

Coalition of Providers and Programs

October 31, 2025

Tamy Abernathy
Federal Negotiator
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Ms. Abernathy and RISE Committee Members,

We, the undersigned organizations representing a wide range of health professions, education programs, and professional associations, appreciate the opportunity to provide recommendations to the Department of Education’s (ED) Reimagining and Improving Student Education (RISE) Committee as it continues its work in Session 2 to implement the student financial aid provisions of Public Law 119–21, commonly referred to as the One Big Beautiful Bill Act (OBBBA), specifically the definition of “professional degree programs.”

Defining Professional Degrees Consistently and Inclusively

As organizations that are all deeply invested in ensuring our nation has a robust workforce pipeline of the next generation of health professionals, we urge ED to adopt a clear and consistent standard for defining “professional degrees” in the health professions sector. For example, classifying all health programs in Classification of Instructional Programs (CIP) Code 51 — Health Professions and Related Clinical Sciences, and related codes, would ensure clarity, fairness, and consistency across all health professions as the Department structures eligibility criteria. The adoption of CIP codes will also protect against unjustified distinctions, such as the length of programs, that do not reflect the rigor or value of a given health profession. The true measure should be the program’s accreditation, content, and alignment with established standards in the health professions, not its duration.

When Congress passed OBBBA, its clear intent was to establish a broad and inclusive definition of “professional degrees” to ensure the full spectrum of accredited health professions preparing students for professional practice are represented. Congress recognizes that health professions are inherently interconnected and that the strength of our health system depends on a collaborative workforce. Fragmenting repayment eligibility by narrowly defining “professional degree” would undermine this interprofessional foundation.

We are concerned that if ED adopts a narrow definition, it will deepen the health workforce shortage by creating uncertainty and limiting access to vital support for students entering critical health fields. The impact would be most severe in rural and underserved communities, where access to health professionals is already strained.

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A broad, consistent definition of “professional degree” is essential to sustaining the nation’s multidisciplinary health workforce and protecting the health of all Americans.

The Stakes for the Nation’s Healthcare Workforce

Failure to adopt an inclusive definition of “professional degree” would have significant negative implications for the health professions workforce. Excluding programs within or related to CIP Code 51 would fragment financial aid eligibility, exacerbate existing shortages, and limit access to education for students seeking to serve in critical health roles.

Recommendations

We respectfully recommend that the Department:

1. Classify all professions under CIP Code 51 — Health Professions and Related Clinical Sciences, and related codes as “professional degrees.”
2. Define “professional degree” as any degree leading to a professional credential required for entry into practice in that field.
3. Define “professional degree” based on accreditation, curriculum, and alignment with recognized health profession standards, not program length or credit hours.
4. Recognize the critical workforce impact of any exclusion of health professions degrees, which would disproportionately harm communities in rural and underserved areas.

An inclusive and clean approach, such as one anchored in CIP Code 51, professional credentialing standards, and Congressional intent will help maintain a strong and sustainable health workforce. It will also ensure equitable access to education financing across all accredited, post-baccalaureate programs preparing students for professional practice.

Thank you for your attention to this matter and for your continued efforts to support the education and financial stability of our nation’s health workforce.

Sincerely,

Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM)

Accreditation Council for Education in Nutrition and Dietetics (ACEND)

American Association for Marriage and Family Therapy

American Association of Colleges of Nursing

American Association of Colleges of Osteopathic Medicine

American Association of Colleges of Pharmacy

American Association of Colleges of Podiatric Medicine

American Association of Nurse Anesthesiology

American Association of Nurse Practitioners

American Association of Veterinary Medical Colleges

American College of Nurse-Midwives

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American Council of Academic Physical Therapy
American Dental Education Association
American Music Therapy Association
American Nurses Association
American Occupational Therapy Association
American Physical Therapy Association
American Society of Acupuncturists
American Speech-Language-Hearing Association
Association of Accredited Naturopathic Medical Colleges
Association of Schools Advancing Health Professions
Association of Schools and Programs of Public Health
Association of University Programs in Health Administration
Council for Accreditation of Counseling and Related Educational Programs
Council of Administrators of Special Education (CASE)
Council of Colleges of Acupuncture and Herbal Medicine (CCAHM)
Council of Graduate Schools
Council on Social Work Education
GAPNA
Masters in Psychology and Counseling Accreditation Council (MPCAC)
National Accrediting Agency for Clinical Laboratory Sciences (NAACLS)
National Association of Nurse Practitioners in Women's Health
National Association of Pediatric Nurse Practitioners
National Association of Pupil Services Administrators
National Association of School Nurses
National Association of Social Workers
National League for Nursing
National Organization of Nurse Practitioner Faculties
School Social Work Association of America