



*A Passionate Voice for Compassionate Care*

March 2, 2026

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

**RE: Re: ED-2025-OPE-0944 Reimagining and Improving Student Education**

Dear Undersecretary Kent:

The Catholic Health Association of the United States (CHA) appreciates the opportunity to submit comments on the referenced Department of Education proposed rule published in the *Federal Register* on January 30, 2026 (91 FR 4254).

CHA is the national leadership organization of the Catholic health ministry, collectively the largest group of not-for-profit providers of health care services in the nation. CHA represents more than 2,200 Catholic health care sponsors, systems, hospitals, long-term care facilities and related organizations across the continuum of care.

The proposed rule would establish new annual and aggregate loan limits and redefine what are considered to be graduate or professional degree programs. The distinction between the two types of programs will determine a student's ability to acquire student loans. Students enrolled in graduate degree programs would be limited to annual loans of \$20,500, with an aggregate cap of \$100,000, while students in professional degree programs would be eligible to borrow up to \$50,000 per year, with a \$200,000 aggregate limit.

Under the proposal, only programs in these 11 fields would be considered professional degree programs: chiropractic, clinical psychology, dentistry, law, medicine, optometry, osteopathic medicine, pharmacy, podiatry, theology and veterinary medicine. While we very much appreciate the ability of students in these programs to access higher loan amounts, we are also very concerned about the exclusion of other essential post-baccalaureate health professions, such as nursing, social work, physician assistant, physical therapy and occupational therapy, which can also require advanced education, clinical training and licensure to practice. They are considered professional because they are structured around competencies defined by the profession; integrate supervised clinical practice with advanced coursework; operate under accreditation standards set by external professional bodies; and are designed to meet state licensure requirements.

The cost of attending post-baccalaureate programs in the excluded health care professions can be significant, exceeding the \$20,500 annual graduate loan cap due to the rigorous academic and training requirements students must meet. According to the American Academy of Physician Associates in its comment letter, the median PA program tuition for state residents is \$96,900 and for non-state residents the median tuition is \$101,229. These amounts are for tuition only and do not include the full cost of attendance. The National Center for Education Statistics reports that the average cost of attendance for nurses and social workers pursuing graduate degrees is more than \$30,000 per year. For physical therapists, the average total cost of attendance is between \$108,212 and \$126,034 before living expenses, fees and other costs, according to the American Physical Therapy Association.

Our nation is already facing a significant health care workforce shortage, especially in primary care and in rural areas. Data from December 2025 found that approximately 92 million Americans are living in Health Professional Shortage Areas, with rural areas disproportionately affected.<sup>1</sup> According to the U.S. Bureau of Labor Statistics (BLS), demand for advanced practice registered nurses (APRNs) is projected to grow by 38% between 2022 and 2032, requiring approximately 29,200 new APRNs each year to meet rising patient needs. The BLS also projects a 15% increase in demand for speech-language pathologists and a 14% increase for occupational therapists.<sup>2</sup>

Eliminating the ability of students in these fields to access federal loans needed to complete post-baccalaureate education is going to have the effect of reducing the supply of highly trained and badly needed health care professionals. Rural areas can be especially dependent upon APRNs - for example, certified registered nurse anesthetists (CRNAs) represent more than 80% of the anesthesia providers in rural U.S. counties.<sup>3</sup> Fewer students graduating from these programs would mean fewer clinicians, limiting hospitals' ability to staff care teams and increasing patient wait times and reliance on emergency care.

Excluding post-baccalaureate nursing programs from the professional degree category eligible for higher loan amounts would have ripple effects for nurse faculty, nurse leaders, researchers, scientists and other frontline providers. Nursing school faculty require advanced degrees. Constricting the supply of nurse faculty would mean cuts in enrollment and narrow the supply of

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<sup>1</sup> Bureau of Health Workforce, Health Resources and Services Administration, U.S. Department of Health & Human Services. "Designated Health Professional Shortage Areas Statistics, First Quarter of Fiscal Year 2026 Designated HPSA Quarterly Summary." <https://data.hrsa.gov/generatehpsaquarterlyreport>.

<sup>2</sup> U.S. Bureau of Labor Statistics. "Speech-Language Pathologists." Occupational Outlook Handbook, U.S. Department of Labor, <https://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm>; U.S. Bureau of Labor Statistics. "Occupational Therapists." Occupational Outlook Handbook, U.S. Department of Labor, <https://www.bls.gov/ooh/healthcare/occupational-therapists.htm>.

<sup>3</sup> American Association of Nurse Anesthesiology. <https://www.aana.com/about-us/about-crnas/#:~:text=CRNAs%20represent%20more%20than%2080,during%20their%20nurse%20anesthesia%20program>

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clinicians who provide primary care, maternal health, behavioral health, rural/safety-net services, and long-term care.

A recent statement from the National Academy of Medicine underscores the importance of post-baccalaureate nurse training for our health care system. “Strong nursing leadership and high levels of nursing education are essential to better patient outcomes, safer care, improved system performance, and lower costs. Support for education and training needs in the nursing profession, including the pursuit of higher degrees, is widely recognized as among the highest priorities for our nation’s health system.”<sup>4</sup>

We urge DOE to reconsider its proposal and to adopt a more inclusive definition of professional degree programs. It clearly has the statutory authority to do so. When it created the two-tiered loan amount structure, Congress deemed a “professional student” to be one enrolled in a program awarding a “professional degree” as defined in the regulations at the time the law was passed. While the referenced regulatory definition gives examples of specific programs, it explicitly states that the examples are not exclusive but merely given to illustrate the fundamental concept that a “professional degree” is one that requires “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,”<sup>5</sup> with licensure often required. This aptly describes the education and skills required for practitioners in the fields of advanced nursing, social work, physician assistant, physical therapy, and occupational therapy.

In closing, thank you for the opportunity to comment on this proposed rule. If you have any questions about these comments or need more information, please do not hesitate to contact Kathy Curran, Senior Director Public Policy, at 202-721-6300.

Sincerely,



Lucas W. Swanepoel, J.D.  
Vice President, Advocacy and Public Policy

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<sup>4</sup> National Academy of Medicine. “Nurses Are Skilled Professionals Essential to the Function of the U.S. Health Care System and Deserving of Professional Degree Recognition,” November 24, 2025. <https://nam.edu/news-and-insights/nurses-professional-degree/>

<sup>5</sup> 34 C.F.R. Section 668.2.