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February 24, 2026

The Honorable Nicholas Kent  
Under Secretary of Education  
Office of Postsecondary Education  
United States Department of Education  
400 Maryland Ave. SW  
Washington, DC 20202

Submitted via [www.regulations.gov](http://www.regulations.gov)

Docket ID ED-2025-OPE-0944

**Re: Public Comment on Proposed Definition of “Professional Degree” and Implications for Health Professions Education**

Dear Under Secretary Kent,

On behalf of the American Burn Association (ABA), thank you for the opportunity to provide comment on the Department’s proposed updates to the federal definition of “professional degree” and the potential implications for graduate health professions education.

On background, the ABA is the national professional organization dedicated to improving the lives of burn patients and supporting the multidisciplinary teams that provide burn care across the continuum—from prevention and emergency response to acute treatment, rehabilitation, and long-term recovery. Our membership reflects the interdisciplinary nature of burn care and includes nurses, surgeons, therapists, advanced practice providers, psychologists, researchers, and burn center leaders across the United States.

Because burn care relies on highly specialized, team-based care delivery, policies affecting access to graduate and professional education for health professions have direct and meaningful implications for workforce sustainability, system readiness, and patient access to care.

## **Interdisciplinary Workforce Considerations**

Nurses and advanced practice nurses are essential members of the burn care team. They provide critical leadership in acute and intensive care settings, rehabilitation and outpatient care, patient and family education, and long-term recovery support. In many burn centers, particularly those serving rural or underserved regions, advanced practice nurses and specialty-trained clinical nurses play a central role in maintaining access to burn care and supporting continuity of services.

Changes to federal policy that influence graduate education affordability, loan eligibility, or program classification for nursing and related health professions may have downstream effects on workforce pipelines. Even a 5% decrease in the healthcare workforce can have devastating impacts. These effects could include:

1. Reduced enrollment in graduate nursing and specialty training programs
2. Increased barriers for students pursuing advanced clinical or faculty roles
3. Challenges in recruiting and retaining specialty nurses in high-acuity settings
4. Strain on interdisciplinary teams within verified burn centers
5. Potential impacts on national preparedness for mass-casualty or disaster events

Burn care is workforce-intensive and infrastructure-dependent. Sustaining a pipeline of highly trained clinicians, including nurses, advanced practice providers, and rehabilitation specialists, is essential to maintaining the nation's capacity to deliver high-acuity burn care and respond to emergencies.

## **Importance of Educational Access and Affordability**

The ABA recognizes that the Department's proposed definition of "professional degree" is intended as an administrative distinction related to federal student loan policy. However, changes in program classification or loan eligibility structures can have practical consequences for students and institutions. Graduate-level health professions education often requires extended training and clinical preparation, and access to financing plays a critical role in ensuring a diverse and sustainable workforce.

Ensuring that nurses and other health professionals retain viable pathways to graduate and specialty education is vital to maintaining access to care for burn patients and for strengthening the broader healthcare system. Burn centers depend on interdisciplinary teams whose training spans multiple professional pathways, many of which rely on graduate-level education and advanced clinical preparation.

## **ABA Perspective and Recommendations**

The ABA respectfully encourages the Department of Education to sustain current levels of loan options and consider the following as it finalizes policy related to the definition of professional degree programs and associated loan provisions:

1. Recognize the essential role of nursing and other interdisciplinary health professions in delivering high-acuity specialty care.
2. Consider potential downstream workforce implications when modifying program classifications or loan eligibility structures.
3. Engage with professional healthcare organizations and specialty societies to better understand workforce needs across disciplines.
4. Support educational pathways that sustain the pipeline of clinicians, educators, and researchers necessary for specialized care delivery.
5. Policies that support access to advanced education and training for health professionals ultimately support patient care, system readiness, and public health. For burn care, where outcomes depend on coordinated multidisciplinary teams, workforce stability is particularly critical.

## **Conclusion**

The American Burn Association appreciates the Department's attention to these issues and its willingness to receive public comment. We remain committed to working collaboratively with federal partners, academic institutions, and healthcare organizations to ensure that policies affecting education and workforce development support the continued delivery of high-quality, interdisciplinary burn care across the United States.

Thank you for the opportunity to provide comment.

Respectfully submitted,

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