



**American Association of
NURSE PRACTITIONERS®**

Department of Education Definition of Professional Degree Program

ACTION NEEDED: The Department of Education has released a proposed rule which does not include nurse practitioners (NPs) in the definition of professional students. Beginning on January 30, 2026, interested parties will have until March 2, 2026, to submit formal comments to the Department of Education urging the Department to explicitly include post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) in the list of professional degrees.

Legislative Background: H.R. 1 (The One Big Beautiful Bill Act) which was signed into law on July 4, 2025, created new federal loan limits for graduate students (\$20,500 annually, \$100,000 aggregate) and professional students (\$50,000 annually, \$200,000 aggregate). These loan limits are separate from undergraduate federal student loans. H.R. 1 also removed the Grad PLUS federal student loans, which makes it even more critical for NPs to be included in the definition of “professional students” given the higher federal loan limits. Since the term “professional students” is not defined in statute, Congress adopted a definition developed by the Department of Education in 1994, which was still in effect at the time H.R. 1 was signed into law. This definition stated that a professional degree is “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.” The regulation then provides a *non-exhaustive list* of examples of degrees that the Department considers “professional.” While NP programs were not specifically listed as examples in regulation, NP programs do meet the criteria developed by the Department for “professional degrees.”

Regulatory Background: On November 6, 2025, the Department of Education finished their Negotiated Rulemaking (the first part of the regulatory process) to create new regulations to implement the loan limits established by H.R. 1, including which programs are defined as graduate versus professional. AANP has been weighing in to Congress and the Department throughout this process, both as an individual association, and as a part of multiple coalitions on the importance of ensuring that NP students are included within the definition of “professional students” given the significant differences in loan limits. Unfortunately, at the conclusion of the Negotiated Rulemaking, the negotiators and the Department reached consensus on a limited definition of “professional students” which did not include nurse practitioners. It is AANP’s position that this is an overly restrictive definition that does not properly incorporate the existing regulatory definition, as intended by Congress.

The Department has now opened a public comment period to provide feedback on the proposed rule. The Department did not include NP students in the proposed definition, and their rationale relied on an inaccurate understanding of NP practice that is also inconsistent with the longstanding definition of “professional degree.” This comment period will close on **March 2, 2026**. It will be very important for Members of Congress to provide comment during this period to implore the Department to include NPs in the definition. After that comment period is complete, the Department will review the comments and release a final rule which will ultimately be the policy that goes into effect on the effective date of July 1, 2026.

Request: Submit formal comments to the Department of Education urging the Department to explicitly include post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) in the list of professional degrees before the comment period ends on March 2, 2026.

For additional information, please contact the AANP Government Affairs Office at 703-740-2529 or governmentaffairs@aanp.org.