

The Honorable Linda McMahon
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
5th Floor
Washington, DC 20202

Re: Proposed Changes to Definition of “Professional Degrees” (FR 2026-01912)

Dear Secretary McMahon,

The undersigned organizations write to express serious concerns about the Department’s proposed redefinition of “professional degrees.” This redefinition would cap the amount that nurses, physician assistants, physical and occupational therapists, speech-language pathologists, social workers, and many other allied health professionals can borrow from the federal government to pursue an advanced degree. Though intended to “drive down the cost of graduate programs and reduce the debt students have to take out,” this policy may exacerbate the healthcare professional shortage and reduce patient access to critical services, while failing to address the true drivers of high tuition costs.¹

Tuition for healthcare graduate programs is driven by clinical training requirements and accreditation standards, not by students’ access to capital. Limiting access to federal loans will force many students to abandon their career aspirations rather than take out costly private loans. This risks deepening undermining the healthcare workforce pipeline at a time of critical shortages.

Key Concerns:

- **Misleading Cost Assumptions:** Under the proposed definition, students enrolled in post-baccalaureate programs in nursing, physician assistantship, physical and occupational therapy, audiology, speech-language pathology, and public health would face a federal borrowing limit of \$20,500 annually and \$100,000 in aggregate. These limits are disconnected from the costs of many of these programs, which require clinical rotations and small class sizes. A 2025 survey of nursing school administrators found that the average annual cost for post-baccalaureate nursing education was \$38,542, almost double the \$20,500 annual loan limit proposed by the Administration.² Some advanced

¹ <https://www.ed.gov/about/news/press-release/myth-vs-fact-definition-of-professional-degrees>

² <https://rheumnow.com/news/nursing-shortage-could-worsen-due-limited-student-loans>

practice nurses, such as Certified Registered Nurse Anesthetists (CRNAs), routinely take on more than \$200,000 in student loan debt to meet their program requirements, twice the lifetime limit imposed by the proposed rule.³ Rather than compelling institutions to lower costs, the new federal borrowing limits will increase students' reliance on private financing—often at higher interest and with fewer protections.

- **Exacerbated Workforce Shortages:** The US is facing a critical healthcare professional shortage, even as demand for advanced practice nurses, speech-language pathologists, physical and occupational therapists and other allied health professionals, is growing. Demand for advanced practice nurses, in particular, is expected to grow by 38% between 2022 and 2032.⁴ Despite their critical role in providing care, a 2022 HRSA analysis projected a shortage of 63,720 full-time nurses in 2030.⁵
- **Reduced Access to Care:** MedPac estimates that 57% of Medicare beneficiaries have received a primary care service from an advanced practice nurse or physician assistant.⁶ Given the critical role these professionals play in providing primary care, particularly in underserved areas, reductions in supply could lead to longer waiting times, missed care and increased emergency department utilization.
- **Threat to Workforce Pipeline:** In 2023, nursing schools turned away 65,766 applicants due to faculty shortages and inadequate clinical sites.⁷ Nursing educators are typically required to have advanced degrees. Faculty shortages have been reported for other allied health professions as well.⁸ The new borrowing limits will further depress the population qualified to train new healthcare professionals.
 - The borrowing limits will most seriously impact students who may not qualify for private loans. Allied health professions can be a crucial engine for economic mobility for people from low-income backgrounds. By reducing access to borrowing capacity, this definition may discourage potential healthcare workers without financial means from entering the field.

While we appreciate the intention, this policy will not reduce costs. The result is more likely to be fewer health professionals entering the workforce, deeper inequities, and exacerbated shortages in critical care sectors. We must not undermine pipelines into the very careers that sustain our health system. We urge the Department to reconsider this policy and maintain the

³ <https://rheumnow.com/news/nursing-shortage-could-worsen-due-limited-student-loans>

⁴ <https://www.aha.org/fact-sheets/2026-02-11-fact-sheet-federal-student-loan-limits-graduate-and-professional-programs>

⁵ <https://www.aacnnursing.org/news-data/fact-sheets/nursing-shortage>

⁶ https://www.medpac.gov/wp-content/uploads/import_data/scrape_files/docs/default-source/reports/jun19_ch5_medpac_reporttocongress_sec.pdf

⁷ <https://www.aacnnursing.org/news-data/fact-sheets/nursing-faculty-shortage>

⁸ <https://www.medicalsolutions.com/blog/client/why-allied-health-roles-are-in-high-demand-and-hard-to-hire/>

current definitions for all health-related professional programs as our nation's ability to meet growing patient needs depends on a robust pipeline across disciplines.

We welcome the opportunity to discuss these concerns further and collaborate on solutions that strengthen, rather than weaken, the healthcare workforce. If you have any questions, please contact Lennie McDaniel, JD (LMcDaniel@rheumatology.org) with the American College of Rheumatology.

Thank you for your attention to this critical issue.

Sincerely,

National Organizations

The American Academy of Hospice and Palliative Medicine

The American Academy of Neurology

The American College of Cardiology

The American College of Obstetricians and Gynecologists

The American College of Rheumatology

The American Gastroenterological Association

The Association for Advancing Physician and Provider Recruitment

Heart Failure Society of America

Lupus Foundation of America

The North American Society for Pediatric Gastroenterology, Hepatology and Nutrition

Sjögren's Foundation, Inc.

The Society for Cardiovascular Angiography and Interventions

State Organizations

Alabama Society for the Rheumatic Diseases

Maryland Society for Rheumatic Diseases

MidWest Rheumatology Association

Tennessee Rheumatology Society

Virginia Society of Rheumatology