

# Nursing is a Professional Degree

## Current Issue

Earlier this year, the Department of Education released their Notice of Proposed Rulemaking, which did not include nursing as a professional degree.

On March 2, AACN submitted formal comments to the Department advocating for the inclusion of post-baccalaureate nursing in the definition of professional degree programs.

The American Association of Colleges of Nursing (AACN) is the national voice for academic nursing representing more than 890 member schools throughout the country.

AACN member schools educate more than 570,000 students and employ more than 58,000 faculty.

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## Request: Include Nursing as a Professional Degree

In response to the Department of Education's (ED) Notice of Proposed Rulemaking (NPRM), AACN submitted formal comments<sup>1</sup> requesting that ED 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.)***

## Why Nursing as a Professional Degree Matters

- **Nurses prepared in master's and doctoral programs serve as advanced practice registered nurses, faculty, researchers, and in other expert clinical roles.** Impacted roles include Nurse Practitioners (about 87% of NPs are educated and prepared in programs that focus on primary care),<sup>2</sup> certified registered nurse anesthetists (CRNAs represent more than 80% of anesthesia providers in rural counties),<sup>3</sup> clinical nurse specialists, certified nurse midwives, and nurse faculty.
- **AACN's latest data shows a national faculty vacancy rate of 7.2%.**<sup>4</sup> Restricting access to these programs will only exacerbate the ongoing nurse faculty shortage, limiting the development of our future nursing workforce at all education levels.
- **Like other professional degrees, post-baccalaureate nursing education provides competencies far beyond the Bachelor of Science in Nursing,** and there is a direct link between the completion of these programs and eligibility for licensure, with curricular design and outcomes set according to regulatory and professional standards.

## Impact on Nursing Education

A recent AACN survey<sup>5</sup> of post-baccalaureate nursing students and deans assessed how nursing education would be impacted by the new student loan caps, and found that:

78% of Deans

Agree that the annual graduate loan limits would negatively impact post-baccalaureate enrollment.

71% of Deans

Anticipate that the graduate loan limits will have negative downstream consequences on their baccalaureate enrollment.

77% of Deans

Believe the graduate loan limits would negatively impact their faculty.

81% of Students

Say that the aggregate graduate loan limit would negatively impact their ability to finance their education.

1. American Association of Colleges of Nursing (AACN) Comments. (2026) Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Policy/Letters/2026/3-2-2026-AACN-Comment-Letter-Dept-of-Education-RISE-NPRM.pdf>  
2. American Association of Nurse Practitioners. Nurse Practitioners in Primary Care. (2025) Retrieved from: [https://www.aanp.org/advocacy/advocacy\\_resource/position-statements/nurse-practitioners-in-primary-care](https://www.aanp.org/advocacy/advocacy_resource/position-statements/nurse-practitioners-in-primary-care)  
3. AANA Get the Facts. Access to Care. Retrieved from: <https://www.aana.com/wp-content/uploads/2023/02/Get-the-Facts-Access-General.pdf>  
4. AACN Survey on Vacant Faculty Positions for Academic Year 2025-2026. Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Reports/Faculty-Vacancy-Report-2025.pdf>  
5. AACN Assessing the Impact of Federal Loan Limits on PostBaccalaureate Nursing Education: Perspectives from Deans and Students. Retrieved from: <https://www.aacnnursing.org/Portals/0/PDFs/Data/AACN-Data-Loan-Cap-Survey-Report-December-2025.pdf>

# The Department of Education Should Support Nursing's Inclusion as a Professional Degree

## Changes to Student Loans and Actions by the Department of Education

The One Big Beautiful Bill Act (OB3A) made a number of changes to student financial aid, including eliminating Grad PLUS loans and creating new annual and aggregate federal loan limits for post-baccalaureate students. Following the enactment of OB3A, the Department of Education began the

process of implementing these changes to post-baccalaureate student loans, starting with negotiated rulemaking. The Department convened the Reimagining and Improving Student Education (RISE) Committee in fall 2025 to update definitions tied to student loan limits under OB3A. Negotiators debated the scope of what constitutes a professional degree program. The Department ultimately adopted a narrow framework<sup>1</sup> limiting professional programs, which they then used in the Notice of Proposed Rulemaking (NPRM) issued on January 30, 2026.<sup>2</sup> Post-baccalaureate nursing programs were not included within this proposed definition. If this rule is finalized as proposed, post-baccalaureate nursing students will be subject to the significantly lower borrowing limits.

	Annual Loan Limit	Aggregate Loan Limit
Professional Degree	\$50,000	\$200,000
Graduate Degree	\$20,500	\$100,000

## Congressional Support for Nursing as a Professional Degree

Senate Nursing Caucus Co-Chairs, Senators Jeff Merkley (D-OR) and Roger Wicker (R-MS), House Nursing Caucus Vice Co-Chair and nurse, Congresswoman Jen Kiggans (R-VA-02), and House Nursing Caucus Co-Chair, Congresswoman Suzanne Bonamici (D-OR-01), along with more than 150 bipartisan members of Congress, sent bipartisan and bicameral comments to the Department of Education in support of Nursing as a Professional Degree.<sup>3</sup>

## AACN's Response Effort and Actions

3,089

Comments submitted by AACN stakeholders to the Department of Education through AACN's Take Action Center supporting nursing as a professional degree.

3,152

Messages sent to federal policymakers by AACN Advocates urging them to sign on to a bipartisan, bicameral congressional comment letter supporting the inclusion of nursing as a professional degree in the Department's final rule, resulting in the signatures of more than 150 members of Congress.

277

National and state organizations signed onto written comments<sup>4</sup> led by AACN and the Nursing Community Coalition (NCC) urging the Department to include post-baccalaureate nurses in the definition of professional degrees.

65

Members of the Nursing Community Coalition (NCC), which AACN convenes, signed onto comments<sup>5</sup> to the Department of Education urging them to include nursing in their final rule.

## What Comes Next?

**This rule is not yet finalized.** The NPRM comment period closed on March 2, 2026. The Department of Education must consider all comments they receive before finalizing this regulatory definition. AACN led the nursing community's response by asking our members, partners, champions, and concerned supporters to provide comments and to continue to advocate for the inclusion of nursing programs as professional degrees.

1. Department of Education RISE Committee Proposed Draft (2025) Retrieved from: <https://www.ed.gov/media/document/rise-section-685102-definitions-november-5-2025-112658.pdf>

2. Department of Education Reimagining and Improving Student Education Notice of Proposed Rulemaking (2026) Retrieved from: <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education>

3. Merkley, Wicker, Kiggans, Bonamici, 150+ Lawmakers: Changes to Nursing Student Loans Threaten Profession (2026) Retrieved from: <https://www.merkley.senate.gov/merkley-wicker-kiggans-bonamici-150-lawmakers-changes-to-nursing-student-loans-threaten-profession/>

4. National and State Organization Comment Letter (2026) Retrieved from: [https://www.thenursingcommunity.org/files/ugd/148923\\_df9a3fea722442b2bd496fb5f0f9c00a.pdf](https://www.thenursingcommunity.org/files/ugd/148923_df9a3fea722442b2bd496fb5f0f9c00a.pdf)

5. Nursing Community Coalition OB3A Comment Letter. Retrieved from: [https://www.thenursingcommunity.org/files/ugd/148923\\_0bb6e10c45114870803f1358d218c001.pdf](https://www.thenursingcommunity.org/files/ugd/148923_0bb6e10c45114870803f1358d218c001.pdf)