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# The Department of Education's Proposed Rule to Define "Professional Student": Frequently Asked Questions

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## The Department of Education’s Proposed Rule to Define “Professional Student”: Frequently Asked Questions

Title VIII of P.L. 119-21 (also referred to as the *FY2025 budget reconciliation law*) amended the Higher Education Act of 1965 (HEA) to update several aspects of the William D. Ford Federal Direct Loan (Direct Loan) program, which is the single largest source of federal financial assistance to support students’ postsecondary education pursuits.

Among other changes, P.L. 119-21 eliminates the availability of Direct PLUS Loans to graduate and professional students in future years and specifies one set of annual and aggregate loan limits for graduate students and a separate set of such limits, in higher amounts, for professional students. In general, these changes are applicable to individuals who, as of June 30, 2026, are not enrolled in a program of study for which they received a Direct Loan. Prior to P.L. 119-21, Direct Loan limits generally did not distinguish between graduate students and professional students, with the exception of certain health professions programs (e.g., Doctor of Allopathic Medicine, Doctor of Dentistry) for which the Secretary of Education invoked previous HEA authority to raise limits because such students were “engaged in specialized training requiring exceptionally high costs of education.”

On January 30, 2026, the U.S. Department of Education published a Notice of Proposed Rulemaking with proposed regulatory text to implement the P.L. 119-21 amendments to the Direct Loan program. This proposed regulatory text reflects draft regulatory text on which a negotiated rulemaking committee reached consensus and includes definitions of “graduate student” and “professional student.” Under the proposed rule, “professional student” would be defined as a “student enrolled in a program of study that awards a professional degree,” and “graduate student” would be defined as a “student enrolled in a program of study that is above the baccalaureate level and awards a graduate credential (other than a professional degree).” “Professional degree” would be defined as one that

- “signifies completion of the academic requirements for beginning practice” in a particular profession and “a level of professional skill beyond that normally required for a bachelor’s degree”;
- is “generally at the doctoral level ... requires at least six academic years of postsecondary education coursework for completion,” at least two years of which must be postbaccalaureate level coursework;
- “generally requires professional licensure to begin practice”; and
- includes a four-digit program Classification of Instructional Programs (CIP) Code (as assigned by the institution of higher education or determined by the Secretary of Education) in the same “intermediate group” as 11 fields identified in regulation.

The 11 fields in which a professional degree could be awarded, under the consensus definition, are (1) Pharmacy (Pharm.D.), (2) Dentistry (D.D.S. or D.M.D.), (3) Veterinary Medicine (D.V.M.), (4) Chiropractic (D.C. or D.C.M.), (5) Law (L.L.B. or J.D.), (6) Medicine (M.D.), (7) Optometry (O.D.), (8) Osteopathic Medicine (D.O.), (9) Podiatry (D.P.M., D.P., or Pod.D.), (10) Theology (M.Div., or M.H.L.), and (11) Clinical Psychology (Psy.D. or Ph.D.). Based on these definitions, numerous programs of study covering a range of fields would be excluded from the definition of “professional degree.” These include, for example, programs of study for architecture, engineering, business, rehabilitation and therapeutic professions (e.g., occupational therapy and physical therapy), and nursing. Thus, students enrolled in such programs would be considered graduate students for purposes of Direct Loan borrowing limits and would therefore have lower borrowing limits compared to individuals who are considered professional students.

Members of the public may comment on the proposed rule on or before March 2, 2026.

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## Introduction

Title VIII of P.L. 119-21 (H.R. 1 in the 119<sup>th</sup> Congress, also referred to as the *FY2025 budget reconciliation law*) amended the Higher Education Act of 1965 (HEA) to update several aspects of the William D. Ford Federal Direct Loan (Direct Loan) program, which is the single largest source of federal financial assistance to support students' postsecondary education pursuits.<sup>1</sup> In FY2024, the U.S. Department of Education (ED), which administers the Direct Loan program, disbursed about \$86 billion in Direct Loans to more than 6.7 million recipients.<sup>2</sup>

Among other changes, P.L. 119-21 eliminated the availability of Direct PLUS Loans to graduate and professional students in future years and updated annual and aggregate loan limits to those students. In doing so, P.L. 119-21 specifies one set of annual and aggregate loan limits for graduate students and a separate set of such limits, in higher amounts, for professional students.<sup>3</sup>

On January 30, 2026, ED published a Notice of Proposed Rulemaking (NPRM) with proposed regulatory text to implement the P.L. 119-21 amendments to the Direct Loan program. This proposed regulatory text largely reflects draft regulatory text on which a negotiated rulemaking committee reached consensus and includes definitions of "graduate student" and "professional student."<sup>4</sup> The proposed definition of "professional student" has been the subject of some controversy. Proponents of the definition argue that it will help limit federal spending on loans to graduate students and potentially cause institutions of higher education (IHEs) to decrease tuition rates for some programs.<sup>5</sup> Opponents argue it may cause students not considered professional students (and therefore subject to the lower graduate student loan limits) to turn to other sources of financing for their postsecondary education such as private education loans, which often do not have the same benefits as Direct Loans (e.g., forgiveness options), or to forgo pursuing advanced degrees altogether.<sup>6</sup>

This report addresses several frequently asked questions regarding the consensus definition of "professional student."

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<sup>1</sup> For detailed information on Direct Loan terms and conditions in effect before enactment of P.L. 119-21, see CRS Report R45931, *Federal Student Loans Made Through the William D. Ford Federal Direct Loan Program: Terms and Conditions for Borrowers*.

<sup>2</sup> ED, *Federal Student Aid Fiscal Year 2024 Annual Report*, November 14, 2024, p. 17, <https://studentaid.gov/sites/default/files/fy2024-fsa-annual-report.pdf>.

<sup>3</sup> For a description of amendments made to the HEA by P.L. 119-21, see CRS Report R48727, *Amendments to the Higher Education Act Made by P.L. 119-21, the FY2025 Budget Reconciliation Law*.

<sup>4</sup> ED, "Reimagining and Improving Student Education," 91 *Federal Register* 4332, January 30, 2026 (hereinafter, RISE NPRM"). HEA Section 492 generally requires ED to use a negotiated rulemaking (commonly referred to as *neg reg*) process to develop proposed regulations pertaining to HEA Title IV. In *neg reg*, an agency convenes a committee of stakeholders with the goal of reaching a consensus outcome on the text of a proposed rule. When negotiations are completed, ED then drafts the text of an NPRM, including any consensus language agreed upon by the *neg reg* committee, and publishes the NPRM in the *Federal Register*. In the current case, a *neg reg* committee reached consensus on all potential draft regulatory language on which they were negotiating, including on the definitions of "graduate student" and "professional student." For additional information on the HEA Title IV *neg reg* process, see CRS Infographic IG10080, *The Rulemaking Process for the Higher Education Act's Title IV Regulations*.

<sup>5</sup> See, for example, ED, "Myth vs. Fact: The Definition of Professional Degrees," press release, November 24, 2025, <https://www.ed.gov/about/news/press-release/myth-vs-fact-definition-of-professional-degrees>.

<sup>6</sup> See, for example, Jessica Blake, "What to Know About Trump's Definition of Professional Degrees," *Inside Higher Ed*, November 26, 2025, <https://www.insidehighered.com/news/government/student-aid-policy/2025/11/26/what-know-about-definition-professional-degree>.

## Background on Direct Loan Types and Limits to Graduate and Professional Students

The HEA authorizes a set of Direct Loans to undergraduate students, a set of Direct Loans to graduate and professional students, and a single Direct Loan type to parents of dependent undergraduate students.<sup>7</sup> The maximum amount of Direct Loans an individual may borrow is subject to annual and aggregate borrowing limits. Annual limits cap the amount an individual may borrow in Direct Loans during a single academic year and vary by loan type, borrower characteristics (e.g., dependency status), program level (e.g., undergraduate), and undergraduate class level. Aggregate limits cap the cumulative amount of outstanding Direct Loan and Federal Family Education Loan program loan principal a student may owe in non-PLUS Loans at any one time.

Amendments made by P.L. 119-21 to the types and amounts of Direct Loan program loans individuals may borrow focus primarily on loans to graduate and professional students.

### What types of Direct Loans currently are available to graduate and professional students and what are the current borrowing limits?

Currently, all qualifying graduate and professional students are eligible to borrow Direct Unsubsidized Loans and Direct PLUS Loans (Grad PLUS Loans) to finance their postsecondary education.

Under existing policy, the HEA authorizes specific annual and aggregate loan limits for Direct Unsubsidized Loans generally applicable to all qualifying graduate and professional students and generally regardless of field of study (e.g., medicine, engineering, business) or credential level (e.g., master's degree, doctoral degree).<sup>8</sup> However, it also authorizes the Secretary of Education (the Secretary) to set higher annual and aggregate loan limits for graduate or professional students "engaged in specialized training requiring exceptionally high costs of education."<sup>9</sup> Since 1996, the Secretary has authorized higher loan limits under this authority for students enrolled in "certain approved health professions disciplines."<sup>10</sup> Thus, students enrolled in the following health professions programs are eligible for higher Direct Unsubsidized limits: Doctor of Allopathic Medicine, Doctor of Osteopathic Medicine, Doctor of Dentistry, Doctor of Veterinary Medicine, Doctor of Optometry, Doctor of Podiatric Medicine, Doctor of Naturopathic Medicine, Doctor of Naturopathy, Doctor of Pharmacy, Graduate program in Public Health, Doctor of Chiropractic, Doctoral Degree in Clinical Psychology, and Masters or Doctoral Degree in Health Administration.<sup>11</sup>

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<sup>7</sup> Additionally, individuals may also borrow Consolidation Loans, which allow them to combine debt from existing qualifying federal student loans into a single, new Direct Loan.

<sup>8</sup> Direct Subsidized Loans were available to graduate and professional students for periods of instruction beginning prior to July 1, 2012. The Budget Control Act of 2011 (P.L. 112-25) eliminated the availability of Direct Subsidized Loans to graduate and professional students for periods of instruction beginning on or after July 1, 2012. Amounts of Direct Subsidized Loans borrowed by graduate or professional students prior to July 1, 2012, are included in the aggregate limits for Direct Unsubsidized discussed here.

<sup>9</sup> HEA §428H(d)(2).

<sup>10</sup> ED, Dear Colleague Letter GEN-08-04. See also ED, Dear Colleague Letters, GEN-96-14, GEN-97-14, 98-L-209, and GEN-05-09.

<sup>11</sup> ED, *2025-2026 Federal Student Aid Handbook*, vol. 8, pp. 38-39.

The HEA does not delineate specific dollar amounts for annual and aggregate limits for Grad PLUS Loans (nor for Direct PLUS Loans to parents of dependent undergraduate students). Rather, it specifies that annual Grad PLUS Loan limits equal a borrower’s cost of attendance (COA) minus their expected financial aid (EFA).<sup>12</sup> The HEA does not specify any aggregate loan limits for Grad PLUS Loans.<sup>13</sup>

**Table 1** shows the annual and aggregate limits that currently apply to Direct Unsubsidized Loans and Direct PLUS Loans to graduate and professional students.

**Table 1. Current Annual and Aggregate Direct Loan Limits for Graduate and Professional Students**

by borrower and program type

Borrower and Program Type	Direct Unsubsidized Loans		Direct PLUS Loans	
	Annual Limit	Aggregate Limit <sup>a</sup>	Annual Limit	Aggregate Limit
Graduate and professional students, in general	\$20,500	\$138,500	Up to COA minus EFA	Not limited
Doctor of Allopathic Medicine				
Doctor of Osteopathic Medicine				
Doctor of Dentistry				
Doctor of Veterinary Medicine	\$40,500 to \$47,167 <sup>b</sup>	\$224,000	Up to COA minus EFA	Not limited
Doctor of Optometry				
Doctor of Podiatric Medicine				
Doctor of Naturopathic Medicine				
Doctor of Naturopathy				
Doctor of Pharmacy				
Graduate in Public Health				
Doctor of Chiropractic	\$33,000 to \$37,167 <sup>c</sup>	\$224,000	Up to COA minus EFA	Not limited
Doctoral Degree in Clinical Psychology				
Masters in Health Administration				
Doctoral Degree in Health Administration				

**Source:** HEA §§428, 428H, 451, and 455; 34 C.F.R. §685.203; and ED, Dear Colleague Letters GEN-05-09, GEN-08-04, and GEN-08-08.

**Notes:** COA: cost of attendance. EFA: estimated financial assistance (i.e., the amount of aid anticipated to be available to a student from all sources for a period of enrollment).

- a. Includes (1) Direct Unsubsidized Loans made to graduate and professional students prior to July 1, 2012; (2) amounts of Direct Subsidized and Unsubsidized Loans borrowed for undergraduate study; and (3)

<sup>12</sup> EFA is the amount of aid anticipated to be available to a student from all sources for a period of enrollment.

<sup>13</sup> HEA §428B(b).

- Subsidized Stafford Loans and Unsubsidized Stafford Loans borrowed through the Federal Family Education Loan program.
- b. Students enrolled in applicable programs are eligible to borrow up to \$40,500 annually for programs with a 9-month academic year and up to \$47,167 for programs with a 12-month academic year. Amounts are prorated for 10- and 11-month programs.
  - c. Students enrolled in applicable programs are eligible to borrow \$33,000 annually for programs with a 9-month academic year and \$37,167 for programs with a 12-month academic year. Amounts are prorated for 10- and 11-month programs.

## What changes did P.L. 119-21 make to the types and loan limits of Direct Loans available to graduate and professional students?

P.L. 119-21 updates the mix and availability of Direct Loans for periods of instruction beginning on or after July 1, 2026, for all graduate and professional students who, as of June 30, 2026, either (1) are not enrolled in a program of study or (2) are enrolled in a program of study for which they did not borrow a Direct Loan.<sup>14</sup> Specifically, for these individuals, P.L. 119-21 eliminates the availability of Grad PLUS Loans. Thus, the ability of these individuals to borrow Grad PLUS Loans in potentially unlimited aggregate amounts is also eliminated. Also, for these individuals, P.L. 119-21 sets differing annual and aggregate loan limits for graduate students and for professional students.<sup>15</sup> **Table 2** shows the annual and aggregate Direct Loan limits that generally are to apply to graduate and professional students for periods of instruction beginning on or after July 1, 2026, with some exceptions identified in the table notes.<sup>16</sup>

**Table 2. Annual and Aggregate Direct Loan Limits for Graduate and Professional Students As Amended by P.L. 119-21**

(by borrower type)

Borrower Type	Direct Unsubsidized Loans		Direct PLUS Loans	
	Annual Limit	Aggregate Limit	Annual Limit	Aggregate Limit
Graduate Students	\$20,500	\$100,000, <sup>a</sup> or \$200,000 minus amounts borrowed as a professional student <sup>b</sup>	Loan type eliminated	
Professional Students	\$50,000	\$200,000, <sup>c</sup> or \$200,000 minus amounts borrowed as a graduate student <sup>d</sup>	Loan type eliminated	

<sup>14</sup> P.L. 119-21's updates to the mix and availability of Direct Loans do not apply to individuals who, as of June 30, 2026, are enrolled in a program of study and have received a Direct Loan for that program. For such individuals, the previously described loan types and limits apply for their "expected time to credential," which is defined as the lesser of three academic years or the remaining time to completion of their program of study. HEA §455(a)(8).

<sup>15</sup> Information published by the Senate Committee on Health, Education, Labor, and Pensions upon passage of P.L. 119-21 indicates that the bill "caps graduate loans at reasonable levels to lower tuition prices and protect students from drowning in debt" while increasing annual limits on Direct Unsubsidized Loans "for professional students (such as doctors)." U.S. Congress, Senate Committee on Health, Education, Labor and Pensions, "President Trump, Republicans Deliver Historic Wins in One Big Beautiful Bill, Reforming America's Broken Higher Education System," press release, August 1, 2025, <https://www.help.senate.gov/rep/newsroom/press/president-trump-republicans-deliver-historic-wins-in-one-big-beautiful-bill-reforming-americas-broken-higher-education-system>.

<sup>16</sup> P.L. 119-21 also instituted lifetime maximum aggregated limits for most student loan borrowers and on the amount that may be borrowed on behalf of a dependent undergraduate student by their parents. Lifetime maximum aggregate limits cap the total amount of loans an individual may ever borrow, regardless of whether their principal balance is paid down, discharged, or forgiven. In general, these changes are applicable to individuals who, as of June 30, 2026, are not enrolled in a program of study for which they received (or on whose behalf their parents borrowed) a Direct Loan.

**Source:** HEA §455(a)(3) and (4).

**Notes:** Amended limits do not apply to individuals who, as of June 30, 2026, are enrolled in a program of study and have received a Direct Loan for that program for the lesser of three academic years or the remaining time to completion of their program of study.

- a. Applies to a graduate student who is not (and has not been) a professional student.
- b. Applies to a graduate student who is (or has been) a professional student.
- c. Applies to a professional student who is not (or has not been) a graduate student.
- d. Applies to a professional student who is (or has been) a graduate student.

Generally, annual limits on Direct Unsubsidized Loans are to remain the same (\$20,500) for graduate students and are to increase (to \$50,000) for professional students, as compared to limits that are currently in effect.

Whether aggregate limits on Unsubsidized Loans for graduate or professional students effectively increase or decrease will depend on an individual borrower's circumstances, as currently effective aggregate limits take into account amounts borrowed for undergraduate education, and P.L. 119-21's new aggregate limits do not. For example, under the pre-P.L. 119-21 aggregate loan limits, an individual who borrowed \$57,500 as an independent undergraduate student and enrolled in a graduate program of study for which the applicable aggregate limit was \$138,500 could borrow up to \$81,000 (\$138,500-\$57,500) in Unsubsidized Loans for their graduate education. However, if the same individual had instead borrowed \$31,000 as an undergraduate student, under the pre-P.L. 119-21 limits they could borrow up to \$107,500 (\$138,500-\$31,000) for their graduate education. Under P.L. 119-21, because graduate and professional student borrower limits will not take into account amounts borrowed for undergraduate education, the individual in both scenarios could borrow up to \$100,000 for their graduate education, equating to a \$19,000 increase in aggregate limits compared to the former scenario and a \$7,500 decrease compared to the latter.

P.L. 119-21 Section 81001 defines "professional student" as "a student enrolled in a program of study that awards a professional degree [as defined in 34 C.F.R. §668.2 and in effect on the date of enactment]<sup>17</sup> upon completion of the program." 34 C.F.R. §668.2 defines "professional degree" as "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."

34 C.F.R. §668.2 then gives a nonexhaustive list of 10 types of professional degrees: "Examples of a professional degree include but are not limited to Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry (D.P.M., D.P., or Pod.D.), and Theology (M.Div., or M.H.L.)."

P.L. 119-21 defines a "graduate student" as "a student enrolled in a program of study that awards a graduate credential (other than a professional degree) upon completion of the program."

P.L. 119-21 did not directly amend the HEA sections that authorize the Secretary to set higher annual and aggregate loan limits for graduate or professional students "engaged in specialized training requiring exceptionally high costs of education."<sup>18</sup> However, based on the other loan limit amendments made by P.L. 119-21, it appears that the Secretary's authority to set higher loan

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<sup>17</sup> The current definition of "professional degree" was added to 34 C.F.R. §668.2 in 2007 to "harmonize and consolidate ... definitions for 'graduate or professional student'" found elsewhere in HEA Title IV regulations. ED, "Federal Student Aid Programs," 72 *Federal Register* 62014, November 1, 2007.

<sup>18</sup> HEA §428H(d)(2).

limits generally may not apply to Direct Loans for periods of instruction beginning on or after July 1, 2026.<sup>19</sup>

## **Were distinctions in loan limits made between graduate and professional students prior to enactment of P.L. 119-21?**

In general, no. HEA provisions that authorized Direct Unsubsidized Loans and Direct PLUS Loans to graduate and professional students and their loan limits used such terms as “graduate student” and “professional student” but did not specify distinct limits for each group. For example, the HEA states that “in the case of such a student who is a graduate or professional student” the annual Direct Unsubsidized Loan limit will be \$20,500.<sup>20</sup> Thus, the annual and aggregate loan limits for Direct Unsubsidized Loans and Grad PLUS Loans were generally applicable to all qualifying graduate and professional students regardless of field of study or credential level. However, as previously discussed, the Secretary has used HEA authority to extend higher loan limits to individuals in certain postbaccalaureate programs of study with exceptionally high costs, at both the doctoral and master’s degree levels.

## **ED Rulemaking to Implement P.L. 119-21’s Amendments to Loan Limits**

### **How would the proposed rule define “graduate student” and “professional student” for purposes of the new loan limits?**

The proposed rule would define “graduate student” as a “student enrolled in a program of study that is above the baccalaureate level and awards a graduate credential (other than a professional degree) upon completion of the program.”<sup>21</sup> It would define a “professional student” as a “student enrolled in a program of study that awards a professional degree upon completion of the program.”<sup>22</sup>

Integral to both of these definitions is the definition of “professional degree.” The proposed definition of this term would define it as a degree that

- “signifies completion of the academic requirements for beginning practice” in a particular profession and “a level of professional skill beyond that normally required for a bachelor’s degree”;
- is “generally at the doctoral level and ... requires at least six academic years of postsecondary education coursework for completion,” at least two years of which must be postbaccalaureate level coursework;
- “generally requires professional licensure to begin practice”; and

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<sup>19</sup> In the NPRM, ED stated that the higher loan limits currently available to certain approved health professions programs under the HEA Section 428(d)(2) authority would not apply to Direct Unsubsidized Loans made to graduate and professional students on or after July 1, 2026. This limitation would not apply to borrowers who, as of June 30, 2026, are enrolled in a program of study and have received a Direct Loan for that program. For such individuals, the previously described loan types and limits apply for their “expected time to credential” (RISE NPRM, p. 4277).

<sup>20</sup> HEA §§428(b)(1)(A)(v), 428H(d)(2)(A), and 455(a)(3).

<sup>21</sup> RISE NPRM, p. 4332.

<sup>22</sup> RISE NPRM, p. 4332.

- includes a four-digit program Classification of Instructional Programs (CIP) Code (as assigned by the IHE or determined by the Secretary) in the same “intermediate group” as 11 fields identified in regulation.<sup>23</sup>

The 11 fields in which a professional degree may be awarded, as contained in the consensus definition, are (1) Pharmacy (Pharm.D.), (2) Dentistry (D.D.S. or D.M.D.), (3) Veterinary Medicine (D.V.M.), (4) Chiropractic (D.C. or D.C.M.), (5) Law (L.L.B. or J.D.), (6) Medicine (M.D.), (7) Optometry (O.D.), (8) Osteopathic Medicine (D.O.), (9) Podiatry (D.P.M., D.P., or Pod.D.), (10) Theology (M.Div., or M.H.L.), and (11) Clinical Psychology (Psy.D. or Ph.D.).<sup>24</sup> These 11 fields include those that align with the nonexhaustive list of professional degrees in 34 C.F.R. §668.2, and also specify Clinical Psychology (Psy.D. or Ph.D.).

## What is a CIP Code?

The CIP is a “taxonomic coding scheme of instructional programs” that was originally developed in 1980 by ED’s National Center for Education Statistics (NCES).<sup>25</sup> Its purpose is to “facilitate the organization, collection, and reporting of fields of study and program completions.”<sup>26</sup> Per NCES, the CIP is “the accepted federal government standard on instructional program classifications and is used in a variety of education information surveys and databases” such as the Integrated Postsecondary Education Data System (IPEDS) and is the standard on instructional programs used by other federal agencies, such as the U.S. Department of Labor’s Bureau of Labor Statistics.<sup>27</sup> Generally, CIP Codes do not correspond to a specific credential or program level (e.g., bachelor’s degree, postbaccalaureate certificate). Though, in some cases, degrees have been specified in illustrative examples for certain CIP codes for which federal agencies needed to obtain data on the number of degrees awarded in a particular field of study.<sup>28</sup> About 2,800 unique fields of study are represented by individual CIP Codes.

The CIP is organized at three levels:

- a two-digit series that is the most general group of related instructional programs and that groups a large number of related programs,
- a four-digit series situated within each two-digit series that represents the “intermediate” grouping of instructional programs that have similar content and objectives, and
- a six-digit series that represents specific instructional programs and is the most detailed program classification in the CIP.<sup>29</sup>

For example, 51 is the two-digit CIP Code for “Health Professions and Related Programs”; 51.20 is the four-digit CIP Code for “Pharmacy, Pharmaceutical Sciences, and Administration”; and 51.2002 is the six-digit CIP Code for “Pharmacy Administration and Pharmacy Policy and

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<sup>23</sup> RISE NPRM, p. 4332.

<sup>24</sup> RISE NPRM, p. 4332.

<sup>25</sup> ED, NCES, “Introduction to the Classification of Instructional Programs: 2020 Edition, (CIP-2020),” p. 1, [https://nces.ed.gov/ipeds/cipcode/Files/2020\\_CIP\\_Introduction.pdf](https://nces.ed.gov/ipeds/cipcode/Files/2020_CIP_Introduction.pdf) (hereinafter “ED, “Introduction to the CIP”).

<sup>26</sup> ED, “Introduction to the CIP,” p. 1.

<sup>27</sup> ED, “Introduction to the CIP,” p. 1.

<sup>28</sup> For instance, CIP Code 51.1201, Medicine, lists “Medicine (MD)” as an illustrative example. ED, NCES, “FAQs: 6. Do degree levels apply to CIP codes?” <https://nces.ed.gov/ipeds/cipcode/FAQ.aspx?y=56>, accessed February 2, 2026.

<sup>29</sup> ED, “Introduction to the CIP,” p. 2.

Regulatory Affairs.”<sup>30</sup> An IHE could offer a program of study in pharmacy administration and pharmacy policy and regulatory affairs at any credential level (e.g., bachelor’s, master’s, doctoral).

### What CIP Codes apply to the 11 fields in which a professional degree may be awarded under the proposed definition?

**Table 3** shows a crosswalk of the 11 fields of study in which a professional degree may be awarded and the applicable four-digit (i.e., the intermediate group) CIP Code. These four-digit CIP Codes cover 38 unique programs of study (i.e., 38 six-digit CIP Codes).<sup>31</sup>

**Table 3. Proposed Definition Fields of Study in Which a Professional Degree May Be Awarded and Applicable Four Digit-CIP Codes**

Proposed Definition Field of Study in Which a Professional Degree May Be Awarded	Four-Digit CIP Code
Pharmacy (Pharm.D.)	Pharmacy and Pharmaceutical Sciences (51.20)
Dentistry (D.D.S. or D.M.D.)	Dentistry (51.04)
Veterinary Medicine (D.V.M.)	Veterinary Medicine (01.80)
Chiropractic (D.C. or D.C.M.)	Chiropractic (51.01)
Law (L.L.B. or J.D.)	Law (22.01)
Medicine (M.D.)	Medicine (51.12)
Optometry (O.D.)	Optometry (51.17)
Osteopathic Medicine (D.O.)	Medicine (51.12)
Podiatry (D.P.M., D.P., or Pod.D.)	Medicine (51.12)
Theology (M.Div., or M.H.L.)	Theological and Ministerial Studies (39.06)
Clinical Psychology (Psy.D. or Ph.D.)	Clinical, Counseling, and Applied Psychology (42.28)

**Source:** ED, “Reimagining and Improving Student Education,” 91 *Federal Register* 4332, January 30, 2026, pp. 4315-4316, Tables 5.2 and 5.3.

### What types of programs of study would be excluded from the definition of “professional degree” under the proposed definition?

Under the proposed definition, a professional degree could be awarded in 38 unique programs of study. All programs of study that do not include one of the four-digit CIP Codes listed in **Table 3** would be excluded. Programs of study that would be excluded from the definition of “professional degree” cover a range of fields. They include, for example, all programs of study under the two-digit CIP Codes for architecture and related services; engineering; and business, management, marketing, and related support services. Excluded fields of study also include, for instance, all programs of study under the four-digit CIP Codes for rehabilitation and therapeutic professions (e.g., occupational therapy, physical therapy) and registered nursing, nursing administration, nursing research, and clinical nursing.

<sup>30</sup> For additional information on the CIP, including a listing of all CIP Codes, see ED, NCES, “The Classification of Instructional Programs,” <https://nces.ed.gov/ipeds/cipcode/default.aspx?y=56>.

<sup>31</sup> RISE NPRM, p. 4316.

## How have terms such as “graduate student,” “professional student,” and “professional degree” historically been defined and used by ED?

As mentioned previously, prior to enactment of P.L. 119-21, distinctions between graduate and professional students were typically not made for the purposes of student loan limits. Nonetheless, those and similar terms have been used by ED in other contexts. When describing graduate or professional degrees, many of these terms have been defined somewhat similarly and examples or lists of the fields in which a credential may be offered have often been provided. Such lists generally contain references to certain health fields (e.g., medicine, osteopathy) and law, and are often similar.

P.L. 119-21 incorporated the definition of “professional degree” found in 34 C.F.R. §668.2, which applies generally to all HEA Title IV programs (e.g., Direct Loans, Pell Grants). That definition is used, for example, to describe appeals available to IHEs at risk of losing HEA Title IV eligibility due to high cohort default rates.<sup>32</sup> The definition of “professional degree” in 34 C.F.R. §668.2 was based “on the long-standing definition of *first-professional degree*” used by NCES.<sup>33</sup>

IHEs that participate in the HEA Title IV programs are required to report to NCES’s IPEDS a variety of data on educational offerings, enrollments, and other institutional information.<sup>34</sup> IPEDS “provides basic data needed to describe—and analyze trends in—postsecondary education in the United States.”<sup>35</sup> Prior to the 2010-2011 IPEDS data collection, IHEs were required to report data on enrollment and degrees for students in “first-professional” fields. Since the 1950s and until the 2010-2011 IPEDS data collection, the degree classification for “first-professional degree” was “unchanged in both definition and in the list of included degree programs.”<sup>36</sup> “First-professional degree” was defined as an award that required completion of a program that met specific criteria (e.g., completion of academic requirements to begin practice in the profession). The definition also specified 10 fields in which first-professional degrees could be awarded: (1) Chiropractic (D.C. or D.C.M.), (2) Dentistry (D.D.S. or D.M.D.), (3) Law (L.L.B., J.D.), (4) Medicine (M.D.), (5) Optometry (O.D.), (6) Osteopathic Medicine (D.O.), (7) Pharmacy (Pharm.D.), (8) Podiatry (D.P.M., D.P., or Pod.D.), (9) Theology (M.Div., M.H.L., B.D., or Ordination), and (10) Veterinary Medicine (D.V.M.).<sup>37</sup>

Beginning with the 2010-2011 IPEDS data collection, the use of the term “first-professional degree” was discontinued. Today, degrees in the 10 fields previously included in the definition of “first-professional degree” are categorized as “doctor’s degree—research/scholarship,” “doctor’s degree—professional practice,” and “doctor’s degree—other,” as applicable. “Doctor’s degree—professional practice” is defined in a manner similar to “first-professional degree.”<sup>38</sup> The IPEDS

<sup>32</sup> An IHE may appeal a notice of loss of Title IV eligibility if it has a high number of low-income students and offers “an associate, baccalaureate, graduate or professional degree.” 34 C.F.R. §668.194(a). For information on cohort default rates, see CRS Report R47874, *Cohort Default Rates and HEA Title IV Eligibility: Background and Analysis*.

<sup>33</sup> RISE NPRM, p. 4262.

<sup>34</sup> HEA §487(a)(17).

<sup>35</sup> NCES, “About IPEDS,” <https://nces.ed.gov/ipeds/about-ipeds> (accessed February 2, 2026).

<sup>36</sup> IPEDS Technical Review Panel #7, “Report and Suggestions from IPEDS Technical Review Panel #7: First-Professional Degree Classification,” May 2004, [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/trp\\_Technical\\_Review\\_04052004\\_26.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/trp_Technical_Review_04052004_26.pdf).

<sup>37</sup> NCES, IPEDS Data Collection System, Glossary, “First-professional degree.”

<sup>38</sup> At the same time, NCES updated the definition of “master’s degree” to include Theology (M.Div., M.H.L./Rav), (continued...)

glossary states the following about Doctor's-degree professional practice programs: "Some of these degrees were formerly classified as first-professional and may include: Chiropractic (D.C. or D.C.M.); Dentistry (D.D.S. or D.M.D.); Law (J.D.); Medicine (M.D.); Optometry (O.D.); Osteopathic Medicine (D.O); Pharmacy (Pharm.D.); Podiatry (D.P.M., Pod.D., D.P.); or, Veterinary Medicine (D.V.M.), and others, as designated by the awarding institution."<sup>39</sup>

As a final example, ED regulations also contain the term "qualifying graduate program," which is used by ED to identify programs of study for which it will use a longer cohort period when calculating debt-to-earnings rates and earnings premium measures (GE measures) under its 2023 gainful employment regulations.<sup>40</sup> For qualifying graduate programs, ED measures graduates' earnings six years after their graduation, rather than three years after (which applies to all other programs), to calculate these metrics. ED's stated rationale for using a longer cohort period for qualifying graduate programs is that graduates of such programs "may have constrained earnings three years after graduation as a result of government imposed postgraduation training requirements" (e.g., medical residencies).<sup>41</sup> In this context, for the first three years for which ED calculates the GE measures, a "qualifying graduate program" is, among other requirements, a "graduate program ... whose students must complete required postgraduation training programs to obtain licensure in one of the following fields: medicine, osteopathy, dentistry, clinical psychology, marriage and family counseling, clinical social work, and clinical counseling."<sup>42</sup> The definition also provides a mechanism for ED to update the list of qualifying graduate programs every three years thereafter by identifying fields that, among other criteria, lead to a "graduate (master's, first-professional, or doctoral) degree" and for which graduates are required to complete a postgraduate training program that, on average, takes three or more years to complete.<sup>43</sup>

## How many students might qualify as a "professional student" under the proposed definition?

The precise number of students who might qualify as a professional student under the proposed definition is unknown. However, for award year 2023-2024, ED estimates that 12.9% of postbaccalaureate student Direct Loan borrowers attended programs that may qualify as professional degree programs under the proposed definition and received \$11.2 billion in Direct Loan program loans for enrollment in those program.<sup>44</sup> Additionally, ED estimates that fewer than 15% of individuals enrolled in those programs received annual loan disbursements exceeding

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which was previously classified as a first-professional degree. NCES, IPEDS Data Collection System, Glossary, "Master's degree."

<sup>39</sup> NCES, IPEDS Data Collection System, Glossary, "Doctor's degree—professional practice."

<sup>40</sup> The HEA requires that most nondegree programs offered by public and private nonprofit IHEs and almost all programs offered by proprietary (for-profit) IHEs and postsecondary vocational institutions, regardless of whether they lead to a degree, prepare students for "gainful employment in a recognized occupation." HEA §§101(b)(1), 102(b)(1)(A)(i), 102(c)(1)(A), and 481(b)(1)(A)(i). Per regulations, ED considers a program to be preparing students for gainful employment if it meets specified debt-to-earnings or earnings premium measures. 34 C.F.R., Part 668, Subpart S.

<sup>41</sup> ED, "Financial Value Transparency and Gainful Employment," 88 *Federal Register* 70040, October 10, 2023.

<sup>42</sup> 34 C.F.R. §668.2(b), "Qualifying graduate program."

<sup>43</sup> 34 C.F.R. §668.2(b), "Qualifying graduate program." ED would use programs' "credential level and CIP codes" to determine the graduate fields that "may contain qualifying graduate programs."

<sup>44</sup> RISE NPRM, pp. 4314-4315. In the same award year, ED disbursed about \$40.3 billion in Direct Unsubsidized and Direct PLUS Loans to graduate and professional students. ED, Office of Federal Student Aid, Data Center, "2023-2024 Award Year Direct Loan Volume by School."

\$50,000 (the new annual Direct Unsubsidized Loan limit for professional students instituted by P.L. 119-21).<sup>45</sup> In award year 2023-2024, it is estimated that 87.4% of postbaccalaureate student Direct Loan borrowers attended programs that may qualify as graduate students under the proposed rule.

### **Would undergraduate students' Direct Loan limits be impacted by the proposed definition of "professional student"?**

No, P.L. 119-21 did not amend Direct Loan limits for undergraduate student borrowers and ED does not propose to do so.

## **Estimates of Student Loan Debt for Programs Proposed to be Included In and Excluded From the Definition of "Professional Degree"**

### **How does *annual* student loan debt borrowed for programs proposed to be included in the definition of "professional degree" compare to that for programs that would be excluded from the definition?**

Information on *annual* amounts of student loans borrowed for postbaccalaureate degree programs by four-digit CIP Code—the CIP Code level at which ED proposes to evaluate whether a program leads to a professional degree—is not publicly available.<sup>46</sup>

### **How does *aggregate* student loan debt borrowed for programs proposed to be included in the definition of "professional degree" compare to that for programs that would be excluded from the definition?**

Information on *aggregate* amounts of Title IV student loans borrowed by program is available for a limited number of institutions in ED's College Scorecard. The College Scorecard is an ED collection of institutional and programmatic level data from several sources including the IPEDS and the National Student Loan Data System (NSLDS).<sup>47</sup> It provides data in a variety of areas, including aggregate student loan debt by field of study, derived from the NSLDS.<sup>48</sup>

Using the College Scorecard, CRS estimated the average aggregate HEA Title IV student loans (student loans) borrowed by individuals who, in award years (AY) 2018-2019 or 2019-2020 (the most recently available data), completed a postbaccalaureate degree in selected fields of study

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<sup>45</sup> RISE NPRM, pp. 4314-4315.

<sup>46</sup> ED published estimates of average annual borrowing for selected programs at the six-digit CIP Code level in the RISE NPRM on pp. 4315-4316.

<sup>47</sup> The NSLDS is ED's central student-level database for tracking Title IV aid, including student loans.

<sup>48</sup> For additional information on the College Scorecard, see ED, "College Scorecard," <https://collegescorecard.ed.gov/>, accessed February 11, 2026.

identified by four-digit CIP Code level.<sup>49</sup> The College Scorecard does not provide aggregate student loan debt data for the more granular six-digit CIP Code. CRS generated separate student loan debt estimates, by each field of study, for the (1) master's degree level and (2) doctoral degree or first-professional degree level.

CRS selected the four-digit CIP Codes that appear to align most closely with the degree programs some stakeholders advocated for inclusion in the definition of "professional degree" but were excluded by ED in its NPRM (see text box below).<sup>50</sup>

#### **Degree Programs Identified in ED's NPRM and Four-Digit CIP Codes**

In its NPRM, ED identified several degree programs that were advocated by stakeholders during the rulemaking process to be considered professional degree programs under the forthcoming rule. To produce estimates of average aggregate student loans borrowed for such programs, CRS selected the four-digit CIP Codes that appear to align most closely with those degree programs. The ED-identified programs (in bold) and corresponding CRS-selected four-digit CIP Codes and labels are as follows:

- **Business (M.B.A.):** 52.02, Business Administration, Management, and Operations
- **Education (M.Ed./Ed.D./Ed.S.):** 13, Education
  - 13.03, Curriculum and Instruction
  - 13.04, Educational Administration and Supervision
  - 13.10, Special Education and Training
  - 13.12, Teacher Education and Professional Development, Specific Levels and Methods
- **Occupational therapy (MSOT/OTD):** 51.23, Rehabilitation and Therapeutic Professions
- **Naturopathic medicine (N.D.):** 51.33, Alternative and Complementary Medicine and Medical Systems
- **Nursing (MSN/DNP):** 51.38, Registered Nursing, Nursing Administration, Nursing Research, and Clinical Nursing
- **Physical therapy (DPT):** 51.23, Rehabilitation and Therapeutic Professions
- **Physician assistant (MPSAS):** 51.09, Allied Health Diagnostic, Intervention, and Treatment Professions
- **Public health (MPH):** 51.22, Public Health
- **Social work (MSW/DSP):** 44.07, Social Work

**Table 4** and **Table 5** below display estimates of average aggregate student loan debt generated from College Scorecard data, though some limitations should be noted. For the majority (72%) of programs (i.e., the precise combination of four-digit CIP Code field of study and degree level), borrower counts and/or amount of student loans borrowed were either missing or suppressed by ED to minimize disclosure of information about any one individual, consistent with College Scorecard privacy standards.<sup>51</sup> As such, these estimates only reflect programs that have available data and sufficiently large student enrollments. Additionally, because data are unavailable for the majority of programs, it is unclear what percentage of all student loan borrowers for a program

<sup>49</sup> HEA Title IV student loans borrowed include Subsidized, Unsubsidized, and Grad PLUS Loans made under the Direct Loan program or the Federal Family Education Loan program. Subsidized Loans were available to postbaccalaureate students prior to July 1, 2012.

<sup>50</sup> RISE NPRM, pp. 4266-4267. Although ED states that pilot training and licensure programs would not satisfy the "professional degree" definition, CRS did not produce estimates on such programs because pilot training programs are those that provide training and certification of airline pilots pursuant to 14 U.S.C. Part 141. Such programs are not, in and of themselves, eligible to participate in the HEA Title IV student aid programs.

<sup>51</sup> See U.S. Department of Education, College Scorecard, *Technical Documentation: College Scorecard Data by Field of Study*, 2025, p. 8, <https://collegescorecard.ed.gov/files/FieldOfStudyDataDocumentation.pdf>. Note that ED does not disclose their precise privacy standards for reporting aggregate measures. Data are missing if a school offered a program of study but data for the program were not presented in the College Scorecard. There could be multiple reasons for a program having missing data (e.g., a program did not have program completers to report in the given timeframe); ED's criteria for determining when data are considered missing, however, are unclear.

type (e.g., doctoral/first professional degree programs in veterinary medicine) are represented by the data presented.

Additionally, these estimates do not necessarily reflect amounts of student loans borrowed for programs that would or would not in practice be considered professional degree programs under ED's proposed rule. This is due to a variety of factors, including that the proposed definition of "professional degree" would require

- that the profession an individual would enter following degree completion generally requires licensure; available data do not reflect whether individual programs lead to such licensure; and
- that the program requires at least six academic years of postsecondary education, at least two of which must be at the postbaccalaureate level; available data do not reflect whether individual programs meet such length requirements.

The estimates in **Table 4** and **Table 5** should not be interpreted to show average aggregate student loan amounts borrowed by individuals in broad professional categories such as lawyers, nurses, or teachers, because for some professions, individuals may have varying levels of educational attainment and those who complete a particular program may obtain employment in other unrelated professions.

**Table 4** presents the average aggregate amounts of student loans borrowed by individuals who completed a doctoral or first professional degree (as identified in the College Scorecard) for those 11 fields of study that ED proposes to include in the definition of "professional degree" and for selected fields of study that ED proposes to exclude from the definition, by four-digit CIP Code. In addition, for education fields data are presented for all programs within the general two-digit CIP Code (13) and for programs in the most commonly completed four-digit CIP Codes (Curriculum and Instruction, 13.03; Educational Administration and Supervision, 13.04; Special Education and Training, 13.10; Teacher Education and Professional Development, Specific Levels and Methods, 13.12).<sup>52</sup>

**Table 5** presents the average aggregate amounts of student loans borrowed by individuals who completed a master's degree in the same fields of study, as ED's proposed definition of "professional degree" would require that a program generally, *but not always*, be at the doctoral level.

Both tables also include the number of borrowers and the number and percentage of programs upon which estimates of average aggregate student loan amounts borrowed are based.

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<sup>52</sup> Identification of the most commonly completed four-digit CIP Codes for education are based on the number of students who completed a master's, doctoral, or first professional degree in AY2023-2024, as reported by institutions of higher education in IPEDS. In total, these four-digit CIP Codes comprised about 63% of all postbaccalaureate degree completions in education.

**Table 4. Estimates of Average Aggregate HEA Title IV Student Loan Borrowing by Individuals Who Completed a Doctoral or First Professional Degree Program in AY2018-2019 or AY2019-2020**

(by field of study)

Field of Study and CIP Code	Average Aggregate Loans Borrowed	Number of Borrowers	Number of Programs <sup>a</sup>	Percentage of Programs <sup>b</sup>
<b>Proposed to be included in the definition of "professional degree"</b>				
Veterinary Medicine 1.80	\$178,661	184	2	3.2%
Law 22.01	\$120,911	39,728	179	57.0%
Theological and Ministerial Studies 39.06	\$61,598	183	10	3.9%
Clinical, Counseling, and Applied Psychology 42.28	\$127,379	2,322	65	16.0%
Chiropractic 51.01	\$196,057	3,274	10	38.5%
Dentistry 51.04	\$260,063	7,863	60	65.9%
Medicine 51.12 <sup>c</sup>	\$183,198	23,298	117	41.3%
Optometry 51.17	\$182,134	1,465	17	54.8%
Pharmacy and Pharmaceutical Sciences 51.20	\$141,497	15,466	88	33.1%
<b>Proposed to be excluded from the definition of "professional degree"</b>				
Education 13	\$80,861	8,267	283	19.1%
Curriculum and Instruction 13.03	\$66,747	710	30	18.9%
Educational Administration and Supervision 13.04	\$67,894	5,015	167	33.6%
Special Education and Training 13.10	— <sup>d</sup>	—	—	—
Teacher Education and Professional Development, Specific Levels and Methods 13.12	\$75,215	245	8	9.1%
Social Work 44.07	\$106,633	364	6	5.4%
Allied Health Diagnostic, Intervention, and Treatment Professions 51.09 <sup>e</sup>	— <sup>f</sup>	—	—	—
Public Health 51.22	\$109,286	519	14	8.2%
Rehabilitation and Therapeutic Professions 51.23 <sup>g</sup>	\$103,805	6,119	79	15.5%
Alternative and Complementary Medicine and Medical Systems 51.33 <sup>h</sup>	\$118,289	1,010	7	12.7%
Registered Nursing, Nursing Administration, Nursing Research, and Clinical Nursing 51.38 <sup>i</sup>	\$77,894	4,043	85	12.2%
Business Administration, Management, and Operations 52.02 <sup>j</sup>	\$105,673	1,789	21	6.9%

**Source:** CRS analysis of U.S. Department of Education, College Scorecard data.

**Notes:** Estimates represent individuals who borrowed HEA Title IV loans and completed the applicable program in AY2018-2019 or AY2019-2020 at a given institution of higher education. HEA Title IV loans include Subsidized, Unsubsidized, and Grad PLUS Loans made under the Direct Loan program or the Federal Family Education Loan program for the program and exclude loans borrowed for undergraduate education.

- a. Represents number of programs for which data were available to calculate the average aggregate student loans borrowed by program completers.
- b. Represents the percentage of all programs at the combination of four-digit CIP Code and degree type for which data were available to calculate the aggregate average student loans borrowed by program completers.
- c. This CIP Code includes allopathic medicine, osteopathic medicine/osteopathy, and podiatric medication/podiatry.
- d. There were 87 doctoral degree programs in Special Education and Training reported in the College Scorecard; however, only one such program had available student loan data. Thus, CRS does not present that data here.
- e. This CIP Code includes the following fields of study, for example: physician associate/assistant, athletic training/trainer, and gene/genetic therapy.
- f. There were 36 doctoral degree programs in Allied Health Diagnostic, Intervention, and Treatment Professions reported in the College Scorecard; however, only one such program had available student loan data. Thus, CRS does not present that data here.
- g. This CIP Code includes the following fields of study, for example: art therapy/therapist, occupational therapy/therapist, physical therapy/therapist, and rehabilitation science.
- h. This CIP Code includes the following fields of study, for example: traditional Chinese medication and Chinese herbology, naturopathic medicine/naturopathy, and homeopathic medicine/homeopathy.
- i. This CIP Code includes the following fields of study, for example: registered nursing/registered nurse, nurse anesthetist, nurse midwife/nursing midwifery, nursing education, and nursing practice.
- j. This CIP Code includes the following fields of study, for example: business administration and management, general; office management and supervision; project management; and organizational leadership.

**Table 4** indicates that, with the exception of dentistry, on average, individuals who borrowed for and completed a doctoral or first professional degree in any of the fields of study proposed by ED for inclusion in the definition of “professional degree” borrowed amounts for their degree below the newly established aggregate loan limit of \$200,000 that generally is to apply to professional students beginning July 1, 2026. The table also shows that, on average, individuals who borrowed for and completed a doctoral or first professional degree in Education or Registered Nursing, Nursing Administration, Nursing Research, and Clinical Nursing borrowed amounts for their degree below the newly established aggregate loan limit of \$100,000 that generally is to apply to graduate students beginning July 1, 2026. On average, individuals who borrowed for and completed a doctoral or first professional degree in the other examined fields of study proposed to be excluded from the definition of “professional degree” borrowed slightly above the newly established \$100,000 aggregate loan limit for graduate students.

**Table 5. Estimates of Average Aggregate HEA Title IV Student Loan Borrowing by Individuals Who Completed a Master’s Degree Program in AY2018-2019 or AY2019-2020**

(by field of study)

Field of Study and CIP Code	Average Aggregate Loans Borrowed	Number of Borrowers	Number of Programs <sup>a</sup>	Percentage of Programs <sup>b</sup>
<b>Proposed to be included in the definition of “professional degree”</b>				
Veterinary Medicine 1.80	n/a <sup>c</sup>	n/a	n/a	n/a

Field of Study and CIP Code	Average Aggregate Loans Borrowed	Number of Borrowers	Number of Programs <sup>a</sup>	Percentage of Programs <sup>b</sup>
Law 22.01	n/a <sup>c</sup>	n/a	n/a	n/a
Theological and Ministerial Studies 39.06	\$46,029	4,689	117	30.2%
Clinical, Counseling, and Applied Psychology 42.28	\$61,446	26,021	340	49.5%
Chiropractic 51.01	n/a <sup>c</sup>	n/a	n/a	n/a
Dentistry 51.04	n/a <sup>c</sup>	n/a	n/a	n/a
Medicine 51.12 <sup>d</sup>	n/a <sup>c</sup>	n/a	n/a	n/a
Optometry 51.17	n/a <sup>c</sup>	n/a	n/a	n/a
Pharmacy and Pharmaceutical Sciences 51.20	\$41,976	386	15	12.4%
<b>Proposed to be excluded from the definition of "professional degree"</b>				
Education 13	\$34,106	132,942	2,295	40.1%
Curriculum and Instruction 13.03	\$26,727	13,547	194	40.0%
Educational Administration and Supervision 13.04	\$40,273	29,865	451	53.6%
Special Education and Teaching	\$32,432	16,621	295	42.7%
Teacher Education and Professional Development, Specific Levels and Methods 13.12	\$31,358	24,613	386	46.3%
Social Work 44.07	\$51,135	46,989	281	76.2%
Allied Health Diagnostic, Intervention, and Treatment Professions 51.09 <sup>e</sup>	\$106,404	15,671	222	52.4%
Public Health 51.22	\$51,994	13,388	231	48.8%
Rehabilitation and Therapeutic Professions 51.23 <sup>f</sup>	\$65,443	10,962	208	59.3%
Alternative and Complementary Medicine and Medical Systems 51.33 <sup>g</sup>	\$98,777	1,255	34	51.5%
Registered Nursing, Nursing Administration, Nursing Research, and Clinical Nursing 51.38 <sup>h</sup>	\$52,808	80,392	451	62.1%
Business Administration, Management, and Operations 52.02 <sup>i</sup>	\$47,179	203,903	910	64.5%

**Source:** CRS analysis of U.S. Department of Education, College Scorecard Data.

**Notes:** Estimates represent individuals who borrowed HEA Title IV loans and completed the applicable program in AY2018-2019 or AY2019-2020 at a given institution of higher education. HEA Title IV loans include Subsidized, Unsubsidized, and Grad PLUS Loans made under the Direct Loan program or the Federal Family Education Loan program for the program and exclude loans borrowed for undergraduate education.

- Represents number of programs for which data were available to calculate the average student loans borrowed by program completers.
- Represents the percentage of all programs at the combination of four-digit CIP Code and degree type for which data were available to calculate the average student loans borrowed by program completers.
- There were no programs offered for this combination of four-digit CIP Code and degree type.

- d. This CIP Code includes allopathic medicine, osteopathic medicine/osteopathy, and podiatric medication/podiatry.
- e. This CIP Code includes the following fields of study, for example: physician associate/assistant, athletic training/trainer, and gene/genetic therapy.
- f. This CIP Code includes the following fields of study, for example: art therapy/therapist, occupational therapy/therapist, physical therapy/therapist, and rehabilitation science.
- g. This CIP Code includes the following fields of study, for example: traditional Chinese medication and Chinese herbology, naturopathic medicine/naturopathy, and homeopathic medicine/homeopathy.
- h. This CIP Code includes the following fields of study, for example: registered nursing/registered nurse, nurse anesthetist, nurse midwife/nursing midwifery, nursing education, and nursing practice.
- i. This CIP Code includes the following fields of study, for example: business administration and management, general; office management and supervision; project management; and organizational leadership.

**Table 5** indicates that, with the exception of Allied Health Diagnostic, Intervention, and Treatment Professions (which can include fields of study such as physician associate/assistant, athletic training/trainer, and gene/genetic therapy), on average, individuals who borrowed for and completed a master's degree in any of the examined fields of study borrowed amounts for their degree below the newly established aggregate loan limit of \$100,000 that generally is to apply to graduate students beginning July 1, 2026.

## What are the next steps in the rulemaking process?

ED has stated that members of the public may submit comments to it for review on or before March 2, 2026.<sup>53</sup> Then, ED is to review the comments and consider changes to the proposed rule before submitting any draft final rule to the Office of Information and Regulatory Affairs for final review and, ultimately, publishing a final rule in the *Federal Register*.<sup>54</sup>

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<sup>53</sup> RISE NPRM, p. 4254.

<sup>54</sup> For additional information on the federal rulemaking process in general, see CRS Report RL32240, *The Federal Rulemaking Process: An Overview*.

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