



National Career
Development
Association

February 25, 2026

Dr. David Barker
Assistant Secretary
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

SUBMITTED VIA [REGULATIONS.GOV](https://www.regulations.gov)

RE: Notice for Proposed Rulemaking - Reimagining and Improving Student Education (RISE)
[Docket ID ED-2025-OPE-0944]

Dear Assistant Secretary Barker:

The National Career Development Association is the organization providing professional development and standards for practitioners and educators who work with students and individuals seeking employment. Our membership represents more than 7,000 career development professionals across the United States, 60% of whom work within higher education institutions and 50.1% have earned a degree in counseling. Our members are directly responsible for advising students on career pathways, labor market viability, and educational return on investment. While NCDA supports the Department's goal of reducing student debt, we have significant concerns regarding the RISE Proposed Rule's implementation timeline, the restrictive definition of "professional student," and the downstream effects on the workforce pipeline for critical professions, disproportionately impacting those that employ a high percentage of women. Addressing these adverse impacts and maintaining the designation of counseling programs as professional degree programs is essential to mitigating workforce shortages and ensuring continued access to career development support nationwide. NCDA asserts that the RISE Proposed Rule, in its current form, will create significant

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barriers to graduate education access, worsen workforce shortages, and introduce inequitable financial burdens for students.

Implementation Timeline and Market Response

The Proposed Rule, specifically the changes to annual and aggregate loan limits under § 685.203 and the elimination of Graduate PLUS loans under § 685.200, is scheduled to take effect on July 1, 2026.¹

Concerns Over Enforcement and Impact: The July 1, 2026, implementation timeline is insufficient for institutions and students to adapt to such a fundamental restructuring of federal aid.

- **Market Inelasticity:** The Department argues that these caps will exert pressure on institutions to lower tuition. However, implementing these caps with less than six months' lead time (assuming a final rule in early 2026) does not allow the market enough time to react quickly enough to bridge the gap between current costs and new loan caps. Tuition reductions require complex budgetary approvals that often take 12–24 months or more.
- **Impact on Advising and Planning:** NCDA members, including high school career counselors, career advisors, and higher education career services professionals, advise both high school and college students years in advance on educational planning. Current undergraduate students have made educational choices based on a financial aid landscape that will abruptly vanish. As noted by the American Council on Education (ACE), rapid implementation violates the spirit of the Higher Education Act's "Master Calendar," causing significant disruption to financial aid packaging cycles.²
- **Disproportionate Harm:** A sudden implementation disproportionately affects low- and middle-income students who lack family savings to cover the immediate funding gap, forcing them to turn to high-interest private loans, work more hours

¹ 34 CFR Parts 674, 682, and 685

² The ACE has expressed concern that the July 1, 2026, implementation date for the loan limits and repayment changes fails to comply with the "Master Calendar" requirements of the Higher Education Act. Typically, regulations must be finalized by November 1 of the preceding year to allow institutions to update their financial aid systems and for students to plan for the upcoming academic year. The ACE argued that imposing such major changes just months before they take effect will cause significant disruption for millions of students and borrowers. American Council on Education. (2025). Comments on the Implementation of the One Big Beautiful Bill Act. In *Department of Education*, available at <https://www.aamc.org/media/85716/download>.

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to cover the cost of education resulting in lower long-term earnings and decreased career mobility, or abandon their education entirely.³

Suggested Changes: NCDCA recommends that the Department delay the effective date of the new loan limits and the elimination of Graduate PLUS loans until at least July 1, 2027.

- *Specific Text Change:* Amend the applicability dates in **§ 685.203(b)(2)(iv)** and **§ 685.200(b)(2)(i)** to read "Beginning on July 1, 2027" instead of "July 1, 2026."

Restrictive Definition of "Professional Student" and Workforce Shortages

Under § 685.102(b), the Proposed Rule defines "Professional student" and "Professional degree." The proposal restricts this definition to a closed list of doctoral-level degrees in fields such as Allopathic Medicine, Dentistry, Veterinary Medicine, and Law, explicitly linking eligibility to specific four-digit [Classification of Instructional Programs \(CIP\)](#) codes.

Concerns Over Enforcement and Impact: This definition arbitrarily excludes essential health and public service professions that require advanced degrees for licensure, specifically, but not exclusively, Nursing (MSN, DNP) and Social Work (MSW, DSW).

- **Workforce Shortages:** The U.S. faces a projected shortage of 450,000 nurses and 100,000 social workers by 2034.^{4,5} Excluding these fields from the "professional" loan limits (\$50,000 annual) and capping them at the "graduate"

³ The regulatory analysis accompanying the Proposed Rules notes that, "Table 3.2 describes the number of borrowers and loan volume that could be affected by the proration provision using Department data from FY 2025. Of the \$92.7 billion in nonconsolidation Federal student loans disbursed in FY 2025, \$84 billion was disbursed to full-time students. The remaining disbursements (\$8.7 billion) were to students enrolled less than full-time and would therefore be subject to the prorated annual loan limit beginning July 1, 2026. These loan limits will create several new costs for borrowers relative to pre-OBBB policy. First, borrowers may have to reduce their enrollment due to the inability to afford the cost of their program. This could delay the time it takes students to finish their program. Second, students may need to seek other forms of financing to maintain their enrollment, such as by pursuing employment while enrolled or taking out private loans. Private loans may have less favorable terms than Federal student loans, meaning some students and parents who utilize these financing options could face higher interest rates and fees. Third, some students and parents may not be able to secure non-Federal loans to replace the borrowing capacity lost under the OBBB, whether that be because non-Federal lenders deem the programs and institutions the students attend to be financially risky, or because the borrowers do not have adequate credit histories or cannot obtain a co-signer. Some of these borrowers may have to drop out of their program due to their inability to afford their program through alternative means. These effects will require some affected borrowers to reconsider their enrollment and financing decisions. These, in turn, may have further effects, such as on timing of on when individuals enter the labor force and their career choices."

⁴ See *Registered nurses*. (2025, August 28). Bureau of Labor Statistics. <https://www.bls.gov/ooh/healthcare/registered-nurses.htm#tab-6>

⁵ See *Social workers*. (2025, August 28). Bureau of Labor Statistics. <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm#tab-6>

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limit (\$20,500 annual) creates a massive funding gap, often exceeding \$25,000 per year for graduate programs, that will deter entry into these high-need fields.⁶

- **Gender Inequity:** The professions excluded from the "professional" definition are overwhelmingly women-dominated (e.g., Women comprise 88.8% of U.S. nurses;⁷ and 81% of U.S. social workers⁸). By preserving higher loan limits for male-dominated fields like Dentistry and Veterinary Medicine while cutting access for Nursing and Social Work, the rule institutionalizes gender-based economic disparities in educational financing.
- **Regulatory Inconsistency:** The Department's list ignores the "illustrative" nature of prior definitions (34 CFR 668.2) and fails to account for degrees that meet the functional criteria for licensure and advanced skill, simply because they do not share a CIP code with the legacy list.
- **Regulatory Burden:** Establishing a closed list of degrees considered "professional degrees" is likely to create future inconsistencies and increase regulatory burden. In a 2017 report, Dell Technologies projected that 85% of the jobs that will exist in 2030 had not yet been invented.⁹ It would be impossible to create a complete closed list of "professional degrees" when new occupations and professions are constantly created due to innovation, technology, and societal need. The closed list will require constant updates and amendments to the regulations, creating an undue burden on regulators and institutions of higher learning alike. Furthermore, it will create a lag in supporting and encouraging students to enter these professions, which will likely have significant needs for skilled labor because they must constantly update the closed list.

Suggested Specific Changes: NCDCA recommends the Department expand the list of eligible degrees in § 685.102(b) to include high-need licensure programs.

⁶ Indeed, Columbia University projects the total cost to attend the fall 2025 and spring 2026 semesters for its Master of Science in Social Work program, a necessary degree to become a licensed social worker, will be \$100,617. This projected cost would exceed the annual borrowing cap under the proposed rule by \$80,117. This projected cost for nine months of study, half of what is required for the degree, would exceed the lifetime loan limit cap proposed by the RISE rule. See *Cost of attendance: Residential Campus 2025-2026 | Columbia School of Social Work*. (n.d.). <https://socialwork.columbia.edu/content/cost-attendance-residential-campus-2025-2026>

⁷ Smiley, R.A., Allgeyer, R.L., Shobo, Y., Lyons, K.C., Letourneau, R., Zhong, E., Kaminski-Ozturk, N., & Alexander, M. (April 2023). *The 2022 National Nursing Workforce Survey*. *Journal of Nursing Regulation*, 14(1), Supplement (S1-S90).

⁸ CareerExplorer. (2025, March 31). *Social worker demographics in the United States*. <https://www.careerexplorer.com/careers/social-worker/demographics/>

⁹ IFTF: *The Next Era of Human-Machine Partnerships*. (July 17, 2017). <https://legacy.iftf.org/humanmachinepartnerships/>

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- *Specific Text Change*: restore the language from 34 CFR 668.2 stating that the list of professional degrees is "illustrative and not exhaustive" to allow for future workforce adjustments.
- *Alternatively*, amend § 685.102(b)(2) to add: "(ii) Nursing (M.S.N., D.N.P.), Social Work (M.S.W., D.S.W.), Physical Therapy (D.P.T.), Occupational Therapy (O.T.D.), and Physician Assistant Studies (M.P.A.S.)."

Reliance on Private Loans and Borrower Protections

Section 685.200(b)(2)(i) eliminates Direct PLUS Loans for graduate and professional students, and § 685.203(b)(2)(iv) sets the annual unsubsidized limit for non-professional graduate students at \$20,500.

Concerns Over Enforcement and Impact: For programs where tuition exceeds the new \$20,500 cap, students will be forced into the private loan market.

- **Loss of Protections:** Private loans do not offer Income-Driven Repayment (IDR) or Public Service Loan Forgiveness (PSLF). NCDAs members frequently advise students to utilize PSLF to make careers in lower-paying public service sectors (e.g., school counseling, community mental health) viable.
- **Predatory Terms:** Private loans often carry variable interest rates and require credit checks or co-signers, disproportionately barring first-generation and low-income students from access.¹⁰ This contradicts the Department's equity goals by creating a system in which only the wealthy can access certain graduate credentials without incurring high-risk debt.

Suggested Specific Changes: The NCDAs suggest creating a "High-Need Public Service" exception.

- *Specific Text Change*: Add a provision to § 685.203 allowing students enrolled in programs identified by the Department of Labor as leading to occupations with "Bright Outlook" or critical shortages to borrow up to the "Professional" annual limit of \$50,000, regardless of the specific degree title.

Inequitable "Legacy" Provisions for Current Undergraduates

Section 685.203(b)(2)(iv)(B) establishes a "legacy" or grandfathering provision only for students enrolled in a program of study as of June 30, 2026.

¹⁰ Filson, J. (2025, September 23). Private lenders would cash in on Congress's student loan changes - Protect borrowers. *Protect Borrowers*. <https://protectborrowers.org/private-lenders-would-cash-in-on-congress-student-loan-changes/>

Concerns Over Enforcement and Impact: This definition of "enrolled" is unfair to current undergraduate students (juniors and seniors) who have planned their academic trajectory with the expectation of accessing Grad PLUS loans for professional school immediately following graduation.

- **Broken Promises:** A student currently finishing a bachelor's degree in pre-law or pre-med has made financial investments based on the availability of federal financing for their eventual graduate training. Because they will not be "enrolled" in the graduate program by June 30, 2026, they are excluded from the legacy protections and face a sudden, unplanned financing cliff.

Suggested Specific Changes: The NCDA recommends extending the legacy provision to current undergraduates who matriculate into graduate programs within a specified window.

- *Specific Text Change:* Amend § 685.203(b)(2)(iv)(B) to include: "Students who completed a bachelor's degree prior to July 1, 2029, and enroll in a graduate or professional program prior to July 1, 2032."

Administrative Burden on Higher Education Institutions

Section 685.203(m)(1) requires institutions to calculate and reduce annual loan limits on a pro-rated basis for students enrolled less than full-time.

Concerns Over Enforcement and Impact: Sixty percent of NCDA members work in higher education, where administrative resources are already stretched thin by Free Application for Federal Student Aid (FAFSA) delays and staffing cuts.

- **Operational Pain Point:** Requiring manual proration calculations for every part-time student creates a massive administrative burden that diverts resources from student support and career counseling services. The complexity of tracking "credit hours considered full-time" across varying programs and terms invites error and compliance risks.

Suggested Specific Changes:

- *Specific Text Change:* NCDA recommends modifying § 685.203(m)(1) to apply the proration requirement only to students enrolled less than half-time, maintaining the current standard for half-time enrollment eligibility which simplifies administration.

Additional Recommendations

To strengthen the effectiveness and fairness of the RISE implementation, NCDA further recommends the establishment of a formal transition advisory window to ensure institutions, students, and state licensing bodies have sufficient time to adapt to structural financial aid changes. Additionally, the Department should require

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comprehensive equity, workforce, and economic impact analyses prior to adopting any future adjustments to federal loan structures, particularly those that affect access to high-need fields. Finally, NCDA urges the creation of a standing Workforce Review Board, comprised of representatives from education, labor, industry, and professional associations, to regularly evaluate and update the list of “professional degree” categories, ensuring that federal loan policy remains aligned with emerging occupations, evolving licensure requirements, and national workforce shortages.

Concluding Remarks

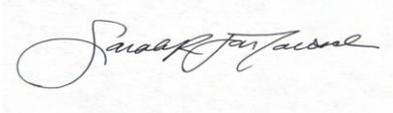
In summary, NCDA urges the Department to reconsider key elements of the RISE Proposed Rule, as the current implementation timeline, restrictive definitions of “professional” programs, and reduced access to federal borrowing collectively pose significant risks to students, institutions, and the nation’s workforce pipeline. Without careful adjustments, the rule is likely to exacerbate existing shortages in critical public service fields, deepen gender-based inequities, and create new financial barriers for low- and middle-income students pursuing careers essential to the nation’s health, education, and social well-being. NCDA respectfully encourages the Department to adopt the recommended changes outlined in this response, including expanded degree eligibility, strengthened borrower protections, transition safeguards, and ongoing workforce review. Thus, federal student aid policy can continue to support rather than undermine access to high-need professions and the stability of the public systems that depend on them.

Thank you for your time and thoughtful consideration of our feedback. If you have any questions about these comments or if NCDA can be of service, you can reach us at governmentrelations@ncda.org.

Sincerely,



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