



A just future begins with bold ideas

March 2, 2026

Submitted via regulations.gov.

The Honorable Nicholas Kent
Under Secretary of Education
US Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Tamy Abernathy
Office of Postsecondary Education
US Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Notice of Proposed Rulemaking Docket ID ED-2025-OPE-0944; RIN 1840-AD98

Dear Under Secretary Kent and Director Abernathy:

On behalf of the Institute for Women's Policy Research (IWPR), I am writing to submit comments on the US Department of Education's (Department) Reimagining and Improving Student Education (RISE) Committee's ongoing rulemaking to implement student financial aid provisions under Public Law 119–21 and the Office of Postsecondary Education's Notice of Proposed Rulemaking (NPRM) issued on January 30, 2026 (Docket ID ED-2025-OPE-0944; RIN 1840-AD98). IWPR strongly opposes the proposed rule reflecting the RISE Committee's decision to omit many post-baccalaureate degrees from the regulatory definition of "professional degree."

IWPR is a nonpartisan, nonprofit organization that conducts and disseminates research to shape policies that close inequality gaps and improve the economic well-being of women and families from diverse backgrounds. To support women's access to economic security, we focus on understanding the barriers and solutions to expanding access to affordable education and career pathways. As a leading national think tank that employs the highest standards of integrity and quality in our related research, IWPR is uniquely positioned to comment and provide evidence on the potential harm the Department's proposed rule may have on students—including women, parenting students, and students of color—access to affordable advanced education.

In July 2025, President Trump signed H.R. 1, the "One Big Beautiful Bill" (OBBB), into law. According to prior IWPR analysis, the OBBB threatens college access and the future economic well-being of women—particularly women of color and parenting students—and the nation's overall economic stability.¹ Among the OBBB's sweeping changes to federal student loan programs and borrowing loan caps are new limitations on graduate loans, with no new investment in grant aid for graduate students. These include the elimination of the Graduate PLUS Loan program and new borrowing limits for borrowers pursuing graduate and professional degrees. Under the OBBB, beginning in July 2026, the cumulative loan limits will be \$100,000 for graduate students and \$200,000 for professional students.

In November, the Department's RISE Committee proposed a new framework to define what qualifies as a professional degree program and to cap loan amounts for students pursuing "non-professional" degrees. The Department's proposed rule pursuing the formalization and adoption of this framework caps loan

¹Institute for Women's Policy Research, "Threats to College Affordability: Impacts of the OBBB on Women and Families," briefing paper (Washington, DC: IWPR, 2025), <https://iwpr.org/threats-to-college-affordability-impacts-of-the-obbb-on-women-and-families/>.

limits for certain post-baccalaureate degrees deemed to not fit within the regulatory definition of “professional degree.” The degrees the Department seeks to exclude from the definition of “professional degree” open access to career paths that provide vital services to communities and families and require years of study, training, and certification. These include advanced degrees within many women-dominated fields, such as nursing, physician assistant, education, and social work, that are vital to supporting families and community well-being.²

By designating these degrees as non-professional—and therefore imposing the significantly lower graduate degree loan cap versus the professional degree loan cap on students pursuing these degrees—the Department would be limiting access to critical postsecondary funding pathways, which would have severe consequences for degree access and attainment. In addition, this administration would put critical services foundational to the nation’s economic stability—including health care, mental and behavioral health care, and child and elder care—that are already under threat due to rising costs and a strained workforce,³ even further out of reach for many families and communities.

Further, the OBBB and the administration’s proposed framework occur against a backdrop of sharply rising college costs. According to the College Board, over the past three decades, average tuition and fees substantially increased in all types of institutions and more than doubled for in-state students at four-year public institutions.⁴ These increases still understate the true financial burden of college, as they exclude essential expenses such as housing, transportation, books, and supplies.⁵ Students from low-income backgrounds and those historically underserved in higher education, including parenting students, Black students, and other students of color, face college affordability challenges more acutely, in part because long-standing intergenerational wealth gaps limit the financial resources families can contribute toward college education.⁶ As a result, borrowing has become an unavoidable part of pursuing higher education, particularly for post-baccalaureate degrees.

Gender segregation across fields of study and occupations, as well as pay inequities, already have negative consequences for women.⁷ For example, women make up more than 80 percent of associate degree graduates in areas such as education, health professions, social services, and human services—

²National Center for Education Statistics, *Graduate Degree Fields*, annual report (Washington DC: National Center for Education Statistic, 2024), <https://nces.ed.gov/programs/coe/indicator/ctb/graduate-degree-fields>.

³<https://iwpr.org/threats-to-care-and-family-support-impacts-of-the-obbb-on-women-and-families/><https://jointcenter.org/budget-reconciliation-cuts-to-the-social-safety-net-and-their-impact-on-black-households/>Institute for Women’s Policy Research, “Threats to Care and Family Support: Impacts of the OBBB on Women and Families,” briefing paper (Washington, DC: IWPR, 2025), <https://iwpr.org/threats-to-care-and-family-support-impacts-of-the-obbb-on-women-and-families/>; Jessica Fulton, “Budget Reconciliation Cuts to the Social Safety Net and their Impact on Black Households,” Joint Center for Political and Economic Studies (blog), July 22, 2025, <https://jointcenter.org/budget-reconciliation-cuts-to-the-social-safety-net-and-their-impact-on-black-households/>.

⁴Jennifer Man, Matea Pender, and Meghan Oster, *Trends in College Pricing and Student Aid 2024*, report (New York, NY: College Board, 2024), <https://research.collegeboard.org/media/pdf/Trends-in-College-Pricing-and-Student-Aid-2024-ADA.pdf>.

⁵Sara Goldrick-Rab and Nancy Kendall, *The Real Price of College*, report (Washington DC: The Century Foundation, 2016), <https://tcf.org/content/report/the-real-price-of-college/>.

⁶Afet Dunder, Jennifer Turner, and Lauren A. Tighe, “Underwater: Student Mothers and Fathers Struggle to Support Their Families and Pay Off College Loans,” research brief (Washington DC: IWPR, 2023), <https://iwpr.org/underwater-student-mothers-and-fathers-struggle-to-support-their-families-and-pay-off-college-loans/>; Mark Huelsman, *Debt to Society: The Case for Bold, Equitable Student Loan Cancellation and Reform*, report (New York, NY: Dēmos, 2019), <https://www.demos.org/research/debt-to-society>.

⁷<https://iwpr.org/occupational-wage-gap-2025/><https://iwpr.org/equal-pay-day-2024/>Ariane Hegewisch and Cristy Mendoza, “Women Earn Less than Men Whether They Work in the Same or Different Occupations,” fact sheet (Washington, DC: IWPR, 2025), <https://iwpr.org/occupational-wage-gap-2025/>.



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fields that tend to pay less than male-dominated professions.⁸ Even within these occupations, women often earn less. Female licensed practical and vocational nurses, for instance, earn a median annual salary of \$50,039 compared to \$54,220 for men.⁹ Because earnings generally rise with additional education, it is often necessary for women to pursue graduate and professional degrees to improve their economic security. However, when degrees in women-dominated fields are excluded from the “professional degree” category—and therefore denied access to higher loan caps—women face steeper financial barriers to advancement than men seeking degrees in other fields.¹⁰

Women’s access to higher credentials is critical for closing wage gaps and achieving economic mobility. Redefining which degrees are worthy of enhanced financial support while reducing the overall loan availability reduces opportunities for women, particularly women of color, to pursue post-baccalaureate education. Not only will this reinforce gender inequities in education and the labor market, it also perpetuates broader risks to the economic stability of families and the nation.

Thank you for the opportunity to comment on the proposed rule. Postsecondary education, including opportunities to pursue and obtain graduate and professional degrees, can yield critical benefits and provide a path to economic security for women in the United States.

As millions of women and their families—particularly women of color and student parents—seek higher education and explore student loan options, the consequences of the law and this proposed rule, if implemented, will only further compound existing challenges they face in striving for economic equity and the labor and workforce security the nation needs.

Sincerely,

Kate Bahn, PhD
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Institute for Women’s Policy Research

⁸Afet Dunder and Cristy Mendoza, “Gender Disparities in Associate’s Degrees by Field of Study and Implications for Future Earnings,” fact sheet (Washington, DC: IWPR, 2024), <https://iwpr.org/gender-disparities-in-associates-degrees-by-field-of-study-and-implications-for-future-earnings/>.

⁹Dunder and Mendoza, “Gender Disparities in Associate’s Degrees.”

¹⁰Sandra E. Black et al., “Taking It to the Limit: Effects of Increased Student Loan Availability on Attainment, Earnings, and Financial Well-Being.” *American Economic Review* 113, no. 12 (2023): 3357–3400.