

From Meghan Kissell, AAUW Senior Director, Policy & Member Advocacy - 12/4/2025

As part of its implementation of new student loan borrowing limits included in H.R.1, ED proposed new definitions of “graduate student” and “professional student.” Lifetime borrowing on graduate student borrowing will be capped at \$100,000 for graduate students and \$200,000 for professional students. These limits will go into effect as of July 1, 2026.

ED’s initial proposal aligned with the current regulatory [definition](#) of “professional degree” under 34 CFR 668.2 by designating higher loan limits for students attending professional programs in ten fields of study: 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.).

As part of the Reimagining and Improving Student Education (RISE) Committee negotiated rulemaking process, [the proposal](#) defines “professional student” to include:

- ten fields of study: 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.)
- all programs within the same four-digit [Classification of Instructional Programs \(CIP\) code](#) of any of the degrees listed in ED’s proposal (the degrees listed in the first bullet), and
- Clinical psychology programs (Psy.D.).

The Department intends to post the proposed rule in early 2026 followed by a 30-day public comment period. The final rule is expected to take effect on July 1, 2026. AAUW will be sharing information around the comment period when it is posted, likely in January.