

Congress of the United States
Washington, DC 20515

February 27, 2026

The Honorable Linda McMahon
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

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

RE: ED-2025-OPE-0944

Dear Secretary McMahon and Under Secretary Kent:

We write as Members of the Connecticut Delegation to provide our comments of strong disapproval of the Department of Education's (Department) Notice of Proposed Rulemaking (NPRM) [ED- 2025-OPE-0944]¹ published on January 30, 2026, in which the Reimagining and Improving Student Education (RISE) Committee made changes to student financial aid provisions under Public Law 119-21. This proposed rule would, among other things, omit post-baccalaureate nursing degrees from the regulatory definition of a "professional degree" for the purposes of determining eligibility for certain lending limits.

On July 4, 2025, President Trump signed the "One Big Beautiful Bill Act" (P.L.119-21)² into law, which reduced critical access to federal student loans by eliminating the Graduate PLUS loan program and establishing strict new limits on how much students and parents can borrow from the federal government. Beginning on July 1, 2026, P.L.119-21 will eliminate new students' access to the Grad PLUS Program, which allows students to borrow up to the full-cost of attendance in federal student loans. After July 1, 2026, post-baccalaureate students pursuing new programs would be subjected to new lending limits based on whether they are pursuing a professional degree or graduate degree. Under these new categories, a student pursuing a professional degree would be eligible to borrow \$50,000 annually, with a lifetime cap of \$200,000. Students pursuing a graduate level degree would be eligible for only half this amount: \$20,5000 annually with a lifetime cap of \$100,000.

While P.L. 119-21 required differentiating loan limits between "graduate students" and "professional students", it did not entirely prescribe which programs would fall into each

¹ [Federal Register :: Reimagining and Improving Student Education](#)

² [Text - H.R.1 - 119th Congress \(2025-2026\): An act to provide for reconciliation pursuant to title II of H. Con. Res. 14. | Congress.gov | Library of Congress](#)

category. Within the NPRM, the Department has both deviated from historical practice and threatened public health by determining that post-baccalaureate nursing degrees should not be considered "professional degrees." The programs included are Pharmacy(PharmD), Dentistry (DDS or DMD), Medicine (MD), Osteopathic Medicine (D.O.), and Clinical Psychology (PsyD or PhD), yet omit post-baccalaureate nursing degrees such as a Master of Science in Nursing, Doctor of Nursing Practice, and a PhD in nursing - which are degrees needed for a variety of advanced practice registered nurses (APRNs). These APRNs fill critical gaps in the health care workforce, encompassing primary care services, mental health services, maternal and infant health, and nursing school faculty to name a few.

Nursing professionals seek additional degrees to meet critical patient care needs across our health care system. According to the Bureau of Labor Statistics, there is an estimated average of 32,700 openings nationally for nurse anesthetists, nurse midwives, and nurse practitioners each year through 2034, representing 35% increase in demand for these key roles and significantly outpacing the 3% projected growth across all occupations.³ A 2024 Health Resources and Services Administration (HRSA) report also notes that "40.2% of the nursing workforce (1,750,277 RNs) have completed a second degree or advanced certificate since initially entering the workforce."⁴

The National Center for Health Workforce Analysis (NCHWA) Nursing Workforce Database demonstrates that, as of 2022, Connecticut alone had 5,904 APRN's - with an estimated 17.9% of them planning to retire within 5 years.⁵ This coming cliff, coupled with a predicted gap of over 550 advanced practice nurse practitioners across Connecticut by 2028 will only deepen the existing shortages in the aforementioned critical areas.⁶ As we continue to grapple with the steady rise in the cost for a post-baccalaureate education, these changes will have consequences for degree access and attainment, severely limiting who will be able to enter and access certain professions.

Additionally, the annual and lifetime loan caps delineated in this proposed rule will significantly limit who can afford to enter these professions as the caps fail to adjust for rising costs over time and severely limit second-career professionals who may wish to pursue advanced degrees in their respective fields. Should these changes take effect, Connecticut students seeking post-baccalaureate nursing degrees would already surpass the annual \$20,500 limitations at two out of four Connecticut universities offering Master of Science in Nursing, Doctor of Nursing Practice, or a PhD in nursing – pushing these students into a private loan market or making these professions out of reach to them. The private student loan market is notoriously opaque. Unlike protections in the federal student loan market, private student loans tend to be more expensive, with interest rates reaching as high as 26%.⁷ Private loans also include fewer protections like the right to an Income Driven Repayment Plan and access to loan forgiveness like Public Service Loan Forgiveness, or loan discharge in the case of death or permanent disability.⁸

³ [Occupational Employment and Wage Statistics Profiles](#)

⁴ [Nursing Education and Training: Data from the 2022 NSSRN](#)

⁵ [NCHWA Nursing Workforce Dashboard](#)

⁶ [Future of the U.S. Healthcare Industry: Labor Market Projections by 2028](#)

⁷ [Student loan interest rates in February 2026 | Bankrate](#)

⁸ [PSL-Report_042020.pdf](#)

This is not the time, in the midst of a nursing crisis, to limit the student pipeline to these critical fields or leave prospective nurses vulnerable to the private student loan market. Nurses ensure the health and safety of millions and nurse faculty educate the next generation. As such, we urge the Department to revise its draft rule and classify post-baccalaureate nursing degrees under the definition of “professional degree.”

We look forward to you addressing these concerns.

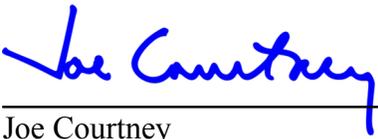
Sincerely,



Christopher S. Murphy
United States Senator



Richard Blumenthal
United States Senator



Joe Courtney
Member of Congress



Jim Himes
Member of Congress



Jahana Hayes
Member of Congress



Rosa L. DeLauro
Member of Congress



John B. Larson
Member of Congress