

UPDATE: U.S. Department of Education Committee Examines Definition of Professional Degrees

This is to provide an update on the Department of Education's [Reimagining and Improving Student Education \(RISE\) Committee](#) and their discussions surrounding the definition of a “professional degree” versus “graduate degree” as it relates to federal student loan borrowing caps.

Background

This fall, the Department's Reimagining and Improving Student Education (RISE) Committee underwent a negotiated rulemaking process aimed at clarifying which academic degrees should be classified as “professional degrees” versus “graduate degrees.” Under current federal statute, only a limited number of degree programs—such as medicine and dentistry—are explicitly designated as professional degrees. Many others, including physical therapy, nursing, audiology, occupational therapy, and speech-language pathology, are not explicitly listed in statute. However, the statute allows the Department to recognize additional degree programs not explicitly listed. Although physical therapy is not explicitly named in federal statute, it has historically been treated as a professional degree.

Latest Action from RISE

Last week the RISE Committee concluded their negotiated rulemaking discussion related to student loans and adopted a proposed definition for what constitutes a “professional degree.” Unfortunately the committee chose to adopt a very narrow definition that mirrors the current definition found in federal statute; the definition excludes numerous health professions and is limited to only the following fields: Pharmacy (PharmD), Dentistry (DDS or DMD), Veterinary Medicine (DVM) Chiropractic (DC or DCM), Law (LLB or JD), Medicine (MD), Optometry (OD), Podiatry (DPM, DP or Pod D), Theology (MDiv or MHL) and Clinical Psychology (PsyD).

The proposed definition carries implications for students (or prospective students) pursuing non-physician health care degrees, including students of physical therapy. If this

proposed definition is eventually adopted via official rulemaking by the Department of Education, borrowing for federal student loans will be limited to \$20,500 per year, with a lifetime cap of \$100,000. In addition, excluding numerous accredited, state licensed or certified health professions programs from the “professional degree” designation could create an inequitable tiered system within the health care workforce.

APTA Advocacy

The American Physical Therapy Association has been actively advocating for the inclusion of the Doctor of Physical Therapy (DPT) degree in definition of “Professional Degree.” APTA has also been collaborating with other affected health care provider groups and coalitions, including the Federation of Associations of Schools of the Health Professions (FASHP) and the Patients Access to Responsible Care Alliance (PARCA), both of which APTA is a member. Below are links to the various comment letters APTA submitted to the Department of Education on this issue:

- APTA comment letter to RISE Committee: Click [HERE](#)
- Provider Coalition letter to RISE: Click [HERE](#)
- FASHP Coalition letter: Click [HERE](#)
- PARCA Coalition: Click [HERE](#)

Next Steps for Advocacy

The negotiated rulemaking process is expected to result in a proposed rule from the Department of Education in early 2026. Once the proposed rule is published in 2026, it will be subject to a public comment period before a final rule is adopted by the Department. APTA will alert members when the Department of Education publishes the proposed rule in 2026; APTA will also provide details on how individuals can submit comments to the Department of Education via the **APTA Regulatory Action Center** when the comment period begins.

In the interim, the provider coalition which APTA is also engaging members of the U.S. Congress to seek their intervention as the proposed definition runs contrary to the intent of Congress.

Stay tuned for opportunities from APTA to advocate on this important issue.