

WellLink Health Alliance Expresses Concerns with U.S. Department of Education’s Proposed Definition of “Professional Student” and “Professional Degree”

WellLink Health Alliance opposes the U.S. Department of Education’s proposed definition of “professional student” and “professional degree” developed through the Reimagining and Improving Student Education (RISE) negotiated rulemaking process. As drafted, the proposal would exclude multiple healthcare professions despite their rigorous accreditation standards, licensure requirements, and essential role in meeting the nation’s healthcare needs.

Communities rely on a broad healthcare workforce - including nursing professionals, advanced practice registered nurses, social workers, counselors, public health professionals, school-based providers, allied health professionals, and other licensed and certified clinicians - to deliver care in clinical, community, educational, and public health settings. These professionals complete accredited graduate education programs, fulfill extensive supervised practice requirements, and obtain state licensure or certification prior to entering practice. Excluding these professions from the definition of “professional degree” is inconsistent with their education, competencies, and statutory requirements and threatens the stability of the nation’s healthcare delivery system.

Restricting access to federal graduate student aid, including Grad PLUS loans, would create significant barriers for students pursuing healthcare careers at a time when workforce shortages are severe and worsening nationwide. Healthcare systems, community-based providers, rural and underserved areas, schools, and safety-net institutions would be disproportionately affected.

These consequences contradict Congress’s long-standing intent to preserve broad access to graduate education across healthcare disciplines. At a time of rising demand for primary care, nursing services, behavioral health, public health capacity, maternal and child health, chronic disease management, and community-based care, federal policy should strengthen, not restrict, the pipeline of qualified professionals entering the workforce.

WellLink Health Alliance urges the Department of Education to adopt an inclusive definition of “professional student” and “professional degree” that reflects the realities of today’s healthcare workforce. Aligning eligibility with recognized accreditation and licensure standards offers a consistent and transparent approach.

The decisions made through this federal rulemaking process will have lasting national implications for healthcare workforce capacity, care access, and community well-being. WellLink Health Alliance calls on federal policymakers to ensure final regulations strengthen, rather than undermine, the professionals serving on the front lines of patient care, public health, education, and community services.

Protecting access to graduate education is essential to sustaining a strong, diverse, and adequately resourced healthcare workforce nationwide.