

Coalition Update: Update to List of Professional Degree Programs Due to Court Order

June 30, 2026

On June 24, the U.S. District Court for the District of Columbia preliminarily stayed the Department of Education's extra-statutory requirements for professional degree designation under the RISE final rule. The court's order in the consolidated *AANP v. McMahon* and *PA Educ. Assoc. v. ED* cases removes, for the duration of the stay, the rule's added requirements that a professional degree be at the doctoral level, require six years of post-secondary coursework, fall within specified CIP code groupings, and require licensure to begin unsupervised practice. The Department must now apply only the three-part statutory test from 34 CFR § 668.2 when designating professional degree programs.

Programs Added to Professional Designation During the Stay

On June 29, the Department published an [interim list of programs](#) it will treat as awarding professional degrees for the duration of the court's stay. Programs now eligible for professional-level loan limits (\$50,000 annual / \$200,000 aggregate) include:

- Physical Therapy (DPT)
- Occupational Therapy (OTD/MSOT)
- Athletic Training (MSAT/MAT)
- Physician Associate/Assistant (MSPA/PA)
- Audiology (AuD)
- Speech-Language Pathology (SLP)
- Anesthesiologist Assistant (CAA)
- Registered Nursing (MSN)
- Nurse Anesthetist (DNAP)
- Nursing Practice (DNP)
- Additional clinical psychology subfields awarding the Psy.D.

The update also includes a list of programs that are now no longer treated as professional degrees that originally were included. **The stay is preliminary.** It remains in effect only pending further proceedings at the summary judgment stage. **The government retains an immediate right to appeal** the stay and could seek to have the appellate court reverse or pause the district court's order.

ED's announcement explicitly states that these interim designations "may change as litigation proceeds." In the same notice, the Department recommends that institutions consider capping loan disbursements at graduate-level amounts for programs temporarily classified as professional, specifically to protect students from disruption if the stay is later reversed or narrowed.

Work Remaining

The court's order and ED's response does not address APWA's concerns, that the RISE rule restricts access to graduate education and the ability to sustain a highly skilled, workforce across critical sectors. APWA's appropriations and authorization strategy remains essential, and the coalition's work to mitigate enforcement of the RISE definition and directing the Secretary to apply a broader functional standard continues on a parallel track. A favorable litigation outcome,

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even a permanent one, would not substitute for congressional action on behalf of the full range of affected professions.