

March 2, 2026

Tamy Abernathy
Office of Postsecondary Education
400 Maryland Ave., SW, 5th Floor
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0944

Dear Ms. Abernathy:

I write on behalf of the American Association of Colleges for Teacher Education (AACTE), its member educator preparation programs, and the undersigned organizations to urge that the definition of professional student in Section 685.102 of the proposed rule be amended to include all students pursuing post-baccalaureate degrees and certificates in the field of education.

We seek this change to address significant affordability concerns for education students and to counter the negative message that their exclusion sends about the professionalism of teachers, school administrators, specialized instructional support personnel, and other educators. For the reasons detailed below, we are confident that education students meet the requirements for professional status outlined in statute.

Access to Affordable Student Loans

The reduced borrowing limits for part-time attendees enacted under the One Big Beautiful Bill Act (OB3) create a significant hardship for education students and, if not addressed by including education in the professional category, will exacerbate shortages in key positions including special education teachers and school administrators.

The new loan limit (\$10,250 for half-time graduate students) is far less than part-time education students need. According to the most recent National Postsecondary Student Aid Study, 50 percent of education graduate students attend less than full-time. Further, these part-time students—who are typically working adults with family responsibilities—are at least as likely as their full-time counterparts to rely on student loans. Moreover, on average, they borrow amounts similar to full-time students.

Federal Direct Loans Borrowed by Graduate Education Students in 2019-20

	Full-time Students	Half-time Students
Master's Degree	50.9% Borrowed Average Borrowed: \$14,800	47.3% Borrowed Average Borrowed: \$12,010
Doctorate	35.5% Borrowed Average Borrowed: \$16,455	59.5% Borrowed Average Borrowed \$15,236

Source: U.S. Department of Education, National Center for Education Statistics. National Postsecondary Student Aid Study: 2019-20. Analysis by AACTE. Certificate students excluded due to insufficient sample size.

As the table above displays, *the new limits for Federal Direct Loans are less than the average amount that half-time education graduate students borrowed five years ago*. Further, because OB3 also eliminated the Grad PLUS program, education students will have no other access to federal student loans. Private student loans will be less affordable and cannot be discharged through the Teacher and Public Service loan forgiveness programs.

Given that educators cannot expect the same earnings as many other professionals, affordable loan financing that can be discharged through the available loan forgiveness programs is essential to recruit and retain students. If education is not included in the professional student category, we can expect reduced enrollment in education graduate programs, higher drop-out rates when students do enroll, and increased shortages in key education occupations.

Acknowledgment of Educators as Professionals

The other important aspect of this definition is the message it sends to current and prospective educators about respect for educators as professionals. Educators – whether teachers, school counselors, principals, or others – are professionals. To practice in the field, they typically require state licensure and ongoing professional development. Educators provide vitally important public service. The well-being of America's young people—and the strength of our future workforce—is dependent on the jobs they do. Denying that recognition sends a demoralizing message to the hard-working and dedicated individuals who want to devote their careers to the profession of education.

In short, expanding the definition of “professional students” to include those studying education addresses students’ practical need for affordable loan financing and sends a powerful message about the importance of educators to our society.



Alignment with Statutory Requirements

The statute establishes the following three-part test to determine whether a degree program is professional:

1. A degree that signifies completion of the academic requirements for beginning practice in a given profession
2. A level of professional skill beyond that normally required for a bachelor's degree
3. Professional licensure is also generally required.

The proposed rule includes the following rationale for the exclusion of education from the professional definition:

Education (M.Ed./Ed.D./Ed.S.): The Department determined that the M.Ed. and Ed.D. would not satisfy the *professional degree* definition because they are not required for entrance into a specific profession and are not required for licensure. While several states require teachers to ultimately obtain a master's degree to maintain their license, no state requires an M.Ed. (or similar master's degree) to begin work as a teacher. Likewise, while an Ed.D. may offer the possibility of career advancement to the degree holder, the degree is not in any way required for entrance into a specific profession or a prerequisite for licensure in a field.

The Department's reasoning is flawed because it assumes that education is a singular profession and that the entry-level position for all roles in that profession is classroom teacher. This is incorrect. "Education" is not a profession in and of itself, just as "healthcare" is not a profession. Rather, the broad field of education includes many professional roles that do not have teaching as a mandatory prerequisite and that require a graduate degree for licensure and/or hiring. For example, becoming a licensed school counselor requires graduate education (typically a master's degree) and does not require prior experience as a teacher. Likewise, becoming a school principal or district superintendent requires a graduate degree, and – while prior teaching experience is an advantage – it is not a requirement.

Even when prior teaching experience is required (as for roles such as literacy specialist or supervisor of special education), the premise that the existence of a bachelor's level job within a broad field disqualifies all other roles within that field is inconsistent with the statute and with the nature of many professional occupations. Under this logic, medical students could be excluded from the professional category if any had previously earned a bachelor's degree in nursing. Most fields include career ladders, with roles of greater autonomy, authority, and/or specialized knowledge and skills requiring advanced education.

A central purpose of the Direct Loan program at the graduate level is to enable individuals to enter challenging new professional roles. It is not to penalize students – and limit their professional options – because of their undergraduate degrees.

Changes Requested

Specifically, we request that Section 685.102 of the proposed rule be revised as follows:
Paragraph (1):

- (i): Eliminate the word "beginning" for the reasons described above.



- (ii): Reduce the number of years of post-baccalaureate coursework from two to one in order to include graduate certificates. In 2023-24, U.S. colleges and universities awarded more than 25,000 graduate certificates in education. Certificate programs, which typically require one year of full-time study, are designed to meet state licensure requirements in education specialties such as multilingual and special education. Post-baccalaureate certificates are also awarded in other fields, most notably nursing and business.

In paragraph (2):

- (i): Add Education (all post-baccalaureate degrees and certificates). Unlike the health and legal fields, degree types in education are not standardized. For example, master's degree students in education may be awarded a Master of Arts (M.A.), Master of Sciences (M.S.), or Master of Arts in Teaching (M.A.T.). To avoid inadvertently excluding students, we recommend including all post-baccalaureate degrees and certificates and all sub-specialties within CIP Code 13 (Education).

Thank you for giving this request serious consideration. We note with gratitude that our recommended changes to the proposed rule largely align with bills introduced by Representatives Mike Lawler ([H.R. 6718](#)) and Timothy Kennedy ([H.R. 6574](#)).

Sincerely,



Cheryl Holcomb-McCoy, PhD
President & CEO, AACTE

Submitted on behalf of:

AASA, The School Superintendents Association
Association of Education Service Agencies (AESAs)
Association of School Business Officials International (ASBO)
Higher Education Consortium for Special Education
National Association for Family, School, and Community Engagement (NAFSCE)
National Association for the Education of Young Children
National Association of Elementary School Principals
National Board for Professional Teaching Standards
National Council for the Social Studies
National Council of Teachers of English (NCTE)
National Council of Teachers of Mathematics (NCTM)
Public Advocacy for Kids (PAK)
Teacher Education Division of the Council for Exceptional Children

