

## Action Alert

### Federal Rulemaking Fails to Recognize Advanced Nursing Degrees as "Professional"

The federal government has proposed a rule that excludes advanced degrees in nursing and other healthcare fields from the list of professional degrees.

In a regulation recently proposed by the federal Department of Education, the definition of a professional degree will be limited to a list intended as examples in legislation passed in 1965, with only one addition. This definition is important because the "One Big Beautiful Bill Act" (OBBBA) sets a lower cap on federal student loan amounts for "graduate degrees" than for "professional degrees." Post-baccalaureate degrees in professions such as nursing, physician assistant, speech-language pathology, and more are excluded from the list of professional degrees. The result is that graduate students in those fields will be limited to less than half as much potential loan funding as allowed for degrees on this restrictive list: *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.), and Clinical Psychology (Psy.D. or Ph.D.).* This could result in fewer students entering vitally important healthcare fields.

With lower loan caps, fewer students will be able to enter DNP or PhD in Nursing programs. This could choke the pipeline for nursing faculty, which is already insufficient to meet demand. A shortage of faculty will reduce the capacity of nursing programs, resulting in fewer nurses graduating and impairing access to and quality of health care.

#### Student Loan Limits

The OBBBA allows students pursuing professional degrees to borrow up to \$50,000 annually and \$200,000 in total. Students in graduate degree programs are limited to \$20,500 per year and \$100,000 in aggregate.

#### Professional Degree Definition

The law defines a professional degree as one 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" and that "generally requires professional licensure to begin practice." Advanced Practice Registered Nurses, Nurse Practitioners, and other nursing professions require advanced degrees and licensing; however, the Department of Education's proposed rule omits post-baccalaureate nursing degrees such as Master of Science in Nursing (MSN), Doctor of Nursing Practice (DNP), or PhD in Nursing from the list of professional degrees. Degrees required for other healthcare professions are similarly excluded.

**See the other side to learn how you can take action!**

## Make Your Voice Heard!

**Let the Department of Education know that you think nursing and other vital healthcare professions should not be devalued.**

The public comment period for the proposed rule that excludes graduate nursing programs from the definition of 'professional degrees' is open until March 2, 2026. You can submit your comments on the *Regulations.gov* website:

<https://www.regulations.gov/commenton/ED-2025-OPE-0944-0001>

Your comments will be more impactful if they are personalized and in your own words. Mention your own experience or situation. If you are in a healthcare profession, you should include that information. Here are points you may want to include:

- The United States is facing a shortage of healthcare workers. It is not reasonable to limit the pool of talent going into these fields by imposing a lower cap on their federal student loans.
- The Department of Education should **not create an inflexible list of professional degrees** based on perceptions from the 1960s of what is professional. New professions have emerged since then, and more are likely to in the future. The definition in the law was intended to be flexible and responsive to changing times. The rule should not be static.
- Defining a limited number of degrees as "**professional**" is **disrespectful to other professions**, such as nursing, that require intensive training and rigorous licensing, and maintain high standards of conduct. The rule is about student loan limits, not the value and dignity of anyone's work. The language of the rules should make that clear by referring to "advanced degrees required for licensure," rather than "professional degrees."

Be aware that the language of the OBBBA law is restrictive. Despite public concern and feedback, the Department of Education may not make major changes in the policy for graduate student loans. However, the Department does have the duty to apply and interpret the definition of "professional degree," found in the law. Lastly, the federal rulemaking process is transparent and dynamic. The number and position of comments received on rulemaking can move the debate forward and impact future legislation.