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RE: ED-2025-OPE-0944; Reimagining and Improving Student Education (RISE)

Dear Secretary McMahon:

On behalf of the Pennsylvania State Education Association (PSEA) and our 177,000 members, including teachers, education support professionals, higher education faculty, and future educators, we submit the following comment in response to the Department of Education’s proposed rule implementing the Reimagining and Improving Student Education (RISE) provisions published in the Federal Register on January 30, 2026.

PSEA’s primary concern is the Department’s restrictive definition of “professional degree,” which would exclude advanced degrees in education from eligibility for the higher graduate loan limits. This exclusion is legally unsound, factually inaccurate, and will cause substantial harm to educators and the students they serve across Pennsylvania and the nation.

The Department’s Definition Exceeds Statutory Authority

The One Big Beautiful Bill Act (OBBBA) defines a “professional student” as one enrolled in a program awarding a “professional degree, as defined under section 668.2 of title 34, Code of Federal Regulations (as in effect on [July 4, 2025]).” That regulatory definition provides that a professional degree (1) signifies completion of academic requirements for beginning practice in a profession, (2) requires skill beyond that of a bachelor’s degree, and (3) generally requires professional licensure. Critically, the regulation states that qualifying degrees “include but are not limited to” a list of specific programs.

The Department’s proposed rule impermissibly converts this illustrative list into an exhaustive one. By doing so, the Department has exceeded its statutory authority. Congress adopted a definition with an expressly non-exhaustive list of examples; the Department cannot unilaterally narrow that definition through rulemaking. Degrees that satisfy the statutory criteria, including

Linda McMahon
Secretary of Education
March 2, 2026
Page 2

many graduate education degrees, must be eligible for the higher loan caps regardless of whether they appear on the Department's preferred list.

Education Degrees Meet the Statutory Definition of Professional Degrees

The Department's assertion that education degrees do not qualify as professional degrees reflects a fundamental misunderstanding of the educator workforce. Numerous educator roles require graduate degrees as a condition of licensure and entry into practice:

School Counselors must hold a master's degree in school counseling and meet state licensure requirements to practice.

Speech-Language Pathologists working in schools must complete a master's degree, a clinical fellowship, and obtain state licensure.

School Librarians and Media Specialists require master's degrees for initial licensure in approximately 20 states, including neighboring Maryland.

Reading Specialists and Instructional Coaches in many states must hold a master's degree plus years of licensed classroom experience.

School Psychologists typically require a specialist-level degree (60+ graduate credits) or doctorate, plus supervised experience and state certification.

Moreover, in Pennsylvania teachers receive initial certification that is contingent upon completing additional credits within a certain time period, which means many go on to achieve master's degrees. Under a plain language reading of the regulatory definition as of July 4, 2025, a professional degree is one that signifies completion of requirements for beginning practice, requires professional skill beyond a bachelor's degree, and generally requires licensure. These education credentials clearly qualify.

The Department's Supervision Rationale Is Applied Inconsistently

The Department suggests that because educators work under administrative supervision, their degrees do not warrant professional classification. This reasoning is inconsistent with how other professions are treated.

Physicians with M.D. or D.O. degrees complete residencies under the direct supervision of senior physicians. Attorneys with J.D. degrees work as associates supervised by partners. Neither form of workplace supervision disqualifies medicine or law from professional degree status. The

relevant question is whether the degree prepares an individual for entry into a licensed, regulated profession, not whether that professional subsequently works independently or under oversight.

Licensed educators manage classrooms, design curricula, assess student progress, and make consequential professional judgments daily. Applying supervision as a disqualifying factor for education while ignoring it for medicine and law reveals an arbitrary and unjustifiable double standard.

Program Length Requirements Are Arbitrary

The proposed rule suggests that professional degree status should correspond to doctoral-level study involving four to six years of postgraduate training. Yet the rule retains the J.D., which is a three-year program, on its approved list. Meanwhile, school psychologists typically complete specialist-level programs of three or more years with extensive clinical training, and speech-language pathologists complete rigorous master's programs with supervised clinical fellowships. If program length and clinical rigor justify higher loan caps, these education-related credentials meet that standard as well as, or better than, some degrees the Department would approve.

The Proposed Rule Will Harm Pennsylvania's Educator Workforce

Pennsylvania, like states across the nation, faces a persistent educator shortage. Limiting graduate students in education to \$20,500 annually and \$100,000 in aggregate federal loans while allowing students in law, medicine, and other fields access to substantially higher limits will exacerbate this crisis.

Aspiring educators forced to seek private loans will face a tougher financial path with higher interest rates and stricter credit requirements. More importantly, these private options lack federal protections like income-driven repayment and Public Service Loan Forgiveness. Research shows that significant percentages of graduate students in education already borrow above the proposed limits, and that those with limited credit histories, disproportionately first-generation students and students of color, may be unable to secure private financing at all.

In Pennsylvania, the ultimate harm will fall on students who will face larger class sizes, fewer specialists, and reduced educational quality.

Linda McMahon
Secretary of Education
March 2, 2026
Page 4

The Definition Reflects a Value Judgment That De-Professionalizes Education

The Department's narrow definition is not a neutral administrative decision. It is a policy choice that signals education is less worthy of professional recognition than law, medicine, or dentistry. This devaluation has consequences: it affects how educators are perceived, how the profession attracts talent, and how policymakers prioritize investment in schools.

It also has a disparate impact. The teaching profession is predominantly female, and many specialized instructional support roles excluded from "professional" status including school nursing, social work, and counseling are similarly staffed primarily by women. The proposed rule would impose its greatest financial burdens on fields where women are overrepresented.

Conclusion

PSEA urges the Department to revise its proposed definition of "professional degree" to faithfully implement the statutory language Congress adopted. Degrees in education that satisfy the three-part test signifying completion of requirements for practice, requiring professional skill beyond a bachelor's degree, and generally requiring licensure must be eligible for the higher loan limits applicable to professional students.

At a time of critical educator shortages, federal policy should support pathways into teaching and related professions, not erect new financial barriers. We respectfully request that the Department align its final rule with both the law and the nation's interest in a strong, stable, and well-prepared educator workforce.

Thank you for the opportunity to comment. Please do not hesitate to contact us with any questions.

Sincerely,



Aaron F. Chapin
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