

June 12, 2026

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

Re: Concerns Regarding Proposed Changes to Definition of “Professional Degrees”

Dear Secretary McMahon:

On behalf of the American College of Rheumatology (ACR), representing over 10,400 rheumatologists and rheumatology interprofessional team members dedicated to improving the lives of patients with arthritis and related diseases, we write to express serious concerns about the Department’s proposed redefinition of “professional degrees” and its impact on the healthcare workforce and patient access to care.

The redefinition of “professional degrees” would cap the amount that nurses, physician assistants, physical and occupational therapists, speech-language pathologists, social workers, and many other 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.

As graduate programs in advanced nursing (MSN, DNP, PhD), physician assistant, physical and occupational therapy, and audiology (and any other program not listed above) would be reclassified as “non-professional”, students in these programs will face borrowing caps of \$20,500 annually and \$100,000 total (passed in the *One Big Beautiful Bill Act*). In contrast, the students pursuing the 11 listed “professional degrees” will have access to \$200,000 total in federal student loans.

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.

This policy will not reduce costs, but will reallocate the financial burden, shifting it from federal aid to the student pursuing a career in healthcare. The result: 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.

The College urges the Department to reconsider this policy and maintain the current definitions for all health-related professional programs. 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. Please contact Sweta Haldar, MSPH, Manager of Regulatory Affairs, at [shaldar@rheumatology.org](mailto:shaldar@rheumatology.org) or (202) 807-5262 if the ACR can be of assistance. Thank you for your attention to this critical issue.

Sincerely,

A handwritten signature in black ink, appearing to read "William F. Harvey". The signature is fluid and cursive, with a long horizontal stroke at the end.

William F. Harvey, MD, MSc, FACR  
President, American College of Rheumatology