

Department of Education's Definition of Professional Degree Program Excludes PAs



Action Requested: Contact the Department of Education to urge modification of its proposed rule, **Reimagining and Improving Student Education**, so that its definition of “professional degree program” includes PA programs and other health care provider programs that fit the definition under H.R. 1, the One Big Beautiful Bill Act (OBBBA). Formal comments may be submitted to the Department of Education until **March 2, 2026**.

If the Department of Education’s proposed rule is finalized, PA students would be limited to borrowing \$20,500 per year and \$100,000 in aggregate in federal student loans beginning July 1, 2026. Because PA programs typically last three academic years while some are compressed into two academic years, PA students would effectively be limited to borrowing \$41,000 for two year programs, and \$61,500 for three year programs. The median tuition for PA school is more than \$96,000, leaving a financing gap of \$35,000. Full cost of attendance for PA school is much more than just tuition, and PAs cannot work while in PA school.

The proposed rule must be modified because:

- It is inconsistent with the text and intent of OBBBA, as passed by Congress;
- It would exacerbate health care workforce issues in rural areas and in primary care practice, where shortages are most acute, by making it more difficult to finance PA school;
- It is out of step with Administration priorities for health workforce, which directly incentivize states to adopt policies modernizing PA practice through the Rural Health Transformation Program.

Background: OBBBA was passed by Congress and signed into law in July of 2025. The law eliminated the Grad PLUS federal student loan program, which allowed students to borrow up to the cost of attendance. It established new loan limits with two levels, “professional” (\$50,000 per year/\$200,000 aggregate) and “graduate” (\$20,500 per year/\$100,000 aggregate), and defined “professional” according to a 1994 Department of Education regulation stating that a “professional degree” is, “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 also includes a list of examples of professional programs, but explicitly states that the definition is not to be limited to these examples.

PA programs clearly meet every aspect of this definition: PA programs are graduate programs required to practice as a PA, and every state licenses PAs.

The Department of Education convened a negotiated rulemaking committee to begin the regulatory process in order implement OBBBA’s student loan provisions, but the negotiators ultimately reached a consensus on a definition of “professional program” that limited it to the non-exhaustive list of examples, plus clinical psychology, and which excluded PAs and many other healthcare professionals. A proposed rule that does not include PAs has now been published, with a public comment period ending on **March 2, 2026**. The proposed rule argues, based on a flawed understanding of “supervision” and “independent practice,” that PA programs should not be considered “professional programs” based on commonalities between the non-exhaustive list of examples.

AAPA Recommendation: AAPA recommends that Members of Congress urge the Department of Education to modify its rule to be consistent with the intent and the text of the law. Contact the Department of Education and provide formal comments by March 2. Cosponsor Rep. Mike Lawler’s Professional Student Degree Act ([H.R. 6718](#)), which would codify the regulatory definition of “professional degree” and explicitly includes PAs.

2/2026