

February 23, 2026

The Honorable Linda McMahon
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

RE: ED-2025-OPE-0944: Reimagining and Improving Student Education

Dear Secretary McMahon:

The Suburban Hospital Alliance of New York State, which represents hospitals and health systems in New York's Hudson Valley and on Long Island, appreciates the opportunity to comment on the Notice referenced above.

We are deeply concerned about the U.S. Department of Education's (DOE) recent Notice of Proposed Rulemaking, which proposes to exclude nursing from professional degree status for the purposes of implementing amendments to federal student loan programs made by the FY2025 budget reconciliation law (P.L. 119-21). These amendments update several aspects of the Federal Direct Loan program, the largest source of federal financial assistance supporting students' post-secondary education pursuits.

Graduate nursing students currently have access to higher borrowing limits (\$50,000 annual/\$200,000 aggregate) available to professional degree programs. The Notice would remove advanced degree nursing from the definition of professional degrees, reducing federal loan access for graduate-level nurses by more than 50 percent. Annual limits would drop to \$20,500 with a \$100,000 lifetime cap. This change would eliminate access to higher Grad PLUS loans and specialized funding, forcing students to rely on high-interest private loans and creating a significant financial barrier to entering advanced nursing practice.

Title VIII of P.L. 119-21 amended the Higher Education Act of 1965 (HEA), eliminating eligibility for Direct PLUS loans to graduate and professional students; the law establishes annual and aggregate loan limits for graduate students and separate, higher limits for professional degree students. Prior to enactment of P.L. 119-21, Direct Loan limits generally did not distinguish between graduate and professional students, with the exception of certain health programs – including Doctor of Allopathic Medicine and Doctor of Dentistry – for which the Secretary of Education invoked HEA authority to raise limits due to exceptionally high educational costs.

The Notice published by DOE would redefine “graduate student” as a student enrolled in a program awarding a professional degree and “professional student” as a student enrolled in a post-baccalaureate program awarding a graduate credential other than a professional degree.

DOE further proposes that a professional degree be defined as one that “signifies the completion of the academic requirements for beginning a practice” in a particular profession, requires “a level of

professional skill beyond that normally required for a bachelor's degree," and "generally requires a professional license to begin practice."

Excluding nursing students from eligibility under this category is inconsistent with the realities of the profession. Professional licensure is required to begin practice as a nurse in all 50 states and passing the NCLEX-RN or NCLEX-PM is mandatory nationwide. Nursing programs combine rigorous coursework with extensive clinical hours specifically designed to prepare graduates for licensure and safe, independent practice. Nursing degrees-particularly the Bachelor of Science in Nursing (BSN), are widely recognized as preparing professionals with advanced competencies in critical care, leadership, health management, and patient safety that far exceed the expectations of a standard baccalaureate education.

DOE also proposes that a professional degree "generally" be at the doctoral level, requiring at least six years of postsecondary coursework, including at least two years of post-baccalaureate study. This criterion is not a universal standard for defining professional practice in nursing and other clinical professions, nor does it reflect the structure of advanced nursing education. Instead, it functions solely as a regulatory mechanism for determining loan eligibility. Using this definition to exclude advanced nursing degrees disregards the evolution of nursing into a highly skilled, research-driven profession with expanding autonomous roles, including advanced practice registered nurses (APRNs), certified registered nurse anesthetists (CRNAs), nurse midwives, and nurse practitioners. In most states, these professions are practiced autonomously.

DOE's intention to rely on a four-digit Classification of Instructional Programs (CIP) code to categorize programs into an "intermediate group" alongside 11 other fields result in a rigid and overly narrow classification system. This approach arbitrarily determines which programs qualify as professional degrees, misclassifying nursing as a lower-limit graduate field despite its licensure requirements, clinical rigor, and essential role in the healthcare workforce. It also misrepresents advanced practice nurses as supervised practitioners rather than highly trained, often autonomous professionals.

The Suburban Hospital Alliance of New York State echoes the concerns raised by the American Nurses Association: funding limits on graduate nursing education—driven primarily by DOE's proposed restrictions on federal student loans for Master's (MSN) and Doctor of Nursing Practice (DNP) programs, pose a direct threat to the current and future nursing workforce. By capping loan levels below the average cost of attendance, these limits will reduce the number of qualified nurses able to pursue advanced practice roles, exacerbating nationwide staffing shortages, constraining educational capacity, and undermining the quality and safety of patient care.

For all these reasons, the Suburban Hospital Alliance of New York State strongly urges the U.S. Department of Education to recognize the essential nature of advanced nursing education and revise its Notice to include nursing within the definition of a professional degree before proceeding with rulemaking.

Sincerely,

Stacy Villagran

Stacy L. Villagran
Chief Operating Officer