

Reimagining and Improving Student Education (RISE)

Negotiated Rulemaking Committee September 29 – October 1

This week, the U.S. Department of Education's (Department) [Reimagining and Improving Student Education \(RISE\) negotiated rulemaking committee](#) began its discussions on provisions concerning the One Big Beautiful Bill Act (OBBBA). The RISE committee spent significant time discussing the definition of a "professional degree." Starting July 1, 2026, full-time graduate students may borrow up to \$20,500 annually with a \$100,000 aggregate limit, while full-time professional students may borrow up to \$50,000 annually with a \$200,000 aggregate loan limit. All students will face a lifetime borrowing cap of \$257,500 for federal student loans (excluding Parent PLUS Loans), regardless of any amounts previously repaid, forgiven, or discharged.

Below are items the committee has discussed at length as of the morning of Thursday, October 2. CGS has also created a [webpage on the implementation of the One Big Beautiful Bill Act](#).

Proposed Definition of Professional Student

- The Department [plans to recognize](#) only the following degrees as professional for purposes of federal loan limits: 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.), and Theology (M.Div. or M.H.L.). Any additions to this list would require a future negotiated rulemaking process, which the Department indicates is not expected in the near term.

Proposed Interim Definition of Professional Student

- The Department is considering an interim definition to expand coverage beyond its original regulatory list. Students enrolled before July 1, 2027, could qualify as a professional student if their program existed as of July 4, 2025, was eligible for Title IV funds in the 2024–25 academic year, and was designated as a professional degree by the institution. Institutions could designate such programs either through consumer disclosures under CFR 668.43 or by submitting information to ED through IPEDS.

Proposed Dual-Degree Threshold for Professional Student Classification

- The Department is considering increasing the threshold for classifying a student in a dual-degree program as a professional student from the originally proposed 50 percent of total credit hours to 75 percent. While a final definition has not been agreed upon, the Department has indicated that it wishes to keep students in the lower loan limit tier versus the higher professional student tier.

Last Updated October 2, 2025

Why it Matters

- The outcome of the RISE negotiated rulemaking will establish the regulatory framework for federal student loan limits, repayment, and program classifications under the OBBBA. Once finalized, the definitions of professional and graduate students will determine which borrowers are eligible for higher loan limits, directly impacting the financing of dual-degree and professional programs.