 state/national orgs.      GradPLUS removed in OBBB (grandfathered students with existing loans as of 6/30/26); Schools creating alternative loan counseling plans. Monitor implementation, legal challenges & grandfathering

[EO on Accreditation](#)      April 2025      Restructuring of accreditation      AANMC tracking with CNME, ACE, NAICU, ASPA, FARB and FASHP; scenario planning for dissolution/restructure of current accreditation framework; connections to ASPA executive      Ongoing; Continue monitoring

**Naturopathic Coordination Council**      May 23, 2025      Convened all national ND orgs, schools, WNF, and regulatory authorities      Discussed possible dismantling of Dept of Ed, threat to GradPlus loans and borrowing caps, Executive Orders impacting PSLF, Visas, DEI, Accreditation, and others. Also discussed CNME accreditation and residency capacity. **DECISION:** GradPlus/loan caps identified as highest priority for all organizations to focus on.      Subsequent to this meeting, the AANP accelerated congressional meetings about protecting GradPlus loans, and issued an action alert (see below).

<a href="#">OBBB / Reconciliation Bill</a>	Spring–Summer 2025	Passed. GradPlus loans eliminated; Higher ed loans restructured with caps for graduate and professional programs.	Joined multi-profession efforts to secure funding for health professions' students; AANMC Board meeting with CNME/NABNE/AANP/CAND held immediately after passage to discuss impact of GradPlus elimination, and upcoming rulemaking to implement new loan structure. Bill language for loans for professional degrees was broad and would include NDs. <b>*Naturopathic</b>	Law enacted despite opposition from higher ed, education associations and healthcare industry; strategic prioritization for immediate and long-term actions; awaiting response from NABNE on August 2025 proposal;
<b>Work Study Program</b>	Early/mid 2025	DOGE	<b><i>medicine meets existing definitions and classifications for a professional degree.</i></b> AANMC draft CNME Standards proposals submitted. AANMC submits proposal to change NPLEX eligibility allowing graduates and residents to work more quickly post-graduation. <a href="#">Update for prospective and current students.</a>	Monitoring
<a href="#">EO on PSLF</a>	4/29/25 & 5/1/25	Public Comment	Submitted targeted public comments via <a href="#">AANMC, INM</a> ; Calls for issue engagement via social media, NMC meeting, direct outreach to PSLF recipients.	<a href="#">Final rule issued</a> restricting employer eligibility; Monitor outcomes and legal challenges
<a href="#">H-1B Visas</a>	6/30-7/2/25	Negotiated rulemaking	Public Comment	Ongoing; Assess ND workforce implications
	8/18- 9/17/25			
	Mid 2025	Restrictions & uncertainty	Tracking via FASHP & higher ed coalitions; <a href="#">AANMC signed letter</a>	

<b>Tariffs / Supply Chain</b>	Spring/Summer 2025	Tariff executive actions	AANMC tracked disruption in the natural products supply chain via healthcare coalitions and UNPA. Crisis averted with reversal of tariff on China.	Ongoing; Monitor impact
<b>Professional Degree Definition (Phase I - Pre RISE Negotiated Rulemaking)</b>	Summer–Fall 2025 7/25-8/28/25	Coalition Building Public Comment	<p>Background: OBBS referenced 34 CFR 668.2's definitions for professional degrees, which defines professional and lists 10 professions as examples, but initially includes language that professional degrees "are not limited to" this list which would have encompassed ND. <b>Of note, at this time, ND meets these established definitions for a profession as defined in statute &amp; congressional intent.</b></p> <p>AANMC <a href="#">submits comments</a>. AANMC &amp; AANP also sign onto 2 joint health professions coalition letters - <a href="#">FASHP letter #1</a>; <a href="#">FASHP letter #2</a> to amplify a unified stakeholder messaging urging RISE to adopt a broad definition in rule.</p> <p><a href="#">RISE Committee appointed</a> with no representation of NDs (or ANY health profession).</p>	<p>Legal counsel initiated in coalition;</p> <p>The AANP State &amp; Federal Affairs committee strategically concentrates on joining broader healthcare coalition efforts to leverage the collective influence of larger professions.</p> <p>Enhanced participation in FASHP &amp; other coalitions</p>
<b>Professional Degree - (Phase II - RISE</b>	Sept–Dec 2025	Committee reached consensus to propose draft rules with very restricted list of professional degrees,	<ul style="list-style-type: none"> <li>Initial draft of the rules proposed a clause for inclusion of other health professions (which would have included ND);</li> </ul>	NPRM (public comment period) forthcoming;

## Negotiated Rulemaking Committee

- excluding ND & most health professions
  - Negotiators began discussing restricting the definition;
  - Of note, the regular ability to submit public comments *during* the committee meetings was removed by ED from committee structure; AANMC networked & advocated with professions with access to negotiators on RISE;
  - Clause removed in final version, creating the proposed draft with only 11 professions;
  - Advocacy shifts to urge Congress to intervene; AANP/AANMC/state affiliates engage in targeted Congressional outreach; AANP action alert generates ~7,000 emails from NDs/patients/students;
  - AANMC redirects budget November 2025 and hires lobbyist in December 2025;
  - Joint AANMC/AANP Letter to HHS to urge Sec. Kennedy to intervene with Sec. McMahan;
  - Communication via surrogate to personal contact at Dept of Ed, with response to “engage in upcoming public comment period.”
  - Department of ED clarifies in an [FAQ](#) that the proposed definition is for purposes of student loans only.
- All health professions direct advocacy to engage Congress to clarify legislative intent to ED in advance of & during upcoming public comment period
- AANMC/AANP join new AHAWD Coalition of 50+ healthcare orgs

<b>AHEAD Negotiated Rulemaking Committee</b>	Dec 2025 - Jan 2026 Negotiated Rulemaking	<p>Early monitoring and analysis of AHEAD alongside RISE to assess cumulative impact on ND programs; Formal written comments submitted via AANMC, FASHP, and allied organizations; *Of note - public comment disabled during the weeklong in person AHEAD meeting.</p> <ul style="list-style-type: none"> <li>• Letter resent to Sec McMahon outlining concerns about misalignment of FVT/DTE metrics for small, primary care, prevention-focused professions</li> <li>• Powermap the appointed negotiators to identify possible lines of communication to convey our concerns; <a href="#">AANMC Letter</a> sent to negotiators outlining concerns</li> <li>• Initiated data collection for message development on alumni workforce, income data &amp; default rates</li> <li>• Outreach to ACLU, ERA and NWLC.</li> <li>• Coordination with CNME to anticipate implications for accreditation, reporting, and program viability</li> <li>• <a href="#">Joint letter from acupuncture and naturopathic medicine</a> to AHEAD negotiated rulemakers.</li> </ul>	<p>AANMC &amp; Lobbyist monitoring;</p> <p>Continued advocacy to correct or contextualize FVT/DTE metrics that disadvantage ND programs;</p> <p>Preparation for congressional oversight, implementation guidance, and potential future rule revisions;</p> <p>Alignment of AHEAD accountability concerns with RISE professional degree advocacy to refine messaging</p> <p>After negotiated rulemaking releases language, work with political strategist &amp; legal to submit rebuttal and counterpoints to rule</p>
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<b>Professional Degree - (Phase III - Public Comment)</b>	<i>Anticipated</i> Early 2026	AANP/AANMC working in healthcare coalitions to pursue 5 strategies: <ol style="list-style-type: none"> <li>1. Generate high volume of comments from individuals</li> </ol>	
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2. Submit substantive, meaningful & strategic organizational letters
3. Continue targeted congressional pressure/engagement
4. Engage with congressional members working on legislative solutions
5. Continue to explore legal options if ED does not correct draft language

The Department announced the Accreditation AIM Negotiated Rulemaking. AANMC vetting additional negotiator nomination.

AANMC convened a meeting with CNME and AANP to discuss strategy and recommendations for a strong negotiator nomination. CNME conducted outreach to ASPA regarding negotiator suggestions.

AANMC began analysis of the proposed rule; conducted check-ins with industry partners; initiated planning for action alerts, social media/public education campaign, and legislative meetings.

The RISE negotiated rulemaking NPRM was formally released, triggering full rule analysis and comment development with legal review.

Multiple action alerts issued to grassroots, sent messaging guidance & repeated

AANP transmitted 2,362 comments to the public docket. ED published

1/26/26

**AIM / Accreditation Negotiated Rulemaking Announced**

Public Comment

1/29/26

**RISE NPRM Public Comment Preparation Begins**

NPRM Released

1/30/26

**RISE NPRM Released (ED-2025-OPE-0944)**

2/6/26 - 3/2/26

**Action Alert Issued &**

<b>Community Mobilization</b>			requests for affiliate community to write grassroots letters	1,134 comments referencing "naturopath." ~16 affiliates and schools submitted organizational comments.
<b>Letter to Secretary Kennedy</b>	2/18/26	Submitted letter to HHS Secretary	A formal request to interact with the Department of Education regarding the workforce pipeline related to ED profession definition change.	
<b>Ad hoc Research Consortium</b>	2/24/26	Joined in a consortium letter	AANMC & AANP joined in on the FY27 Recommendation for NIH Funding	
<b>Legislative Meetings</b>	3/5/26	In person meetings with administrative staff in DC	Participation in administration meetings and congressional meetings	Education of agencies and staff regarding ND position and impact of proposed rules.
<b>AANMC and AANP Hire Data Analyst</b>	March	Data analyst hired and onboarded for AHEAD	Given that it was unclear when the AHEAD rule would be released, we had a DC-based data firm on standby	Analysis, report writing and review of AHEAD public comment
<b>NACIQI CNME Hearing</b>	March	Preparation for hearing	Assisted in gathering background information and data for testimony.	Follow up with administration and profession organization post-decision
<b>APWA Coalition Steering Committee</b>	March/April/ May - ongoing	AANP/AANMC joined together on APWA Coalition Steering Committee	Organizing collective response on RISE, including education/advocacy and planning June 8 Congressional Brief	Jointly directing APWA initiatives

<b>DCFLI</b>	4/13/26	AANP National Fly In	Congressional Education on RISE, AHEAD and AIM issues, and AANP talking points	Multiple legislative meetings
<b>AHEAD Draft Rule</b>	4/20/26	AHEAD Draft released	AANMC reviewed Rule, prepared preliminary comments, coordinated cross-profession data analysis (acupuncture joined our initiative) to inform AHEAD public comments. AANP/AANMC engaged Avalere data firm to strengthen methodological and policy arguments. Reviewed statements from IHPC, former Trump official, acupuncture and chiropractic to align messaging.	Developed and distributed comment templates to AANMC member institutions and AANP affiliates to support individual submissions. Prepared comment for submission 5/20.
<b>Presentation on AIM Negotiated Rulemaking</b>	5/7/26	Presentation to CNME Board	Gave overview of AIM NegReg Process	Requested that CNME engage in coordinated professional response
<b>Final RISE Rule</b>	Early May and ongoing	Legal and legislative strategy development	Explained potential implications for programmatic accreditation	
<b>National Academies of Practice (NAP) Hill Day</b>	5/12/26	Legislative Meetings	Analysis of final RISE Rule 4/30-5/1, with subsequent legal and legislative strategy development.	Engaged in ongoing initiatives to block implementation.
			Focus: workforce impact of RISE and inclusion of all health professions	Congressional education
			Additional advocacy for permanent telehealth flexibilities and inclusion of all providers	

<p><b>Congressional Review Act (CRA) to repeal the RISE rule</b></p>	<p>5/13/26</p>	<p>Joined a consortium letter</p>	<p>Offices engaged included House and Senate members across key committees</p>
			<p>AANMC signed on to the Congressional Review Act (CRA) resolution to repeal the RISE rule</p>
			<p>Tracking issue and bipartisan support efforts</p>
			<p>Participated in APWA coalition sign-on effort</p>
			<p>Forwarded CRA opportunity to aligned partners and stakeholders, including: IFM, IHPC, AIHM, FASHP, NAP, INM AANMC member institutions</p>