



October 31, 2025

The Honorable Nicholas Kent, Under Secretary
The Honorable David Barker, Assistant Secretary, Office of
Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

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

Dear Under Secretary Kent, Assistant Secretary Barker, and Members of the RISE Rulemaking Committee:

On behalf of the 57 undersigned organizations representing the Nursing Community Coalition (NCC), we appreciate the ongoing work of the Department of Education's (ED) Reimagining and Improving Student Education (RISE) Committee to implement Public Law 119-21 – One Big Beautiful Bill Act (OBBBA). The Nursing Community Coalition (NCC) is a cross section of education, practice, research, and regulation within the nursing profession representing Registered Nurses (RNs), Advanced Practice Registered Nurses (APRNs),¹ nurse leaders, boards of nursing, students, faculty, and researchers. Together, we recognize how critical a strong nursing education pathway is to ensuring a robust nursing workforce that supports the health needs of our nation. This includes support for our masters' and doctoral (DNP and PhD) nursing students who go on to serve on the frontlines as our primary care providers, faculty and educators, researchers, and leaders within the health care profession. As you continue negotiated rulemaking, **the NCC strongly recommends the RISE Committee explicitly include post-baccalaureate nursing programs, as outlined under the "Health Professions and Related Clinical Sciences" series of Classification of Instructional Programs (CIP) codes (Series 51), in the regulatory definition of "professional degree programs."**

Under 34 CFR § 668.2(b), a professional degree, "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."² All registered nurses must pass the National Council Licensure Examination (NCLEX-RN), the nationwide licensing exam for entry into the profession, and all APRNs must complete a graduate degree, such as a Master of Science in Nursing (MSN) or a Doctor of

¹ APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs) and nurse practitioners (NPs).

² Code of Federal Regulations § 668.2 General Definitions. Retrieved from: <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-A/section-668.2>

Nursing Practice (DNP), to be licensed and practice in a state. Master's and doctoral nursing students need further national certifications and licensures, which require rigorous examinations and continuing education for license renewal, paralleling the processes seen in other healthcare disciplines such as medicine, dentistry, and pharmacy, all of which already carry the "professional" designation.

Post-baccalaureate nurses not only support America's health but often fall within the new loan limits outlined under "professional degree programs" in OBBBA. For example, the average CRNA graduates with upwards of \$200,000 in student loan debt, quickly reaching the aggregate limit, similar to other health profession students.³ This is also the case for programs like the accelerated entry-level master's program, which can easily reach the annual limit threshold outlined in OBBBA. Additionally, many programs operate year-round across three full-time semesters, rather than on the traditional two-semester academic calendar, which is also consistent with other health professional degree programs. It is also important to note that unlike their physician counterparts who get paid during their residency, most advanced practice nurses are required to complete their education and clinical hours without the support of a salary, making this "professional degree" designation even more important to their education.

Adding nursing to this definition is also consistent with other ED practices, such as classifying both medicine and nursing within the same "Health Professions and Related Clinical Sciences" series of Classification of Instructional Programs (CIP) codes (Series 51).⁴ Further, the additional instruction post-baccalaureate nursing students receive, including in pharmacology, diagnostics, and systems leadership, parallels other professional programs. Additionally, a PhD nursing degree, while often research-oriented, is critical to the preparation of educators, clinical leaders, and front-line practitioners who sustain the professional workforce.

As the largest segment of the healthcare profession,⁵ nursing is involved at every point of care. Nurses work in community health centers, Veterans Health Administration and Indian Health Services facilities, hospitals, long-term care facilities, local and state health departments, schools, workplaces, and patients' homes. They also support our aging population. As outlined in the MedPAC's July 2025 data book, Medicare patient "encounters with APRNs and PAs grew rapidly from 2018 to 2023 (50 percent in total), and encounters with primary care physicians declined substantially (–22 percent)."⁶ In fact, over 233,000 APRNs treated Medicare patients and approximately 40% of Medicare beneficiaries received care from an APRN.⁷ Supporting educational pathways into post-baccalaureate nursing programs removes barriers to enter the

³ A CRNA's Life After Anesthesia Preview. Retrieved from: <https://www.crnafinancialplanning.com/p/a-crnas-life-after-anesthesia-chapter-1-preview>

⁴ Classification of Instructional Programs. Health Professions and Related Clinical Sciences. Retrieved from: <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?v=55&cipid=87605>

⁵ Smith, Sean and Blank, Andrew. U.S. Bureau of Labor Statistics. (June 2023) Healthcare Occupations: Characteristics of the Employed. Slide Two: Employment in the 25 largest healthcare occupations, 2022. Retrieved from: <https://www.bls.gov/spotlight/2023/healthcare-occupations-in-2022/>

⁶ Andrilla, C. H. A., Patterson, D. G., Moore, T. E., Coulthard, C., & Larson, E. H. (2018). Projected Contributions of Nurse Practitioners and Physicians Assistants to Buprenorphine Treatment Services for Opioid Use Disorder in Rural Areas. Medical Care Research and Review, Epub ahead. <https://doi.org/10.1177/1077558718793070>

⁷ Centers for Medicare & Medicaid Services Data.CMS.gov. CMS Program Statistics-Medicare Providers. (2022) Retrieved from: <https://data.cms.gov/summary-statistics-on-provider-enrollment/medicare-provider-type-reports/cms-program-statistics-medicare-providers>

profession, supports ongoing nursing workforce needs, and ensures patients across the country have access to high-quality healthcare.

Nurses continue to provide a growing proportion of care to patients across the nation, while simultaneously facing a workforce shortage with an aging population that requires increasing healthcare services. It is crucial that the RISE Committee define post-baccalaureate nursing education as a “professional degree.” This designation, consistent with current CIP Code 51 “Health Professions and Related Programs,” has a direct impact on the health of our nation. Should you have any questions or if the Nursing Community Coalition can be of any additional assistance please contact the coalition’s Executive Director, Rachel Minahan, at rstevenson@thenursingcommunity.org.

Sincerely,

Academy of Medical-Surgical Nurses
Academy of Neonatal Nursing
Alliance of Nurses for Healthy Environments
American Academy of Ambulatory Care Nursing
American Academy of Emergency Nurse Practitioners
American Association of Colleges of Nursing
American Association of Critical-Care Nurses
American Association of Heart Failure Nurses
American Association of Neuroscience Nurses
American Association of Nurse Anesthesiology
American Association of Nurse Practitioners
American Association of Occupational Health Nurses
American Association of Post-Acute Care Nursing
American College of Nurse-Midwives
American Nephrology Nurses Association
American Nurses Association
American Nursing Informatics Association
American Organization for Nursing Leadership
American Pediatric Surgical Nurses Association, Inc.
American Psychiatric Nurses Association
American Public Health Association, Public Health Nursing Section
American Society for Pain Management Nursing
American Society of PeriAnesthesia Nurses
Association of Community Health Nursing Educators
Association of Nurses in AIDS Care
Association of periOperative Registered Nurses
Association of Public Health Nurses
Association of Rehabilitation Nurses
Association of Women's Health, Obstetric and Neonatal Nurses
Commissioned Officers Association of the U.S. Public Health Service
Dermatology Nurses' Association
Emergency Nurses Association
Gerontological Advanced Practice Nurses Association

Hospice and Palliative Nurses Association
Infusion Nurses Society
International Association of Forensic Nurses
International Society of Psychiatric-Mental Health Nurses
National Association of Clinical Nurse Specialists
National Association of Hispanic Nurses
National Association of Neonatal Nurse Practitioners
National Association of Neonatal Nurses
National Association of Nurse Practitioners in Women's Health
National Association of Pediatric Nurse Practitioners
National Association of School Nurses
National Black Nurses Association
National Council of State Boards of Nursing
National Forum of State Nursing Workforce Centers
National Hartford Center of Gerontological Nursing Excellence
National League for Nursing
National Organization of Nurse Practitioner Faculties
Nurses Organization of Veterans Affairs
Oncology Nursing Society
Organization for Associate Degree Nursing
Preventive Cardiovascular Nurses Association
Society of Pediatric Nurses
Society of Urologic Nurses and Associates
Wound, Ostomy, and Continence Nurses Society