

Massachusetts Department of Higher Education

MAIN OFFICE One Ashburton Place, Room 1401
Boston, MA 02108
TEL (617) 994-6950
FAX (617) 727-0955
WEB www.mass.edu

OFFICE of STUDENT FINANCIAL ASSISTANCE 135 Santilli Highway
Everett, MA 02149
TEL (617) 391-6070
FAX (617) 391-6085
WEB www.mass.edu/osfa

Noe Ortega
Commissioner
Chris Gabrieli
Board Chair

March 2, 2026

Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Docket ID ED-2025-OPE-0944

Dear Director Tamy Abernathy:

On behalf of the Commonwealth of Massachusetts, I submit this comment letter in opposition to the United States Department of Education's (ED) proposed rule, "Reimagining and Improving Student Education" (Docket ID ED-2025-OPE-0944), implementing new graduate student loan limits. The proposed rule includes a restrictive definition of "professional degree" that would unduly hinder access to low-cost, relatively low-risk federal graduate student loans and exacerbate workforce shortages in high-need and public good occupational fields, such as nursing and social work.

Approximately one in three Massachusetts graduate student loan borrowers is estimated to have financial need in excess of new federal student loan borrowing limits under the proposed regulation, according to an examination of federal data and background work done by the Postsecondary Education and Economics Research (PEER) Center at American University. Under the proposed rule, approximately 13,000 Massachusetts graduate students will have to seek more expensive and riskier financing in the private loan market so as to not disrupt their educational plans. To make matters worse, over 4,000 of these 13,000 graduate students have low-income levels and low credit scores, or lack a qualified co-signer, meaning they may not be able to access any safe, alternative private student loan financing, and thus lose access to graduate studies entirely. In other words, the proposed federal student loan regulation would make graduate education less affordable for an estimated 9,000 Massachusetts students and less accessible for over 4,000 more Massachusetts students.

The Trump administration has the ability to mitigate this looming decrease in graduate education affordability but has not done so. The One Big Beautiful Bill Act of 2025 provides that "professional degree" seeking graduate students are able to access heightened, low-cost federal student loan amounts. The statute includes a non-exhaustive list of ten programs of study eligible

for relief. To be clear, that list is illustrative. In the proposed implementing rule, however, only the study of clinical psychology and fields immediately adjacent to the ten programs of study listed in the statute were included in the list of “professional degree” programs, for which students could garner heightened access to low-cost federal loans. Graduate work in other occupational fields that has long been considered professional preparation and that meets all other aspects of the professional-degree program definition, such as leading to practice in a profession and preparing graduates for a licensed occupation, are excluded. The named programs in the proposed rule make up only two percent of all fields of graduate study.

The proposed narrow interpretation of "professional degree" would have particularly harmful impacts on health care and public health workforces in ways that risk undermining the very goals of this policy. Clinicians like physician assistants, nurse practitioners, physical therapists, occupational therapists, public health specialists, audiologists, speech-language pathologists, counselors, mental health therapists, social workers, and health administrators not only provide vital care for patients across the Commonwealth but also provide their expertise and guidance directly at the Department of Public Health and other state agencies. Restricting access to adequate federal loans will ultimately shrink the pipeline of trained professionals in fields where the workforce is already strained, and we anticipate these impacts will adversely impact access to care most in health professional shortage areas.

A better rule would be a flexible one that deems professional degree programs eligible for heightened federal student loan access as those linked to objectively-defined high-need, high-value occupational fields, such as nursing, social work and education. In fact, the federal student loan program should ensure quality graduate education programs remain accessible for all those pursuing high-need, high-value occupational fields *and* all those attending institutions of higher education where graduates have a high likelihood of generating future earnings and repaying the relevant capital investment.

We should be doing all we can to ensure our workforce is prepared for present-day social and economic challenges as well as those to come. The proposed rule unduly and unnecessarily restricts federal student loan access and arbitrarily cuts off access to important, high-demand, and well-paying fields. I urge the Trump administration and the U.S. Department of Education to modify the definition of “professional degree” to incorporate additional fields so as to not exacerbate higher education affordability concerns, extinguish opportunities for talented students from economically disadvantaged backgrounds, and undermine the ability of states to meet critical workforce needs.

Sincerely,



Noe Ortega
Commissioner of Higher Education
Commonwealth of Massachusetts