

Professional Degree Program Definition Timeline



July 4, 2025

The One Big Beautiful Bill Act (OBBBA) was [signed](#) into law.

- Set new, higher annual and aggregate loan limits for “students enrolled in a program of study that awards a professional degree,” as defined in an existing regulatory definition at 34 CFR 668.2.
- Degrees included as examples of a professional degree in CFR 668.2 include but are not limited to: Pharmacy (Pharm.D.), Dentistry (D.D.S. or D.M.D.), Veterinary Medicine (D.V.M.), Chiropractic (D.C. or D.C.M.), Law (L.L.B. or J.D.), Medicine (M.D.), Optometry (O.D.), Osteopathic Medicine (D.O.), Podiatry (D.P.M., D.P., or Pod.D.), and Theology (M.Div., or M.H.L.).

November 7, 2025

The Reimagining and Improving Student Education (RISE) negotiated rulemaking committee reached [consensus](#) on ED’s proposals related to student loan changes enacted under OBBBA, including a definition of a professional degree program.

- Consensus definition included the 10 programs listed in CFR 668.2, plus Clinical Psychology (Psy.D. or Ph.D.).
- Any other program with the same 4-digit Classification of Instructional Programs (CIP) code as the 11 specified programs could also be considered a professional degree if it:
 - 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;
 - Is generally at the doctoral level, requiring at least six academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework; and
 - Generally requires professional licensure to begin practice.

January 30, 2026

ED [published](#) a Notice of Proposed Rulemaking (NPRM) to seek public comment on the proposed changes to the federal student loan program enacted under OBBBA, including the professional degree definition.

- The professional degree definition included in the NPRM mirrors draft regulatory text agreed upon during the November negotiated rulemaking session.

May 1, 2026

ED [published](#) final regulations implementing student loan changes under OBBBA.

- The professional degree definition in the final regulations mirrors the definition in the NPRM and the draft regulatory text agreed upon during rulemaking.

June 24, 2026

A federal court [issued](#) a preliminary stay in response to a lawsuit comprised of associations representing nurse practitioners and physician associates.

- The preliminary stay temporarily halted the following elements of paragraph (i) of the definition of a professional degree in 34 CFR 685.102(b):
 - 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;
 - Is generally at the doctoral level requiring at least six academic years of postsecondary education coursework for completion, including at least two years of post-baccalaureate level coursework;
 - Generally requires professional licensure to begin practice; and
 - Includes the same 4-digit CIP code as one of the 11 specified programs in paragraph (ii)(A).

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June 29, 2026

ED published an Electronic Announcement ([GENERAL-26-42](#)) with guidance regarding the preliminary stay.

- The guidance includes an updated list of CIP codes temporarily eligible for the higher professional degree program loan limits during the stay, as well as a list of programs that were previously eligible but have been temporarily removed from eligibility.
- The following programs are considered professional degree programs during the Court's stay. Such programs must award the degree in parentheses to qualify as professional.

DEGREE PROGRAM	
Veterinary Medicine (D.V.M.)	Dentistry (D.D.S.; D.M.D.)
Law (L.L.B.; J.D.)	Anesthesiologist Assistant (CAA)
Divinity/Ministry (M.Div.)	Physician Associate/Assistant (MSPA; PA)
Rabbinical Studies (M.H.L.)	Athletic Training/Trainer (MSAT; MAT)
Clinical Psychology (Psy.D.)	Medicine (M.D.)
Counseling Psychology (Psy.D.)	Osteopathic Medicine (D.O.)
School Psychology (Psy.D.)	Podiatry (D.P.M.; D.P.; Pod.D.)
Clinical Child Psychology (Psy.D.)	Optometry (O.D.)
Health/Medical Psychology (Psy.D.)	Pharmacy (Pharm.D.)
Family Psychology (Psy.D.)	Occupational Therapy/Therapist (OT; MSOT; OTD)
Forensic Psychology (Psy.D.)	Physical Therapy/Therapist (PT; DPT)
Clinical, Counseling and Applied Psychology, Other (Psy.D.)	Registered Nursing/Registered Nurse (MSN)
Chiropractic (D.C.; D.C.M.)	Nurse Anesthetist (DNAP)
Audiology/Audiologist (AuD)	Nursing Practice (DNP)
Speech-Language Pathology/Pathologist (SLP)	

In addition to the guidance above, ED also included a list of programs that were previously eligible for professional degree treatment based on the definition in the RISE final rule but, for the duration of the stay, are not.

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PROGRAMS NOT TREATED AS GRANTING PROFESSIONAL DEGREES DURING THE COURT'S STAY	
Theology/Theological Studies	Medicine, Other
Pre-Theology/Pre-Ministerial Studies	Pharmacy Administration and Pharmacy Policy and Regulatory Affairs
Theological and Ministerial Studies, Other	Pharmaceutics and Drug Design
Community Psychology	Medicinal and Pharmaceutical Chemistry
Industrial and Organizational Psychology	Natural Products Chemistry and Pharmacognosy
Educational Psychology	Clinical and Industrial Drug Development
Environmental Psychology	Pharmacoeconomics/Pharmaceutical Economics
Geropsychology	Clinical, Hospital, and Managed Care Pharmacy
Applied Psychology	Industrial and Physical Pharmacy and Cosmetic Sciences
Applied Behavior Analysis	Pharmaceutical Sciences
Performance and Sport Psychology	Pharmaceutical Marketing and Management
Somatic Psychology	Pharmacy, Pharmaceutical Sciences, and Administration, Other
Transpersonal/Spiritual Psychology	

July 10, 2026

Blue note [update](#) added to ED's Electronic Announcement.

- Clarified the 6-digit CIP codes for the Registered Nursing/Registered Nurse (MSN) (51.3801) and Nursing Practice (DNP) (51.3818) include any program within the same four-digit CIP code, as assigned by the institution or determined by the Secretary, provided it awards the same credential.
- Stated that the Clinical Psychology program (42.2801) includes the Ph.D. designation, which was inadvertently omitted from the original list of professional programs.
- Did not change CIP code eligibility for physician associate/assistant (PA) programs. However, hours after the blue note was posted, a "Notice of Updated Department Action" was filed on the lawsuit's docket. In it, ED stated that for the duration of the court's stay, it will grant requests from institutions to treat PA degree programs under CIP code 51.0912 as awarding professional degrees, provided the degree is equivalent to the degrees listed in the updated guidance's parenthetical for that code. As of August 4, 2026, the Department has not formally incorporated this note into the guidance.

Future dates

- December 4, 2026: ED to file its final reply to the plaintiff's motion, closing the briefing phase.
- Date TBD: Final court decision on professional degree definition.