



March 2, 2026

The Honorable Nicholas Kent  
Under Secretary  
U.S. Department of Education  
Office of Postsecondary Education  
400 Maryland Ave., SW  
Washington, DC 20202

*Submitted via regulations.gov*

**Re: NASW Comments to Department of Education in response to the Reimagining and Improving Student Education Notice of Proposed Rulemaking [Docket ID ED-2025-OPE-0944]**

The National Association of Social Workers (NASW) appreciates the opportunity to submit these comments in response to the U.S. Department of Education’s (ED) Reimagining and Improving Student Education Notice of Proposed Rulemaking (NPRM)—which proposes to amend the regulations for the Federal student loan programs authorized under title IV of the Higher Education Act (HEA) of 1965, as amended to implement the statutory changes included in the One Big Beautiful Bill Act (Public Law No. 119-21).

Founded in 1955, NASW is the largest membership organization of professional social workers in the United States. NASW has 93,000 members and works to enhance the professional growth and development of its members, to create and maintain professional standards, and to advance sound social policies.

If ED’s NPRM is finalized as proposed, social workers across the country will be at significant and needless risk of losing access to adequate federal student loans. Losing access to adequate federal student loans risks causing many dedicated individuals not to be able to afford to pursue post-baccalaureate education necessary for many social work careers, exacerbating the crushing and widely recognized mental health provider shortage facing our country.

Federal student loans make higher education possible for individuals that do not have the means to finance their schooling. Students repay these loans after completion of their education. Without adequate federal student loans, those pursuing advanced social work degrees will be forced into the private loan market, which does not afford the same protections, accessibility, and sensible flexibilities as federal loans. Furthermore, non-federal loans are not eligible for the Public Service Loan Forgiveness (PSLF) program, which many social workers have utilized to serve in roles that provide clear benefit to communities across the country.

## **William D. Ford Federal Direct Student Loan (Direct Loan) Program Definitions (§ 685.102)**

ED proposes to define *professional student* to mean “a student enrolled in a program of study that awards a professional degree upon completion of the program.” In defining professional student, ED applies the definition of a professional degree in [34 CFR 668.2](#) that was in effect on July 4, 2025, and clarifies that such degrees meet the following elements: signifies both completion of the academic requirements for beginning practice in a given profession and a level of professional skill beyond that which is normally required for a bachelor's degree; is generally at the doctoral level; requires at least six academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework; generally requires professional licensure to begin practice; and, includes a four-digit program Classification of Instructional Program (CIP) code, as assigned by the institution or determined by the Secretary, in the same intermediate group in certain fields. ED proposes that a professional degree only includes degrees in the following fields: 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. or Ph.D.).

### **Loan Limits § 685.203**

*The proposed rule contradicts Congress’ intent to be expansive in the types of programs considered to be professional. The definition of ‘professional degree’ used in the proposed rule is far more restrictive than the one offered in Public Law No. 119-21 and the Code of Federal Regulations and ignores the lengthy body of literature of what constitutes a profession, under which social work clearly falls.*

The definition of a professional degree in 34 CFR 668.2 is:

*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.).

As is indicated in the definition, these are examples of professional degrees, but they are not limited to these. The key characteristic is that a professional degree requires education beyond a bachelor’s degree and where professional licensure is generally required. The master’s in social work is the terminal degree in social work,

and it is needed for many social work jobs. Furthermore, social workers can be licensed at the generalist or clinical level and abide by the NASW Code of Ethics.

NASW appreciates ED's request for comment on its analysis relating to the professional degrees it excluded from the professional student definition. NASW strongly disagrees with ED's rationale for excluding Social Work degrees such as the Master of Social Work (MSW) or Doctorate of Social Work (DSW) from this definition. Specifically, ED states that "[t]he Department has determined that MSW and DSW would not meet the *professional degree* definition because neither degree is generally required to obtain an entry-level licensure in the social work field or to begin work in a profession. A person may obtain work as a social worker after earning a bachelor's degree. Most states license Bachelor of Social Work (BSW) holders as certified social workers, making the baccalaureate level degree the one necessary to begin practice in the social work profession. In addition, individuals who are licensed with a BSW may later obtain an MSW with only one year of additional coursework, for a total of five years of education compared to six years as provided for in the *professional degree* definition." ED further states that "the Department does not believe the statute permits the classification of clinical social work as a separate and distinct profession, as opposed to a specialization or concentration."

We address the flaws in ED's analysis as follows:

NASW strenuously disagrees with ED's assertion that social work is not a professional degree for the purposes of student loan limits. ED asserts that licensure at the bachelor's degree level precludes MSW and DSW degrees from being professional degrees. In fact, licensure at the MSW level is necessary for the diagnosis and treatment of mental illness. The BSW does not qualify an individual for independent entry-level licensure as a clinical social worker. An individual with a BSW may practice, but not independently. Employers in all settings often require an MSW to provide services to clients.

An accredited MSW or DSW degree is the required graduate credential for licensure at the level of independent and clinical practice and therefore satisfies the definition of a professional degree. An MSW or DSW degree is required to become a licensed clinical social worker.

There are roughly 250,000 licensed clinical social workers, who are required to have a master's degree and licensure to practice independently. Social workers help people cope with and solve a wide variety of problems in their everyday lives. They are found in every facet of community life, including schools, hospitals, behavioral health clinics, senior centers, prisons, child welfare and juvenile services, the military, corporations, courts, private practice, elected office, and in numerous public and private agencies.

ED has added criteria to definition of a professional degree that is not in Public Law No. 119-21. The law says nothing about the need for a professional program to be generally at the doctoral level or that it requires at least six academic years of postsecondary education. By adding these requirements, ED is going beyond the parameters of statutory language and therefore the requirements should not be applied.

That being said, the MSW degree requires six years of postsecondary education. While someone who earns a BSW degree can attain Advanced Standing in an MSW program, individuals without a BSW degree require four years of college and two years of a graduate program.

The United States Health Resources and Services Administration clearly believes social work to be a profession, as signified by funding announcement HRSA-25-068, “Behavioral Health Workforce Education and Training Program for Professionals,” which includes “programs in social work.”

The Department’s proposal to exclude social work degrees from the definition of “professional degrees” is contrary to law and arbitrary and capricious.

*Predatory private student loans are extremely problematic.*

Without adequate federal student loans, students will be forced into the private loan market, which does not afford the same protection against exorbitant interest rates and predatory loan practices. Furthermore, non-federal loans are not eligible for the PSLF program. Should NASW’s members lose access to the federal student loans, many of them will not be able to afford to attend graduate school. Federal investments in social work and social work education are critically needed to ensure that there is a sufficient supply of social workers to meet evolving demands. Potential social work students must grapple with that decision *now*, as they consider whether to apply for or enroll in a MSW program, or make any number of other decisions related to their education.

The loss of access to federal student loans will frustrate NASW’s ability to advance the profession by encouraging the sustainable growth of the profession and impede its ability to advocate for sound social policies. Ultimately, those harms trickle down to the populations that NASW’s members serve, including some of the most vulnerable members of society.

It is currently estimated that more than one in five U.S. adults – or almost 60 million - live with a mental illness.<sup>1</sup> According to the US Administration for Children and Families, there were over 500,000 victims of child abuse and neglect nationally

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<sup>1</sup> Mental Illness, National Institute of Mental Health, <https://www.nimh.nih.gov/health/statistics/mental-illness>.

in 2024.<sup>2</sup> One in four adults in the US is a family caregiver;<sup>3</sup> a number that is likely to rise given the aging of the country – 1 in 6 Americans is already 65 and older.<sup>4</sup> And today there are some 18 million veterans in the country, representing about 6% of the population.<sup>5</sup>

Social workers serve all these populations and more. They help rebuild lives and communities after disasters; prevent and treat individuals struggling with substance use, addiction, and mental health disorders; help patients and their families leave hospitals with appropriate follow-up care; support veterans struggling with PTSD, promote well baby health, and protect children from abuse and neglect; comfort individuals and families coping with end-of-life care and grief. Social workers are one of the largest providers of mental, behavioral, and social care services in the United States.

Social workers at the MSW and DSW levels provide diagnosis and treatment of mental health and substance use disorders. Advanced degrees allow social workers to specialize in programs that impact children and youth, older adults, and individuals with disabilities. It is critical that these professionals have access to student loans so that they can serve their clients.

Federal student loans are the key that makes all of this possible.

Social work students do not have the luxury of research dollars or tuition coverage. They rely on federal student loans to help them cover the cost of tuition and education-related expenses. Social work students choose their field because of their commitment to their communities and desire to improve the lives of individuals, families, and communities.

The demand for social workers is expected to increase substantially—by more than twice the average expected for all occupations—over the coming years.<sup>6</sup> Demand for all categories of social workers is expected to grow faster than average, with

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<sup>2</sup> Child Maltreatment 2024, Children’s Bureau (Administration on Children, Youth and Families, Administration for Children and Families) of the U.S. Department of Health and Human Services, <https://acf.gov/sites/default/files/documents/cb/cm2024.pdf#page=21>.

<sup>3</sup> Caregiving in the U.S. Report: 2025, AARP and National Alliance for Caregiving, <https://www.caregivingintheus.org/reports/caregiving-in-the-us-report-2025/>.

<sup>4</sup> 2023 Profile of Older Americans, Administration for Community Living, [https://acl.gov/sites/default/files/Profile%20of%20OA/ACL\\_ProfileOlderAmericans2023\\_508.pdf](https://acl.gov/sites/default/files/Profile%20of%20OA/ACL_ProfileOlderAmericans2023_508.pdf).

<sup>5</sup> The changing face of America’s veteran population, Pew Research Center, <https://www.pewresearch.org/short-reads/2023/11/08/the-changing-face-of-americas-veteran-population/>.

<sup>6</sup> Bureau of Labor Stats., U.S. Dep’t of Labor, *Occupational Outlook Handbook—Social Workers*, <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm>.

particularly rapid growth in the need for healthcare social workers and mental health and substance use disorder social workers.<sup>7</sup>

Our country is already facing a documented lack of social workers.<sup>8</sup> For example, almost all child welfare programs struggle with recruiting and retaining qualified and effective child welfare staff, and turnover rates remain high.<sup>9</sup> Making social work education less attainable will affect the ability of employers to recruit new social workers and make the retention of current social workers even more critical. Educational institutions are not on pace to meet the expected increase in need. While enrollment in social work education shows modest growth, this upward trend is insufficient to meet the corresponding anticipated increase in demand for qualified social workers.<sup>10</sup>

The consequences of attrition and difficulties recruiting can be dire for the populations for whom social workers provide care and services—reduction or elimination of services and longer waiting times mean that people in need have less access to healthcare, supportive services, child welfare services, violence prevention, education assistance, and so much more.<sup>11</sup> It will impact older adults, children, and individuals across the lifespan. Individuals may be denied services that they so desperately need which means individuals, families, and communities lose access to the programs that keep them alive, and families lose services from programs that work to keep them together.

29,757 social workers signed a [petition](#) to ED expressing concern regarding the Department’s proposed definition of ‘professional degree’ programs, which excludes a plethora of professions including social work.

### **Public Service Loan Forgiveness § 685.219**

The NPRM states “that only ‘on-time’ payments made under the Repayment Assistance Plan (RAP) will also qualify for PSLF.” The NPRM allows for a Tiered

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<sup>7</sup> *Id.*; see also Michael Rieley, U.S. Bureau of Labor Stats., *Beyond the Numbers: Projected Employment Growth for Community and Social Service Occupations, 2022-32* (Feb. 2024), <https://www.bls.gov/opub/btn/volume-13/projected-employment-growth-for-community-and-social-service.htm> (demand for healthcare social workers projected to grow 9.6% from 2022 to 2032).

<sup>8</sup> Columbia School of Social Work, *Bridging the Gap: The Urgent Need for Social Workers* (Sept. 29, 2023, <https://socialwork.columbia.edu/news/bridging-gap-urgent-need-social-workers>) (reporting an expected deficit of 74,000 social workers annually over the next decade).

<sup>9</sup> Nat’l Child Welfare Workforce Inst., *Critical Workforce Needs* (Dec. 2020), <https://perma.cc/TY6M-LS7W> (noting turnover rates between 20 to 50 percent nationally).

<sup>10</sup> Ryan Bradshaw, Council on Social Work Educ., *Spring 2021 CSWE Member Pulse Survey Results* (2021), <https://perma.cc/M4CR-FZPV>.

<sup>11</sup> See, e.g., Nat’l Council of Nonprofits, *supra* note 5, at 5-8.

Standard repayment plan, which does not qualify for PSLF. The PSLF program was established by Congress through bipartisan legislation with the intent of helping communities in need by allowing public service professionals to have their student loans forgiven after 120 payments on their student loans if they work for an eligible employer. By disallowing PSLF to those in the Tiered Standard repayment plan, ED is adding confusion for student loan borrowers with respect to this vital program that has a challenging history of complex rules and confusion surrounding eligibility. It is not clear how borrowers will know to choose RAP over the Tiered Standard repayment plan in order to remain eligible for the PSLF.

The PSLF program enables borrowers, including NASW’s members—many of whom otherwise carry unsustainable debt burdens—to enter public service careers and carry out critically important work for the public good. Student loans are essential to ensure a strong social work workforce and keep it financially accessible to individuals in the future. In the middle of a mental health crisis, social workers and other mental health professionals are needed now more than ever. NASW urges ED to permit any payment plans to allow eligible PSLF borrowers to earn forgiveness for making payments on their student loans.

NASW urges ED to permit all repayment plans to allow for eligible PSLF borrowers to earn forgiveness for making payments on their student loans while serving the public interest. There is no rational policy basis for excluding the Tiered Standard repayment plan, yet it can now be the basis for unwittingly erasing years of service for someone who is serving in a critical role such as a social worker.

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In summation, NASW strongly opposes this NPRM and the effort to limit the types of graduate programs which are entitled to greater federal student loan limits. Limiting federal student loan borrowing based on arbitrary circumstances contradicts Congress’s intent to be expansive in the types of programs which are considered professional. It creates chaos and confusion for the millions of borrowers participating in federal student aid, and for social work in particular, would dramatically limit our ability to promote the health and well-being of individuals, families, communities, and the country as a whole. Additionally, the Tiered Standard repayment plan should be eligible for PSLF.

We thank you for the opportunity to submit NASW’s comments in response to ED’s Reimagining and Improving Student Education NPRM. We appreciate the opportunity to provide clarity surrounding social work education and practice as well as the importance of ensuring this vital workforce can pursue post-baccalaureate education and continue playing a leading role in our shared priority of ensuring those with mental health needs have access to high quality providers able to address their needs.

Should you have any questions about these comments, please feel free to contact Dina Kastner, Public Policy and Advocacy Manager at NASW, at [dkastner.nasw@socialworkers.org](mailto:dkastner.nasw@socialworkers.org) or (202) 336-8218.

Respectfully submitted,

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