



March 2, 2026

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

RE: Notice of Proposed Rulemaking, Reimagining and Improving Student Education [ED-2025-OPE-0944]

Dear Under Secretary Kent:

On behalf of the 65 undersigned organizations representing the Nursing Community Coalition (NCC), we appreciate the opportunity to comment on the Department of Education's Notice of Proposed Rulemaking (NPRM), Reimagining and Improving Student Education (RISE) [ED-2025-OPE-0944], as you implement Public Law 119-21 – One Big Beautiful Bill Act (H.R.1) and propose changes to the definition of "professional degree" programs. 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 ensure a robust nursing workforce that supports the health needs of our nation. This includes support for our master's and doctoral nursing students who go on to serve as primary care providers, faculty and educators, researchers, and leaders within the health care profession.

As you finalize this proposed rule, **the NCC strongly requests that the Department of Education 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 51.38), in the regulatory definition of professional degree programs, and all the degrees at the master's and doctoral level they represent, specifically:** "A professional degree may be awarded in the following fields: (i) Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law, (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry, (D.P.M., D.P., or Pod.D.), Theology (M.Div., or M.H.L.), Clinical Psychology (Psy.D. or Ph.D.), and **Nursing (MSN, DNP, Ph.D.).**"

The inclusion of post-baccalaureate nursing into the definition of a professional degree program is critically important for these students given the new loan limits of \$20,500 annually and \$100,000 aggregate for graduate degree programs compared to the \$50,000 annually and \$200,000 aggregate for

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

professional degree programs.² This is especially true given the phasing out of the Graduate PLUS student loan program. This distinction between graduate and professional degrees is more important now than ever, especially as a recent survey shows that 69% of post-baccalaureate nursing students use federal student loans.³

Nursing Programs Satisfy the Definition Standards for “Professional Degree”

The Department proposes to establish new definitions of “graduate student,” “professional student,” and “professional degree,” in 34 CFR 685.102⁴ pursuant to the new federal student loan limits established by section 81001.⁵ The Department recognizes in the NPRM that it is, “bound to adhere closely to the text of the statute” in its interpretation of “professional students” and “professional degrees.”⁶ The Department states that the operative definition of “professional degree” provided in the H.R.1 establishes a three-part test, based on the historical definition in 34 CFR 668.2.

The three-part test that H.R.1 incorporated to define a professional degree is:

1. The degree must signify completion of the academic requirements for beginning practice in a given profession;
2. The profession the graduate enters must require a level of professional skill beyond what is normally required for a bachelor’s degree; and,
3. The profession that a degree holder would enter after graduating generally requires professional licensure.⁷

As discussed in detail below, post-baccalaureate nursing degrees meet every part of the three-part test adopted by H.R.1. First, all 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.⁸ This alone satisfies both the first and third parts of what defines a professional degree. Second, post-baccalaureate nursing graduates enter professions that require a level of professional skill beyond that is required for a bachelor’s degree. The daily practice for these master’s and doctoral prepared APRNs is distinct and beyond that of RNs. For instance, APRN daily practice includes assessment; ordering, performing, supervising and interpreting diagnostic and laboratory tests; making diagnoses; initiating and managing treatment including prescribing medication and non-pharmacologic treatments; coordinating care; counseling; and educating patients and their families and communities. Further, Ph.D. prepared nurses, while often research-oriented, are critical to the preparation of faculty, educators, scientists, clinical leaders, and clinicians who sustain the professional workforce.

² H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>

³ 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

⁴ Reimagining and Improving Student Education, 34 CFR Parts 674, 682, and 685 [Docket ID ED-2025-OPE-0944], 91 FR 4332. Retrieved from: <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education#print>

⁵ H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>

⁶ Reimagining and Improving Student Education, 34 CFR Parts 674, 682, and 685 [Docket ID ED-2025-OPE-0944]. Retrieved from: <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education#print>

⁷ Reimagining and Improving Student Education, 34 CFR Parts 674, 682, and 685 [Docket ID ED-2025-OPE-0944], 91 FR 4262. Retrieved from: <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education#print>

⁸ Consensus model for APRN regulation: Licensure, accreditation, certification & education. (2008). Retrieved from: https://www.ncsbn.org/public-files/Consensus_Model_Report.pdf

Third, as outlined in the proposed rule, professional licensure is also generally required.⁹ While all registered nurses must pass the National Council Licensure Examination (NCLEX-RN), the nationwide licensing exam for entry into the profession, APRNs have additional education and required certification and licensure. All APRNs must complete a graduate degree, such as a Master of Science in Nursing (MSN) or a Doctor of Nursing Practice (DNP), and must pass national certification and APRN-specific state licensure to be licensed to practice in a state.¹⁰ Therefore, while licensure as an RN is a prerequisite for APRNs, the APRN licensure is a separate, additional licensure with further requirements and privileges. Master's and doctoral nursing students require additional national certifications and licensures, which entail rigorous examinations and continuing education for license renewal.¹¹ These are distinct requirements that go beyond what is required for licensure as an RN.

The Department of Education's lack of recognition of post-baccalaureate nurses as health care professionals conflicts with other federal agencies and departments across the federal government who have long recognized APRN roles as unique and distinct professions. For example, the Social Security Administration, Centers for Medicare and Medicaid Services, Department of Transportation, Substance Abuse and Mental Health Services Administration, and the United States Military, among others, all recognize the importance of APRNs as health care professionals. Thus, it is consistent that post-baccalaureate nursing students be recognized within the "professional degree" definition.

Even though post-baccalaureate nursing degrees meet the existing criteria which was incorporated into H.R.1 and the proposed definition of "professional student," the NPRM invents two new requirements that do not exist in statute or regulation. First, the Department states that APRNs are already licensed nurses, therefore MSNs and DNPs are not professional degrees. Second, the Department creates a new state practice authority criterion. By introducing these new criteria, the Department of Education narrows the definition of professional degree without statutory authority and departs from its own historical framework.

Finally, within this proposal, the Department states that "degrees on the example list in 34 CFR 668.2 may be fairly compared to any degrees not on the list. If any given degree is like degrees on the list, that provides additional evidence that the degree at hand may be a professional degree." Post-baccalaureate nursing degrees are similar to the health care degrees on the enumerated list. In fact, in many cases in agencies across the federal government and in state regulation, APRNs have a similar scope of duties and responsibilities as the professions listed.

Given that Congress clearly defined the term "professional degree," and definitively and unambiguously clarified the definition at the date of enactment of the statute, the Department and the RISE Committee exceeded their statutory authority in the negotiated rulemaking process by proposing a new and more restrictive definition. In fact, the Department and the negotiators removed language from its definition

⁹ Reimagining and Improving Student Education, 34 CFR Parts 674, 682, and 685 [Docket ID ED-2025-OPE-0944], 91 FR 4262. Retrieved from: <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education#print>

¹⁰ Consensus model for APRN regulation: Licensure, accreditation, certification & education. (2008). Retrieved from: https://www.ncsbn.org/public-files/Consensus_Model_Report.pdf

¹¹ APRN Consensus Model (n.d.). national Council of State Boards of Nursing. Accessed February 1, 2026. Retrieved from: <https://www.ncsbn.org/nursing-regulation/practice/aprn.page> and Consensus model for APRN regulation: Licensure, accreditation, certification & education. (2008). Retrieved from: https://www.ncsbn.org/public-files/Consensus_Model_Report.pdf

which was included in the existing definition in 34 CFR 668.2. The existing regulation states that “examples of a professional degree include but are not limited to” and includes a list of degree programs which are meant to be illustrative, not exhaustive, examples. However, in the NPRM preamble, the Department clarifies this definition, stating that “professional degree only includes degrees in the following fields.” This is a clear departure from the definition included by Congress, and a change the Department and the RISE Committee are not empowered to make.

Direct Impact on Our Nation’s Health: Why Including Post-Baccalaureate Nursing Programs (MSN, DNP, Ph.D.) Offers a Strong Return on Investment

As we examine return on investment (ROI) of professions, a topic discussed by the RISE Committee, it is clear that post-baccalaureate nursing degrees provide a strong ROI. Supporting educational pathways into post-baccalaureate nursing programs removes barriers to entering the profession, supports ongoing nursing workforce needs, and ensures patients across the country have access to high-quality health care. This comes at a time when the Bureau of Labor Statistics (BLS) estimates that there will be an average of 32,700 openings for nurse anesthetists, nurse midwives and nurse practitioners each year through 2034, representing a 35% growth rate.¹² Similarly, BLS projects approximately 189,100 annual job openings for RNs through 2034, representing 5% growth over the next decade.¹³ As we support our current nursing workforce and prepare our future RNs and APRNs, post-baccalaureate nurses at the master’s and doctoral levels (DNP, Ph.D.) are needed now more than ever.

Not only does post-baccalaureate nursing have a strong economic return on investment, but it also has a strong return on the health investments for the communities across the nation where they are providing access to care. As the largest segment of the health care profession,¹⁴ 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 decades, we have seen how our nursing workforce has supported the needs of our communities. As the Medicare Payment Advisory Commission’s (MedPAC) 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%).”¹⁵ In fact, over 233,000 APRNs treated Medicare patients and approximately 40% of Medicare beneficiaries received care from an APRN.¹⁶ APRNs support our aging population, are the fastest growing group of

¹² U.S. Bureau of Labor Statistics. (2025). Occupational Outlook Handbook- Nurse Anesthetists, Nurse Midwives, and Nurse Practitioners. Retrieved from: <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm>

¹³ U.S. Bureau of Labor Statistics. (2025). Occupational Outlook Handbook- Registered Nurses. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm>

¹⁴ 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/>

¹⁵ 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>

¹⁶ 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>

professionals treating Medicare patients,¹⁷ and are critical to ensuring Medicaid patients have access to care.¹⁸

This growing need for post-baccalaureate nurses and APRNs is not limited to Medicare and Medicaid—it is evident across the entire health care delivery system, particularly in rural settings. According to the Health Resources and Services Administration (HRSA), in 2024 there were over 13,000 full time employed NPs in community health centers, who performed over 30 million in-person clinic visits, and almost 3 million virtual visits, more than any other individual clinician group.¹⁹ In addition, our nation’s Certified Registered Nurse Anesthetists (CRNAs) form the backbone of surgical delivery in rural communities as they comprise nearly 80% of all anesthesia providers in those areas.²⁰ It is evident that communities, including rural and underserved areas, rely on our post-baccalaureate prepared nurses, including APRNs, to meet their health care needs.

Supporting our Future Nurses: Impact of Financial Barriers Without Professional Degree Recognition

When looking at the new federal student loan structure, post-baccalaureate nursing students would be impacted at every level if not included in the professional degree definition. Under the graduate aggregate loan limit of \$100,000, a recent survey found that 81% of students would be negatively impacted.²¹ A prime example is CRNAs who can graduate with upwards of \$200,000 in student loan debt, quickly surpassing this lower aggregate limit.²² This demonstrates a clear need for access to these loans, while a reported 0-1% default rate proves this borrowing provides a high return on investment.²³ In other programs, like the entry level master’s program, students are most likely to be impacted by the annual limits. For example, 82% of post-baccalaureate students indicated the annual loan cap would negatively affect their ability to finance education.²⁴ Students further reported average annual costs of approximately \$38,500, nearly double the new graduate loan limit.²⁵ Similarly, many nursing programs operate year-round across trimesters, rather than on the traditional two-semester academic calendar, which is consistent with other health professional degree programs. As a result, while some programs may be under the aggregate limit of \$100,000, they may be over the \$20,500 annual limit. This is another reason why it is critical for these programs to be deemed professional degrees so that students can access up to \$50,000 per year.

¹⁷ See CMS dataset, Number of Medicare Non-Institutional Providers, by Specialty, Calendar Years 2019-2023 (Accessed on February 17, 2026) Retrieved from: <https://data.cms.gov/provider-summary-by-type-of-service/medicare-physician-other-practitioners>

¹⁸ Buerhaus, Peter. Nurse Practitioners: A Solution to America’s Primary Care Crisis (September 18, 2018).

Retrieved from: <https://www.aei.org/research-products/report/nurse-practitioners-a-solution-to-americas-primary-care-crisis/>

¹⁹ Health Resources and Services Administration. Table 5: Staffing and Utilization. Retrieved from:

<https://data.hrsa.gov/topics/healthcenters/uds/overview/national/table?tableName=5&year=2024>

²⁰ Relationship between rural hospital closures and the supply of nurse practitioners and certified registered nurse anesthetists:

Retrieved from: <https://www.sciencedirect.com/science/article/abs/pii/S0029655421001329>

²¹ American Association of Colleges of Nursing. Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspective from Deans and Students: Retrieved from: <https://www.aacnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>

²² A CRNA's Life After Anesthesia Preview. Retrieved from: <https://www.crnafinancialplanning.com/p/a-crnas-lifeafter-anesthesia-chapter-1-preview>

²³ American Association of Nurse Anesthesiology. (2026). *What are the federal student loan caps and their impact on CRNAs?* <https://www.anesthesiafacts.com/wp-content/uploads/2025/12/Federal-Student-Loan-Caps-and-their-Impact.pdf>

²⁴ American Association of Colleges of Nursing. Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspective from Deans and Students: Retrieved from: <https://www.aacnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>

²⁵ Ibid.

Survey data from Fall 2024 indicates that more than a third of students in baccalaureate and higher degree nursing programs enrolled in post-baccalaureate nursing programs (master’s, DNP, Ph.D.).²⁶ 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.

Sustaining Strong Nursing Education Pathways: The Need for Professional Recognition of Nursing Faculty to Address Ongoing Shortages

The professional degree designation is not only important for students, but for nursing education, nurse faculty, and ultimately the nursing workforce. A recent survey found that 78% of nursing school deans reported the \$20,500 annual loan cap would negatively affect enrollment in post-baccalaureate nursing programs, while 70% reported the \$100,000 aggregate cap would reduce enrollment.²⁷ This concern extends to nurse faculty as 77% of deans indicated the new loan limits would negatively affect recruitment and retention of nursing faculty.²⁸ This would exacerbate an already problematic nurse faculty shortage, as a total of 1,588 full-time faculty vacancies were identified by 863 nursing schools with baccalaureate and/or post-baccalaureate programs across the country.²⁹

Nurse faculty members, who are often paid much less than their clinician partners, not only educate our post-baccalaureate nursing students, but also those at the bachelors and associate levels. As outlined in the National Nursing Education Database data on faculty, which include 34 participating member states, 96.1% of RN education faculty for bachelor’s degree programs hold a Ph.D., DNP, or Master’s Degree.³⁰ Without a professional degree designation for post-baccalaureate nursing, a recent survey found that 71% of deans said they anticipate the new loan caps will have negative downstream consequences on their baccalaureate enrollment as well.³¹ As the United States continues to face a provider and nursing shortage, creating unnecessary barriers by restricting post-baccalaureate nurses to a lower loan limit and impeding access to affordable education financing options, risks a disruption in nursing education pathways that will directly impact health care for patients across the country.

²⁶ American Association of Colleges of Nursing. National Snapshot. Retrieved from:

<https://www.aacnnursing.org/Portals/0/PDFs/Policy/State-Resources/national-snapshot.pdf>

²⁷ American Association of Colleges of Nursing. Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspective from Deans and Students: Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>

²⁸ Ibid.

²⁹ American Association of Colleges of Nursing. Faculty Vacancy Report - Academic Year 2025-2026. Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Reports/Faculty-Vacancy-Report-2025.pdf>

³⁰ National Nursing Education Database, Retrieved from:

<https://app.powerbi.com/view?r=eyJrIjoiMTQ1MzcyNmIzMjdYYS00YzNjLWlwOWQyYjE3NzZmMDg5NTImlwiwidCI6IjUxNzVkYTNIUWUwNDctNDliNS1hZDJmLWNhMzU1YTZiMzdhMyIsImMiOiN9>

³¹ American Association of Colleges of Nursing. Assessing the Impact of Federal Loan Limits on Post-Baccalaureate Nursing Education: Perspective from Deans and Students: Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>

Understanding Legislative Context and Higher Education Costs

While H.R. 1 does create new distinctions between annual and aggregate limits for graduate versus professional degrees, it does not change the current regulation of “professional degree.” Further, nothing in the statutory text or legislative history of H.R.1 suggests an intent to narrow the category of professional degree to only a handful of long-established professions or to exclude fields that require post-baccalaureate-level preparation for licensed practice.

In fact, other agencies that have implemented sections of H.R.1, such as the Department of Health and Human Services (HHS) in the creation of the Rural Health Transformation Program (RHTP) [sec. 71401], have recognized the importance of APRNs in providing care to communities across the nation. In the Notice for Funding Opportunity for the RHTP, HHS explicitly incentivized their use, giving states extra scoring weight if the state has full practice authority, or plans to expand full practice authority, for nurse practitioners.³² The Administration recognizes the importance of APRNs, as further highlighted by the scoring factors, two of which speak to the importance of APRNs in addressing patient access to primary care and preventing chronic disease.³³

We understand that rising costs of higher education is a legitimate concern. The premise that these new limits on student loans or not including post-baccalaureate nursing in the list of professional degrees, will reduce program costs or exert downward pressure on overall institutional pricing structures is unproven and concerning. In fact, research does not support a causal link between federal loan availability and broad tuition inflation, with some analyses finding little to no effect of higher loan limits on tuition levels.³⁴ Nursing programs adhere to strict requirements that need to balance safety with strong outcomes. For post-baccalaureate nursing students this is not just tuition, books, housing, transportation, etc., but labs, faculty, clinical preceptors and education, among other items. As noted above, 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. Further, such a large reduction in the graduate annual and aggregate student loan cap for post-baccalaureate nursing students would require debilitating cuts that are not feasible for most universities.

Beyond the immediate financial challenges for students and institutions, it is also important to recognize the broader economic contributions colleges and universities make to their communities. In rural areas, “one million dollars in university external research expenditures is associated with \$711,000 in value added, 10 jobs, and \$159,000 in tax revenue” while in larger metropolitan areas “one million dollars in university external research expenditures is associated with \$945,000 in value added, 9 jobs, and \$164,000 in tax revenue.”³⁵ Indeed, it is not just that colleges and universities generate a substantial contribution to their local economies, but also graduate professionals who make a strong and

³² H.R.1 - One Big Beautiful Bill Act. Retrieved from: <https://www.congress.gov/119/bills/hr1/BILLS-119hr1enr.pdf>

³³ Rural Health Transformation Program. Opportunity number: CMS-RHT-26-001. Retrieved from: https://sponsors.aha.org/rs/710-ZLL-651/images/09262025_cms-rht-26-001_final.pdf?version=0

³⁴ Gordon, Grey. Do Student Loans Drive Up College Tuition? August 2022, No. 22-32. Retrieved from: https://www.richmondfed.org/publications/research/economic_brief/2022/eb_22-32

³⁵ Apriesnig, Jenny et. al., 2024. Regional economic impact of university research expenditures. Studies in Higher Education. Retrieved from: <https://www.tandfonline.com/doi/abs/10.1080/03075079.2024.2376262>

immediate impact at the national level. Of note, the U.S. Bureau of Labor Statistics Job Report highlighted that health care added 82,000 jobs in January of this year alone.³⁶

Post-baccalaureate nursing education is essential to address workforce demand, providing upward economic mobility, caring for an aging population, and supporting community health. As intended in H.R.1, this investment in our nation's current and future nursing workforce is essential to making, and keeping, America healthy again.

Including Post-Baccalaureate Nursing as Professional Degree is a Strong Investment in our Nation's Future

As we look at investing in the health of our nation, it is evident that our post-baccalaureate nurses are a critical part of our health system and that investments in nursing education provide a strong return on investment across the board, particularly for our rural and underserved communities. These investments align with previous Administration efforts to reduce barriers to nursing practice, and to increase choice and competition in health care.³⁷ There is substantial data that clearly demonstrates how important investment in our current and future nursing workforce is, including:

- A national analysis of nearly 14,000 post-baccalaureate programs found that the median master's degree yields an estimated lifetime earnings increase of approximately \$83,000 while most nursing master's programs generate lifetime earnings gains exceeding \$500,000.³⁸
- NPs had one of the lowest debts compared to other medical professionals. They have one of the best debt-to-income ratios and can easily repay their loans across varying payment plans.³⁹
- NPs had an average loan of \$129,000, but a net positive gain of \$764,348 over the course of 30 years, indicating a strong return on investment in NP education.⁴⁰
- CRNAs are quickly employed after graduation, with U.S. News reporting a 1.9% unemployment rate.⁴¹
- CRNAs are high income earners, with a 2024 annual mean wage of \$231,700, leading CRNAs to have extremely low student loan default rates.⁴²

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 health care services. **Therefore, the NCC urges the Department to include post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) explicitly in the list of professional degrees.** Should you have any questions or if the

³⁶ U.S. Bureau of Labor Statistics. Economic News Release. Employment Situation Summary (Feb. 11, 2026). Retrieved from: <https://www.bls.gov/news.release/empsit.nr0.htm>

³⁷ Department of Health & Human Services. (2017). *Reforming America's Healthcare System Through Choice and Competition*. Retrieved from: <https://www.hhs.gov/sites/default/files/Reforming-Americas-Healthcare-System-Through-Choice-and-Competition.pdf>

³⁸ "Is Grad School Worth It? A Comprehensive Return on Investment Analysis. Retrieved from: <https://freopp.org/whitepapers/is-grad-school-worth-it-a-comprehensive-return-on-investment-analysis/>

³⁹ Shields RK, Suneja M, Shields BE, Tofte JN, Dudley-Javoroski S. Healthcare educational debt in the united states: unequal economic impact within interprofessional team members. *BMC Med Educ*. 2023 Sep 14;23(1):666. doi: [10.1186/s12909-023-04634-1](https://doi.org/10.1186/s12909-023-04634-1). PMID: 37710228; PMCID: PMC10503048.

⁴⁰ ROI for NPs and PAs. Retrieved from: <https://pubmed.ncbi.nlm.nih.gov/28538427/>

⁴¹ U.S. News & World Report, Nurse Anesthetist. Retrieved from: <https://careers.usnews.com/best-jobs/nurse-anesthetist>.

⁴² U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics: Nurse Anesthetists, National, Annual Mean Wage, May 2024. Retrieved from: <https://data.bls.gov/oesprofile/>

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 Academy of Nursing
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
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 for Radiologic and Imaging Nursing
Association of Community Health Nursing Educators
Association of Nurses in AIDS Care
Association of Pediatric Hematology/Oncology Nurses
Association of PeriOperative Registered Nurses
Association of Public Health Nurses
Association of Rehabilitation Nurses
Association of Veterans Affairs Nurse Anesthetists
Association of Women's Health, Obstetric and Neonatal Nurses
Commissioned Officers Association of the U.S. Public Health Service
Dermatology Nurses' Association
DNPs of Color
Emergency Nurses Association
Friends of the National Institute of Nursing Research
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 Nurse-Led Care Consortium
National Organization of Nurse Practitioner Faculties
Nurses Organization of Veterans Affairs
Oncology Nursing Society
Organization for Associate Degree Nursing
Pediatric Endocrinology Nursing Society
Preventive Cardiovascular Nurses Association
Society of Pediatric Nurses
Society of Urologic Nurses and Associates
Wound, Ostomy, and Continence Nurses Society