

February 25, 2026

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

RE: Comments on Proposed Rulemaking, Reimagining and Improving Student Education [ED-2025-OPE-0944]

Dear Under Secretary Kent:

On behalf of our more than 12,500-member nurse leaders who lead the delivery and provision of patient care across the health care continuum, the American Organization for Nursing Leadership (AONL) appreciates the opportunity to comment on the Department of Education's proposed definition of "professional degree" programs. AONL is the national professional organization for nurse leaders, representing individuals who guide nursing practice, shape workforce strategy, advance care delivery innovation and ensure the competency and preparedness of the nursing workforce.

AONL urges the department to explicitly include post-baccalaureate nursing degree programs — Master of Science in Nursing, Doctor of Nursing Practice and Ph.D. in Nursing — within the definition of "professional degree" programs. Excluding advanced nursing overlooks the structure of U.S. nursing education and licensure, the academic and clinical rigor of graduate nursing preparation and the workforce demands facing the nation's health care system. Post-baccalaureate nurses serve as advanced practice registered nurses, primary care providers, faculty, educators, researchers and clinical leaders. Including these degrees in the definition of "professional degrees" is essential to strengthening nursing education pathways, sustaining a robust nursing workforce and ensuring communities nationwide have access to timely, high-quality care.

Post-baccalaureate Nursing Degrees Meet the Department's Criteria for Professional Education

These programs require advanced coursework, extensive clinical training and licensure consistent with other designated professional degrees. All states require graduate-level education for advanced practice nursing licensure, including nurse practitioners, certified nurse-midwives, clinical nurse specialists and certified registered nurse anesthetists, ensuring consistent, rigorous preparation across the U.S.

Moreover, the department defines professional degrees as programs signifying completion of requirements to begin practice in a given profession and explicitly notes the list is "not limited to" the examples provided, affirming the department's clear authority to include post-baccalaureate nursing degrees as professional programs.

Excluding Nursing Will Worsen Workforce Shortages

Excluding post-baccalaureate nursing programs from the “professional degree” would cap federal borrowing at \$20,500 per year and \$100,000 lifetime cap, significantly below actual program costs. According to the National Center for Education Statistics, graduate nursing education averages more than \$33,000 per year, with recent studies placing the average cost closer to \$38,542, leaving a substantial funding gap for the 69% of students relying on federal loans to finance their education.

Data from the American Association of Colleges of Nursing (AACN) reinforces the severity of this impact: 78% of nursing school deans anticipate enrollment declines under the proposed caps, 82% of students report the annual cap will harm their ability to finance necessary post-baccalaureate education and 81% report the lifetime cap as a barrier to pursuing an advanced degree. These constraints threaten faculty pathways at a time when schools already turn away over 80,000 qualified applicants each year due to insufficient faculty capacity, as reported by the AACN. The Commission on Collegiate Nursing Education’s standards require nursing program directors to hold doctoral degrees and faculty to possess advanced nursing education. Excluding post-baccalaureate nursing degrees from the professional degree designation will further intensify this shortage and further constrict the supply of doctoral-prepared faculty and researchers, ultimately limiting schools’ ability to expand enrollment.

Simultaneously, the health care system continues to face escalating clinical shortages, increasingly threatening access to care. The Bureau of Labor Statistics projects 38% growth in APRN roles from 2022 to 2032, requiring approximately 29,200 new APRNs annually to meet demand. The Health Resources and Services Administration reports that as of January 2026, approximately 92 million Americans live in a primary care Health Professional Shortage Area. Rural and underserved communities are most vulnerable. According to the American Association of Nurse Anesthesiology, certified registered nurse anesthetists represent more than 80% of anesthesia providers in rural counties, and over half of U.S. counties have no obstetric physician. These gaps translate into longer wait times, delayed diagnoses, increased emergency visits and higher costs for an already strained health system.

A narrowed definition of a “professional degree” would exacerbate these shortages across the nursing workforce. Reduced loan access will increase out-of-pocket costs, drive students toward a patchwork of high-interest private loans and suppress enrollment in APRN and other post-baccalaureate nursing programs. The subsequently constricted pathways for nurse faculty would limit schools’ ability to expand enrollment and narrow the supply of clinicians who provide primary care, maternal health, behavioral health, rural/safety-net services and long-term care. Ultimately, excluding post-baccalaureate nursing programs from the professional degree category would disrupt the entire education pathway of APRNs, nurse faculty, nurse leaders, researchers, scientists and other frontline providers. It is a misguided policy change that would harm nurses seeking advanced education and licensure, and the patients and families who rely on them.

The Department Possesses Statutory Flexibility to Include Nursing

The department has clear statutory authority to include post-baccalaureate nursing degrees within its definition of “professional degrees.” Congress referenced a regulatory definition that explicitly acknowledges there are more professional degrees beyond the listed examples, empowering the Department to adopt a broader and more accurate definition reflective of modern health care practice. Including post-baccalaureate nursing degree programs is fully consistent with statutory language, longstanding departmental practice, the educational and licensure requirements of advanced nursing roles, and national workforce priorities that depend on a robust pathway of highly trained nurses.

Conclusion

Post-baccalaureate nursing degree programs — Master of Science in Nursing, Doctor of Nursing Practice and Ph.D. in Nursing — clearly meet the department's three-part definition of a professional degree: they signify completion of the academic requirements for beginning practice in advanced nursing roles; they require a level of professional skill and clinical competence beyond what is normally required for a bachelor's degree; and they lead to roles that generally require professional licensure or national certification tied to state licensure. Accordingly, AONL urges the department to explicitly classify MSN, DNP, and Ph.D. in Nursing programs as “professional degrees” in the final rule.

As drafted, the proposed definition would instead classify these programs as graduate rather than professional, subjecting advanced nursing students to the much lower graduate-level loan caps rather than the higher professional-degree limits. Because graduate-level caps fall materially below typical program costs, this misclassification would price out qualified students, depress enrollment and constrict pathways into becoming advanced practice nurses, educators and leaders at the very moment our health care system needs them. Given the significant pressures facing the health care workforce, ensuring robust access to post-baccalaureate nursing education is essential to sustaining a strong, highly educated nursing workforce capable of meeting our nation's growing care needs. To align policy with the Department's own criteria, the final rule should include post-baccalaureate nursing degrees within the “professional degree” category.

Thank you for considering these comments. If you have any questions, please contact Stacey Chappell, AONL's senior director, advocacy and external communications, at schappell@aha.org.

Sincerely,



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