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Congress of the United States
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November 21, 2025

The Honorable Linda E. McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

The Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Secretary McMahon and Under Secretary Kent:

As the Department finalizes the Notice of Proposed Rulemaking (NPRM), post the-Reimagining and Improving Student Education (RISE) Committee negotiated rulemaking process for Public Law 119-21, I would like to request that the definition of “professional degree” include post-baccalaureate nursing programs.

P.L. 119-21 created new student loan borrowing limits for post-baccalaureate study, with two separate limits for graduate and professional degrees.

Unfortunately, the RISE Committee chose not to include post-baccalaureate nurses under the new professional degree designation. Excluding these programs from professional-degree classification would lower the federal borrowing limits available to post-baccalaureate nursing students, reduce access to advanced education, increase out-of-pocket costs for post-baccalaureate nursing students, and create an inequitable financial structure compared to other clinical programs with comparable licensing requirements.

These programs prepare students for clinical practice and clearly meet the statutory and regulatory standards of a professional degree.

Advanced practice nurses deliver a substantial amount of frontline care; reducing their ability to finance the education they need would mean fewer licensed providers entering the workforce. For example, more than 243,000 nurse practitioners (NPs) treated Medicare patients in 2024—more than any other provider group. Many communities around the United States, especially rural areas, rely on NPs as their primary or only source of care.

Furthermore, some Certified Registered Nurse Anesthetists (CRNAs) programs cost over \$200,000 and do not include other mandatory expenses and fees. Without the professional degree status, access to critical anesthesia care is at stake, especially in rural counties. It is not just the aggregate lifetime limit that is impacting post-baccalaureate nursing programs, but the annual limit would also impact the

accelerated entry-level master's program and other year-round programs that span three full-time semesters. It is important to remember that nursing faculty are also vital to preparing the future nursing workforce. Keep in mind 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. If nursing students do not have access to the level of student loans available under the professional degrees designation, fewer will be able to pursue post-baccalaureate nursing degrees, which will result in workforce shortages that directly impact patients across the nation.

The proposed rule must classify post-baccalaureate nursing programs as professional degrees for federal student loan purposes. The rule must also ensure current nursing students retain access to appropriate borrowing as the federal loan system transitions away from Graduate PLUS under Public Law 119-21.

Guaranteeing that post-baccalaureate nursing programs receive professional degree classification is necessary to maintain a highly educated healthcare workforce and uphold congressional intent in implementing the law.

I appreciate your help with this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "J.A. Kiggans", with a stylized flourish at the end.

Jen A. Kiggans
Member of Congress