



August 25, 2025

The Honorable James Bergeron
Deputy Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Public Hearing; Negotiated Rulemaking Committees. [Docket ID ED-2025-OPE-0151-0001]

Dear Deputy Under Secretary Bergeron and Members of the Rulemaking Committees:

On behalf of the 56 undersigned organizations representing the Nursing Community Coalition (NCC), we appreciate the opportunity to comment on the implementation of federal student loan limits outlined in Public Law 119-21 – One Big Beautiful Bill Act (H.R.1) – and provide recommendations to the Department of Education’s Reimagining and Improving Student Education (RISE) Committee. The NCC is a cross section of education, practice, research, and regulation within the nursing profession representing Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),¹ nurse leaders, boards of nursing, students, faculty, and researchers. Together, we recognize how critical a strong nursing education pathway is to ensure a robust nursing workforce to support the health needs of our nation. As such, the NCC has a vested interest in supporting our masters’ and doctoral (DNP and PhD) nursing students who go on to serve on the frontlines as our primary care providers, faculty and educators, researchers, and leaders within the health care profession. Therefore, we strongly recommend the Department of Education explicitly include post-baccalaureate nursing programs in the regulatory definition of “professional degree programs” as part of their implementation efforts.

Aligning federal “professional degree” definitions with today’s nursing education and workforce needs

As the largest segment of the health care profession,² nursing is involved at every point of care. Our nation’s nurses work in community health centers, Veterans Health Administration and Indian Health Services facilities, hospitals, long-term care facilities, local and state health departments, schools, workplaces, and patients’ homes. Further, continued nurse-led research ensures that today’s science leads to enhanced patient health outcomes. Over the past three

¹ APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs).

² Smith, Sean and Blank, Andrew. U.S. Bureau of Labor Statistics. (June 2023) Healthcare Occupations: Characteristics of the Employed. Slide Two: Employment in the 25 largest healthcare occupations, 2022. Retrieved from: <https://www.bls.gov/spotlight/2023/healthcare-occupations-in-2022/>

decades, we have seen how our nursing workforce has supported the needs of the community. As MedPAC's July 2025 data book highlights, Medicare "encounters with APRNs and PAs grew rapidly from 2018 to 2023 (50 percent in total), and encounters with primary care physicians declined substantially (–22 percent)."³ In fact, over 233,000 APRNs treated Medicare patients and approximately 40% of Medicare beneficiaries received care from an APRN.⁴ Supporting the educational pathways into post-baccalaureate nursing programs removes barriers to enter the profession, supports ongoing nursing workforce needs, and ensures patients across the country have access to high-quality health care.

Nursing programs satisfy the definition standards for "professional degrees," paralleling classifications of other health professions included in the definition

Under 34 CFR § 668.2(b), a professional degree, "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. Professional licensure is also generally required."⁵ All registered nurses must pass the National Council Licensure Examination (NCLEX-RN), the nationwide licensing exam for entry into the profession, and all Advanced Practice Registered Nurses (APRNs) must complete a graduate degree, such as a Master of Science in Nursing (MSN) or a Doctor of Nursing Practice (DNP), to be licensed and practice in a state. Masters and doctoral nursing students require additional national certifications and licensures, which require rigorous examinations and continuing education for license renewal paralleling the processes seen in other health care disciplines such as medicine, dentistry, and pharmacy, all of which already carry the "professional" designation.

Adding nursing to this definition is also consistent with other Department of Education practices, such as classifying both medicine and nursing within the same "Health Professions and Related Clinical Sciences" series of Classification of Instructional Programs (CIP) codes (Series 51).⁶ Further, the additional instruction post-baccalaureate nursing students receive, including in pharmacology, diagnostics, and systems leadership, parallels other professional programs. Additionally, a PhD nursing degree, while often research-oriented, is critical to the preparation of educators, clinical leaders, and front-line practitioners who sustain the professional workforce.

Post-baccalaureate nursing programs are a better fit under H.R. 1's "professional degree" loan limits

With the new loan limits of \$20,500 annually and \$100,000 aggregate for graduate degree programs and \$50,000 annually and \$200,000 aggregate for professional degree programs, it is imperative that advanced nursing degrees be categorized as "professional" in order to sustain a robust healthcare workforce.⁷ In some cases, post-baccalaureate nursing students would exceed the aggregate loan limit under the graduate designation. For example, the average CRNA

³ Andrilla, C. H. A., Patterson, D. G., Moore, T. E., Coulthard, C., & Larson, E. H. (2018). Projected Contributions of Nurse Practitioners and Physicians Assistants to Buprenorphine Treatment Services for Opioid Use Disorder in Rural Areas. *Medical Care Research and Review*, Epub ahead. <https://doi.org/10.1177/1077558718793070>

⁴ Centers for Medicare & Medicaid Services Data.CMS.gov. CMS Program Statistics-Medicare Providers. (2022) Retrieved from: <https://data.cms.gov/summary-statistics-on-provider-enrollment/medicare-provider-type-reports/cms-program-statistics-medicare-providers>

⁵ Code of Federal Regulations § 668.2 General Definitions. Retrieved from: <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-A/section-668.2>

⁶ Classification of Instructional Programs. Health Professions and Related Clinical Sciences. Retrieved from: <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?v=55&cipid=87605>

⁷ H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>

graduates with upwards of \$200,000 worth of student loan debt.⁸ In other programs, like the accelerated entry level Master's program, students are most likely to be impacted with the annual limits if not designated as a professional degree. Similarly, many programs operate year-round across three full-time semesters, rather than on the traditional two-semester academic calendar, which is consistent with other health professional degree programs. It is also important to note that unlike their physician counterparts, who get paid during their residency, most advanced practice nurses are required to complete their education and clinical hours without the support of a salary, making this professional degree designation even more important to their education.

The loss of Grad PLUS loans heightens the urgency of explicitly classifying nursing as a "professional degree."

According to an American Association of Colleges of Nursing recent survey, 69% of post-baccalaureate nursing students utilize federal student loans.⁹ Given that the One Big Beautiful Bill (H.R.1) also phases out the Graduate PLUS student loan program, which nursing students use to cover the full cost of attendance, the distinction between graduate and professional degrees and their corresponding loan limits is more important than ever. A major concern is that if a professional degree is not defined to explicitly include post-baccalaureate nursing, it could lead to a decrease in enrollment in these critical programs and provide undue strain on an already challenging health care environment. By adding nursing to the definition of a professional degree, we can continue to support these nursing students who go on to serve as valued providers, especially in rural and underserved areas.

As nurses continue to provide a growing proportion of care to patients across the nation, while simultaneously facing a workforce shortage with an aging population that requires increased health care services, it is crucial that the RISE Committee define post-baccalaureate nursing as a professional degree program. Should you have any questions or if the Nursing Community Coalition can be of any additional assistance please contact the coalition's Executive Director, Rachel Minahan, at rstevenson@thenursingcommunity.org.

Sincerely,

Academy of Medical-Surgical Nurses
Academy of Neonatal Nursing
Alliance of Nurses for Healthy Environments
American Academy of Ambulatory Care Nursing
American Academy of Emergency Nurse Practitioners
American Association of Colleges of Nursing
American Association of Critical-Care Nurses
American Association of Heart Failure Nurses
American Association of Neuroscience Nurses
American Association of Nurse Anesthesiology
American Association of Nurse Practitioners
American Association of Occupational Health Nurses
American Association of Post-Acute Care Nursing

⁸ A CRNA's Life After Anesthesia Preview. Retrieved from: <https://www.crnafinancialplanning.com/p/a-crnas-life-after-anesthesia-chapter-1-preview>

⁹ American Association of Colleges of Nursing. (2017). The Numbers Behind the Degree: Financing Graduate Nursing Education. Retrieved from: http://www.aacnnursing.org/Portals/42/Policy/PDF/Debt_Report.pdf

American College of Nurse-Midwives
 American Nephrology Nurses Association
 American Nurses Association
 American Nursing Informatics Association
 American Organization for Nursing Leadership
 American Psychiatric Nurses Association
 American Public Health Association, Public Health Nursing Section
 American Society for Pain Management Nursing
 American Society of PeriAnesthesia Nurses
 Association of Community Health Nursing Educators
 Association of Nurses in AIDS Care
 Association of periOperative Registered Nurses
 Association of Public Health Nurses
 Association of Rehabilitation Nurses
 Association of Women's Health, Obstetric and Neonatal Nurses
 Commissioned Officers Association of the U.S. Public Health Service
 Dermatology Nurses' Association
 Emergency Nurses Association
 Gerontological Advanced Practice Nurses Association
 Hospice and Palliative Nurses Association
 Infusion Nurses Society
 International Association of Forensic Nurses
 International Society of Psychiatric-Mental Health Nurses
 National Association of Clinical Nurse Specialists
 National Association of Hispanic Nurses
 National Association of Neonatal Nurse Practitioners
 National Association of Neonatal Nurses
 National Association of Nurse Practitioners in Women's Health
 National Association of Pediatric Nurse Practitioners
 National Association of School Nurses
 National Black Nurses Association
 National Council of State Boards of Nursing
 National Forum of State Nursing Workforce Centers
 National Hartford Center of Gerontological Nursing Excellence
 National League for Nursing
 National Organization of Nurse Practitioner Faculties
 Nurses Organization of Veterans Affairs
 Oncology Nursing Society
 Organization for Associate Degree Nursing
 Preventive Cardiovascular Nurses Association
 Society of Pediatric Nurses
 Society of Urologic Nurses and Associates
 Wound, Ostomy, and Continence Nurses Society



October 31, 2025

The Honorable Nicholas Kent, Under Secretary
The Honorable David Barker, Assistant Secretary, Office of
Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

RE: Negotiated Rulemaking Committees. [Docket ID ED-2025-OPE-0151-0001]

Dear Under Secretary Kent, Assistant Secretary Barker, and Members of the RISE Rulemaking Committee:

On behalf of the 57 undersigned organizations representing the Nursing Community Coalition (NCC), we appreciate the ongoing work of the Department of Education's (ED) Reimagining and Improving Student Education (RISE) Committee to implement Public Law 119-21 – One Big Beautiful Bill Act (OBBBA). The Nursing Community Coalition (NCC) is a cross section of education, practice, research, and regulation within the nursing profession representing Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),¹ nurse leaders, boards of nursing, students, faculty, and researchers. Together, we recognize how critical a strong nursing education pathway is to ensuring a robust nursing workforce that supports the health needs of our nation. This includes support for our masters' and doctoral (DNP and PhD) nursing students who go on to serve on the frontlines as our primary care providers, faculty and educators, researchers, and leaders within the health care profession. As you continue negotiated rulemaking, **the NCC strongly recommends the RISE Committee explicitly include post-baccalaureate nursing programs, as outlined under the "Health Professions and Related Clinical Sciences" series of Classification of Instructional Programs (CIP) codes (Series 51), in the regulatory definition of "professional degree programs."**

Under 34 CFR § 668.2(b), a professional degree, "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. Professional licensure is also generally required."² All registered nurses must pass the National Council Licensure Examination (NCLEX-RN), the nationwide licensing exam for entry into the profession, and all APRNs must complete a graduate degree, such as a Master of Science in Nursing (MSN) or a Doctor of

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Nursing Practice (DNP), to be licensed and practice in a state. Master's and doctoral nursing students need further national certifications and licensures, which require rigorous examinations and continuing education for license renewal, paralleling the processes seen in other healthcare disciplines such as medicine, dentistry, and pharmacy, all of which already carry the "professional" designation.

Post-baccalaureate nurses not only support America's health but often fall within the new loan limits outlined under "professional degree programs" in OBBBA. For example, the average CRNA graduates with upwards of \$200,000 in student loan debt, quickly reaching the aggregate limit, similar to other health profession students.³ This is also the case for programs like the accelerated entry-level master's program, which can easily reach the annual limit threshold outlined in OBBBA. Additionally, many programs operate year-round across three full-time semesters, rather than on the traditional two-semester academic calendar, which is also consistent with other health professional degree programs. It is also important to note that unlike their physician counterparts who get paid during their residency, most advanced practice nurses are required to complete their education and clinical hours without the support of a salary, making this "professional degree" designation even more important to their education.

Adding nursing to this definition is also consistent with other ED practices, such as classifying both medicine and nursing within the same "Health Professions and Related Clinical Sciences" series of Classification of Instructional Programs (CIP) codes (Series 51).⁴ Further, the additional instruction post-baccalaureate nursing students receive, including in pharmacology, diagnostics, and systems leadership, parallels other professional programs. Additionally, a PhD nursing degree, while often research-oriented, is critical to the preparation of educators, clinical leaders, and front-line practitioners who sustain the professional workforce.

As the largest segment of the healthcare profession,⁵ nursing is involved at every point of care. Nurses work in community health centers, Veterans Health Administration and Indian Health Services facilities, hospitals, long-term care facilities, local and state health departments, schools, workplaces, and patients' homes. They also support our aging population. As outlined in the MedPAC's July 2025 data book, Medicare patient "encounters with APRNs and PAs grew rapidly from 2018 to 2023 (50 percent in total), and encounters with primary care physicians declined substantially (-22 percent)."⁶ In fact, over 233,000 APRNs treated Medicare patients and approximately 40% of Medicare beneficiaries received care from an APRN.⁷ Supporting educational pathways into post-baccalaureate nursing programs removes barriers to enter the

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⁵ Smith, Sean and Blank, Andrew. U.S. Bureau of Labor Statistics. (June 2023) Healthcare Occupations: Characteristics of the Employed. Slide Two: Employment in the 25 largest healthcare occupations, 2022. Retrieved from: <https://www.bls.gov/spotlight/2023/healthcare-occupations-in-2022/>

⁶ Andrilla, C. H. A., Patterson, D. G., Moore, T. E., Coulthard, C., & Larson, E. H. (2018). Projected Contributions of Nurse Practitioners and Physicians Assistants to Buprenorphine Treatment Services for Opioid Use Disorder in Rural Areas. Medical Care Research and Review, Epub ahead. <https://doi.org/10.1177/1077558718793070>

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profession, supports ongoing nursing workforce needs, and ensures patients across the country have access to high-quality healthcare.

Nurses continue to provide a growing proportion of care to patients across the nation, while simultaneously facing a workforce shortage with an aging population that requires increasing healthcare services. It is crucial that the RISE Committee define post-baccalaureate nursing education as a "professional degree." This designation, consistent with current CIP Code 51 "Health Professions and Related Programs," has a direct impact on the health of our nation. Should you have any questions or if the Nursing Community Coalition can be of any additional assistance please contact the coalition's Executive Director, Rachel Minahan, at rstevenson@thenursingcommunity.org.

Sincerely,

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Academy of Neonatal Nursing
Alliance of Nurses for Healthy Environments
American Academy of Ambulatory Care Nursing
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American Association of Colleges of Nursing
American Association of Critical-Care Nurses
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American Association of Nurse Practitioners
American Association of Occupational Health Nurses
American Association of Post-Acute Care Nursing
American College of Nurse-Midwives
American Nephrology Nurses Association
American Nurses Association
American Nursing Informatics Association
American Organization for Nursing Leadership
American Pediatric Surgical Nurses Association, Inc.
American Psychiatric Nurses Association
American Public Health Association, Public Health Nursing Section
American Society for Pain Management Nursing
American Society of PeriAnesthesia Nurses
Association of Community Health Nursing Educators
Association of Nurses in AIDS Care
Association of periOperative Registered Nurses
Association of Public Health Nurses
Association of Rehabilitation Nurses
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National Association of School Nurses
National Black Nurses Association
National Council of State Boards of Nursing
National Forum of State Nursing Workforce Centers
National Hartford Center of Gerontological Nursing Excellence
National League for Nursing
National Organization of Nurse Practitioner Faculties
Nurses Organization of Veterans Affairs
Oncology Nursing Society
Organization for Associate Degree Nursing
Preventive Cardiovascular Nurses Association
Society of Pediatric Nurses
Society of Urologic Nurses and Associates
Wound, Ostomy, and Continence Nurses Society