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Reimagining and Improving Student Education (RISE) Negotiated Rulemaking Committee November 3-6, 2025

This week, the U.S. Department of Education's (Department) **Reimagining and Improving Student Education (RISE) negotiated rulemaking committee** concluded its discussions on provisions related to 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. Over the next several weeks, the Department will finalize the language and post a Notice of Proposed Rulemaking, which Under Secretary of Education Nicholas Kent said will be published early next year.

CGS has also created a webpage on the implementation of the One Big Beautiful Bill Act.

Proposed Definition of Professional Student

- The Department proposes to narrow the definition of professional degrees by limiting eligibility to specific fields and corresponding four-digit CIP codes. The revised language clarifies which programs qualify as professional degrees and establishes that only students enrolled in those designated programs may be considered professional students. In addition to the listed degrees below, the Department will write in the preamble of its regulation that a Ph.D. in psychology must prepare a student for professional licensure to qualify for the professional-level limits. Below is the draft text on the Department's definition of a professional student, on which consensus was reached.

> **(iii)** Generally requires professional licensure to begin practice; and
>
> **(iv)** Includes a four-digit program CIP code, as assigned by the institution or determined by the Secretary, in the same intermediate group as the fields listed in paragraph (2)(i) of this definition.
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> **(2)** A professional degree may be awarded in the following fields:
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> **(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.), and Clinical Psychology (Psy.D.).

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(3) A professional student under this definition:

(i) May not receive Title IV aid as an undergraduate student for the same period of enrollment; and

(ii) Must be enrolled in a program leading to a professional degree under paragraph (2) of this definition.

Eligible CIP Codes Released During Discussion

CIP-2	*CIP-2 Title*	*CIP-6*	*CIP-6 Title*
51	*Health Professions And Related Clinical Sciences.*	*510401*	*Dentistry*
51	*Health Professions And Related Clinical Sciences.*	*512100*	*Medicine*
51	*Health Professions And Related Clinical Sciences.*	*512101*	*Medicine*
51	*Health Professions And Related Clinical Sciences.*	*512102*	*Osteopathic Medicine/Osteopathy*
51	*Health Professions And Related Clinical Sciences.*	*512103*	*Podiatric Medicine/Podiatry*
51	*Health Professions And Related Clinical Sciences.*	*512199*	*Medicine, Other*
51	*Health Professions And Related Clinical Sciences.*	*517101*	*Optometry*
51	*Health Professions And Related Clinical Sciences.*	*512002*	*Pharmacy Administration And Pharmacy Policy And Regulatory Affairs*
51	*Health Professions And Related Clinical Sciences.*	*512003*	*Pharmaceutics And Drug Design*
51	*Health Professions And Related Clinical Sciences.*	*512004*	*Medicinal And Pharmaceutical Chemistry*
51	*Health Professions And Related Clinical Sciences.*	*512005*	*Natural Products Chemistry And Pharmacognosy*
51	*Health Professions And Related Clinical Sciences.*	*512007*	*Pharmacoeconomics/Pharmaceutical Economics*

CIP-2	CIP-2 Title	CIP-6	CIP-6 Title
51	*Health Professions And Related Clinical Sciences.*	*512008*	*Clinical, Hospital, And Managed Care Pharmacy*
51	*Health Professions And Related Clinical Sciences.*	*512011*	*Pharmaceutical Marketing And Management*
51	*Health Professions And Related Clinical Sciences.*	*512099*	*Pharmacy, Pharmaceutical Sciences, And Administration, Other*
42	*Psychology*	*422001*	*Clinical Psychology*
42	*Psychology*	*422002*	*Counseling Psychology*
42	*Psychology*	*422003*	*Industrial and Organizational Psychology*
42	*Psychology*	*422004*	*Educational Psychology*
42	*Psychology*	*422005*	*Clinical Child Psychology*
42	*Psychology*	*422006*	*Health Medical Psychology*
42	*Psychology*	*422011*	*Family Psychology*
42	*Psychology*	*422013*	*Applied Psychology Analysis*
42	*Psychology*	*422015*	*Performance And Sport Psychology*
42	*Psychology*	*422118*	*Transpersonal/Spiritual Psychology*
51	*Health Professions And Related Clinical Sciences.*	*510101*	*Chiropractic*
51	*Health Professions And Related Clinical Sciences.*	*510200*	*Clinical, Counseling And Applied Psychology, Other*
51	*Health Professions And Related Clinical Sciences.*	*510500*	*Dentistry*

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Proposed Dual-Degree Threshold for Professional Student Classification

- The Department concluded that the threshold for classifying a student in a dual-degree program as a professional student would remain at the proposed 50 percent of total credit hours.

Public Service Loan Forgiveness (PSLF) Provisions

- The Department also responded to negotiators' concerns regarding how the Repayment Assistance Plan (RAP) interacts with PSLF. Specifically, the Department clarified that periods of deferment or forbearance that count toward forgiveness under other repayment plans would not count toward PSLF under RAP.
- The consensus regulation on professional and graduate programs follows the Trump administration's **final rule on PSLF**, which cancels remaining student debt for borrowers employed by eligible government or nonprofit organizations. Starting July 1, 2026, public-service employers involved in "unlawful activities," detailed in the final regulations will be excluded.