



# Proposed Rule Change: Public Health & Nursing Professional Degrees

## CONTEXT:

The U.S. Department of Education shared a series of proposed regulatory changes on January 29, which would exclude public health degrees (MPH and DrPH) and nursing from a new definition of professional degree programs. If implemented, these changes would negatively impact public health students, professionals and Indigenous communities in the following ways:

<p><b>Limit access to federal financial aid and higher loan limits for public health students.</b></p>	<p><b>Increase financial barriers for students from diverse and historically excluded communities.</b></p>	<p><b>Reduce program accessibility and enrollment, especially at institutions serving <u>rural and underserved regions</u>.</b></p>	<p><b>Weaken the public health workforce pipeline, undermining the nation's ability to prepare professionals who protect and promote community health.</b></p>
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The proposed rule will be open for public comment for 30 days. This is an opportunity for those who may wish to engage in the federal rulemaking process on an issue closely connected to the CIH mission.

**“One well supported comment is often more influential than a thousand form letters.” - Regulations.gov**

**COMMENT PERIOD: The public comment period runs until March 2, 2026.**

## HOW TO SUBMIT A COMMENT:

1. Visit the Federal eRulemaking Portal: [www.regulations.gov](http://www.regulations.gov)
2. Search using the term: “Reimagining and Improving Student Education”
3. Click on the “Comment” button at the top of the page:



4. **Draft your comment.** Try to incorporate both your personal reasons for your stance as well information (statistics, evidence) on how Indigenous

communities or individuals will be impacted. Comments must represent your own individual views. Example below.

To help support your comment, the JHClH Training Team has provided the following key points/arguments that you may wish to include:

- **Loan cap changes would restrict entry into the field:** Removing public health from professional degree designation would lower federal loan caps to \$20,500 per year and \$100,000 total, far below the cost of MPH and doctoral training. This would reduce access—especially for rural, Tribal, and underserved students—and limit the pipeline of trained professionals with lived and community-based knowledge of health disparities.
- **Existing workforce shortages in Tribal health:** Tribal Health Organizations already need a 21.5% increase in new public health positions to reach full capacity (NIHB, 2025), including roles in health education, data management, logistics, care coordination, and program administration. Restricting training pipelines would lead to further understaffing.
- **Disproportionate impact on AI/AN students:** AI/AN students rely heavily on federal scholarship and loan programs (such as IHS and HRSA). Lower loan limits tied to non-professional designation would decrease the number of AI/AN students able to attain public health degrees, worsening inequities in a field where AI/AN professionals are already severely underrepresented.
- **Threat to shortage-area workforce:** HRSA supports Health Professional Shortage Areas (HPSA) and Medically Underserved Populations (MUP) through scholarships and loan repayment tied to service. Public health must remain a professional degree to sustain this workforce. Removing the designation would weaken the supply of trained professionals supporting critical public health infrastructure.
- **Tribal Epidemiology Centers (TECs) demonstrate workforce impact:** After investment in workforce development, TECs increased staff with health-related degrees from 45% to 72% in three years and more than doubled their technical assistance capacity. Public health-trained professionals in epidemiology, biostatistics, informatics, and health administration are essential for surveillance, data translation, and lifesaving programs such as the IHS Diabetes Care and Outcomes Audit. □

**Sample comment** (not a template, *please make this your own*):

*I am submitting this comment as a supporter of equitable access to education and strong public health systems. Excluding public health (MPH, DrPH) and nursing from the definition of professional degree programs would create new financial barriers for students entering fields that are essential to community wellbeing.*



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*These professions already face workforce shortages, particularly in rural and underserved communities. Reducing access to federal aid and loan support will shrink the pipeline of trained professionals and limit opportunities for students from low-income backgrounds. [OR argument specific to impact of change on Indigenous communities, using data points offered above]*

*I urge the Department to reconsider this change and maintain public health and nursing as professional degree programs to protect educational access and the future health workforce.*

*Thank you for re-considering the proposed changes.*

Name  
City/State

**5. Complete additional fields:**

- a. What is your comment about?** Individual
- b. Email address:** use personal email address
- c. Tell us about yourself! I am...** An individual

***Thank you for taking the time to share your voice and expertise through your comment—***

*your words matter in shaping decisions that impact Indigenous communities and future workforce.*