

February 27, 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 XX undersigned national and state organizations we write in strong support of adding post-baccalaureate nursing degrees (MSN, DNP, PhD), 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)¹ 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,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. They support our aging population, are the fastest growing group of professionals treating Medicare patients,³ and they are critical to ensuring Medicaid patients have access to care⁴. In fact, the Bureau of Labor Statistics outlines that the demand for most APRNs is expected to grow 35% by 2034, which is much faster than average.⁵ Further, BLS estimates that, “about 189,100 openings for registered nurses are projected each year, on average, over the decade.”⁶ 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.

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/>

³ 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>

⁴ 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/>

⁵ 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>

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

The high-quality care from our nation's post-baccalaureate nurses, including our APRNs, is grounded in their education, including in pharmacology, diagnostics, and systems leadership. Further, our PhD 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. Detering 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 their 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.

Sincerely,

[UNDERSIGNED ORGANIZATIONS]