

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

February 27, 2026

*Submitted electronically*

**Re: Public Comment on Notice of Proposed Rulemaking, Reimagining and Improving Student Education [Docket ID: ED-2025-OPE-0944]**

Dear Secretary McMahon and Under Secretary Kent,

We appreciate the opportunity to provide comments in response to the Department of Education's proposed rulemaking regarding the definition of "professional degree programs" under the One Big Beautiful Bill Act (OBBBA).

The undersigned organizations and individuals represent health professionals from a wide array of disciplines who contribute to efforts which improve community health, advocate for public health, conduct health education and public health programming and support community health workers. These endorsers include professionals from across various health disciplines including advanced degree nurses, physicians, and graduate level public health workers, social workers, and more.

Our organizations have serious concerns about the narrowing of the proposed definition of "professional degree programs," particularly the exclusion of public health degrees. While the proposed change has been deemed "an internal definition" rather than a value judgement, the impact of this rule change will have far reaching and critical implications for the health of our nation. The classification of public health degrees directly affects who can afford to enter the field and whether the nation can sustain the workforce required to improve health outcomes, reduce healthcare costs, and respond to emerging threats.

As we consider these implications, it is important that we remember that many of the individuals who enter the fields which have been deemed not to meet the "professional degree" category are nurses, social workers, public health students and graduates who work as the nurses who conduct health screenings and administer vaccinations, the epidemiologists who conduct disease surveillance and track outbreaks, the health educators who build trust in communities, the environmental health practitioners who keep food supplies and drinking water systems safe, and the administrative leaders who coordinate responses when we are faced with an epidemic or a natural disaster. Many of these individuals are working in local communities earning minimal compensation because they are committed to protecting the health of their communities.

These proposed rules will negatively impact who can pursue a nursing or public health career. Graduate education represents a significant financial investment. Access to federal loans serves as a critical safety net for students committed to public service careers that are essential but not highly compensated. If nursing and public health degrees are no

longer classified as professional degrees, many qualified students, particularly those from communities most in need of representation in the workforce, may be priced out of graduate degree programs because they cannot afford graduate education and cannot take a financial risk of higher loan rates through private banks and loan companies. This action will significantly narrow the number of individuals entering the nursing and public health workforce at a time when our workforce is suffering from severe and critical shortages in these professions. Ultimately, this will cause harm to the populations and communities nurses public health professionals serve.

Collectively, our organizations represent almost 11,000 health professionals and we strongly urge you to abide by the statutory definition. Ideally, the Department of Education should **maintain the current definition of “professional degree programs” incorporated by Congress and avoid adding new restrictive criteria not contemplated in statute.** Additionally, we urge you to **explicitly recognize MSN, DNP, APRN, MPH, DrPH, MSPH, and MSW programs as eligible professional degrees consistent with longstanding federal recognition and workforce needs.**

Thank you for your consideration and for your commitment to ensuring the nation’s federal student aid programs support a strong, sustainable public health and healthcare workforce to serve the needs of our population.

Sincerely,

**Organizations:**

Illinois Public Health Association	Health & Democracy Michigan Partners	MPHA - PHN Section
Adaptive Responses Wellness Foundation	Henry County Health Department	Northern Illinois Public Health Consortium
Agape, NFP	Illinois Association of Public Health Administrators	Peoria City/County Health Department
AIDS Foundation Chicago	Illinois Pharmacists Association	Shelter Care Ministries
Black Midwifery Collective	Illinois Public Health Nurse Administrators	SI CABE: Southern Illinois Culture and Art in Bilingual Education
Boone County Health Department	Illinois Rural Health Association	Society of Latinx Nurses
Cass County Public Health Department	Immigrant Solidarity DuPage	Southern Illinois Public Health Consortium
Chicago Family Health Center	Kane County Health Department	Stark County Health Department
Community Health Partnership of Illinois	Lee County Health Department	Stickney Public Health District
Connecticut Public Health Association	LULAC-IL	Tennessee Public Health Association
DuPage County Health Department	McDonough County Health Department	The Project of the Quad Cities
East Side Health District	Michigan Public Health Association	Warren County Health Department

**Individuals:**

Christopher	Adams	BS, MPH candidate
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Leticia	Boughton Price	MSW
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Joy	Preciado	FNP
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