



March 2, 2026

The Honorable Linda E. McMahon
Secretary
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Ms. Tamy Abernathy
Director, Policy Coordination Group
Office of Postsecondary Education
400 Maryland Ave. SW, 5th Floor
Washington, DC 20202

RE: Reimagining and Improving Student Education, RIN 1840-AD98 [Docket ID ED-2025-OPE-0944]

Dear Secretary McMahon:

As Members of the Democratic Women's Caucus, we are committed to building an economy where women have access to quality education, equal job opportunities, and support in any career path they choose. That's why we write to express our deep concerns regarding the Department of Education's [the Department] proposed rule, RIN 1840-AD98, which would narrow the definition of 'professional students' to implement the student loan provisions of the ironically named *One Big Beautiful Bill Act*, signed into law in July 2025. This reclassification would disproportionately harm women, who make up the majority of the professional students losing access to student loans in this rule—registered nurses, physician assistants, physical therapists, educators, and social workers.¹ Students pursuing these demanding and essential professions would no longer qualify for greater loan assistance under proposed rule RIN 1840-AD98. **We urge the Department to immediately modify this rule and expand the definition of professional students in a way that does not indiscriminately leave professions that are dominated by women without adequate access to funding.**

The poorly named *One Big Beautiful Bill Act*, launched an unprecedented attack on women graduate students' ability to pay for their education. This law eliminated Grad PLUS Loans,

¹ Newsweek. (2025, November 24). *Are women more affected by Trump administration's 'professional' degree change?* <https://www.newsweek.com/how-women-affected-trump-change-professional-degrees-11099533>.

instituted arbitrary loan caps, and established exclusionary definitions to classify degrees under those limits. Prior to this law, all graduate students had access to different types of loans to finance their education regardless of their degree. Specifically, through Grad PLUS Loans, a student could borrow equal to the amount of their cost of attendance minus any financial aid.² Following the enactment of the *One Big Beautiful Bill Act*, proposed rule RIN 1840-AD98 would separate ‘professional’ and ‘graduate’ students under the law’s new degree definitions to enforce the new loan caps. Notably, the rule would define students in women dominated fields, like nursing, education, and social work as ‘graduate students’ rather than ‘professional students.’ As a result, these ‘graduate students’ would have a cap of \$20,500 per year with a lifetime maximum of \$100,000 in student loans. In comparison, ‘professional students’ can borrow up to \$50,000 a year with a \$200,000 lifetime maximum.³ This rule both undervalues the rigor of these degree programs and restricts the financial assistance available to women graduates to pursue these in-demand jobs.

Women will face outsized financial hardship due to this rule because the degrees reclassified for lower loan caps are predominantly pursued by women including registered nurses, educators, and social workers. Women pursuing these degrees dedicate two or three years of their lives and thousands of dollars to achieving them, while managing significant time commitments outside the classroom. Unlike undergraduate programs, these degrees include intense field work by placing nursing students in clinicals and prospective educators in classrooms. The intensive demand for these programs leaves little time for alternative financial options. The *One Big Beautiful Bill Act*’s graduate student loan limit of \$20,500 per year will prevent women from affording their multi-year programs that cost more than the new student loan limit. For example, the average cost of graduate nursing school each year is \$30,000.⁴ With the new loan cap, nurses would be left to pay the remaining \$9,500 each year or take out additional private student loans that are less attractive than federal loans.

To cover the remainder of their tuition, the Department’s proposed rule pressures women to navigate private student loans. Private student loans greatly differ depending on the situation of the borrower. Private loans tend to have higher interest rates, less flexibility with repayment plans, and require an established credit score or a cosigner. As a result of the *One Big Beautiful Bill Act*, 4 in 10 graduate students may be unable to secure a private loan with a lower interest rate.⁵ Additionally, private lenders can employ deceptive billing statements and engage in

2 U.S. Department of Education. (n.d.). *Grad PLUS loans*. Federal Student Aid. <https://studentaid.gov/understand-aid/types/loans/plus/grad>

3 CBS News. (2025, November 25). *Trump administration proposal to exclude nursing from ‘professional degree’ list* – CBS News. <https://www.cbsnews.com/news/trump-nursing-professional-degree-excluded-list/>.

4 American Nurses Association, “*Department of Education’s Loan Proposal Puts Nursing Workforce and Patient Care at Risk*,” *American Nurses Association*, November 26, 2025, <https://www.nursingworld.org/news/news-releases/2025/departments-of-education-loan-proposal-puts-nursing-workforce-and-patient-care-at-risk/>

5 Tomas Monarrez, Jordan Matsudaira & Dubravka Ritter, *Student Loans for Graduate School: Who Will Be Affected by the New Federal Lending Limits?* (Fed. Reserve Bank of Philadelphia, Dec. 2025), <https://www.philadelphiafed.org/-/media/FRBP/Assets/Consumer-Finance/Reports/student-loans-for-graduate->

discriminatory lending practices.⁶ Women already hold two-thirds of the country's \$1.54 trillion student debt.⁷ This proposed rule will worsen women's financial security and force them out of these professions.

Without women pursuing these fields, the workforce shortages will intensify and limit access to critical services in our communities. Women constitute 89% of registered nurses,⁸ 73% of teachers,⁹ and 83% of social workers.¹⁰ Yet, each field faces significant shortages.^{11 12 13} The women in these jobs keep our families healthy, our communities safe, and teach our kids valuable lessons and skills. We must bolster the number of women entering these professions. Instead, the Department is going to worsen the workforce shortages in these women dominated fields and limit access to quality health care and education for our communities.

The Democratic Women's Caucus is dedicated to building a future where all women and families can thrive. Women must have access to affordable education and have the freedom to pursue their chosen career. Similarly, essential workforces, like health care and education, must be bolstered to effectively serve our communities. We call on the Department of Education to modify proposed rule RIN 1840-AD98 and maintain women's access to student loans.

Sincerely,

6 U.S. Senator Elizabeth Warren. (2025, August 4). *Warren, Sanders, Schumer, lawmakers press private student loan lenders on plans for borrowers after Republicans slash access to federal loans*. Retrieved from <https://www.warren.senate.gov/newsroom/press-releases/warren-sanders-schumer-lawmakers-press-private-student-loan-lenders-on-plans-for-borrowers-after-republicans-slash-access-to-federal-loans>

7 American Association of University Women. (n.d.). *Women & student debt*. <https://www.aauw.org/issues/education/student-debt/>

8 Grateful Care ABA. (n.d.). *Nursing statistics & demographics*. Grateful Care ABA. <https://www.gratefulcareaba.com/blog/nursing-statistics-demographics#:~:text=The%20Gender%20Dynamics%20in%20Nursing&text=Women%20remain%20the%20dominant%20gender,new%20talent%20to%20the%20profession>.

9 Newsweek. (2025, November 24). *Are women more affected by Trump administration's 'professional' degree change?* <https://www.newsweek.com/how-women-affected-trump-change-professional-degrees-11099533>.

10 Newsweek. (2025, November 24). *Are women more affected by Trump administration's 'professional' degree change?* <https://www.newsweek.com/how-women-affected-trump-change-professional-degrees-11099533>.

11 American Association of Colleges of Nursing (AACN), *Nursing Shortage Fact Sheet* (fact sheet, American Association of Colleges of Nursing, Washington, DC), accessed February 13, 2026, <https://www.aacnnursing.org/Portals/0/PDFs/Fact-Sheets/Nursing-Shortage-Factsheet.pdf>

12 Tan, T. S., Arellano, I., & Patrick, S. K. (2024). *State teacher shortages 2024 update: Teaching positions left vacant or filled by teachers without full certification* (Learning Policy Institute). Learning Policy Institute. https://learningpolicyinstitute.org/media/4412/download?inline&file=State_Vacancy_2024_RESOURCE.pdf.

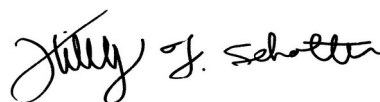
13 National Association of State Mental Health Program Directors Research Institute (NRI), *SMHA Workforce Shortages 2023: State Behavioral Health Workforce Shortages and Initiatives, 2023–2024* (Falls Church, VA: NRI, October 1, 2024), accessed February 13, 2026, <https://nri-inc.org/media/tghpz5uu/smha-workforce-shortages-2023.pdf>



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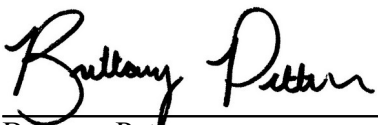
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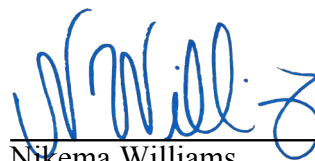
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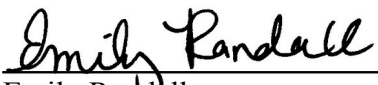
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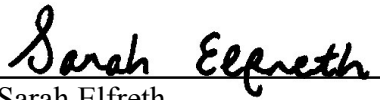
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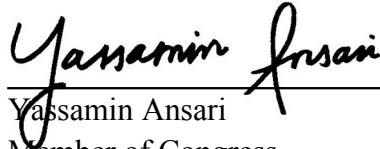
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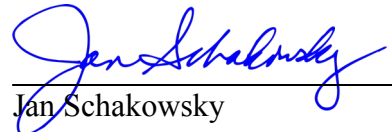
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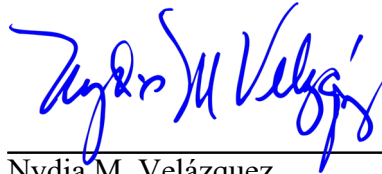
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