

# U.S. House of Representatives

## Washington, DC 20515

December 8, 2025

Honorable Linda E. McMahon  
Secretary of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

Dear Secretary McMahon,

On November 21, 2025, the Department of Education modified the definition of “professional degree” programs eligible for federal student aid programs, removing many health, education, and graduate credentials from the list of definitions at the detriment of students with disabilities.<sup>1</sup> This reclassification is part of a new student loan policy and is expected to take effect on July 1, 2026. Fields affected by these exclusions include nursing, physical therapy, occupational therapy, audiology, public health, speech-language pathology, education, and social work. Students in these programs could now lose their qualification for certain aid or debt programs which experts fear would exacerbate workforce shortages. These fields are the foundation of our economy, ensuring that our nation remains safe, educated, and healthy. We are deeply concerned about the impacts this reclassification will have on the essential workforce that educates and supports students with disabilities.

The definition of a professional degree comes from federal law and is “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.”<sup>2</sup> Professional degrees can include fields from the healthcare sector, legal field, and even theology. Specifically for educators and specialized personnel working with students with disabilities, professionals with master’s degrees in occupational therapy, physical therapy, social work, school psychology, and other mental health staff are essential in aiding a student throughout their educational journey. With the decision to exclude certain professions, the Department is limiting the borrowing power for students attaining education and healthcare degrees to access necessary financial aid. With fewer students able to access aid to achieve their degrees, we anticipate a reduction of demand for the degrees and total number of educators and healthcare professionals across the country.

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<sup>1</sup> <https://www.usatoday.com/story/news/nation/2025/11/21/what-considered-professional-degree-explained/87396245007/>

<sup>2</sup> 34 CFR 668.2(b) “Professional degree”; [https://www.ecfr.gov/current/title-34/part-668/section-668.2#p-668.2\(b\)\(Professional%20degree\)](https://www.ecfr.gov/current/title-34/part-668/section-668.2#p-668.2(b)(Professional%20degree))

At a time when states continue to face significant shortages in special educators and specialized personnel, now is not the time to create significant barriers that will both limit access for degree-seeking adults as well as limit a state's ability to provide personnel preparation to key professionals through master's and Ph.D. programs. Many states allow for initial special education certification after a bachelor's degree, and also require a master's degree and/or Ph.D. later for full certification or career advancement. At a time where school districts across the nation struggle with persistent teachers and specialized personnel shortages, we are concerned that the department would want to add more hurdles to the process of becoming a certified teacher or other professional educator.<sup>3</sup>

This change stemmed from Public Law No: 119-21, signed into law in July 2025.<sup>4</sup> Beginning in July 2026, the law caps annual loans at \$50,000 for professional students but now with the change of who is considered a professional student, this is going to potentially reduce access for essential financial aid programs.<sup>5</sup>

Given the significant changes to the department, and the ability for students to receive financial support, we request answers to the following questions within 1 month of receipt of the letter:

- What was the rationale for your agency to limit the definition of “professional degree”?
- When is the public expected to hear more about these changes of designations?
- How will the department mitigate the direct and immediate impacts the designations will have on the educator workforce?
- What is the timeline for public comment on the final rule and how will the Department address the comments?

Together, we will continue to fight for and support access to higher education for the professionals who aim to dedicate their careers to the education of our nation's children, including students with disabilities. Thank you for your consideration in this matter and we look forward to receiving a response.

Sincerely,

[[SIGNATURES]]

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<sup>3</sup> <https://learningpolicyinstitute.org/product/teacher-shortages-subjects-across-states-factsheet>

<sup>4</sup> <https://www.congress.gov/bill/119th-congress/house-bill/1/text>

<sup>5</sup> <https://www.ed.gov/about/news/press-release/us-department-of-education-concludes-negotiated-rulemaking-session-implement-one-big-beautiful-bill-acts-loan-provisions>