

Alverno College  
Bellin College  
Beloit College  
Carroll University  
Carthage College  
Concordia University Wisconsin  
Edgewood University  
Herzing University  
Lakeland University  
Lawrence University



Wisconsin's private, nonprofit colleges and universities  
working together for educational opportunity

Marian University of Wisconsin  
Marquette University  
Medical College of Wisconsin  
Milwaukee Institute of Art & Design  
Milwaukee School of Engineering  
Mount Mary University  
Ripon College  
St. Norbert College  
Viterbo University  
Wisconsin Lutheran College

March 2, 2026

The Honorable Linda E. McMahon  
The Honorable Nicholas Kent  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202

**Re: Public Comment on Notice of Proposed Rulemaking, Reimagining and Improving Student Education (Docket ID: ED-2025-OPE-0944)**

Dear Secretary McMahon and Under Secretary Kent,

The Wisconsin Association of Independent Colleges and Universities (WAICU) appreciates the opportunity to comment on the January 30, 2026 Notice of Proposed Rulemaking, *Reimagining and Improving Student Education*. WAICU is the official organization of Wisconsin's private, nonprofit colleges and universities, representing 20 member campuses that collectively serve more than 52,000 students. Our institutions confer 22 percent of the state's bachelor's degrees and 34 percent of all advanced degrees, without receiving direct taxpayer operating support. A January 2026 economic impact study found that Wisconsin's private, nonprofit institutions have a \$5.4 billion economic impact on the state of Wisconsin and when taken together, ranks among Wisconsin's top 10 employers.

While we appreciate the Department's efforts to address student loan debt, several provisions in the proposed rule would significantly harm workforce capacity and student opportunity in Wisconsin. The restrictive definition of "professional programs," and the absence of a transparent, periodic review process for updating eligible programs, would limit the private, nonprofit sector of higher education's ability to prepare graduates for critical and emerging fields. The rule would also create inequitable outcomes for students at independent institutions, as our institutions do not receive the state operating support afforded to our public sector counterparts. These pressures are compounded by the loss of Graduate PLUS loans, which serves to further limit access to graduate education.

WAICU institutions are central to Wisconsin's healthcare workforce pipeline. Our institutions award 54 percent of bachelor's degrees in nursing and 44 percent of all undergraduate healthcare degrees. At the graduate level, our institutions produce 100 percent of dentists, 58 percent of medical doctors, 36 percent of pharmacists, and 83 percent of advanced nursing graduates. Sixty percent of our alumni remain in Wisconsin after graduation. Restrictions on access to these programs will exacerbate the state's existing healthcare workforce shortages. Notably, the programs most affected by the new loan limits are concentrated in healthcare fields. Federal policy should strengthen, not restrict, healthcare workforce pipelines.

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### **Lack of Flexibility in Professional Degree Classification Process**

The proposed rule does not outline a transparent or efficient process for updating or amending the list of eligible degree programs as workforce demands evolve or as new accredited programs are developed. This omission discourages innovation and disincentivizes the creation of new professional programs for evolving career pathways. Private colleges are market-driven and uniquely positioned to respond quickly to workforce demands; defining a restrictive list without a mechanism for institutions to add programs restricts innovation and fails to account for new degree programs developed to meet emerging market demands. For example, the Master of Science in Perfusion, a five-semester program preparing specialized members of surgical teams who operate heart-lung machines during cardiac surgery, is not included in the proposed professional programs list despite strong earnings outcomes and extensive clinical and didactic requirements. This program is a perfect example of a program that should be included in the professional program category as should many other programs offered in graduate-level biosciences and graduate-level engineering programs.

### **Proposed Solutions**

We respectfully urge the Department to withdraw the new definition and instead develop a process around the existing online mechanism institutions use to designate programs as professional or graduate. It is critical to preserve institutional flexibility to determine which programs qualify under the professional program definition. The Department can then review compliance during recertification, as they will do with the upcoming accountability framework.

Alternatively, WAICU supports the inclusion of other degree fields in the professional program list so they can access higher annual and aggregate loan limits. However, we believe a static list of programs in regulation will struggle to reflect evolving workforce needs or new degree programs. For both recommendations, we suggest aligning with workforce needs, where possible, particularly in healthcare fields.

On behalf of our organization and our 20 member institutions, thank you for considering these comments and for your continued commitment to higher education and the students we serve. We welcome the opportunity to provide additional information or engage further on this important issue.

Sincerely,



Eric W. Fulcomer, PhD  
President