



October 30, 2025

Honorable Nicholas Kent
Under Secretary of Education
U.S. Department of Education

Under Secretary Kent:

On behalf of the more than 69,000 members of the American Association of Nurse Anesthesiology (AANA), we write to you with great concern about the regulations implementing H.R. 1, the One Big Beautiful Bill Act, regarding the definition of “professional student” and its relation to federal unsubsidized student loan caps. As the Reimagining and Improving Student Education (RISE) Committee has engaged in negotiated rulemaking this month, the currently proposed changes to this definition created an exhaustive rather than exemplary list and excludes the profession of nurse anesthetist. This would have a devastating impact on future nurse anesthetists and their ability to afford nurse anesthesia programs and will impact access to essential healthcare.

AANA is the professional association representing Certified Registered Nurse Anesthetists (CRNAs) and Student Registered Nurse Anesthetists (SRNAs) nationwide. CRNAs are Advanced Practice Registered Nurses (APRNs) who are doctorally prepared autonomous anesthesia providers through their training and preparation. CRNAs must be board certified and participate in continuing education and recertification every 4 years in order to practice. CRNAs provide expert anesthesia and pain management care across diverse clinical settings and are trained and licensed to care for all patients, including those with complex medical conditions. In some states, CRNAs are the sole anesthesia providers in nearly 100 percent of rural hospitals, affording these medical facilities obstetrical, surgical, trauma stabilization, and pain management capabilities.

A doctorate degree is required in order to become a CRNA as of January 1, 2022.¹ A Doctor of Nurse Anesthesia Practice (DNAP) or a Doctor in Nursing Practice (DNP) are three-year programs that can cost over \$300,000. As part of admissions requirements for these programs, applicants must be a Registered Nurse with a baccalaureate degree in Nursing or a related science and have successfully passed the NCLEX. Then they must practice one to two years as a critical care nurse before they acquire their doctorate at an

¹ Council on Accreditation of Nurse Anesthesia Educational Programs, *Standards for Accreditation of Nurse Anesthesia Programs – Practice Doctorate*, effective January 1, 2026, available at: <https://www.coacrna.org/wp-content/uploads/2025/08/Standards-for-Accreditation-of-Nurse-Anesthesia-Programs-Practice-Doctorate-May-2025-Effective-Date-January-2026-1.pdf>.

aana.com | CRNA focused. CRNA inspired.

25 Massachusetts Avenue NW, Suite 320, Washington, DC 20001-1408

Phone 202.484.8400

accredited nurse anesthesia program. Once they pass their National Certification Examination (NCE) administered by the National Board of Certification and Recertification for Nurse Anesthetists they must complete recertification every four years to maintain their licensure.²

The basis of 34 CFR § 668.2(b) states 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.” CRNAs squarely fit this definition, as they:

- Complete extensive academic requirements to practice their profession;
- Acquire professional skills through three years of doctoral-level education and at least one year in critical care practice beyond the bachelor's degree required to become a Registered Nurse;
- Require professional licensure to practice, with mandatory continuing education and recertification on a four-year cycle.

Additionally, nurse anesthetists are specifically included in the National Center for Education Statistics’ Classification of Instructional Programs Codes in Series 51, along with the other health professions listed as examples in the definition of professional degree at 34 CFR § 668.2(b).

The proposal to make the list of professional degrees included in the definition at 34 CFR § 668.2(b) exhaustive without including CRNAs wrongfully excludes the nurse anesthesia profession. CRNAs are essential to addressing anesthesia care access in places with the deepest gaps as the country faces a widening anesthesia workforce shortage.³ CRNAs serve more rural and underserved communities as well as higher concentrations of low-income, Medicaid-eligible, and uninsured patients.⁴ CRNAs are also at the forefront of innovative approaches to chronic conditions with a growing number specializing in chronic pain management and gaining a credential in non-surgical pain management (NSPM-C). Capping SRNAs at the aggregate \$100,000 will cripple the CRNA workforce pipeline as the

² National Board of Certification & Recertification for Nurse Anesthetists, *The Continued Professional Certification (CPC) Program*, available at: <https://www.nbcna.com/certification-programs/cpc>

³ Negrusa et al., *Anesthesia Services: A Workforce Model and Projections of Demand and Supply*, Nursing Economic\$, December 2021, available at: https://www.researchgate.net/publication/357569422_Anesthesia_Services_A_Workforce_Model_and_Projections_of_Demand_and_Supply.

⁴ Liao CJ, et al., *Geographical imbalance of anesthesia providers and its impact on the uninsured and vulnerable populations*, Nursing Economic\$, September 2015, available at: <https://pubmed.ncbi.nlm.nih.gov/26625579/>; and Palmer A, et al., *An examination of factors contributing to different anesthesia models in underserved areas*, Nursing Outlook, March 2025, available at: <https://pubmed.ncbi.nlm.nih.gov/39874636/>.

average CRNA graduates with more than \$200,000 in student loan debt due to the extensive educational and professional requirements.⁵

CRNAs cannot be left out of this conversation. We appreciate the opportunity to speak with you and your staff about this critical issue and discuss solutions that ensure a robust future CRNA workforce. Please do not hesitate to reach out with any questions to Romy Gelb-Zimmer, MPP, Director of Regulatory Affairs, at rgelb-zimmer@aana.com.

Sincerely,



Jeffrey E. Molter CRNA, MSN, MBA
AANA President

John M. Underwood, DNAP, APRN-CRNA
Program Director, St Elizabeth Health Center School for Nurse Anesthetists at Youngstown
State University Youngstown, Ohio

Jodi M. Della Rocca, PhD, CRNA
Program Director & Associate Professor at the Center for Nurse Anesthesiology
Albany Medical College

Michelle L. Canale, DNP, CRNA, APRN, FAANA
Assistant Dean and Program Director
Doctor of Nursing Practice Nurse Anesthesiology Program
USF College of Nursing

Rachel Davis, DNP, CRNA, CHSE, FAANA
Associate Professor of Anesthesiology and Health Professions
Baylor College of Medicine

Dr. Monika Feeney, BSN, MS, DNAP, CRNA
School and Program Director, Associate Professor
School of Nurse Anesthesia
Missouri State University

Rebecca Lee, DNP, CRNA
Program Director and Professor
The University of the Incarnate Word

⁵ CRNA Financial Planning, *A CRNA's Life After Anesthesia Preview: Chapter 1 the Current Landscape in Health Care for CRNAs*, available at: <https://www.crnafinancialplanning.com/p/a-crnas-life-after-anesthesia-chapter-1-preview>.

Patricia Kostelnak, DNAP, CRNA
Director, Doctor of Nursing Practice-Nurse Anesthesia Program
M. Louise Fitzpatrick College of Nursing
Villanova University

Julia Feczko, DNP, CRNA
Program Director, Endeavor Health School of Nurse Anesthesia
DePaul University

Robyn Ward, PhD, CRNA, FAANA
Program Director and Professor
Texas Christian University, School of Nurse Anesthesia

Linda McDonald, DNAP, CRNA
Program Director
Oakland University-Beaumont Graduate Program of Nurse Anesthesia

Connie Lorette, PhD, CRNA, FAANA
Program Director and Clinical Professor
Doctor of Nursing Practice Nurse Anesthesia Program
Northeastern University

Jeffrey R. Darna, PhD, DNP, CRNA, ACNP-BC, FAANA
Program Administrator and Associate Professor
Keck School of Medicine, Program of Nurse Anesthesia
University of Southern California

William T. Prosser DNAP, MSN, CRNA
Program Director, CRNA Program
George Fox University

Terri M. Cahoon, DNP, CRNA, FAANA
Professor and Chair, Department of Nurse Anesthesia
Samford University

Linda Stone, DNP, MSN, CRNA
Program Director/Associate Professor
UNC Greensboro Nurse Anesthesia Program

Kristie J. Hoch, DNP, CRNA, MS, FAANA
Program Director and Professor
University of Arizona

Brian Garrett, CRNA, DNP
Director
Otterbein University OhioHealth Grant Medical Center, Nurse Anesthesia program

Linda Wunder, PhD, CRNA, ARNP, FAANA
Program Director and Associate Professor
Barry University Nurse Anesthesiology Program

Adrienne G. Hartgerink, DNP, CRNA, FAANA
Director, Nurse Anesthesia Program
Ellmer School of Nursing
Old Dominion University

Lois Stewart, PhD, CRNA, FAANA
Program Director and Associate Professor, DNP Nurse Anesthesia Program
South College

James R Barnett, DNAP, CRNA
Program Director and Assistant Professor, DNAP Program
Mount Marty University

Dr. Jess Tomasiewicz DNAP, CRNA, APNP
Director of DNP–Nurse Anesthesia Emphasis
University of Wisconsin-Oshkosh

Eric Ledwin DNP, CRNA, RN, ACNP
Program Director, DNP Nurse Anesthesia
St. John Fisher University

Joshua Olson DNP, CRNA
Assistant Professor, Program Coordinator, Nurse Anesthesia
University of Detroit Mercy

Karri Arndt, DNP, CRNA
Interim Chair/Program Director and professor
Nurse Anesthesia Education Department
University of Kansas Medical Center

Leah M. Gordon, DNP, APRN, CRNA
Program Director and Assistant Professor
Saint Mary's University of Minnesota Graduate Program in Nurse Anesthesiology

Molly Wright, DNP, CRNA
Program Director and Professor, Nurse Anesthesia Program
Union University, Jackson, Tennessee

Deborah Burnett-Olsen, DNAP, CRNA
Director and Assistant Professor, Nurse Anesthesia Program
Cedar Crest College

Dana Flatley, DNP, CRNA
Program Director
Millikin University and Decatur Memorial Hospital Nurse Anesthesia Program

Bimpe Adenusi, PhD., CRNA, APRN
Program Administrator and Associate Professor
Jefferson College of Nursing, Nurse Anesthesia Program

Charles D. Myers III, DNP, CRNA
Program Director/ Clinical Associate Professor
Nurse Anesthesia Program at Northern Kentucky University

Amy Yerdon, DNP, CRNA, CNE, CHSE, FAANA
Interim Director and Assistant Professor
University of Alabama at Birmingham Nurse Anesthesia Program

Scot Pettey, DNAP, CRNA
Program Director and Department Chair, Department of Nurse Anesthesia
Providence Sacred Heart Medical Center/Gonzaga University Nurse Anesthesia Program

L. Todd Hammon, PhDc, DNP, CRNA
Program Director and Assistant Professor, Nurse Anesthesia
Arkansas State University

Travis Laffoon DNP, CRNA, APRN
Director
Minneapolis School of Anesthesia

Brian Torres, DNP, CRNA
Program Director and Associate Professor
Nurse Anesthesia Program at Barnes-Jewish College

Maribeth Massie, PhD, CRNA, FAAN, FAANA
Program Director and Assistant Professor, DNP Program in Nurse Anesthesia
Columbia University School of Nursing

Virginia Londahl Ramsey, DNAP, CRNA, APRN, CHSE, FAANA
Golisano Institute GIDDN Fellow, Program Director, and Assistant Professor, DNP Nurse
Anesthesiology Program
Florida Gulf Coast University

Todd Hicks, DNP, CRNA
Program Director and Assistant Professor
University of South Alabama

Gayle B. Lourens, DNP, MS, CRNA,
Program Director and Associate Professor
Michigan State University

Kerianne Flavin, DNP, CRNA, CHSE
Program Director and Assistant Clinical Professor, School of Nurse Anesthesia
University of New England, Portland, ME

Jen McPherson, DNP, CRNA
Program Director, Nurse Anesthesiology Program
Mary Baldwin University

Suzanne Ariza, PhD, CRNA
Program Director and Professor
Drexel University Nurse Anesthesia Program

Gena M. Welch, DrAP, CRNA
Program Director and Clinical Assistant Professor, Nurse Anesthesia Program
University of Michigan-Flint

Joseph Janakes Ph.D., MSN, CRNA
Director and Assistant Professor, Doctor of Nurse Anesthesia Practice Program
Samuel Merritt University

Sonya Moore, DNP, CRNA, FAAN, FAANA
Director, Nurse Anesthesia Program
Frances Payne Bolton School of Nursing
Case Western Reserve University

Jessica Phillips, PhD, CRNA
Program Director and Assistant Professor, Nurse Anesthesia Program
Wayne State University

Jessica Peterson, PhD, CRNA
Program Director
Franciscan Healthcare School of Anesthesia

Maria Szafranski, DNAP, CRNA
Program Director
Integrated Anesthesia Associates Nurse Anesthesia Program of Hartford

Ross Castille, DNP, CRNA
Program Director and Associate Professor, Nurse Anesthesia Program
Franciscan Missionaries of Our Lady University

Christine Wittebort, DNAP, CRNA
Director, DNAP Program
La Roche University

Michael A. DeBroeck, DNP, CRNA
Program Director, Independence Health System School of Anesthesia
St. Vincent College

Kelly L. Wiltse Nicely, PhD, CRNA, FAANA, FAAN
Nurse Anesthesia DNP Program Director and Assistant Professor
Emory University Nell Hodgson Woodruff School of Nursing

Maiko Yamashita, DNP, CRNA, APRN
Program Director
Rush University Nurse Anesthesia Program

Gretchen Caldwell, DNP, CRNA
Program Director and Professor, Dual Nurse Anesthesia/Adult Gerontology Acute Care
Nurse Practitioner Program
Loyola University New Orleans

Sharon Hadenfeldt, PhD, CRNA
Program Director and Dean
Bryan College of Health Sciences School of Nurse Anesthesia

Jose Bonilla, DNAP, CRNA
Program Director and Associate Professor, Nurse Anesthesia Program
University of Puerto Rico

John M. O'Donnell, DRPH, CRNA, CHSE, FSSH, FAANA, FAAN
Professor, Previous Chair and Director, Nurse Anesthesia Program
University of Pittsburgh

Carrie Bowman Dalley, PhD, CRNA, FAANA
Program Director and Associate Professor, Doctor of Nurse Anesthesia Practice Program
Berkley School of Nursing, Georgetown University

James Stimpson, DNP, CRNA
CRNA Program Director and Professor
University of Nevada, Las Vegas

Cheryl Parker, DNP, CRNA
Director of Nurse Anesthesia Program
University of Louisville, School of Nursing

Veronica Y. Amos, PhD, CRNA, PHCNS-BC, FAANA, FAAN
Specialty Director, Nurse Anesthesia
University of Maryland, School of Nursing

Brian Radesic, DNP, MSN, CRNA
Director Nurse Anesthesia Track
The University of Akron, School of Nursing

Cormac O'Sullivan, PhD, CRNA, ARNP, FAANA
Clinical Professor and Program Director, DNP Program in Nurse Anesthesia
University of Iowa

Nancy Sweet, DNAP, APRN-CRNA
Program Director and Clinical Associate Professor, Nurse Anesthesia DNP Program
The University of Tulsa

Beth Ann Clayton, DNP, CRNA, FAAN, FAANA
Professor and Nurse Anesthesia Program Director
University of Cincinnati

Cheryl A. Spulecki, DNAP, CRNA, ACNP, FAANA
Program Director and Associate Clinical Professor, Nurse Anesthetist Program
University at Buffalo, School of Nursing

Megan Orphanos, DMPNA, APRN, CRNA
Program Director and Associate Professor, Doctor of Nurse Anesthesia Practice
University of Charleston/Charleston Area Medical Center

Vicki Callan, PhD, CRNA, CHSE, FAANA
Program Director Nurse Anesthesia, Professor
Webster University Nurse Anesthesia Program

Rebekah L. Carmel, PhD, CRNA
Program Director and Director of Clinical Education, Nurse Anesthesia
Virginia Commonwealth University

Steven L. Belmont, DNP, CRNA, APRN, CFI/II, FAANA,
Program Director and Associate Professor of the Practice
Fairfield University

Kacy Ballard, DNP, CRNA
Program Director
Ohio University-OhioHealth Grant Medical Center Nurse Anesthesia Program

Kevin J. LeBlanc, PhD, MNA, CRNA
Program Director and Associate Professor, Graduate Program in Nurse Anesthesia
University of South Carolina

Debra Minzola PhD, MSN, MBA, CRNA
Program Director and Associate Professor
Geisinger/Commonwealth University of Pennsylvania - Bloomsburg

Linda Hill, DNSc, DNP, CRNA, FAANA
Program Director and Professor
University of Tennessee at Chattanooga/Erlanger Health Systems Nurse Anesthesia
Concentration
University of Tennessee at Chattanooga

Mitch Simmons, DNAP, CRNA
Education Director
University Health Truman Medical Center School of Nurse Anesthesia

Lisa Osborne DNP, CRNA, CHSE, FAANA
Assistant Program Director and Associate Professor, DNP Nurse Anesthesia Program
South College

Michael Kost, DNP, CRNA, CHSE, FAANA, FAAN
Program Director, Frank J. Tornetta School of Anesthesia
EMCM/La Salle University School of Nursing

Martin E. Rivera, DNP, CRNA, APRN
Nurse Anesthesia Program Director/Administrator
University of Texas at Tyler

Ann B. Miller, DNP, CRNA, FAANA
Chair, Department of Nurse Anesthesiology
Florida International University

Jill Mason Ed.D., DNAP, MSN, CRNA, APRN, COI, FAANA
DNAP Program Director
AdventHealth University

Shannon. L. Broxton, DNP, CRNA, FAANA
Chair DNP Department/Director Nursing Anesthesia Program
Augusta University, College of Nursing

Stacey A. VanDyke, DNP, CRNA, FAANA
Program Administrator, Nurse Anesthesia
Florida State University Panama City

Angella Ruley, DNP, CRNA, NP-C
Program Director/Associate Professor NAP DNP
Lourdes University

Laura S. Bonanno, PhD, DNP, CRNA, FAANA, FAAN
Nurse Anesthesia Program Director, Professor of Nursing
Louisiana State University Health Sciences Center School of Nursing