

Congress of the United States

Washington, DC 20515

March 2, 2026

The Honorable Linda McMahon
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Secretary McMahon,

Thank you for the opportunity to provide comments to the Department of Education (ED or the Department) on its Reimagining and Improving Student Education (RISE) Notice of Proposed Rulemaking.

As Congressional representatives from the Massachusetts delegation, we write to request that the Department remove or delay implementation of the proposed framework governing the designation and treatment of professional degree programs, as this proposal will restrict access to graduate education financing in ways that undermine workforce development and long-term economic mobility.

Massachusetts is famously home to many of our nation's top schools and colleges; people from all over the Commonwealth, country, and globe come here to get a world class education. Developing and training the next generation of professionals is a source of strength and economic dynamism that should be encouraged and incentivized. ED's interpretation of H.R. 1, the "One Big Beautiful Bill Act," would have the opposite effect. Policies that take away options or restrict opportunities for students to access a wide range of graduate programs will have detrimental impacts on talent development by slowing growth in the full variety of sectors and fields that are central to Massachusetts' innovation and workforce.

Research has shown that individuals with graduate degrees have low unemployment rates and high earning potentials.¹ Moreover, in our current economy, many workplaces and professional organizations recognize the benefits of a master's degree and prefer that senior-level employees have one; 33% of employers have raised hiring requirements over the last several years.² Individuals holding graduate degrees experience the lowest unemployment rates and among the highest lifetime earnings nationwide, contributing significantly to local communities' economic growth, tax revenue, and innovation output.³ Making it possible for graduate students to wisely finance their student loans is a smart investment for our economy.

ED's proposal to limit the availability of federal loans will push students to seek out alternative options with fewer borrower protections, such as private loans. Further, private lenders rely on students' credit scores, and many students lack the credit history or scores needed to secure those

¹Shulsinger, Tamar. "The Benefits of a Master's Degree in Today's Job Market." Knowledge Hub, Northeastern University Graduate Programs, 30 Aug. 2024, <https://graduate.northeastern.edu/knowledge-hub/masters-degree-benefits/?utm>

²"Botched FAFSA Rollout Leaves Uncertainty for Students Seeking Financial Aid for College." WatchBlog: Following the Federal Dollar, U.S. Government Accountability Office, 24 Sept. 2024, <https://www.gao.gov/blog/botched-fafsa-rollout-leaves-uncertainty-students-seeking-financial-aid-college>

loans. Capping federal loans for graduate and professional students does not reduce student borrowing; instead it incentivizes private loans that carry significantly higher interest rates, increasing financial risk with potentially disastrous consequences on the finances of young Americans.

At the very least, we advise the Department of Education to delay implementation of any final rule that would otherwise create logistical and enrollment problems for institutions of higher education. The timeline of this proposed rule does not reflect the Master Calendar requirement in the Higher Education Act, where final regulations affecting Title IV programs must be published by November 1 to take effect the following July 1.⁴ Any final rule issued in the next few months would be far beyond the required November 1 deadline. Significant changes so close to the start of the academic year could lead to a repeat of the chaos that we recently saw with the FAFSA rollout.⁵

We remain willing to work with the Department to responsibly reform the federal student loan system and rein in student loan debt. Young people deserve to set out in their careers on secure financial footing. For the reasons outlined above, we respectfully urge the Department to consider workforce needs and flexibility for future innovation by removing or delaying implementation of the proposed framework governing the designation and treatment of professional degree programs.

Thank you for considering these comments. We would welcome the opportunity to provide additional information to assist the Department's review.

Sincerely,



SETH MOULTON
Member of Congress



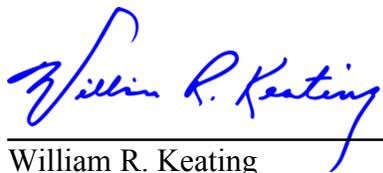
Richard E. Neal
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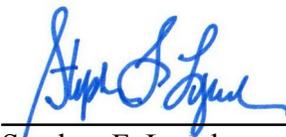
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⁴“Education Pays, 2023.” Career Outlook, U.S. Bureau of Labor Statistics, Apr. 2024.

⁵Ibid.



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