

February 26, 2026

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

Re: Docket ID ED-2025-OPE-0944

The National Society of Professional Engineers (NSPE) appreciates the opportunity to submit comments on the Department of Education's proposed rule implementing recent changes to federal graduate student aid policy, including revisions to the definition of a professional degree in 34 C.F.R. § 668.2, and to share perspective on how the rule's implementation may affect graduate engineering education.

NSPE represents licensed Professional Engineers across disciplines whose professional work carries responsibility for public health, safety, and welfare. Because that work often involves complex and safety-critical work, graduate engineering education can play an important role in supporting advanced technical practice and professional development.

As the Department moves forward with implementation, NSPE is concerned that, without explicit designation or clear guidance, many accredited graduate engineering programs may not align with the professional degree category as currently structured. Many of these programs, however, support preparation for advanced responsibilities within professional engineering practice beyond the bachelor's degree. This potential classification outcome arises because the definition is structured around entry-to-practice professional degrees, whereas engineering commonly involves a qualifying bachelor's degree followed by optional graduate specialization.

For many Professional Engineers, graduate education can support advanced competency and employer expectations and may complement licensure aligned pathways. In some disciplines, graduate study is increasingly common in roles involving complex, safety-critical work that demand advanced technical judgment. Federal graduate lending policy therefore plays a meaningful role in shaping whether these pathways are financially feasible to pursue and, over time, the availability of qualified professionals to meet public needs.

NSPE respectfully urges the Department to provide clear and consistent guidance on how accredited graduate engineering programs may be evaluated under the definition when the

qualifying credential is the bachelor's degree. In particular, implementation approaches that recognize professional preparation beyond the bachelor's level, including programs commonly pursued to develop specialized technical competency, would help avoid unintended barriers to advanced engineering education while remaining consistent with statute and regulatory authority.

Clarifying this framework would support students, institutions, and employers by ensuring consistent application nationwide and by aligning federal student aid policy with the realities of professional engineering practice. It would also help preserve a strong and geographically distributed pipeline of Professional Engineers equipped to serve communities, public agencies, and the private sector.

NSPE appreciates the Department's consideration of these comments and welcomes continued dialogue as implementation proceeds. We stand ready to provide additional perspective on professional engineering practice, licensure, and workforce impacts as the rulemaking process moves forward.

Submitted by:

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