



August 21, 2026

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

Re: Professional-Student Loan Limits and Accredited Graduate Engineering Programs

Dear Secretary McMahon:

On behalf of the undersigned engineering organizations, we write regarding the Department of Education's implementation of the professional-degree framework for federal graduate student aid and its application to accredited graduate engineering programs that prepare students for professional engineering practice.

The engineering community previously submitted comments urging the Department to provide clear and consistent guidance on how accredited graduate engineering programs may be evaluated under the professional-degree framework. As implementation proceeds, uncertainty remains for graduate programs that are not specifically identified in the Department's list of professional degree programs but may nevertheless prepare students for professional practice and meet the underlying regulatory criteria.

This issue warrants continued attention because engineering does not always fit neatly within a model built around a single entry-to-practice graduate credential. In many engineering fields, the academic foundation for professional practice is a qualifying bachelor's degree, followed by experience, examination and licensure for those pursuing the Professional Engineering credential. Graduate engineering education builds on that foundation by supporting advanced technical specialization, professional development, employer expectations, and responsible practice in increasingly complex or safety-critical areas.

Graduate engineering education plays an important role in supporting the nation's infrastructure, technological capacity, public safety, resilience, and economic competitiveness. Advanced engineering study can help develop the specialized competency needed for complex design, construction, operation, maintenance, risk assessment, and system-level decision-making where safety, reliability, and resilience are critical. It also supports a professional engineering workforce prepared to meet responsibilities tied to public infrastructure, governmental functions, and protection of the public health, safety, and welfare.

We respectfully request that the Department provide a clear, objective, and consistent pathway for accredited graduate engineering programs that support advanced technical specialization within engineering practice to be evaluated under the professional-degree framework. Such guidance should address how programs outside the Department's enumerated list may be considered when they support professional preparation beyond the bachelor's degree. For accredited graduate engineering programs, relevant criteria could include alignment with professional practice, specialized technical competency, public safety responsibilities and other objective factors relevant to engineering education and practice.

In particular, we urge the Department to clarify:

1. Whether and how programs outside the specifically enumerated list of professional degree programs may be evaluated under the professional-degree framework;
2. How institutions may seek evaluation of accredited graduate engineering programs that prepare students for professional engineering practice;
3. What criteria the Department will apply in determining whether such programs qualify for professional-student loan limits; and
4. How the Department will engage with engineering organizations, institutions, and employers as implementation continues.

Providing this clarity would help avoid unintended exclusions of established professional pathways and ensure that federal student aid policy reflects the structure of engineering education and professional practice. It would also help students make informed decisions, assist institutions in applying the rules consistently, and support a strong engineering workforce equipped to meet national needs.

We appreciate the Department's consideration of this request and would welcome the opportunity to provide additional information regarding engineering education, professional licensure, and workforce impacts.

Respectfully submitted,
American Council of Engineering Companies
American Public Works Association
American Society of Civil Engineers
American Society for Engineering Education
ASHRAE
National Academy of Construction
National Society of Professional Engineers
Society of American Military Engineers

cc: Office of the Deputy Secretary
Office of Postsecondary Education
Federal Student Aid