



October 30, 2025

The Honorable Nicholas Kent, Under Secretary
The Honorable David Barker, Assistant Secretary, Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

RE: Docket ID ED-2025-OPE-0151-0001

Dear Under Secretary Kent, Assistant Secretary Barker, and Members of the Reimagining and Improving Student Education Negotiated Rulemaking Committee:

We write on behalf of the undersigned organizations representing the Patient Access to Responsible Care Alliance (PARCA) regarding the Department of Education's (ED) Reimagining and Improving Student Education (RISE) Committee as you continue negotiated rulemaking to implement the student financial aid provisions under Public Law 119–21, the *One Big Beautiful Bill Act*. As member organizations of PARCA, we represent over four million non-MD/DO Medicare recognized health and mental health providers who provide high-quality, evidence-based care to millions of Americans, especially to those living in rural and underserved areas.

As organizations whose members must obtain post-baccalaureate degrees to become state licensed and/or certified health professionals, we urge the RISE Committee to adopt an inclusive definition of “professional degree program” consistent with law’s reference to the definition of professional degree found at 34 CFR § 668.2, which delineates such degrees as those ‘including but not limited to’ those specified.¹ While some of the PARCA member organizations are specifically listed in the definition of “professional degree program”, many are not. We support the retention of these named health care providers in the definition but urge the RISE Committee to ensure that the definition is inclusive of other post-baccalaureate health care providers as well.

In developing regulations to implement PL-119-21, it is critical that post-baccalaureate health care provider programs generally required for licensure or certification are explicitly included within the scope of “professional degree programs.” All of these programs provide degrees that are rigorous, practice-based, and require substantial clinical and/or fieldwork components. These degrees lead to students obtaining state licensure and/or certification required to practice.

PARCA members are all deeply invested in ensuring our nation has a robust pipeline of future health care providers. A definition of “professional degree program” should include all health care providers with a masters or doctoral degree and not create a system that preferences certain health professions over others. Lower loan limits for some professional degrees would discourage the entry of highly motivated and dedicated individuals into programs of study for these high demand fields. The application of an inconsistent standard, where some health professional programs have higher loan limits than others, would create an imbalance in the competitiveness of these programs ultimately decreasing patient access and choice. As more patients are receiving health care from PARCA organization members, creating a



standard that does not include these health care providers could exacerbate the provider shortages around the nation.

We strongly believe that all students pursuing accredited post baccalaureate health profession degrees generally required for licensure or certification—regardless of discipline—should be treated equally in loan eligibility, borrowing limits, and access to repayment programs.

We offer the following specific recommendations to the RISE Committee:

- Adopt a clear and inclusive regulatory definition of “professional degree program” that encompasses any master's or doctoral degree generally required for licensure and/or certification in health professions. We recommend that such a definition utilize Classification of Instructional Programs codes that encompass any such health professional program.
- Such definition must maintain alignment with state and federally recognized licensure- and/or certification-based credentialing pathways when required. All health professions where a state license or certificate to practice is generally required should be treated consistently with other health professions in all relevant student aid regulations.

Any ambiguity in defining eligible professional degree programs could jeopardize access to financing for future health profession students, ultimately threatening workforce supply in schools, hospitals, and community settings where provider shortages currently exist and demand for health services continues to grow.

Thank you for your commitment to a transparent and inclusive rulemaking process. We appreciate the opportunity to offer these recommendations and are available to provide any additional information that may be of use to the RISE Committee. Please contact Jessica Talbert, PARCA chair, at jtalbert@aanp.org if you have any questions or want additional information.

American Academy of Audiology
American Academy of Physician Associates
American Association for Marriage and Family Therapy
American Association of Nurse Anesthesiology
American Association of Nurse Practitioners
American Chiropractic Association
American College of Nurse-Midwives
American Occupational Therapy Association
American Nurses Association
American Psychological Association Services
American Physical Therapy Association
American Speech-Language-Hearing Association
National Association of Clinical Nurse Specialists
National Association of Pediatric Nurse Practitioners
National League for Nursing
National Association of Social Workers



ⁱ 34 CFR § 668.2: *Professional degree*: 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. Professional licensure is also generally required. Examples of a professional degree include but are not limited to 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.).