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AAAA Advocacy Update – Department of Education Legal Challenges

Background - ED's Narrowed List of Professional Degrees

As many of you are aware, earlier this year, the U.S. Department of Education adopted a narrowed definition of “[professional degree](#)” for purposes of new federal graduate student loan limits. Under that rule, only a limited list of programs would have qualified for the higher professional-degree borrowing limits of \$50,000 annually and \$200,000 in aggregate borrowing, while excluded graduate programs would have been limited to \$20,500 annually and \$100,000 in aggregate borrowing.

This distinction is especially important for CAA students because anesthesiologist assistant programs are clinically intensive, graduate-level training programs that often carry substantial tuition and costs. Under ED's original rule, CAA programs – along with many other advanced clinical training programs – were not included on the Department's professional-degree list, meaning CAA students could have faced significantly lower access to federal loans beginning with the 2026–2027 award year.

Recent Legal Action

On June 25, 2026, a federal court [granted preliminary relief](#) in a challenge to ED's rule led by the American Association of Nurse Practitioners and other professional groups. The court found that the plaintiffs were likely to succeed on their claim that ED exceeded its authority by adopting a narrowed definition of “professional degree,” and it stayed the challenged portions of the rule while the case continues.

Judge Beryl Howell broadly agreed with plaintiffs that ED's definition was “contrary to law,” and ordered the Department to expand the list of programs treated as professional degrees for loan-limit purposes while the litigation proceeds. Following the court's order, ED issued [interim guidance](#) expanding the list of programs treated as professional degrees and reversing the Department's narrow definition. Importantly, that interim list now includes Anesthesiologist Assistant (CAA) programs, CIP 51.0809.

What This Means for CAAs

CAA programs are currently being treated as professional degree programs for federal student loan limit purposes while the court's stay remains in effect. As a result, eligible CAA students may access the higher professional-degree loan limits of \$50,000 annually and \$200,000 in aggregate borrowing, rather than the lower limits initially proposed by the Department.

However, this is not a final resolution. The court's order is temporary, the litigation remains ongoing, and ED has indicated that it disagrees with the decision and will continue defending its interpretation. Undersecretary Nicholas Kent said in a [statement](#) that the Department "disagrees with the judge's order but will comply," adding, "we will continue to make the case that the definition is both lawful and appropriate." This means CAA professional-degree status could still change depending on future court decisions, appeals, or additional Department action.

AAAA views the court's order and ED's interim guidance as an important and positive development for CAA students and the future anesthesia workforce. At the same time, we recognize that temporary relief is not the same as permanent protection. AAAA is closely monitoring the litigation and ED's implementation of the court order, and is actively evaluating pathways to continue advocating for durable recognition of CAA programs as professional degrees. Those options include legal advocacy, amicus support, continued regulatory engagement, and broader policy efforts to ensure that federal student loan rates reflect the clinical rigor and modern cost structure of CAA education.

AAAA will continue to keep members updated as the litigation proceeds and as additional opportunities emerge to protect access to federal student loans!