



Nursing is a Professional Degree

Our Request

AACN 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 only includes degrees 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.)**."

Background

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. Under the new framework, graduate programs are limited to \$20,500 per year and \$100,000 in total federal borrowing, while professional degree programs can borrow up to \$50,000 per year and \$200,000 total. In November, the Department of Education completed negotiated rulemaking meetings with the Reimagining and Improving Student Education (RISE) Committee to implement changes to student financial aid provisions included in OB3A. Negotiators for the RISE Committee deliberated the definitions of graduate and professional degree programs, ultimately arriving at a definition of professional degree programs that did not include post-baccalaureate nursing education. On January 30, 2026, the Department released a Notice of Proposed Rulemaking formally proposing these changes and inviting public comment.

If post-baccalaureate nursing programs are not included as professional degrees, there will be direct financial, workforce, and public health implications as nurses potentially face the decision to take out high-interest private loans or abandon advanced education altogether. Visit AACN's hub to learn more.

Talking Points

<h3 style="margin: 0;">Impact on Students</h3>	<ul style="list-style-type: none"> • According to an <u>AACN survey</u>, 69% of post-baccalaureate nursing students utilize federal student loans. • In a 2025 <u>survey of Post-Baccalaureate Nursing Students</u> (1,713 respondents across 330 schools): <ul style="list-style-type: none"> ◦ 82% of students indicated the annual loan cap would negatively affect their ability to finance education. ◦ 81% reported the lifetime cap would have a similar impact. ◦ Students also reported average annual costs of approximately \$38,500, nearly double the new annual graduate loan limit. • The average certified registered nurse anesthetist (CRNA) graduates with <u>upwards of \$200,000</u> in student loan debt, quickly reaching the aggregate limit. • A 2017 analysis found that nurse practitioners (NPs) have an <u>average loan of \$129,000</u>.
<h3 style="margin: 0;">Financial Impact of Post-Baccalaureate Nursing Degrees</h3>	<ul style="list-style-type: none"> • U.S. Bureau of Labor Statistics (BLS) found <u>mean annual wages</u> of \$132,000 for Nurse Practitioners, \$231,700 for Nurse Anesthetists, and \$128,110 for Nurse Midwives. • A <u>national analysis</u> 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.

Urge the Department of Education to Protect Post-Baccalaureate Nursing Students

Impact on Faculty and Enrollment

- AACN's survey on vacant faculty positions for Academic Year 2025-2026 found that a total of 1,588 full-time faculty vacancies were identified by 863 nursing schools across the country with baccalaureate and/or post-baccalaureate programs.
- As of Fall 2024, across AACN's more than 875 member schools, there were 358,528 (66.1%) baccalaureate students, 136,476 (25.2%) master's students, 4,223 (0.8%) PhD students, and 42,767 (7.9%) DNP students. As such, **33.9% of all nursing students are enrolled in post-baccalaureate programs.**
- In AACN's 2025 Survey of Deans (469 respondents), 78% 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. Additionally, 77% indicated the new loan limits would negatively affect nursing faculty, including recruitment and retention.

Future Healthcare Workforce

- BLS projects approximately 32,700 annual job openings for Nurse Practitioners, Nurse Anesthetists, and Nurse Midwives through 2034, representing 35% growth, far exceeding the national average of 3%.
- Similarly, the BLS projects approximately 189,100 annual job openings for registered nurses through 2034, representing 5% growth over the next decade.

Supervision is Not a Statutory Standard

- The NPRM invents an "unsupervised practice" requirement that does not exist in statute or regulation. Neither OB3A nor the existing regulatory definition in 34 CFR § 668.2 conditions professional degree status on the absence of supervision after licensure.
- By introducing supervision as an additional criteria, the Department arbitrarily narrows the definition of professional degree without statutory authority and departs from its own historical framework, which focuses on educational preparation and licensure eligibility rather than workplace arrangements.

Impact on Tuition

- 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. Consequently, restricting federal student loans is unlikely to lower tuition and instead risks reducing access without addressing the true drivers of educational costs.

New Loan Caps Limit Competition Among Institutions

- Where multiple programs operate within the same market, institutions already compete for students on a mix of price, format, and perceived value. Schools differentiate through tuition levels, program length, clinical placement networks, and delivery models (e.g., hybrid, accelerated, or evening programs), and students respond by selecting programs that best balance affordability, convenience, and expected career outcomes rather than enrolling in a single default option.