

Congress of the United States
Washington, DC 20510

March 2, 2026

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Re: Reimagining and Improving Student Education [Docket ID ED-2025-OPE-0944]

Dear Under Secretary Kent:

We write regarding the Department of Education's notice of proposed rulemaking to implement the student financial aid provisions included in Public Law 119-21. As Members of Congress who have championed legislation to strengthen the nursing workforce, we write with disappointment over the Department's decision to omit post-baccalaureate nursing degrees from the regulatory definition of "professional degree." As such, we strongly urge you to categorize all post-baccalaureate nursing degrees (MSN, DNP, PhD) as "professional degrees."

Nurses comprise the largest health care workforce in the United States, with more than 5 million registered nurses nationwide, including over 500,000 advanced practice registered nurses (APRNs). Nurses provide high-quality care to patients in all communities, including rural and urban areas, yet we are in the midst of a nursing workforce crisis in this country. According to the 2024 National Nursing Workforce Study, more than 138,000 nurses have left the workforce since 2022 due to stress, burnout, and retirement, and by 2029, almost 40 percent of nurses intend to leave the workforce. Post-baccalaureate prepared nurses are essential for patients to have access to high-quality health care in the United States, and for educating and providing clinical training for the next generation of nursing students. Given this trend, we have a strong interest in bolstering the nursing workforce, and the nursing faculty that educate them. This support extends to legislation and regulations that will make it easier for nurses to enter the field.

The Department's interpretation of the term "professional degree" will make it more difficult for nurses to join the health care workforce because the Department explicitly said that a Master of Science in Nursing (MSN) or a Doctor of Nursing Practice (DNP) would not satisfy the "professional degree" definition. This will make it harder for nursing students to access the loans that they need. Moreover, it is important to note that the original regulation cited by Congress, which the Department recognizes, describes a professional degree as a degree 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." That regulation also states that "professional licensure is also generally required." Post-baccalaureate nursing degrees satisfy these criteria, as all APRNs must have a graduate degree, such as an MSN or a DNP, and require national certification and state licensure to practice.

The Department also omits nursing from its definition of a "professional degree" due to its troubling explanation that degrees that may be required under state law to have a supervisory agreement or relationship with another licensed professional cannot be professional degrees. However, this particular characterization goes far beyond how professional students are defined in § 685.102 and the definition of "professional degree" in § 668.2 as intended by Congress.

According to that definition, students must possess “a level of professional skill beyond that normally required for a bachelor’s degree.” These qualifications are clearly satisfied by an MSN, a DNP, a PhD in nursing. The additional limits the proposed rule places on health professionals are arbitrary and unprecedented.

Furthermore, this new proposed limit to exclude professions that may be required under state law to have a supervisory agreement or relationship with another provider was never part of discussions by the Reimagining and Improving Student Education (RISE) Committee. Similarly, when defining the term “professional student,” the text of H.R. 1 pointed to “section 668.2 of title 34, Code of Federal Regulations (as in effect on the date of enactment of this paragraph).” That regulation gives specific examples of a professional degree but explicitly says that those examples “include but are not limited to” a list of professions. Congress specifically pointed to a broader regulation, but the Department has circumvented the text of H.R. 1 by including a fixed list of degrees rather than a larger group or a recognition that these examples “include but are not limited to,” as Congress intended.

Post-baccalaureate nursing students also have a demonstrated need to access the higher borrowing limits for professional degrees set in Public Law 119–21. The law states that students earning professional degrees may borrow up to \$50,000 annually and \$200,000 aggregate, in contrast to students earning graduate degrees, whose borrowing limits are capped at \$20,500 annually and \$100,000 aggregate. In a recent survey on the impact of federal loan limits on post-baccalaureate nursing education, 81% of nursing students surveyed indicated that the \$100,000 aggregate federal loan cap will negatively impact their ability to finance their education.¹

Similarly, the current graduate level loan cap would not meet the need of most Certified Registered Nurse Anesthetist (CRNA) programs, which can cost over \$200,000, thereby restricting the pipeline of CRNAs and further limiting an anesthesia workforce that is suffering from shortages across all provider types. For example, a recent survey of nurses showed that 75% of those surveyed reported that CRNA education would no longer be financially feasible under the new loan caps.² CRNA programs have shown to be a critical return on investment, with default rates near zero percent, and a workforce that overwhelmingly provides anesthesia to rural and underserved communities where higher cost physicians do not practice.

In addition, many post-baccalaureate nursing programs hit the annual limit of \$20,500, including some programs that may be under the aggregate limit. For instance, many nurse practitioner and other post-baccalaureate academic programs operate year-round across three full-time semesters, as opposed to the traditional two-semester academic calendar, and thus cost more than \$20,500 per year. A recent survey also found that 82% of nursing students reported that the \$20,500 annual loan limit would negatively affect their ability to finance their education. These same students reported an average annual cost of approximately \$38,500, nearly double the new

¹ *Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspectives from Deans and Students*, American Association of Colleges of Nursing (December 2025), <https://www.aacnnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>.

² *Impact of Proposed Federal Loan Limits on the CRNA Workforce: Findings from AANA’s Pulse Survey on the Affordability of CRNA Education*, American Association of Nurse Anesthesiology (January 2026), <https://www.aana.com/wp-content/uploads/2026/01/Impact-of-Proposed-Federal-Loan-Limits-on-the-CRNA-Workforce-1.pdf>.

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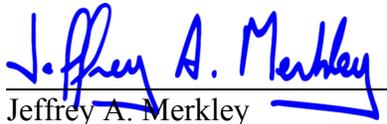
annual graduate borrowing cap.³ Classifying these programs as graduate programs would result in these students having to take out additional student loans to cover the remainder of their tuition, which will limit the ability for students to complete their advanced degree.

At a time when our nation is facing a health care shortage, especially in primary care, now is not the time to cut off the student pipeline to these programs. According to the Medicare Payment Advisory Commission (MedPAC), fifty-seven percent of Medicare beneficiaries received a primary care service from an NP or physician associate (PA), and sixty-six percent of rural Medicare patients received a primary care service from an NP or PA. Consequently, we believe that post-baccalaureate nursing degrees should be included in the department's definition of a "professional degree."

Nurses and nurse faculty make up the backbone of our health system, and post-baccalaureate nursing degrees lead to demonstrated outcomes, with a recent study from the Foundation for Research on Equal Opportunity showing that nursing was one of the top three master's degrees for return on investment.⁴ As such, post-baccalaureate nursing degrees should be treated equally to other accredited post-baccalaureate health profession degrees.

Thank you for your attention to this matter, and we implore you to work with us to improve and expand the nursing workforce across the country.

Sincerely,



Jeffrey A. Merkley
United States Senator



Roger F. Wicker
United States Senator



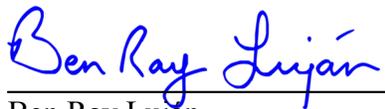
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³ *Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspectives from Deans and Students*, American Association of Colleges of Nursing (December 2025), <https://www.aacnnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>.

⁴ Preston Cooper, *Is Grad School Worth It? A Comprehensive Return on Investment Analysis*, Foundation for Research on Equal Opportunity, <https://freopp.org/whitepapers/is-grad-school-worth-it-a-comprehensive-return-on-investment-analysis/>.



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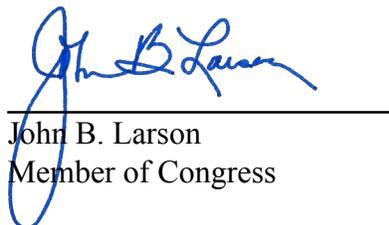
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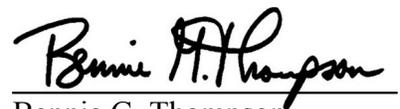
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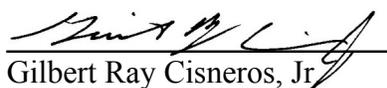
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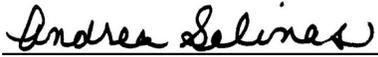
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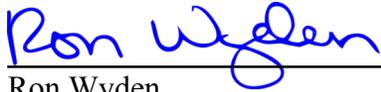
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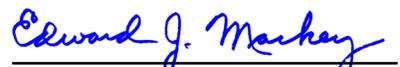
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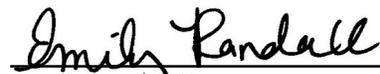
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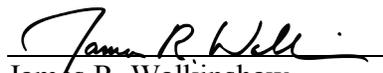
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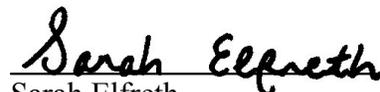
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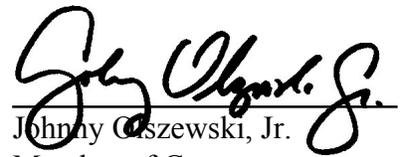
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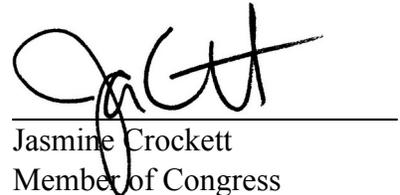
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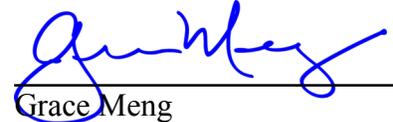
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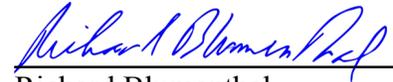
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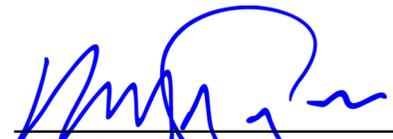
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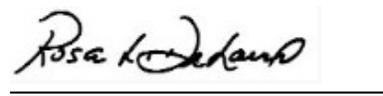
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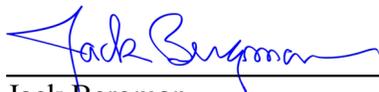
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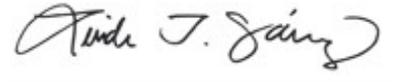
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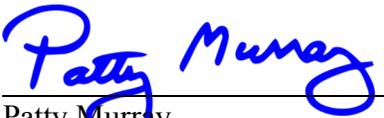
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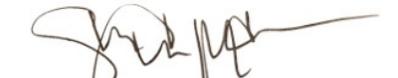
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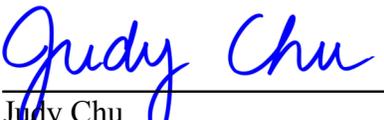
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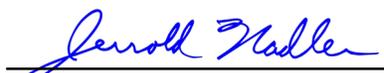
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CC: The Honorable Linda McMahon, Secretary of Education