



August 25, 2025

Deputy Under Secretary James P. Bergeron
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Docket ID ED-2025-OPE-0151-0001

To Deputy Under Secretary Bergeron,

The American Association of Colleges of Nursing (AACN) appreciates the opportunity to comment on the preparation of draft regulations implementing changes to the Higher Education Act (HEA) of 1965 programs and the establishment of negotiated rulemaking committees, consistent with the enactment of the One Big Beautiful Bill Act.¹ As the national voice for academic nursing, AACN represents more than 875 schools of nursing offering a mix of baccalaureate, graduate, and post-graduate programs at public and private universities nationwide, which engage more than 540,000 students and 53,500 faculty members.² Collectively, these institutions graduate Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),³ faculty, researchers, and frontline providers. AACN is committed to preparing a highly educated nursing workforce, strengthening the foundation of nursing science, and advancing innovative healthcare solutions.

Impact of Graduate and Professional Program Designations

The establishment of new annual loan limits for graduate and professional students and parent borrowers, and the implementation of new lifetime borrowing caps, particularly given the lack of clarity around the categories of “graduate” and “professional” degrees, is of critical importance to our members and students. As this issue will fall under the purview of the newly formed Reimagining and Improving Student Education (RISE) Committee, we respectfully ask that they consider a more expansive definition of professional degree programs that appropriately accounts for the technical complexity of post-baccalaureate nursing education.

Clarifying that post-baccalaureate nursing degrees are defined as “professional degrees” has direct financial, workforce, and public health implications. If the Department of Education were to maintain outdated classifications that place post-baccalaureate nursing degrees in the “graduate” category rather than recognizing them as “professional,” the federal student aid framework would restrict borrowing to lower limits, forcing nursing students to seek high-interest private loans or abandon advanced practice education altogether. This would be especially concerning given the increasing demand for nurse practitioners, nurse anesthetists, nurse midwives, clinical nurse specialists, and nursing faculty, all of whom require graduate-

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

² About the American Association of Colleges of Nursing. Retrieved from: <https://www.aacnnursing.org/About-AACN>.

³ APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs).

level education and advanced licensure to practice. The omission of nursing from the existing federal list of professional degree programs does not reflect the current realities of nursing education, licensure, and scope of practice, and it risks exacerbating national provider shortages at a time when healthcare systems face unprecedented workforce challenges. Informed by this reality, AACN does not believe adoption of such a narrow definition would be consistent with congressional intent.

Recommendation: AACN urges the Department of Education to modernize the existing definition of “professional degree” under Title IV to explicitly include post-baccalaureate nursing degrees, specifically those programs that lead to the Master of Science in Nursing (MSN), Doctor of Nursing Practice (DNP), and nursing PhD. Under 34 CFR § 668.2, a professional degree is understood as one that “requires completion of the academic requirements to begin practice in a profession.”⁴ While the current federal list, largely unchanged for decades, includes medicine, dentistry, law, and pharmacy, it omits nursing, even though post-baccalaureate nursing education clearly meets both the educational and licensure criteria that have historically defined the category.

Evolution and Development of Professional Degree Programs

The distinction between “graduate” and “professional” degrees in higher education policy originated during the expansion of federal financial aid programs under the Higher Education Act of 1965.⁵ In that context, professional degrees, initially called “first-professional degrees,” were defined as terminal degrees required for licensure and practice in fields such as medicine (MD), dentistry (DDS/DMD), law (JD), pharmacy (PharmD), and theology (MDiv), among others. These definitions were subsequently codified in 34 CFR § 668.2, with the terms “first-professional” and “professional” degree effectively synonymous.⁶ The “first-professional” classification was also incorporated into the Integrated Postsecondary Education Data System (IPEDS), though its use was eliminated in 2008-2009.⁷ In contrast, “graduate” degrees referred to academic master’s and doctoral programs focused on research or scholarship.

While originally developed for administrative clarity, the distinction between graduate and professional degree programs has been increasingly critiqued for its inconsistencies and vagueness, especially as many fields such as nursing, physical therapy, and psychology now offer doctoral-level professional education that leads to licensure and direct practice but are often categorized as graduate degrees for financial aid purposes. A reclassification of these categories based on functional outcomes, including licensure, accreditation, and professional scope of practice, rather than outdated designations, is necessary to keep pace with the increasingly technical and sophisticated nature of post-baccalaureate degree programs, particularly for fields such as nursing.

⁴ 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>.

⁵ Higher Education Act of 1965. Retrieved from: <https://www.govinfo.gov/content/pkg/COMPS-765/pdf/COMPS-765.pdf>.

⁶ 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>.

⁷ National Center for Education Statistics Integrated Postsecondary Education Data System. Archived Changes, 2008-2009. Retrieved from: <https://nces.ed.gov/ipeds/report-your-data/archived-changes/2008-09>.

Including Post-Baccalaureate Nursing Education as Professional Degree Programs

Graduate-level nursing programs embody the rigor and structure of those included in the existing definition of professional programs. The Doctor of Nursing Practice (DNP) requires several years of post-baccalaureate study, nationally accredited coursework, and extensive supervised clinical training. Likewise, the Master of Science in Nursing (MSN), a required degree for many advanced practice roles, provides additional instruction in pharmacology, diagnostics, and systems leadership that parallels other professional programs such as the MD and PharmD. Even the nursing PhD, which is research-oriented, is critical to the preparation of educators, clinical leaders, and front-line practitioners who sustain the professional workforce.

These degrees also meet the licensure and certification requirements that have long distinguished professional programs from purely academic graduate education. Every RN must first pass the National Council Licensure Examination (NCLEX-RN), which is legally required for entry into the nursing profession. Building on this foundation, graduates of MSN and DNP programs pursue advanced national certifications and state licensure that authorize independent clinical practice. These credentials require rigorous examinations and continuing education for license renewal, paralleling the processes seen in medicine, dentistry, and pharmacy, all of which already carry the “professional” designation.

Institutional and Programmatic Support for Categorizing Post-Baccalaureate Nursing Education as Professional Degree Programs

AACN member institutions have expressed deep concern that classifying post-baccalaureate nursing programs as “graduate” rather than “professional” would have severe consequences for enrollment, program completion, and workforce readiness. For example, programs such as the Doctor of Nursing Practice - Nurse Anesthesia (DNP-NA) and the Master’s Entry Program in Nursing (MEPN) are full-time, in-person programs that cannot be sustained by students limited to \$20,500 per year in federal loans under a graduate designation. Without access to higher borrowing capacity, students in these programs would be forced to decelerate their studies, delaying graduation and the entry of highly needed and skilled advanced practice providers into the healthcare workforce. Our members have indicated that up to 75% of their students rely on some form of financial assistance to facilitate their post-baccalaureate education.

Additionally, some AACN member institutions noted that many MSN and higher-level nursing programs, including certain entry-level MSN programs, already fit the definition of “professional” under 34 CFR § 668.2. While some direct-entry MSN programs share substantial core content with BSN-level training, they also incorporate advanced components, including leadership, quality improvement, and evidence-based practice, that extend beyond the bachelor’s level. Excluding these programs from the professional degree category would create a significant funding gap, leaving students without sufficient federal loan capacity to cover educational costs. Similarly, many direct-entry, prelicensure MSN programs operate year-round across three full-time semesters, rather than on the traditional two-semester academic calendar. Current annual loan limits appear calibrated to the latter model, and without the higher professional borrowing caps, students in such intensive, continuous

programs will face disproportionate financial hardship, threatening both program viability and the timely preparation of the nursing workforce.

Categorical Overlap between Nursing Education and Other Health Professions

Additionally, the Department of Education already classifies both medicine and nursing within the same “Health Professions and Related Clinical Sciences” series of Classification of Instructional Programs (CIP) codes (Series 51).⁸ Medicine is coded as 51.1201, Dentistry as 51.0401, and Veterinarian Medicine as 51.2401, and each of these is treated as a professional degree for Title IV purposes. Meanwhile, nursing programs occupy the 51.38 range, including 51.3802 (Nursing Administration), 51.3808 (Nursing Science), 51.3804 (Nurse Anesthetist), 51.3807 (Nurse Midwife), and 51.3818 (Nursing Practice).⁹

These CIP code similarities demonstrate that post-baccalaureate nursing programs are federally recognized as health professions fields that lead directly to licensure and advanced professional practice. Maintaining a Title IV framework that treats MD and DO programs as professional while classifying MSN, DNP, and nursing PhD programs as merely “graduate” would be inconsistent with how the Department itself organizes and tracks these programs.

Workforce Implications for Decreased Access to Federal Student Loans for Nurses

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 post-baccalaureate nursing degrees be categorized as “professional” in order to sustain a robust healthcare workforce and reinforce the education pathways of future nurse practitioners and educators.¹⁰

The Bureau of Labor Statistics (BLS) estimates that an average of 194,500 openings for registered nurses are projected each year through 2033, representing 6% growth.¹¹ Additionally, BLS estimates an average of 31,900 openings for nurse anesthetists, nurse midwives, and nurse practitioners each year through 2033, representing 40% growth and significantly outpacing the 4% projected growth across all occupations.¹² However, AACN’s own enrollment surveys have shown a decline in enrollment in nursing PhD programs for eleven consecutive years.¹³ At a time of increasing demand for healthcare providers, specifically nurses, maintaining the available financing options for nurse education is imperative to the viability of the nursing workforce, from educators and students to practitioners on the frontlines of delivering quality healthcare.

⁸ Classification of Instructional Programs. Health Professions and Related Clinical Sciences. Retrieved from: <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cid=87605>

⁹ Ibid.

¹⁰ H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>.

¹¹ Bureau of Labor Statistics. Occupational Outlook Handbook, Registered Nurses, 2023-2033. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm#tab-6>

¹² Bureau of Labor Statistics. Occupational Outlook Handbook, Nurse Anesthetists, Nurse Midwives, And Nurse Practitioners, 2023-2033. Retrieved from: <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm#tab-6>

¹³ AACN. Schools of Nursing Enrollment Increases Across Most Program Levels, Signaling Strong Interest in Nursing Careers. 2025. Retrieved from: <https://www.aacnnursing.org/news-data/all-news/article/schools-of-nursing-enrollment-increases-across-most-program-levels-signaling-strong-interest-in-nursing-careers>

For these reasons, we strongly urge the Department to modernize the definition of “professional” degree as outlined in 34 CFR § 668.2 by including MSN, DNP, and nursing PhD programs. This revision would reflect the current realities of nursing education, align Title IV aid policies with the licensing and practice standards set by national accrediting and certification bodies, and support the federal government’s broader commitment to building and sustaining the healthcare workforce the nation urgently needs.

Unintended Consequences of Grad PLUS Loan Eliminations

The Department’s elimination of the Graduate PLUS Loan program, as directed in the One Big Beautiful Bill Act,¹⁴ heightens the need to ensure post-baccalaureate nursing degrees are appropriately classified as “professional degrees” under Title IV. Currently, students in medicine, dentistry, pharmacy, and other programs designated as professional degrees continue to qualify for higher borrowing limits and more flexible federal loan options. AACN members report that many graduate nursing students, including those in MSN, DNP, and DNP-NA programs, rely heavily on Grad PLUS loans, with some programs indicating that roughly 50% of their post-baccalaureate nursing students depend on this as a source of aid. Without continued access to Grad PLUS, students will face insurmountable financial barriers, leading to program deceleration, delayed graduation, and slower entry into critical advanced practice nursing roles. Expanding the existing and outdated classification of professional degree to include nursing programs would more accurately recognize the role these programs play in preparing highly trained, licensed practitioners who are critical to the healthcare workforce.

In 2022, data from the National Center for Health Workforce Analysis indicated that for APRNs,¹⁵ 66% relied on self-financing (from savings, earnings, family, etc.) for their education, while 48% relied on federally-assisted student loans and 17% relied on other types of student loans.^{16,17} Without access to Grad PLUS loans, nursing students in these post-baccalaureate degree programs will face substantially reduced federal borrowing capacity, often insufficient to cover the full cost of tuition, clinical placements, and living expenses during intensive, multi-year programs. For those choosing to continue pursuing the education required to obtain professional licensure, many would be forced to turn to private lenders with higher interest rates and fewer borrower protections. This places an undue financial burden on future nurses whose education, licensure, and public service clearly meet the standards of professional education. Ensuring classification of these programs as professional degrees under Title IV would better reflect the contemporary structure of the healthcare workforce and achieve a logical policy result.

¹⁴ H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>

¹⁵ APRNs require graduate-level education and advanced certification from degree granting programs that include master’s and doctoral programs. Post-graduate programs include both postmaster’s and post-doctoral certificate education programs. See AACN (2008), “Consensus Model for APRN Regulation: Licensure, Accreditation, Certification & Education.”

Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Teaching-Resources/APRNReport.pdf>

¹⁶ National Center for Health Workforce Analysis Nursing Workforce Dashboard. Retrieved from: <https://data.hrsa.gov/topics/health-workforce/nursing-workforce-dashboards>

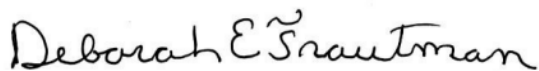
¹⁷ Students can pay for education costs using multiple sources of financing, thus percentages across all sources may not sum to 100%.

Recommendations for Classification of Professional Degree Programs

AACN strongly encourages the Department of Education to modernize the existing classification of professional degree programs to appropriately include those preparing nurse practitioners (NPs), certified nurse-midwives (CNMs), clinical nurse specialists (CNSs), and certified registered nurse anesthetists (CRNAs), as well as other post-baccalaureate nursing degree programs culminating in a Master of Science in Nursing (MSN), Doctor of Nursing Practice (DNP), Doctor of Philosophy in Nursing (PhD), Doctor of Education in Nursing (EdD), and Doctor of Science in Nursing (DNS). These programs are offered exclusively at the graduate level, require advanced academic coursework in areas such as physiology, pharmacology, and population health, and culminate in both national certification and state licensure to practice. Further, graduate-entry programs leading to initial licensure in nursing, such as the Master's Entry Program in Nursing (MEPN), are distinctly different from traditional or accelerated BSN programs, incorporating graduate-level competencies and preparing graduates for advanced nursing practice from the outset.

Thank you for your consideration of AACN's comments on this negotiated rulemaking. Maintaining access to federal student loans for post-baccalaureate nursing education is critical to the optimal functioning of our healthcare system and necessary for supporting the future growth of the healthcare workforce. A modernized and clarified definition of professional degree programs that include post-baccalaureate nursing education is necessary to ensure a strong nursing workforce. Please consider AACN an ally in this endeavor. If our organization can be of any assistance, please contact AACN's Director of Policy, Dr. Josh Adams at jadams@aacnnursing.org.

Sincerely,

A handwritten signature in black ink that reads "Deborah E. Trautman". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Deborah E. Trautman, PhD, RN, FAAN
President and Chief Executive Officer