SDBP
Society for Developmental & Behavioral Pediatrics

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SDBP Mission Statement:
Optimizing the development and behavioral (DB) health of all children and families through interprofessional collaboration.

SDBP Statement on the DOE proposed rule to de-classify certain advanced degrees as "nonprofessional."

On behalf of the Society for Developmental and Behavioral Pediatrics (SDBP), we are expressing our strong opposition to the U.S. Department of Education's proposal that excludes certain healthcare fields and their training programs from a list of "Professional" programs, thereby limiting financial aid opportunities for students in these fields. As a national interdisciplinary organization dedicated to promoting the developmental and behavioral health of children—particularly those with developmental disabilities—we are deeply concerned about the negative consequences this decision would have on the pediatric healthcare workforce and the children and families who rely on it.

Healthcare disciplines such as ***nursing, social work, occupational therapy, physical therapy, speech-language pathology, and other health professions*** require intensive graduate-level training, clinical practicum hours, and licensure. Their longstanding recognition as "professional" programs reflects the advanced competencies required to provide evidence-based collaborative care. Classifying these programs as something less than "professional" not only diminishes the rigor of this training but also risks weakening the pipeline of providers at a time when national shortages are already severe.

Workforce data consistently demonstrate that demand for pediatric developmental, behavioral, and therapeutic intervention services greatly exceeds supply. Developmental professionals from all disciplines face shortages across the country, resulting in long wait times for developmental evaluations as well as intervention services.[1-5]

The consequences of excluding the professional designation for these programs would be substantial:

- **Barriers to financial aid and graduate enrollment** would further reduce the workforce entering these fields.
- **Increased shortages** would extend wait times for evaluation, diagnosis, and therapy—many already months to years long.
- **Disruptions to early intervention**, which has strong evidence supporting its impact on long-term developmental outcomes (National Research Council; Institute of Medicine. *From Neurons to Neighborhoods: The Science of Early Childhood Development*. National Academies Press; 2000.)
- **Greater caregiver burden**, especially for families of children with autism spectrum disorder, cerebral palsy, intellectual disability, ADHD, genetic conditions, or complex medical needs.

Policies that unintentionally restrict the supply of highly trained providers will only deepen disparities and reduce the quality and timeliness of care. Multidisciplinary care—including speech therapy, occupational therapy, physical therapy and behavioral health—is not supplemental; it is essential. Undermining the educational and professional infrastructure that trains these clinicians will directly weaken access to services that support communication, mobility, learning, emotional regulation, and overall developmental progress.

SDBP strongly urges the Department of Education to assign the professional program classification to all healthcare fields requiring advanced clinical training and licensure, and to continue to ensure that federal policy strengthens the pediatric healthcare workforce rather than jeopardizing it. This classification supports high-quality education, workforce sustainability, and—critically—the well-being of the nation's most vulnerable children.

References:

1. American Academy of Pediatrics. *Pediatric Physician Workforce: 2020 Workforce Characteristics*. Elk Grove Village, IL: AAP; 2021.
2. Health Resources and Services Administration. *National Projections: 2020–2035*. U.S. Department of Health and Human Services; 2020.
3. American Speech-Language-Hearing Association. *2023 SLP Workforce and Work Conditions Survey Report*. ASHA; 2023.
4. American Occupational Therapy Association. *AOTA Workforce Data: 2022 Report*. AOTA; 2022.
5. American Physical Therapy Association. *APTA Workforce Profile 2023*. APTA; 2023.