

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 277 undersigned national and state organizations, we write in strong support of adding post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) to the list of “professional” degrees as outlined in the notice of proposed rulemaking (NPRM) on Reimagining and Improving Student Education [ED-2025-OPE-0944]. Our nation’s nurses and Advanced Practice Registered Nurses (APRNs)<sup>1</sup> serve as our primary care providers, faculty and educators, researchers, and leaders within the health care profession. Including post-baccalaureate nursing in the regulatory definition of “professional” degrees for the purpose of student loan limits is necessary as we continue to strengthen nursing education pathways, support a robust nursing workforce, and ensure communities across the country have access to timely, high-quality nursing care. **Together, we urge the Department to amend its proposed rule and include post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) explicitly in the list of “professional” degrees.**

As the largest segment of the healthcare profession,<sup>2</sup> 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. They support our aging population, are the fastest growing group of professionals treating Medicare patients,<sup>3</sup> and they are critical to ensuring Medicaid patients have access to care.<sup>4</sup> In fact, the Bureau of Labor Statistics (BLS) outlines that the demand for most APRNs is expected to grow 35% by 2034, which is much faster than average.<sup>5</sup> Further, BLS estimates that, “about 189,100 openings for registered nurses

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

<sup>2</sup> 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/>

<sup>3</sup> 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>

<sup>4</sup> 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/>

<sup>5</sup> U.S. Bureau of Labor Statistics. (2026). 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>

are projected each year, on average, over the decade.”<sup>6</sup> 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.

The high-quality care from our nation’s post-baccalaureate nurses, as well as our APRNs, is grounded in their education, including in pharmacology, diagnostics, and systems leadership. Further, our Ph.D.-prepared nurses, while often research-oriented, are critical to the preparation of faculty, educators, clinical leaders, and clinicians who sustain the professional workforce. The education, licensure and certification pathways and practice authority for our post-baccalaureate nurses parallel other healthcare disciplines such as medicine, dentistry, and pharmacy, all of which already carry the “professional” designation. Deterring future students from pursuing careers in nursing and serving as nurse faculty is counterintuitive and ultimately impacts the entire health care system.

In this NPRM, the Department establishes certain criteria for degrees to qualify as professional in its proposed definition of “professional student.” Post-baccalaureate nursing degrees meet these criteria, as well as the criteria for “professional degree programs” in 34 CFR § 668.2, which was incorporated into H.R. 1 and the proposed definition of “professional student.” Post-baccalaureate nursing degrees are required for beginning practice as an APRN and for educating nursing students. They signify a level of professional skill beyond what is normally required for a bachelor’s degree, and professional licensure is generally required. These are the criteria the Department established, based on the longstanding definition incorporated by Congress, and post-baccalaureate nursing programs meet all of them.

Supporting post-baccalaureate nursing education removes barriers to entry into the profession, supports ongoing nursing workforce needs, and ensures patients across the country have access to high-quality healthcare. For this reason, we stand united in our request that the Department **include post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) explicitly in the list of “professional” degrees.** This is consistent with the regulatory language and will help ensure a stable pathway of essential nursing professionals for years to come. We appreciate your consideration of our comments. Should you have any questions or if we can be of any additional assistance, please contact Rachel Minahan at [rminahan@aacnnursing.org](mailto:rminahan@aacnnursing.org).

Sincerely,

**National Organizations:**

- Academy of Neonatal Nursing
- Academy of Medical-Surgical Nurses
- Alliance for Connected Care
- Alliance for Women's Health and Prevention
- Alliance of Nurses for Healthy Environments
- Alliance of Wound Care Stakeholders
- American Academy of Ambulatory Care Nurses
- American Academy of Emergency Nurse Practitioners
- American Academy of Hospice and Palliative Medicine
- American Academy of Nursing

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<sup>6</sup> U.S. Bureau of Labor Statistics. (2026). Occupational Outlook Handbook- Registered Nurses. Retrieved from: <https://www.bls.gov/ooh/healthcare/registered-nurses.htm>

American Academy of Pediatric Nurse Practitioners  
American Association of Birth Centers  
American Association of Colleges of Nursing  
American Association of Critical-Care 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 Clinical Wound Specialists  
American College of Nurse-Midwives  
American Diabetes Association  
American Holistic Nurses Association  
American Nephrology Nurses Association  
American Nurses 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  
Association for Advanced Practice Psychiatric Nurses  
Association for the Advancement of Wound Care  
Association of Advanced Pulmonary Practice Providers  
Association of Clinicians for the Underserved  
Association of Community Health Nursing Educators  
Association of Critical Care Nurses  
Association of Nigeria Nurse Practitioners in North America  
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 Women's Health, Obstetric and Neonatal Nurses  
ATI Nursing Education  
Chi Eta Phi Education Foundation  
Coalition of Unified Providers for Patient Access  
Commissioned Officers Association of the U.S. Public Health Service  
Convenient Care Association  
Dermatology Nurses' Association  
DNP's of Color  
Emergency Nurses Association  
Food Allergy Nursing Association  
Friends of the National Institute of Nursing Research  
Gerontological Advanced Practice Nurses Association  
HealthyWomen  
Hospice and Palliative Nurses Association  
International Association of Forensic Nurses, Inc.  
International Nurses Society on Addictions  
International Society of Psychiatric-Mental Health Nurses

Jamaica Association of Nurse Practitioners  
Men's Health Network  
National Alliance for Care at Home  
National Association of Family Nurse Practitioners  
National Association of Hispanic Nurses  
National Association of Indian Nurses of America  
National Association of Nurse Practitioners in Women's Health  
National Association of Pediatric Nurse Practitioners  
National Association of School Nurses  
National Association of Veterans' Research and Education Foundations  
National Black Nurses Association, Inc.  
National Coalition for Hospice and Palliative Care  
National Council of State Boards of Nursing  
National Forum of State Nursing Workforce Centers  
National Foundation for Infectious Diseases  
National Hispanic Medical Association  
National Indian Nurse Practitioners Association of America  
National League for Nursing  
National Nurse Practitioner Entrepreneur Network  
National Nurse-Led Care Consortium  
National Organization of Nurse Practitioner Faculties  
National Partnership for Healthcare and Hospice Innovation  
National Rural Health Association  
Nurses Organization of Veterans Affairs  
NurseTRUST  
Oncology Nursing Society  
Orthodox Jewish Nurses Association  
Orthopedic Nurses Certification Board  
Pediatric Endocrinology Nursing Society  
Philippine Nurses Association of America  
Preventive Cardiovascular Nurses Association  
Society for Vascular Nursing  
Society of Critical Care Medicine  
Society of Pain and Palliative Care Pharmacists  
Society of Pediatric Nurses  
Society of Psychiatric Advanced Practice Nurses, Inc  
The National Association of Rural Health Clinics  
The National Certification Corporation

**State Organizations:**

Alabama Association of Nurse Anesthetists  
Alabama State Nurses Association  
Alaska Advanced Practice Registered Nurse Alliance  
Alaska Association of Nurse Anesthesiology  
Alpha Health Services LLC  
American College of Nurse Midwives - Iowa State Affiliate  
American College of Nurse Midwives - Utah Affiliate  
American Nurses Association - Illinois

American Nurses Association - New York  
American Nurses Association Massachusetts, Inc.  
American Nurses Association of Idaho  
APRNs of Washington State  
Arizona Affiliate of ACNM  
Arizona Association of Nurse Anesthesiology  
Arizona State Board of Nursing  
Arkansas Nurse Practitioner Association  
Ascentria Care Alliance  
Association of California Nurse Leaders  
Association of Missouri Nurse Practitioners  
Association of Southeast Minnesota Nurse Practitioners  
AtlantiCare  
Brigham Young University College of Nursing - Provo, UT  
California Association of Nurse Anesthesiology  
California Baptist University  
Coalition of Advanced Practice Nurses of Indiana  
Coalition of Texans with Disabilities  
Colorado Association of Nurse Anesthesiology  
Colorado Nurses Association  
Colorado Organization of Nurse Leaders  
Columbia River Nurse Practitioner Association  
Connecticut Advanced Practice Registered Nurse Society  
Connecticut Affiliate of the American College of Nurse-Midwives, Inc.  
Connecticut Association of Nurse Anesthesiology  
Consortium of Texas Certified Nurse-Midwives  
Council on Nursing Education in Washington State  
Dartmouth Hitchcock Hospital  
Delaware Association of Nurse Anesthetists  
Delaware Coalition of Nurse Practitioners  
Delaware Nurses Association  
Dignity Nursing School  
Florida Association of Nurse Anesthesiology  
Florida Council of Nurse-Midwives, Inc.  
Florida Nurse Practitioner Network  
Fort Worth Region Nurse Practitioners Association  
Georgia Association of Nurse Anesthetists  
Georgia Hospice and Palliative Care Organization  
Georgia Nurses Association  
Good Samaritan  
Granite State Home Health & Hospice Association  
Greater Kansas City Chapter of the American Society for Pain Management Nursing  
Hawai'i - American Nurses Association  
Huntington Hospital Journal Club  
Idaho Center for Nursing  
Illinois Association of Colleges of Nursing  
Illinois Association of Nurse Anesthesiology  
Illinois Nurses Foundation

Illinois Organization of Nurse Leaders  
Illinois Society of Advanced Practice Nursing  
Indiana Association of Nurse Anesthetists  
Iowa Association of Nurse Anesthetists  
Iowa Nurse Practitioner Society  
Kansas Association of Nurse Anesthetists  
Kansas Organization of Nurse Leaders  
Kentucky Association of Nurse Practitioners and Nurse-Midwives  
Kentucky Organization of Nurse Leaders  
Louisiana Association of Nurse Anesthesiology  
Louisiana Association of Nurse Anesthetists  
Louisiana Organization for Nursing Leadership  
Louisiana State Nurses Association  
Loyola University  
Maine Association of Nurse Anesthesiology  
Maine Nurse Practitioner Association  
Maine State Board of Nursing  
Maryland Affiliate of the American College of Nurse Midwives, Inc.  
Maryland Association of Nurse Anesthetists  
Massachusetts Affiliate of the American College of Nurse Midwives  
Massachusetts Association of Nurse Anesthesiology  
Massachusetts Coalition of Nurse Practitioners  
Metrolina Coalition of Nurse Practitioners  
Michigan Affiliate of the American College of Nurse Midwives  
Michigan Association of Nurse Anesthetists  
Middle Tennessee Advanced Practice Registered Nurses  
Minnesota Association of Nurse Anesthetists  
Mississippi Association of Nurse Anesthetists  
Mississippi Association of Nurse Practitioners  
Missouri Nurse Practitioners for Full Practice Authority  
Missouri Nurses Association  
National Association of Social Workers, New Hampshire Chapter  
National Association of Social Workers, Vermont Chapter  
National University Doctorate of Nurse Anesthesiology Program  
Nebraska Affiliate of the American College of Nurse Midwives  
Nebraska Association of Nurse Anesthetists  
Nebraska Nurse Practitioner Organization  
Nevada Association of Nurse Anesthesiology  
New Hampshire Affiliate of ACNM  
New Hampshire Nurse Practitioner Association  
New Hampshire Nurses Association  
New Jersey Palliative Care APN Consortium  
New Jersey State Nurses Association  
New Mexico Affiliate of the American College of Nurse-Midwives  
New York Organization for Nursing Leadership, Inc.  
New York State Association of Nurse Anesthetists  
New York State Nurse Practitioner Association  
North Carolina Association of Nurse Anesthetists

North Carolina Board of Nursing  
North Carolina Nurses Association  
North Carolina Organization of Nurse Leaders  
North Dakota Center for Nursing  
North Dakota Nurses Association  
North Texas Nurse Practitioners  
Northwell Health  
Northwest Organization of Nurse Leaders  
NPASP-Pennsylvania Coalition of Nurse Practitioners  
NP Forum of Wisconsin Nurses Association  
NPs of Lee County  
Nurse Leaders of Idaho  
Nurse Practitioner Alliance of Rhode Island  
Nurse Practitioner Association of DC  
Nurse Practitioner Journal Club of Huntington  
Nurse Practitioners of Idaho  
Nurse Practitioners of Oregon  
Ohio Association of Advanced Practice Nurses  
Oklahoma Nurses Association  
Old Dominion University  
Oregon Affiliate of the American College of Nurse-Midwives  
Oregon Association of Nurse Anesthetists  
Oregon Health and Science University  
Oregon Nurses Association  
Organization of Maine Nurse Leaders  
Organization of Nurse Leaders of New Jersey  
Pediatric Nurse Practitioner House Calls  
Pennsylvania Association of Nurse Anesthetists  
Pennsylvania Coalition of Nurse Practitioners  
Pennsylvania Coalition of Nurse Practitioners - Laurel Highlands  
Pennsylvania Organization of Nurse Leaders  
Providence Sacred Heart Medical Center/Gonzaga University Nurse Anesthesia Program  
Psychiatric Advance Practice Nurses of Texas  
Pukalani Family Practice, LLC  
Rush System for Health  
SBH Health System  
South Carolina Affiliate of the American College of Nurse-Midwives  
South Carolina Association of Nurse Anesthesiology  
South Carolina Nurses Association  
South College Nurse Anesthesia Program  
Tennessee Association of Nurse Anesthetists  
Tennessee Wesleyan University  
Texas Association of Nurse Anesthetists  
Texas Business Leadership Council  
Texas Nurse Practitioners  
The Maryland Academy of Advanced Practice Clinicians  
The Nurse Practitioner Association of Maryland, Inc.  
The Nurse Practitioner Association of New York State

The Ohio Organization for Nursing Leadership  
The State University of New York, Upstate Medical University College of Nursing  
The Vermont Affiliate of the American College of Nurse-Midwives  
University of Mobile  
University of North Carolina at Chapel Hill  
University of Pennsylvania School of Nursing  
University of Vermont  
Upstate Nurse Practitioner Association  
Utah Nurse Practitioners Association  
Utah Nurses Association  
Vermont Association of Nurse Anesthetists  
Vermont Nurse Practitioners Association  
Vermont Speech Language Hearing Association  
Virginia Association of Colleges of Nursing  
Virginia Association of Nurse Anesthesiologists  
Virginia Association of Nurse Anesthesiology  
Virginia Council of Nurse Practitioners  
Virginia Nurses Association  
Washington Association of Nurse Anesthesiology  
Washington State Board of Nursing  
Washington State Nurses Association  
West Virginia Affiliate of the American College of Nurse-Midwives  
West Virginia Organization for Nursing Leadership  
Western Regional Advanced Practice Nurses Network  
Wisconsin Association of Nurse Anesthetists  
Wyoming Association of Nurse Anesthetists  
Wyoming Center for Nursing  
Wyoming Council for Advanced Practice Nursing  
Wyoming Nurses Association