



Via online submission to <http://www.regulations.gov>

August 25, 2025

The Honorable James Bergeron
Deputy Under Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

RE: Docket ID ED-2025-OPE-0151-0001

Dear Deputy Under Secretary Bergeron and Members of the Rulemaking Committees:

On behalf of the National Alliance of Specialized Instructional Support Personnel (NASISP), we appreciate the opportunity to submit written comments providing advice and recommendations to inform the Department of Education's (ED) Reimagining and Improving Student Education (RISE) Committee as they begin their work on the negotiated rulemaking to implement the student financial aid provisions under Public Law 119–21, commonly known as the One Big Beautiful Bill Act.

We are specifically requesting the Department ensure that the regulatory definition of "professional degree program" includes the myriad school-based professionals (e.g. school counselors, school nurses, school psychologists, social workers and school social workers; occupational therapy practitioners, physical therapists, speech-language pathologists, audiologists, and other specialized instructional support personnel) for which a master's or doctoral degree is required to obtain a state credential to practice (e.g. licensure and/or certification).

About NASISP

NASISP is a coalition of national professional organizations whose members provide and support a variety of school-based prevention, early identification, and intervention services that remove barriers to learning and assist students in becoming effective learners and productive citizens. Our organizations represent over a million specialized instructional support personnel (SISP) nationwide, including school counselors, school nurses, psychologists, school psychologists, social workers and school social workers; occupational therapy practitioners, physical therapists; art, dance/movement, and music therapists; speech-language pathologists, and audiologists; and the major national organizations representing general and special education teachers and administrators.

SISP are integral to implementing school-wide initiatives such as multi-tiered systems of supports, preventative discipline policies, positive behavior interventions and supports, college and career planning, and violence and bullying prevention — all of which contribute to students’ readiness to learn and promote a more positive school environment.

Post-Baccalaureate School Health Professions Programs Meet the Definition of “Professional Degree” Programs

As how the new loan limits will be implemented is discussed and debated, we encourage ED to do all possible to address our critical school SISP workforce shortages. To prevent the crisis being exacerbated, it is critical that post-baccalaureate school health professions programs are explicitly included within the scope of “professional degree programs.” All of these programs provide degrees that are rigorous, practice-based, and require substantial clinical and fieldwork components, and often lead to students obtaining a state licensure or certification required to practice.

Recommendations

We offer the following specific recommendations to the Department of Education and the RISE Committee:

1. ED should adopt a clear and inclusive regulatory definition of “professional degree programs” that encompasses any master’s or doctoral degree education generally required for licensure or certification.
2. Such definition must maintain alignment with state and federally recognized licensure- or certification-based credentialing pathways when required. All SISP professions where a state license or certificate to practice is generally required should be treated consistently with other health professions in all relevant student aid regulations.

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Thank you for this opportunity to provide advice and recommendations to the RISE committee in the upcoming negotiations. NASISP stands ready to provide further information. Please contact Abe Saffer, NASISP Co-Chair, at asaffer@aota.org if you have any questions or need additional information.

Sincerely,

AFT, AFL-CIO
American Music Therapy Association
American Occupational Therapy Association
American Physical Therapy Association
American School Counselor Association
American Speech Language Hearing Association
Council of Administrators of Special Education
Council for Exceptional Children
National Association of Pupil Services Administration

National Association of School Nurses
National Association of School Psychologists
National Association of Social Workers
School Social Work Association of America

The National Alliance of Specialized Instructional Support Personnel (NASISP) is a 501(c)(6) organization that represents over a million Specialized Instructional Support Personnel (SISP) nationwide. SISP professionals provide and support school-based prevention and intervention services to address barriers to educational success, ensure positive conditions for learning, and help all students achieve academically and ultimately become productive citizens. SISP collaborate with teachers, administrators, parents, and families to ensure that all students are successful in school. NASISP seeks to empower SISP professionals by encouraging multidisciplinary collaboration, and affirming their role in education's best practices and their involvement in school improvement efforts.

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