



March 2, 2026

Ms. Tamy Abernathy  
Office of Postsecondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

**RE: Reimagining and Improving Student Education Proposed Rule (ID ED-2025-OPE-0944)**

Dear Ms. Abernathy:

On behalf of the Council of Graduate Schools (CGS), I am submitting comments on the U.S. Department of Education’s (Department) Reimagining and Improving Student Education (RISE) Committee’s Notice of Proposed Rulemaking. This comment letter will specifically address the proposed definition of professional degrees and the amended loan limits for graduate degree programs. While CGS appreciates efforts to improve accountability and transparency in higher education, we are concerned that the proposed definition for professional degrees and the annual and aggregate loan limits will hinder current and prospective students from accessing and completing advanced degree programs.

CGS is an organization of 450 institutions of higher education in the United States and Canada, along with 24 international institutions. CGS is the only national higher education association solely dedicated to the advancement of graduate education, research, and the preparation of candidates for advanced degrees. Moreover, the CGS member-institutions educate, train, and prepare more than 1.7 million graduate students to be contributors to the nation’s workforce.

**Section 685.102: Definition of Professional Degrees**

In 2025, the 119<sup>th</sup> Congress passed, and President Trump signed into law the One Big Beautiful Bill Act (OBBA), which included provisions that dramatically impacted graduate student loan borrowers, due to the elimination of the Graduate PLUS Loan Program, the definition of professional degrees, and annual and aggregate loan limits for graduate students.

As stated in the proposed rule, “Congress borrowed and codified the Department’s regulatory definition of the term professional degree in (34 CFR 668.2).” By adopting this definition, the Department will use a three-part test to determine if a program qualifies as a professional degree. According to the proposed rule, the three-part test includes the following criteria: (1) the degree must signify completion of the academic requirements for beginning practice in a given profession; (2) the profession the graduate enters must require a level of professional skill

beyond what is normally required for a bachelor's degree; and (3) the profession that a degree holder enters after graduating generally requires professional licensure. If the Department is going to utilize the above-mentioned three-part test to determine if a program is a professional degree, CGS strongly recommends that it consider two important points. First, many graduate degree programs meet all three criteria, especially programs in the fields of healthcare, clinical social work, mental health therapy and psychology, etc. Yet the Department automatically dismisses the possibility that some of these programs, including social work, physical therapy, and physician assistants, would qualify as a professional degree in the proposed rule. It also should be noted that by limiting this category to a narrow list of traditional programs, such as medicine and law, the Department ignores the reality of modern workforce requirements for Master of Public Health (MPH), Master of Science in Nursing (MSN), and Doctor of Nursing Practice (DNP) programs, as well as professional degrees in education and accounting. These programs are not elective academic pursuits; they are rigorous, clinical, and practitioner-based tracks that require professional skills beyond a bachelor's degree for entry into the field. Excluding these programs denies students and the workforce the benefits of their professional degrees.

In the proposed rule, the Department highlights the differences in opinion between the Federal and non-Federal RISE Committee negotiators concerning the definition of professional degrees. The proposed rule states that “The non-Federal negotiators proposal includes programs in 219 unique 6-digit CIP codes (compared with 38 under the Department’s proposal) that cover 17.5 percent of graduate student borrowers.” In the same section of the proposed rule, it says that “the non-Federal negotiators’ definition includes all professional programs in health care and health care-related fields and therefore encompasses several large fields with high levels of borrowing, such as physical therapy and nursing.” While it is clear that the Department is trying to limit the number of professional degree programs in order to keep the disbursement of federal loans to a minimum amount of money, it should be recognized that a well-educated, rigorously trained, and highly credentialed professional workforce is not merely a social good, but an economic imperative. Fields such as physical therapy and nursing are indispensable to the health and well-being of American communities, and the nation’s capacity to meet the growing demands of an aging population rests squarely upon its ability to produce qualified professionals in these critical disciplines.

The second important point that CGS wants the Department to consider concerns the process for designating more fields of study as professional degrees. In the proposed rule, the Department chronicles the history of the definition of professional degrees. Specifically, the proposed rule states, “The Department does not necessarily claim that the included list of professional degrees

represents all professional degrees being offered by institutions, just those that the Department has identified as meeting the statutory definition. Indeed, the definition states that examples of a professional degree include but are not limited to the degrees listed.” The proposed rule then states, “Degrees on the example list in 34 CFR 668.2 may be fairly compared to any degree not on the list. If any given degree is similar to degrees on the list, that provides additional evidence that the degree at hand may be a professional degree.” This section in the proposed rule raises several questions for CGS and our membership. For example, what is the process for comparing existing programs to the list of the 11 designated professional degree programs? What is the timeline for review, and how often will institutions be given the opportunity to have their programs considered for designation as a professional degree program? CGS encourages the Department to provide guidance on these points to ensure transparency and predictability for institutions and students.

### **Section 685.203: Annual and Aggregate Loan Limits**

The OBBB established new annual and aggregate loan limits for Direct Unsubsidized Loans for graduate students for periods of enrollment beginning on or after July 1, 2026. For graduate degree programs, the annual limit is \$20,500, and the aggregate limit is \$100,000. It is important for the Department to recognize that the new loan limits will dramatically impact current and prospective graduate students’ ability to access and complete their graduate degrees. For example, many healthcare master’s programs, such as nursing, have annual tuition and fees totaling \$38,000.<sup>1</sup> This illustrates that under the proposed annual federal loan limit of \$20,500, students would still face a significant gap between federal loan limits and the actual cost of graduate degree programs.

The new loan limits will require students to turn to the private market to cover the full cost of their programs, placing them in higher-interest, less-protected lending environments. Moreover, interest rates for private lending vary widely and are often higher than federal loan rates, with some private loans reaching nearly 20 percent. Nearly 40 percent of borrowers exceeding the new loan limits could be unable to obtain private loans without a cosigner under current underwriting standards, according to a study conducted by the Federal Reserve Bank of Philadelphia<sup>2</sup>. Moreover, the limits fail to account for tuition inflation and the real-world costs associated with graduate education, including specialized equipment, clinical fees, mandatory residency requirements, etc. For many programs, completing a degree under these loan limits would be financially impossible without seeking private financing.

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<sup>1</sup> Kimberlee Montgomery and Mary Ellen Glasgow, “An arbitrary rule change is threatening America’s health care system,” *The Washington Post* (February 23, 2026).

<sup>2</sup> Federal Reserve Bank of Philadelphia, *Student Loans for Graduate School: Findings from the 2020 Survey of Consumer Finances*, Consumer Finance Institute Report (Philadelphia: Federal Reserve Bank of Philadelphia, 2024).



Thank you for your consideration of these comments. CGS encourages the Department to convene another negotiated rulemaking committee to discuss the definition of professional degrees, the process for designating a program as a professional degree, and the implementation of the annual and aggregate loan limits for graduate degrees. We also encourage the Department to invite more representatives from the higher education and university community to participate in future negotiated rulemaking committees.

Sincerely,

A handwritten signature in black ink that reads 'Chevelle Newsome'. The signature is written in a cursive, flowing style.

Chevelle Newsome  
CGS President