

Congress of the United States
Washington, DC 20510

December 12, 2025

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

Re: Negotiated Rulemaking Committees [Docket ID ED-2025-OPE-0151-0001]

Dear Under Secretary Kent:

We write regarding the Department of Education’s Reimagining and Improving Student Education (RISE) Committee’s ongoing rulemaking to implement the student financial aid provisions under Public Law 119–21. As Members of Congress who have championed legislation to strengthen the nursing workforce, we write with concerns over the RISE Committee’s decision to omit post-baccalaureate nursing degrees from the regulatory definition of “professional degree” in its recently released proposed framework.

Nurses are central to our health care system. They comprise the largest health care workforce in the United States, with more than 5 million registered nurses nationwide. Nurses provide high-quality care to patients in all communities, including rural and urban areas, yet we are in the midst of a nursing workforce crisis in this country. According to the 2024 National Nursing Workforce Study, more than 138,000 nurses have left the workforce since 2022 due to stress, burnout, and retirement. This study also outlined predictions that by 2029, almost 40 percent of nurses intend to leave the workforce. Given this trend, we have a strong interest in bolstering the nursing workforce and supporting legislation that will make it easier for nurses to enter the field.

The RISE Committee’s proposed definition will make it more difficult for nurses to join the health care workforce because post-baccalaureate nursing degrees are excluded from the list of health care degrees in the definition of a “professional degree.” This list includes Pharmacy (PharmD), Dentistry (DDS or DMD), Medicine (MD), and Clinical Psychology (PsyD or PhD), but it omits post-baccalaureate nursing degrees such as a Master of Science in Nursing (MSN), Doctor of Nursing Practice (DNP), and a PhD in nursing. However, the proposed definition describes a professional degree as 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.” The definition also states that a professional degree “generally requires professional licensure to begin practice.” Post-baccalaureate nursing degrees satisfy these criteria, as all registered nurses must pass the National Council Licensure Examination to enter the profession. Similarly, all Advanced Practice Registered Nurses (APRNs) must have a graduate degree, such as an MSN or a DNP, and require national certification and state licensure to practice.

Post-baccalaureate nursing students also have a demonstrated need to access the higher borrowing limits for professional degrees set in Public Law 119–21. The law states that students earning professional degrees may borrow up to \$50,000 annually and \$200,000 aggregate, in contrast to students earning graduate degrees, whose borrowing limits are capped at \$20,500

annually and \$100,000 aggregate. The current graduate level loan cap would not meet the need of most Certified Registered Nurse Anesthetist (CRNA) programs, which can cost over \$200,000, thereby restricting the pipeline of CRNAs and further limiting an anesthesia workforce that is suffering from shortages across all provider types. CRNA programs have shown to be a critical return on investment, with default rates near zero percent, and a workforce that overwhelmingly provides anesthesia to rural and underserved communities where higher cost physicians do not practice.

In addition, many post-baccalaureate nursing programs hit the annual limit of \$20,500, including some programs that may be under the aggregate limit. For instance, many nurse practitioner and other APRN academic programs operate year-round across three full-time semesters, as opposed to the traditional two-semester academic calendar, and thus cost more than \$20,500 per year. Classifying these programs as graduate programs would result in these students having to take out additional student loans to cover the remainder of their tuition, which will limit the ability for students to complete their advanced degree.

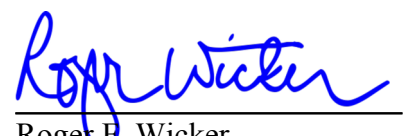
At a time when our nation is facing a health care shortage, especially in primary care, now is not the time to cut off the student pipeline to these programs. According to the Medicare Payment Advisory Commission (MedPAC), fifty-seven percent of Medicare beneficiaries received a primary care service from an NP or physician associate (PA), and sixty-six percent of rural Medicare patients received a primary care service from an NP or PA. Consequently, we believe that post-baccalaureate nursing degrees should be included in the department's definition of a "professional degree."

Nurses and nurse faculty make up the backbone of our health system, and post-baccalaureate nursing degrees lead to demonstrated outcomes, with a recent study from the Foundation for Research on Equal Opportunity showing that nursing was one of the top three master's degrees for return on investment.¹ As such, post-baccalaureate nursing degrees should be treated equally to other accredited post-baccalaureate health profession degrees.

Thank you for your attention to this matter, and we hope to work with you to improve and expand the nursing workforce across the country.

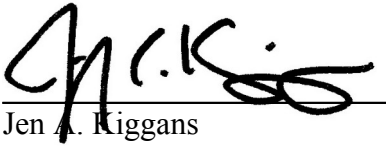
Sincerely,


Jeffrey A. Merkley
United States Senator

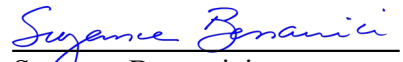

Roger F. Wicker
United States Senator

¹ Preston Cooper, *Is Grad School Worth It? A Comprehensive Return on Investment Analysis*, Foundation for Research on Equal Opportunity, <https://freopp.org/whitepapers/is-grad-school-worth-it-a-comprehensive-return-on-investment-analysis/>.

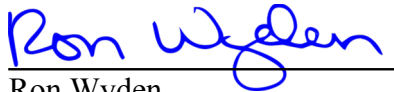
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Jen A. Kiggans
Member of Congress



Suzanne Bonamici
Member of Congress



Ron Wyden
United States Senator



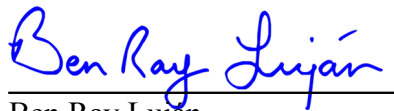
Mark R. Warner
United States Senator



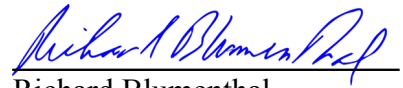
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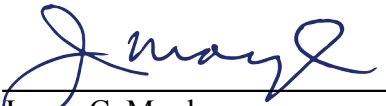
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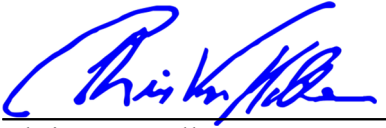
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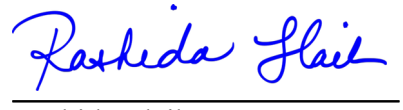
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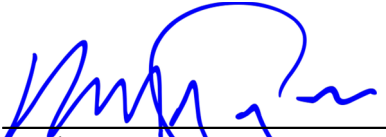


Lloyd Doggett
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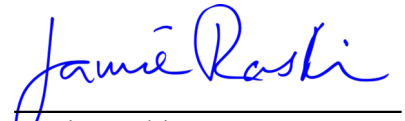


Adriano Espaillat
Member of Congress

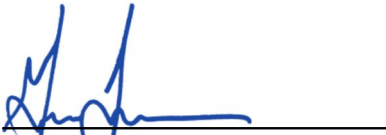
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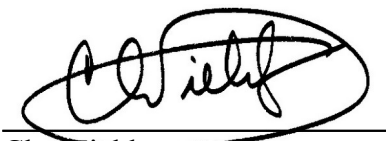
Joe Courtney
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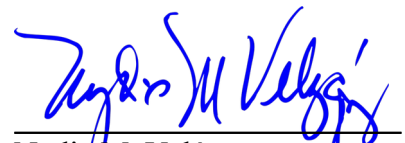
Adam Smith
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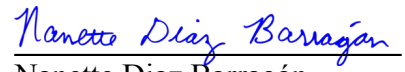
Cleo Fields
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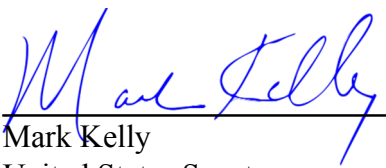
Nanette Diaz Barragán
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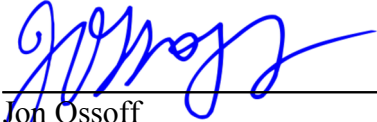
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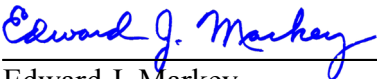
Madeleine Dean
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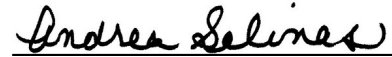
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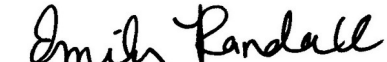
Marilyn Strickland
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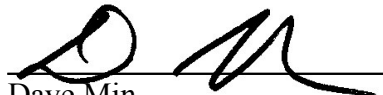
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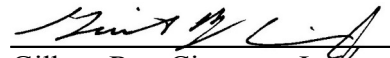
Delia C. Ramirez
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Member of Congress



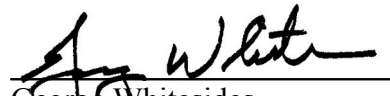
Kathy Castor
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Gilbert Ray Cisneros, Jr.
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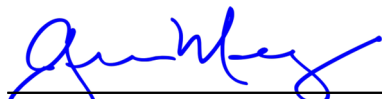
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Jason Crow
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André Carson
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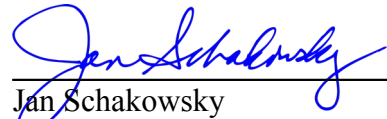


Dwight Evans
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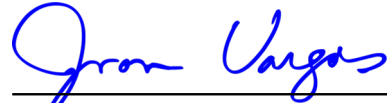
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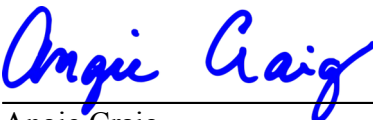
Val Hoyle
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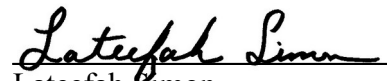
Dan Goldman
Member of Congress



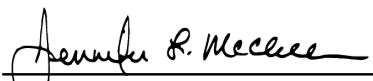
Patty Murray
United States Senator



Angie Craig
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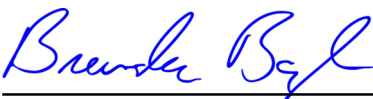
Lateefah Simon
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Jennifer L. McClellan
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Michael V. Lawler
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Brendan F. Boyle
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Pramila Jayapal
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Jahana Hayes
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Peter Welch
United States Senator



Elissa Slotkin
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Bill Foster
Member of Congress



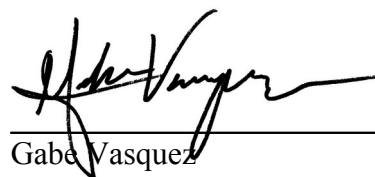
J. Luis Correa
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Mike Levin
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Chellie Pingree
Member of Congress



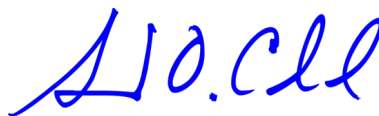
Gabe Vasquez
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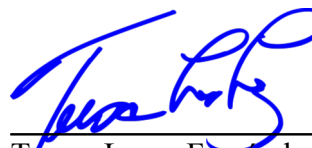
Donald G. Davis
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Salud Carbajal
Member of Congress



Teresa Leger Fernandez
Member of Congress



Rick Larsen
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Maria Cantwell
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Elizabeth Warren
United States Senator



Valerie P. Foushee
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Zoe Lofgren
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Jeanne Shaheen
United States Senator



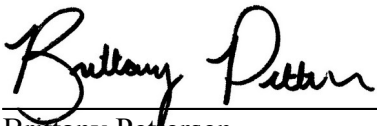
Ami Bera, M.D.
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Brad Sherman
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Raja Krishnamoorthi
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Brittany Pettersen
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Summer L. Lee
Member of Congress



Dina Titus
Member of Congress



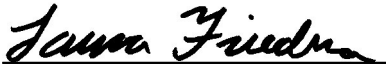
Kelly Morrison
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James P. McGovern
Member of Congress



Greg Casar
Member of Congress



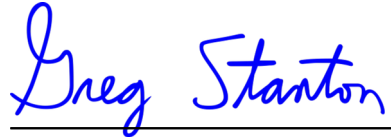
Laura Friedman
Member of Congress



Kirsten Gillibrand
United States Senator



Rob Bresnahan, Jr.
Member of Congress



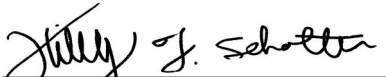
Greg Stanton
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Jefferson Van Drew
Member of Congress



Nellie Pou
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Hillary J. Scholten
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Ryan Mackenzie
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Eric Swalwell
Member of Congress



Judy Chu
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George Latimer
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David P. Joyce
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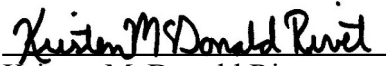


Sheldon Whitehouse
United States Senator



Mazie K. Hirono
United States Senator

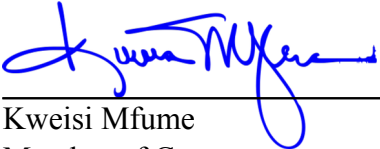
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Kristen McDonald Rivet
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Haley M. Stevens
Member of Congress



Kweisi Mfume
Member of Congress



Thomas R. Suozzi
Member of Congress



Adam B. Schiff
United States Senator



Maggie Goodlander
Member of Congress

CC: The Honorable Linda McMahon, Secretary of Education