

February 26, 2026



The Honorable Nicholas Kent, Under Secretary
The Honorable David Barker, Assistant Secretary, Office of Postsecondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Request to include nursing among “professional degree” programs for federal student loan purposes under Docket ID: ED-2025-OPE-0944

Dear Under Secretary Kent and Assistant Secretary Barker,

The Society of Trauma Nurses (STN) appreciates the opportunity to comment on the William D. Ford Federal Direct Student Loan (Direct Loan) Program Definitions (§ 685.102) contained in the U.S. Department of Education (DOE) proposed rulemaking under Docket ID: ED-2025-OPE-0944 (Proposed Rule). STN is dedicated to promoting optimal trauma care for all people through evidence-based clinical practices across the continuum of care, from injury prevention and prehospital treatment to emergency critical care, inpatient treatment, rehabilitation, and reintegration into society.

We urge the DOE to include post-baccalaureate nursing education within the definition of “professional degree” programs for purposes of federal graduate student loan limits. Communities across the United States face significant gaps in timely access to trauma and critical care services. Only approximately 24 percent of rural residents have access to a Level I or II trauma center within one hour, and many urban communities similarly experience life-threatening delays in trauma care. Excluding nursing degrees from professional degree programs risks exacerbating these access challenges by constraining the pipeline of graduate-prepared trauma and advanced practice nurses.

The DOE has already taken proactive steps to recognize clinical psychology (CIP Series 42) as a professional degree program due to workforce shortages and the importance of ensuring access to services in underserved communities. Post-baccalaureate nursing degrees warrant similar recognition. Graduate-prepared nurses are essential to ensuring Americans have timely access to lifesaving trauma, surgical, emergency, and critical care services, particularly in rural and health professional shortage areas (HPSAs) identified by the U.S. Health Resources and Services Administration (HRSA).

STN members see firsthand how workforce constraints translate into delayed care, reduced access to specialty services, and preventable complications. Limiting access to affordable financing for graduate nursing education would restrict the supply of advanced practice registered nurses (APRNs), nurse educators, and clinical leaders who are indispensable to trauma centers, rural hospitals, and underserved communities. Such a limitation would conflict with broader federal priorities aimed at expanding access to care and strengthening the healthcare workforce.

Nursing education meets the core elements of a professional degree. Nursing is a licensed profession in all states. APRNs, including nurse practitioners, certified registered nurse anesthetists, clinical nurse

specialists, and certified nurse-midwives, complete graduate or doctoral-level education, extensive clinical training, national certification, and ongoing licensure requirements. In trauma systems and across acute and critical care settings, these professionals exercise independent clinical judgment and hold defined responsibilities that are central to patient care delivery. The regulatory framework should reflect this established professional status.

STN therefore respectfully requests that the DOE revise the definition of “professional degree” programs to explicitly include post-baccalaureate nursing education pathways consistent with advanced nursing licensure under CIP Series 51. This action will help ensure the final rule supports a stable supply of clinically trained nursing professionals who underpin and fortify the U.S. healthcare system.

STN welcomes the opportunity to serve as a resource on trauma nursing workforce needs and the real-world impact of graduate nursing education on patient outcomes. Please contact Stephanie Czuhajewski at sczuhajewski@traumanurses.org for additional information. Thank you for your consideration of this important request.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Czuhajewski".

Stephanie Czuhajewski, MPH, CAE
Executive Director
Society of Trauma Nurses