

MICHAEL V. LAWLER
17TH DISTRICT, NEW YORK
HOUSE FINANCIAL SERVICES
COMMITTEE
HOUSE FOREIGN AFFAIRS
COMMITTEE
lawler.house.gov



Congress of the United States
House of Representatives
Washington, DC 20515-3217

WASHINGTON DC OFFICE:
324 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-3217
(202) 225-6506

DISTRICT OFFICE:
ONE BLUE HILL PLAZA
THIRD FLOOR, P.O. BOX 1645
PEARL RIVER, NY 10965
(845) 201-2060

CARMEL TOWN HALL
60 McALPIN AVENUE
MAHOPAC, NY 10541
(845) 743-7130

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

February 26, 2026

Dear Secretary McMahon,

I write today to leave a public comment on the Department of Education's proposed rule titled, "Reimagining and Improving Student Education." As the Department considers modifications to the proposed rule, I encourage you to amend the interpretation of the definition of "professional degree" to include additional programs that satisfy the definition under 34 CFR 668.2.

As you know, the Working Families Tax Cuts Act modified the annual loan limit caps for students in graduate programs. The law caps traditional graduate education at \$20,500 per year and \$100,000 overall. But for graduate students seeking professional degrees, this limit is raised to \$50,000 per year and \$200,000 overall. The law refers to existing regulation to define "professional degree," as 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 regulation lays out a non-exhaustive list of ten professional degrees.

The Rule takes this existing definition yet further narrows its interpretation by only including degrees that are at the doctoral level and require at least six academic years of postsecondary education coursework for completion. It also provides an exhaustive list, only adding "clinical psychology" in addition to the original non-exhaustive list. This specifically excludes critical professional degrees such as nursing, physical therapy, social work, and more.

The Rule also provides a number of arbitrary reasons why certain degrees are not considered professional. The truth is that many of these professions need advanced degrees and licenses to begin and continue practice. Additionally, scope of practice varies from state to state for many of the covered professions as well. Further, there is nothing in current statute or prior regulation that supports the idea that professional degrees are only programs where those who obtain them, after licensure, can practice without supervision.

As you may know, I introduced H.R.6718, the Professional Student Degree Act, to codify the definition in 34 CFR 668.2 and explicitly lay out the degrees that meet the requirements. My bill specifically includes the following degrees: Pharmacy, Dentistry, Veterinary Medicine,

Chiropractic, Law, Medicine, Optometry, Osteopathic Medicine/Osteopathy, Podiatric Medicine/Podiatry, Theology/Theological Studies, Clinical Psychology, Ministry, Social Work, Audiology, Physician Assistant/Associate, Occupational Therapy, Physical Therapy, Nursing, Public Health, Business Administration and Management, Accounting, Architecture, Education, and Special Education.

I encourage you to implement the Working Families Tax Cuts Act as Congress intended and ensure that the full swath of professional degrees that satisfy the definition laid out in 34 CFR 668.2 are properly listed in the final rule.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Michael Lawler". The signature is written in a cursive style with a large, stylized initial "M".

Michael V. Lawler
Member of Congress