

Nursing is a Professional Degree

Current Issue

The Department of Education's proposed rule does not include nursing as a professional degree. We only have a limited window to provide comments to the Department urging them to include nursing. Comments must be submitted by **March 2, 2026**.

Make your voice heard today!

ACT NOW >>

The American Association of Colleges of Nursing (AACN) is the national voice for academic nursing representing more than 875 member schools throughout the country.



AACN member schools educate more than 540,000 students and employ more than 53,500 faculty.

CONTACT

655 K Street NW
Suite 750
Washington, DC 20001
202-463-6930
X: @AACNPolicy

Our Request

AACN is urging the Department of Education to explicitly include post-baccalaureate nursing programs (MSN, DNP, Ph.D.) in the regulatory definition of professional degree programs.

Changes to Student Loan Law

In July 2025, Congress passed and the President signed into law the One Big Beautiful Bill Act (OB3A), which made a number of changes to student financial aid. OB3A eliminated Grad PLUS loans and created new annual and aggregate federal loan limits for post-baccalaureate students which meaningfully differentiated between graduate and professional degree programs for the first time.

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

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 specialize in primary care), certified registered nurse anesthetists (CRNAs represent more than 80% of anesthesia providers in rural counties), clinical nurse specialists, certified nurse midwives, and nurse faculty.
- AACN's latest data shows a national faculty vacancy rate of 7.2%. 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

In December 2025, AACN conducted a survey of post-baccalaureate nursing students and deans at our member schools to assess how nursing education would be impacted by the new graduate degree federal loan limitations.

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.

Urge the Department of Education to Support Nursing's Inclusion as a Professional Degree

Support for Nursing as a Professional Degree

Recognizing nursing as a professional degree has generated strong support from across the healthcare and higher education communities and in Congress. On December 12, 2025, leaders of the Congressional Nursing Caucuses led a bipartisan, bicameral group of more than **140 members of Congress** urging the Department of Education to include post-baccalaureate nursing as a professional degree. A similar petition has been signed by over **245,000 members of the public**.

Department of Education Actions

Following 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 limiting professional programs, which they then used in the Notice of Proposed Rulemaking (NPRM) issued on January 30, 2026. **Post-baccalaureate nursing programs are not included within this definition.** If this rule is finalized as proposed, post-baccalaureate nursing students will be subject to the significantly lower borrowing limits.

What is Our Request?

AACN is requesting that the Department of Education's final rule include nursing within the definition of a professional degree.

How to Include Nursing in the Definition of a Professional Degree

We urge the Department of Education to 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 proposed regulatory definition of professional degree programs, and all the degrees at the master's and doctoral level they represent, specifically:

"(2) 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.)**"

What Comes Next?

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

Additional Resources

[Resource Hub](#)

[AACN Statement](#)

[How to Submit a Comment](#)

[Congressional Engagement](#)