



Public Comment on Proposed Rule Regarding Professional Degree Classification and Loan Caps

Submitted on behalf of the Hospice and Palliative Nurses Association

To Whom It May Concern:

The Hospice and Palliative Nurses Association (HPNA) is the national professional organization that represents the specialty of hospice and palliative nursing. On behalf of hospice and palliative nurses across the United States, we respectfully submit these comments urging the U.S. Department of Education to include post-baccalaureate nursing degrees within the definition of “professional degrees” for purposes of federal student loan policy and to ensure that nursing graduates are not subjected to restrictive loan caps under the currently proposed rule.

Nursing is a licensed, regulated, and highly specialized profession that requires:

- Completion of rigorous undergraduate and, often, graduate education
- Extensive clinical training hours
- National licensure examination (NCLEX)
- Ongoing continuing education requirements
- Compliance with state and federal regulatory standards.

Advanced practice registered nurses (APRNs), including nurse practitioners and clinical nurse specialists in hospice and palliative care, complete graduate-level education (master's or doctoral degrees) and comparable requirements to other recognized professional degree programs.

As with physicians, pharmacists, and dentists, nursing education is designed to prepare graduates for direct entry into a licensed healthcare profession.

Hospice and palliative nurses provide specialized, interdisciplinary care to patients with serious, life-limiting illnesses. This critically important role requires advanced competencies in:

- Complex symptom management
- Pharmacology
- Pain control
- End-of-life care planning
- Ethical decision-making
- Interdisciplinary care coordination
- Family systems support and grief counseling.

The specialized nature of this work often necessitates additional training beyond entry-level nursing education. Many hospice and palliative advanced practice nurses pursue certification in the specialty of hospice and palliative nursing.



Many APRNs also serve in roles within system leadership and academia. They are responsible for developing palliative programs, mentoring staff, and integrating care standards in clinical settings.

Loan caps would exacerbate the increasing workforce shortage in this field of nursing. The United States faces a growing demand for palliative and end-of-life care due to an aging population and increased prevalence of chronic illness. Hospice services are already limited in many underserved and rural communities.

The first hospice was established in the United States just over 50 years ago. Shortly thereafter, the specialty of palliative care was born. Over the past decade, many of the pioneering nurses who helped build, shape, and advance hospice and palliative nursing have entered retirement. Their departure is contributing to a growing workforce shortage. Financial barriers to recruiting new APRNs will pose an additional threat; further limits on educational loan support will discourage nurses from pursuing the graduate degrees required to replace the founding generation.

Excluding post-baccalaureate nursing degrees from the definition of professional degrees, while including other licensed healthcare professions, would create inconsistency in federal policy and fail to recognize the equivalent regulatory and educational rigor required of nurses.

Palliative and hospice nurses reduce hospitalizations, improve quality of life, and support cost-effective care delivery. Their work decreases emergency department utilization and promotes care that aligns with patients' priorities, ultimately reducing strain on the healthcare system. Palliative care has been shown to improve health outcomes, including helping patients live longer, while also reducing Medicaid and Medicare costs for individuals across all stages of life. Hospice care delivers high-quality end-of-life support at significantly lower cost, while prioritizing comfort and care that aligns with patients' goals. Limiting access to educational financing for these professionals is not merely a workforce issue, it is a national public health and economic concern.

HPNA strongly urges the U.S. Department of Education to classify nursing degrees such as a Master of Science in Nursing (MSN), Doctor of Nursing Practice (DNP), and a PhD in nursing as professional degrees under the final rule and ensure that nurses are not subjected to restrictive loan caps that would undermine workforce stability and patient access to quality hospice and palliative nursing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rikki Hooper", positioned above a horizontal line.

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HPNA PRESIDENT

A handwritten signature in black ink, appearing to read "Virginia A. Marshall", positioned above a horizontal line.

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