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diagnosis, and treatment of chest  
diseases through education,  
communication, and research.

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March 2, 2026

The Honorable Nicholas Kent  
Under Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue,  
SW Washington, DC 20202-1100

**RE: Notice of Proposed Rulemaking, Reimagining and Improving  
Student Education [ED-2025-OPE-0944]**

Dear Under Secretary Kent:

On behalf of the American College of Chest Physicians, we write in strong support of adding post-baccalaureate nursing degrees (MSN, DNP, PhD), and physician assistant degrees (PA) to the list of “professional” degrees as outlined in the notice of proposed rulemaking (NPRM) on Reimagining and Improving Student Education [ED-2025-OPE-0944].

Our nation’s physician assistants, nurses, and Advanced Practice Registered Nurses (APRNs) are involved at every point of care for pulmonary, critical care, and sleep patients and serve as educators, researchers, and leaders within the health care profession.<sup>i</sup> Including these roles in the regulatory definition of professional degrees for the purpose of student loan limits is critical as we continue to strengthen health career pathways and support a robust workforce to ensure communities across the country have access to timely, high-quality care.

As critical roles in care teams, nurses and physician assistants serve patients across locations including community health centers, Veterans Health Administration and Indian Health Services facilities, hospitals, long-term care facilities, local and state health departments, schools, workplaces, and patients’ homes. The Bureau of Labor Statistics outlines that the demand for most APRNs is expected to grow 35%, and likewise by 20% for physicians assistants, by 2034.<sup>ii,iii</sup> Both fields are expected to grow faster than the rate of growth for average occupations, clearly indicating that communities, including rural and underserved areas, rely on these important professions to meet their health care demands.

In this NPRM, the Department establishes certain criteria for degrees to qualify as professional in their proposed definition of “professional

student.” The training and certification required in both physician assistant and post-baccalaureate nursing education require a level of professional skill beyond that normally required for a bachelor's degree and professional licensure is also generally required. Physician assistant and post-baccalaureate nursing degrees meet these outlined criteria, as well as the criteria for “professional degree programs” in 34 CFR § 668.2, which was incorporated into H.R. 1 and the proposed definition of “professional student.”

Supporting physician assistant and post-baccalaureate nursing education removes barriers to entry into the profession, supports ongoing workforce needs, and ensures patients across the country have access to high-quality healthcare. For this reason, we urge the Department to include physician assistant degrees (PA) and post-baccalaureate nursing degrees (MSN, DNP, Ph.D.) explicitly in the list of professional degrees. This is consistent with the regulatory language and will help ensure a stable pathway of essential healthcare professionals for years to come. We appreciate your consideration of our comments. Should you have any questions or if we can be of any additional assistance please contact Angela Eastlund, aeastlund@chestnet.org.

Sincerely,

Neil Freedman, MD, FCCP  
President

Robert Musacchio, PhD  
Chief Executive Officer

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<sup>i</sup> APRNs include certified nurse-midwives (CNMs), certified registered nurse anesthetists (CRNAs), clinical nurse specialists (CNSs), and nurse practitioners (NPs).

<sup>ii</sup> U.S. Bureau of Labor Statistics. (2026). Occupational Outlook Handbook- Nurse Anesthetists, Nurse Midwives, and Nurse Practitioners. Retrieved from: <https://www.bls.gov/ooh/healthcare/nurse-anesthetists-nurse-midwives-and-nurse-practitioners.htm>

<sup>iii</sup> U.S Bureau of Labor Statistics. (2026). Occupational Outlook Handbook - Physician Assistants. Retrieved from: <https://www.bls.gov/ooh/healthcare/physician-assistants.htm>