

February 9, 2026

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

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

Re: Notice of Proposed Rulemaking Docket ID ED-2025-OPE-0944; RIN 1840-AD98

Dear Under Secretary Kent and Director Abernathy:

We submit this comment in response to the U.S. Department of Education’s Reimagining and Improving Student Education (RISE) Committee’s ongoing rulemaking to implement student financial aid provisions under Public Law 119–21 and the Office of Postsecondary Education’s Notice of Proposed Rulemaking (NPRM) issued on January 30, 2026. As civil rights, gender justice, and healthcare organizations, we strongly oppose the RISE Committee’s decision to omit many post-baccalaureate degrees from the regulatory definition of “professional degree.” The Department of Education’s decision caps loan limits for certain post-baccalaureate degrees deemed to not fit within the regulatory definition of “professional degree.” The degrees the Department of Education seeks to exclude from the definition of “professional degree” open access to career paths that provide vital services to communities and families and require years of study, training, and certification. By designating these degrees as non-professional, this administration risks putting critical services, like healthcare that supports our seniors and others, education provided to children, and social work that addresses youth in foster, out of reach for many communities and families. Further, by limiting access to critical funding pathways, these changes will have severe consequences for degree access and completion, especially for women and Black students.

On July 4, 2025, President Trump signed the One Big Beautiful Bill Act (“OBBBA”) into law. This legislation included substantial changes to the federal student loan system that will prevent many students from pursuing postsecondary education. This includes new limitations on graduate loans, including the elimination of the Graduate PLUS Loan program and new borrowing limits for borrowers pursuing graduate and professional degrees. While making no new investments in grant aid for graduate students, the OBBBA sets annual and cumulative loan limits of \$20,000 and \$100,000 for graduate degrees, and \$50,000 and \$200,000 for “professional” degrees. Subsequently, on November 6, the Department of Education proposed a new framework to define what qualifies as a professional degree program and to cap loan amounts for students pursuing what the Department considers “non-professional” degrees. This proposed framework will limit access to advanced degrees for nurses, physician assistants, physical therapists, audiologists, architects, accountants, educators, and social workers. The Department has offered only minimal explanation and analysis of the projected impact of the exclusion of these degrees or the inclusion of others. Had the Department engaged in thorough analysis of the impact, it would not be able to persist in implementing these changes, as the available data makes clear that this framework would sharply limit access to available public, federal student loans for all degree programs not designated as “professional,” creating a

devastating impact for students in these advanced degree programs and hitting women and students color particularly hard, as outlined below.

Most of the professional degree programs excluded from the RISE Committee’s definition of “professional” are predominantly held by women. **Overall, women hold 63 percent of the master’s degrees and 57 percent of the doctorate degrees across the impacted professions.** The percentages are even more dramatic when broken down individually, with women holding **over 75 percent** of master’s and doctorate degrees for registered nursing, dental hygiene, occupational therapy, audiology, social work, teaching, and public health.

Select graduate degrees awarded by field of study and gender, 2021-2022								
Degree field	Master's degrees				Doctorate degrees			
	Total	Men	Women	Share Women	Total	Men	Women	Share women
All	880,249	328,894	551,355	63%	203,884	87,772	116,112	57%
Registered nurse	19,912	2,557	17,355	87%	1,105	133	972	88%
Dental hygienist	106	6	100	94%	-	-	-	-
Physical therapy	42	25	17	40%	13,268	5,002	8,266	62%
Occupational therapist	6,893	707	6,186	90%	2,888	236	2,652	92%
Audiologist	101	8	93	92%	622	66	556	89%
Social work	33,194	4,129	29,065	88%	758	155	603	80%
Teacher, elementary to high school	20,030	4,362	15,668	78%	145	35	110	76%
Public health, general	11,597	2,554	9,043	78%	608	183	425	70%
Accounting	15,392	7,088	8,304	54%	45	16	29	64%

Source: NWLC calculations using U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System, Table 318.30: Bachelor's, master's, and doctor's degrees conferred by postsecondary institutions by sex of student and field of study. "Teacher, elementary to high school" degrees are defined as: Elementary education and teaching, Junior high/intermediate/middle school education and teaching, Secondary education and teaching, and Teacher education, multiple levels.

It is evident that women will be significantly harmed by these abrupt changes to program classifications. Women rely on professional and post-baccalaureate programs for career advancement. Reclassifying or leaving these programs in the nonprofessional category threatens their access to stable professions and self-sufficiency. And, although the above data shows that women will be most impacted, cutting funding and stripping these programs of their professional designation will harm all students, regardless of gender, by making education more expensive for everyone. Ultimately, these changes by the Department harm everyone and exacerbate inequitable access to certain professions, as women and students of color will be hit the hardest by the changes to program classifications.<sup>1</sup>

<sup>1</sup> Sandra Perez & Brianna Huynh, *How the Elimination of Grad PLUS Loans and Classification of Professional Degrees Harm Women and Students of Color*, Ed Trust (Dec. 16, 2025), <https://edtrust.org/rti/eliminating-grad-plus-loans-professional-degrees-harms-women-students-of-color/>.

This will also have a disproportionate impact on students of color, especially Black borrowers. While the above National Center for Education Statistics data does not provide disaggregated data by race for the individual fields above, evidence shows that as a result of systemic inequities, Black borrowers in particular must rely on loans more than other groups to pursue both undergraduate and graduate education—with Black women borrowing at the highest rates.<sup>2</sup> Further, because of societal and cultural factors, women and students of color are also more likely to pursue professions that will fall under the lower proposed limits.<sup>3</sup> The Department’s proposal will ensure that fewer women and students of color, and particularly Black women, are able to pursue graduate study in these programs because they will be less able to cover the cost of these degrees. The only option many students will have is taking out private loans, which often have less favorable terms and protections than federal loans, compounding the effects of the gender pay gap and race-based wealth disparities.<sup>4</sup>

Students who hold these degrees go on to become healthcare professionals, educators, and public servants who perform some of the most essential work in our society. Excluding these degrees from the professional definition—and to cap their loans on that basis—disproportionately harms women, Black students, and other people of color. Even as we grapple with the unsustainable cost of graduate education, we must not deny students access to federal support based on an arbitrary distinction that devalues essential women-dominated fields that provide much needed services and expertise to communities and the economy.

We urge you to ensure that women and people of color, the predominant holders of these degrees, are not disproportionately blocked from doing urgently-needed work. If you have questions about this comment please reach out to Ashley Harrington (aharrington@naacpldf.org), Chazz Robinson (crobinson@lawyerscommittee.org), and Shiwali Patel (spatel@nwlc.org).

Thank you,

National Women’s Law Center  
Legal Defense Fund  
Lawyers’ Committee for Civil Rights Under Law

*Joined by:*

AFL-CIO  
AFT: Education, Healthcare, Public Services  
American Association of University Women (AAUW)  
American Atheists  
American Civil Liberties Union  
American-Arab Anti-Discrimination Committee (ADC)

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<sup>2</sup> Lyss Welding, *Examining Student Loan Debt by Race: 2024 Statistics*, Best Colleges (June 14, 2024), <https://www.bestcolleges.com/research/student-loan-debt-by-race/#fn-8>.

<sup>3</sup> Sandra Perez & Brianna Huynh, *supra* note 1.

<sup>4</sup> American Association of University Women, *Deeper in Debt, 2021* (2024), [https://www.aauw.org/app/uploads/2021/05/Deeper\\_In\\_Debt\\_2021.pdf](https://www.aauw.org/app/uploads/2021/05/Deeper_In_Debt_2021.pdf).

Arizona Students' Association  
Center for Law and Social Policy (CLASP)  
Clearinghouse on Women's Issues  
Coalition on Human Needs  
Council of Parent Attorneys and Advocates (COPAA)  
Delta Sigma Theta Sorority, Incorporated  
ED-OCR Alumni Collective  
End Rape On Campus  
Equal Rights Advocates  
Feminist Majority Foundation  
Healthy Teen Network  
Illinois Coalition Against Sexual Assault  
Institute for Women's Policy Research  
International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW)  
Japanese American Citizens League  
Just Solutions  
Labor Council for Latin American Advancement (LCLAA)  
League of United Latin American Citizens (LULAC)  
Legal Momentum, The Women's Legal Defense and Education Fund  
NAACP  
National Action Network  
National Alliance for Partnerships in Equity  
National Association of Social Workers  
National Black Justice Collective Institute  
National Council of Asian Pacific Americans  
National Down Syndrome Congress  
National Education Association  
National Employment Law Project  
National Nurses United  
National Organization for Women  
National Urban League  
National Women's Political Caucus  
Planned Parenthood Federation of America  
PowHer New York  
Protect Borrowers  
Service Employees International Union  
Southwest Women's Law Center  
The Center for Learner Equity  
The Leadership Conference on Civil and Human Rights  
UltraViolet Action  
Women Employed  
Women's Law Project