

Congress of the United States
Washington, DC 20515

November 4, 2025

The Honorable Linda E. McMahon
Secretary of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Secretary McMahon:

As the Department's Reimagining and Improving Student Education (RISE) Committee implements the student financial aid provisions of Public Law 119-21, we urge the Committee to explicitly include doctoral-level clinical psychology within the definition of "professional degree" for purposes of the new federal student loan limits. We believe it is essential that doctoral-level clinical psychology be recognized alongside other health professions requiring advanced postbaccalaureate study and licensure, ensuring that clinical psychologists are both fully qualified to serve communities across the country and available in sufficient numbers to confront the nation's escalating mental health crisis.

P.L. 119-21 created new student loan borrowing limits for postbaccalaureate study, with two separate limits for graduate and professional degrees. Specifically, the law utilizes 34 CFR § 668.2 to define a "professional degree" as:

"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. Examples of a professional degree 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.)."

While P.L. 119-21 does not explicitly list clinical psychology among the examples of a professional degree, it clearly states that such degrees are "not limited" to those examples. In utilizing this language, Congress intended to allow for the inclusion of a broader range of programs that meet the established criteria, even if they are not specifically named. Doctoral programs in clinical psychology clearly fall within this scope.

First, clinical psychology is a practice-oriented degree in psychology. Second, licensure is a requirement for professional practice in clinical psychology in every state. Third, licensure as a clinical psychologist requires completion of a doctoral degree in psychology (Ph.D., Psy.D., or equivalent). This standard plainly "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," as stated in the above definition. Clinical psychologists

complete this rigorous, doctoral-level, practice-oriented training to ensure they are fully prepared to meet the behavioral health needs of individuals and communities across the nation.

If doctoral clinical psychology students cannot access sufficient federal student aid to enroll and graduate from their degree programs, this will further exacerbate our mental health provider shortages. It is estimated that 158 million U.S. residents live in a mental health workforce shortage area. Over the next ten years, these shortages are projected to worsen, particularly in rural areas. Today, psychologists are already reporting high demand for their services and long wait times to see patients. By 2037, the nation is projected to meet only 55 percent of the need for psychologists, further exacerbating today's shortages and wait times. To help address this crisis, it is essential that doctoral-level clinical psychology programs be classified as "professional degrees," ensuring that qualified students are not barred from entering this critical field due to financial barriers.

We understand that during the RISE Committee's first negotiated rulemaking session, held from September 29 to October 3, 2025, the Department considered adopting a narrow interpretation of the term "professional degree," effectively disregarding the "include but are not limited to" language in the statute and limiting the designation to only the ten programs listed as examples. The week-long session concluded without consensus on the definition of "professional degree." However, we understand that negotiations are still ongoing, as the RISE Committee is currently meeting for its rulemaking session that began on November 3.

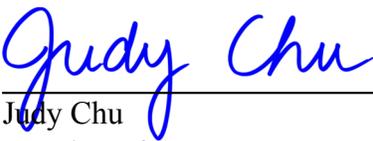
To uphold Congressional intent and ensure clarity in the application of the new federal student loan limits, we urge the RISE Committee, in defining which programs qualify as professional degrees, not to limit the designation to the ten program examples listed in the statute. Moreover, we urge that doctoral-level clinical psychology, which fully satisfies the statutory criteria, be clearly included within the Department's definition of "professional degree" to ensure that individuals pursuing this essential profession have access to the same federal student loan levels as those in other comparable health professions.

Thank you for your attention to this matter.

Sincerely,



Brian K. Fitzpatrick
Member of Congress



Judy Chu
Member of Congress

Andrea Salinas

Andrea Salinas
Member of Congress

Don Bacon

Don Bacon
Member of Congress