



February 24, 2026

U.S. Department of Education  
Office of Postsecondary Education  
400 Maryland Ave SW  
Washington, DC 20202

Re: Docket ID ED-2025-OPE-0944

Dear Secretary McMahon:

The undersigned engineering organizations respectfully submit this letter to encourage the Department of Education (the Department) to recognize accredited graduate engineering programs that prepare students for professional engineering practice as eligible for treatment as professional programs for purposes of federal graduate student aid.

Our organizations span engineering education and professional practice. Together, these components form an integrated professional system that prepares engineers to design, build, operate, and safeguard the nation's infrastructure and technological systems in service of the public health, safety, and welfare. Graduate engineering education is an essential part of this system and plays a critical role in meeting national workforce, infrastructure, and competitiveness needs.

Engineering practice encompasses multiple, well-established professional pathways. In many disciplines, graduate education is integral to professional preparation, whether to meet employer expectations, support licensure as a Professional Engineer, or develop advanced competencies required for responsible practice in safety-critical fields. While licensure is not required for all engineering roles, it remains a central and legally defined pathway for professional responsibility in many sectors, particularly those serving public infrastructure and governmental functions.

Recent statutory changes to federal graduate lending, including the elimination of the Graduate PLUS loan program and the establishment of differentiated borrowing limits for professional and non-professional students, have introduced new constraints on access to graduate education. Under the current framework, students enrolled in programs classified as professional degrees may access higher annual and aggregate loan limits, while other graduate students may not. As implemented, this distinction risks excluding many graduate engineering programs that function as professional preparation programs but are not explicitly identified as such under existing regulatory examples.

We are concerned that absent clarification, qualified and accredited graduate engineering programs may be treated as non-professional by default, despite meeting the core regulatory definition of a professional degree: completion of the academic requirements for beginning professional practice at a level beyond that of a bachelor's degree, often aligned with licensure or regulated professional responsibility. This outcome would create unintended barriers for students, constrain the engineering workforce pipeline, and reduce access to advanced engineering education precisely at a time when national demand for engineering expertise is increasing.

We therefore urge the Department to adopt an implementation pathway that explicitly recognizes graduate engineering programs that prepare students for professional engineering practice as eligible for professional-student loan limits. Such recognition can be achieved in a manner consistent with statute and existing regulations by:

- Affirming that the definition of “professional degree” in 34 C.F.R. § 668.2 is non-exhaustive and may encompass additional programs that meet its core criteria;
- Establishing clear, objective criteria by which accredited graduate engineering programs that prepare students for professional practice, including licensure-aligned pathways, may be designated as professional programs; and
- Providing institutions and students with predictable guidance through regulation or formal Departmental interpretation to ensure consistent application nationwide.

This approach would preserve congressional intent to manage borrowing while avoiding unintended exclusions of established professional pathways. It would also support a geographically distributed and technically prepared engineering workforce capable of meeting long-term national needs related to infrastructure, public safety, resilience, and economic growth.

As the Department develops implementation guidance and engages in rulemaking, our organizations welcome continued dialogue and stand ready to provide additional information regarding the structure of engineering education, professional practice pathways, and workforce impacts. We appreciate the Department's consideration of these issues and its ongoing efforts to implement federal student aid policy in a manner that serves both students and the public interest.

Respectfully submitted,

American Council of Engineering Companies  
American Society of Civil Engineers  
American Society for Engineering Education  
ASHRAE  
National Society of Professional Engineers