



## Public Comment Guide for Professional Student Definition

This document provides background information and sample text to assist AACTE members in responding to the [Proposed Rule](#) for changes to the federal student loan programs, including the definition of professional degrees, released by the U.S. Department of Education (the Department) on January 30, 2026. All comments are due by **March 2, 2026**.

Federal law requires an agency to consider and respond to all unique comments received during the period for public comment. Accordingly, it is imperative that the Department receive significant and widespread pushback from the educator preparation community in response to the proposed rule.

AACTE has created this guide to equip members, their employees and students, and key partners, including K-12 leaders, with the tools they need to submit compelling, unique, personalized, and significant comments.

After a summary of background on the issue and a few [general guidelines](#), this document includes response templates for three groups:

1. [Institutions or schools, colleges, or departments of education](#)
2. [Faculty, staff, and students not responding on behalf of a program or institution](#)
3. [K-12 leaders and other partners](#)

### Background

The "One Big Beautiful Bill Act" (OB3), the sweeping tax and spending law enacted in July 2025, made several major changes to student loan programs that will have a significant impact on educator preparation programs (EPPs) and their students. These changes take effect on July 1, 2026, but most are phased in to limit the immediate impact on current students. For more information on the student loan changes under OB3, see this [Explainer](#).

The most significant student loan changes under OB3 are:

1. Loan eligibility will be pro-rated based on attendance status. Part-time students will have considerably less access to federal loans, creating significant affordability concerns. For example, instead of being able to borrow up to \$20,500 annually – as they can now – half-time graduate students will only be able to borrow up to \$10,250.

2. Graduate students will not have the option to augment their borrowing through the Grad PLUS program, which OB3 eliminates, and may need access to private loans which are not eligible for the Public Service and Teacher Loan Forgiveness programs.
3. Graduate students classified as “professional” are eligible for higher annual and cumulative Federal Direct loan limits (up to \$50,000 annually and \$200,000 cumulatively compared with \$20,500 and \$100,000 for other graduate students).

OB3 provides only a cursory definition of a professional degree: “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. Professional licensure is also generally required.*” The Department is responsible for publishing regulations that specify which students qualify for the professional category. The proposed rule excludes education students, thereby severely limiting their access to federal student loans.

## General Guidelines for All Responses

The Department must review and respond to each unique comment it receives. ***It is therefore essential that those using the templates that follow customize their comments to describe the impact exclusion from the professional category will have on themselves, their students, their program, and/or their communities as appropriate.***

You can review the [Proposed Rule](#) online or in a [Federal Register PDF](#). The portion of the proposed rule on the professional student definition, including the Department’s rationale, can be found under William D. Ford Federal Direct Student Loan Program/Definitions (§ 685.102) in the online version and on pages 7-12 of the *Federal Register* PDF. See in particular the rationale for the exclusion of education programs (page 12 of the PDF).

Submit your comments through the Federal eRulemaking portal at [www.regulations.gov](http://www.regulations.gov). All responses must include the federal register Docket ID [ED-2025-OPE-0944] at the top of the comments and should include the full name, title, and contact information of those submitting the comments. The letter should be addressed as follows:

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

Comments submitted after the **March 2** deadline will not be reviewed.

See <https://aacte.org/advocacy/federal/> for a video guide to submitting your comments. Note that all the text of all comments is published at [regulations.gov](http://regulations.gov), so avoid including personal information such as a personal phone number or home address

In addition to reviewing our guidance that follows, you may find this document helpful as well: [https://www.regulations.gov/assets/files/Public-Comment-on-Federal-Regulations\\_Final.pdf](https://www.regulations.gov/assets/files/Public-Comment-on-Federal-Regulations_Final.pdf).

To amplify your comments – and encourage others to submit as well -- we recommend posting them to your social media accounts.

## **Institution or School, College, or Department of Education Responses**

***\*If your institution is submitting a broader set of comments, make sure that education programs are included in any discussion of the professional degree definition.***

1. Why are you commenting? Be clear early on that you are writing to urge the inclusion of education students in the professional definition.
2. Introduce your program and institution. Describe the institution and your education programs. Who are your graduate students? What are their personal and professional backgrounds? What do they study? How many of them attend less than part-time? Where do they work after completing your program? How do they contribute to your community, region, and state?
3. Why does the professional degree definition matter to your students/program? What is the cost of your program(s), including living expenses as well as tuition and fees? How are students able to attend? What role do student loans play for your students? How much do they currently borrow? How important are teacher and public service loan forgiveness to your students?
4. Why should education be included?
  - Educators – whether teachers, school counselors, principals, or other educators – are professionals. To practice in the field, they require state licensure and ongoing professional development. They work independently with minimal supervision. They provide a vitally important public service. Denying that recognition sends a demoralizing message to the hard-working and dedicated students who want to devote their careers to the profession of education.
  - The Department's rationale is false that all professional educators enter the field via a bachelor's degree in education. While many teachers may enter the field with a bachelor's degree, for some teaching specialties (e.g., special education teacher, reading specialist) and numerous other occupations in education (e.g., principal, school counselor), post-baccalaureate education is required for both licensure and employment. Sixty percent of degrees conferred in education are at the graduate level because so many occupations in the field require post-baccalaureate education.
  - The lowered borrowing limits for part-time attendees will force students to either drop out or significantly delay their progress toward a degree. Inclusion in the professional category will enable part-time students to secure an adequate amount of loan financing.
  - Without adequate access to federal student loans, education students will be forced to seek private loans. If these loans are even available, they will be less affordable and cannot be discharged through the Teacher and Public Service loan forgiveness programs.
5. State your specific requests:

- Include all graduate programs in education (post-baccalaureate certificates, master's degrees, and doctorates) in the professional degree category.
- Eliminate the requirement for at least two-years of graduate study since post-baccalaureate certificates are often one year in duration. These programs typically prepare educators to work with particular student populations (e.g., students with autism) and result in the issuance of a state license.
- Because the degrees awarded (e.g., MAT, MS, Ed.D, Ph.D.) vary considerably and are not standardized within the field, include all types of graduate certificates, master's degrees, and doctorates.

**Individual Responses (faculty, staff, or students not responding on behalf of a program or institution)**

1. Why are you commenting? Be clear early on that you are writing to urge inclusion of education programs in the professional degree definition.
2. Introduce yourself. Describe the institution and your education program.
  - If you are a graduate student, describe your background, graduate program, and career goals. Do you attend full- or part-time? Where do you plan to work after you graduate? How do you want to contribute to your community, region, and/or state?
  - For faculty and staff, who are your graduate students? What are their personal and professional backgrounds? What do they study? How many of them attend less than part-time? Where do they go on to work? How do they contribute to your community, region, and state?
3. Why does the professional degree definition matter?
  - For students: What is the cost of your program? How are you affording to attend? What role do student loans play for you? How much do you currently borrow? What will it mean to you that the amount you can borrow will be reduced if you don't attend full-time? How would more access to federal student loans help you?
  - For faculty/staff: What is the cost of your program, including both living costs and tuition and fees? How are students affording to attend? What role do student loans play for your students? How much do they currently borrow? What will happen to your part-time students if they have reduced access to student loans?
4. Why should education be included?
  - Educators – whether teachers, school counselors, principals, or other educators – are professionals. To practice in the field, they require state licensure and ongoing professional development. They provide a vitally important public service. Denying that recognition sends a demoralizing message to the hard-working and dedicated students who want to devote their careers to the profession of education.
  - While teachers may enter the field with a bachelor's degree, for many teaching specialties (e.g., special education) and numerous other occupations in education (e.g., principal, school counselor), post-baccalaureate education is required. The Department's rationale is false that all professional educators enter the field via a bachelor's degree in education. *[For students: Relate this to your own career if applicable.]*

- The lowered borrowing limits for part-time attendees will force students to either drop out or significantly delay their progress toward a degree. Inclusion in the professional category will enable part-time students to secure an adequate amount of loan financing.
  - Without increased access to loans, education students will be forced to seek private loans. If these loans are even available, they will be less affordable and cannot be discharged through the Teacher and Public Service loan forgiveness programs.
5. State your specific requests:
- Include all graduate programs in education (post-baccalaureate certificates, master's degrees, and doctorates) in the professional degree category.
  - Eliminate the requirement for at least two-years of graduate study since post-baccalaureate certificates are often one year in duration. These programs typically prepare educators to work with particular student populations (e.g., students with autism) and result in the issuance of a state license.
  - Because the degrees awarded (e.g., MAT, MS, Ed.D, Ph.D.) vary considerably and are not standardized within the field, include all types of graduate certificates, master's degrees, and doctorates.

## **K-12 Leader and Other Partner Responses**

1. Why are you commenting? Be clear early on that you are writing to urge inclusion of education programs in the professional degree definition.
2. Introduce yourself. What is your role and organization? What is your relationship with the educator preparation program(s) in your region?
3. Why does the professional degree definition matter to your organization? How will it impact your ability to recruit and retain well-qualified educators? What will it mean to your employees who are pursuing – or who want to pursue – graduate education?
4. Why should education be included?
  - Educators – whether teachers, school counselors, principals, or other educators – are professionals. To practice in the field, they require state licensure and ongoing professional development. They provide a vitally important public service. Denying that recognition sends a demoralizing message to the hard-working and dedicated students who want to devote their careers to the profession of education.
  - While teachers may enter the field with a bachelor's degree, for many teaching specialties (e.g., special education) and numerous other occupations in education (e.g., principal, school counselor), post-baccalaureate education is required. The Department's rationale is false that all professional educators enter the field via a bachelor's degree in education. [*Cite examples from your state, district, or school.*]
  - The lowered borrowing limits for part-time attendees will force your employees to either drop out or significantly delay their progress toward a degree, contributing to staffing shortages in your school/district. Inclusion in the professional category will enable school/district employees who are part-time students to secure an adequate amount of loan financing.

- Without the increased access to loans, education students will be forced to seek private loans. If these loans are even available, they will be less affordable and cannot be discharged through the Teacher and Public Service loan forgiveness programs, making work in schools less attractive.
5. State your specific requests:
- Include all graduate programs in education (post-baccalaureate certificates, master's degrees, and doctorates) in the professional degree category.
  - Eliminate the requirement for at least two-years of graduate study since post-baccalaureate certificates are often one year in duration. These programs often prepare educators to work with particular student populations (e.g., students with autism) and result in the issuance of a state license.
  - Because the degrees awarded (e.g., MAT, MS, Ed.D, Ph.D.) vary considerably and are not standardized within the field, include all types of graduate certificates, master's degrees, and doctorates.