

ISSUE SUMMARY:

Redefining Professional Student Degrees

Under the Higher Education Act (HEA), a professional student degree is a post-bachelor's degree in fields that typically require advanced certification or licensure and lead to practice in each profession. Unlike academic degrees focusing on original research or theory, they emphasize practical skills, clinical experience, and real-world application.

WHAT CHANGED?

Federal loan limit reforms under the **One Big Beautiful Bill Act (OBBB)** and the corresponding "redefinition" of professional degrees during recent negotiated rulemaking sessions.

The **Reimagining and Improving Student Education (RISE)** committee adopted the Department of Education's narrower definition of a professional degree, which revised the original HEA regulatory language and replaced it with a list of 11 approved degree programs. Covered programs must:

- Require a degree that signifies **both** completion of the academic requirements for beginning practice in a given profession and a level of professional skill beyond that normally required for a bachelor's degree
- Have a **Classification of Instructional Programs (CIP)** code matching the existing list of covered programs
- Require a license to practice

Impact on Regional Public Universities (RPUs)

Under the OBBB, **federal loan limits** now vary by degree type:



PROFESSIONAL PROGRAMS
\$200K total / \$50K annually

OTHER GRADUATE PROGRAMS
\$100K total / \$20.5K annually

For RPUs, which enroll large numbers of first-generation and lower-income students, narrowing the definition creates significant challenges:

PROGRAM CLASSIFICATION RISKS

RPUs awarding graduate degrees outside the revised definition or CIP codes will lose professional designation, affecting student borrowing limits and undermining access.

COMPETITIVE IMBALANCE AND COMPLIANCE BURDENS

RPUs generally receive less government funding than other public four-year institutions, which could make compliance with stricter CIP oversight more burdensome. Other better-resourced universities are more likely to offer programs that are already recognized as professional degrees (e.g., medicine, dentistry, law) and have larger endowments than those at RPUs, enabling greater institutional flexibility and aid.

WORKFORCE IMPACTS

Educational organizations, health care and nursing associations, and professional groups (e.g., physician assistants, social work, nursing advocates) have criticized the narrow definition, arguing it excludes many fields requiring licensure and creates affordability barriers that will limit graduate pipelines and workforce development.

ENROLLMENT DECLINE

RPUs expand access to education for underserved and lower-income communities. Lower borrowing limits could force students to delay or decline enrollment in professional graduate programs. Some may choose shorter or cheaper certificate programs as an alternative to a full degree.

WHY IT MATTERS

ED has released a Notice of Proposed Rulemaking (NPRM):

In January 2026, the Department of Education released an NPRM based on the consensus reached during the RISE negotiations. The public comment period ended March 2, with almost 82,000 comments received. The Department must now review comments and plans to publish a final rule this spring.

Fast-tracked enactment date:

Per deadlines set in the OBBB, the Department is required to implement regulatory provisions that will support the new loan limits by **July 1**, their statutory enactment date.

NEXT STEPS:

Legislative Alternatives

AASCU-ENDORSED

H.R. 6718 – Professional Student Degree Act (Lawler, R-NY)

Amends the HEA to broaden the federal definition of "professional degree," allowing 13 additional graduate programs, many among the most popular RPU graduate programs, to qualify for higher federal student-loan borrowing limits.

H.R. 6574 – Loan Equity for Advanced Professionals Act (Kennedy, D-NY)

Standardizes loan caps at \$50,000 annually and \$200,000 total in federal Direct Unsubsidized Loans for all professional and graduate students.

H.R. 6677 – Professional Degree Access Restoration Act (Torres, D-NY)

Reverses OBBB changes that eliminated Federal Direct PLUS Loans and implemented loan limits on graduate students.

H.R. 6739 – Clarity in Professional Degree Act (Dingell, D-MI)

Expands HEA's professional degree list to include 10 additional degrees.

Graduate Degrees Granted "Professional" Designation Under New Regulations

RISE CONSENSUS DEFINITION

- Medicine (M.D.)
- Dentistry (D.D.S./D.M.D.)
- Law (L.L.B./J.D.)
- Pharmacy (Pharm.D.)
- Veterinary Medicine (D.V.M.)
- Chiropractic (D.C. or D.C.M.)
- Optometry (O.D.)
- Podiatry (D.P.M., D.P., or Pod.D.)
- Theology (M.Div., or M.H.L.)
- Clinical Psychology (Psy.D. or Ph.D.)
- Osteopathic Medicine (D.O.)

H.R. 6718 EXPANDED LIST

- Nursing (M.S.N., D.N.P., or Ph.D.)
- Ministry (D.Min.)
- Social Work (M.S.W. or D.S.W.)
- Audiology (Au.D.)
- Physician Assistant/Associate (M.P.A.S., M.S.P.A.S., M.M.S., or M.S.)
- Occupational Therapy (M.O.T. of O.T.D.)
- Physical Therapy (D.P.T.)
- Public Health (M.P.H.)
- Business Administration and Management, General (M.B.A. or D.B.A.)
- Accounting (M.Acc. or M.S.A.)
- Architecture (M.Arch.)
- Education (M.A., M.S., M.A.T., M.Ed.)
- Special Education (M.Ed. or M.S.Ed.)