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March 2, 2026

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

Submitted via <https://www.regulations.gov/>

RE: Reimagining and Improving Student Education (ED-2025-OPE-0944)

Dear Secretary McMahon,

The Society of Gynecologic Oncology (SGO) respectfully submits these comments in response to the Department of Education's ("the Department") proposed rule titled *Reimagining and Improving Student Education* regarding the implementation of amendments to the Federal student loan programs under Title IV of the Higher Education Act. SGO **strongly opposes** the proposed revision to the term "professional degree" that would exclude master's and doctoral programs training advanced practice providers (APPs), including nurse practitioners (NPs), physician assistants (PAs), and certified nurse midwives (CNMs), from qualification as professional degrees eligible for higher federal loan limits. We urge the Department not to finalize these proposed changes and ensure that APP degrees continue to be recognized as professional degrees.

The SGO is the premier medical specialty society for healthcare professionals trained in the comprehensive management of gynecologic cancers. Our more than 3,000 members include physicians, advanced practice providers, nurses, and patient advocates who collaborate with the SGO's foundation, the Foundation for Women's Cancer, to increase awareness of gynecologic cancers and improve the care of those diagnosed with gynecologic cancers. Our mission focuses on supporting research, disseminating knowledge, raising the standards of practice in the prevention and treatment of gynecologic malignancies, and collaborating with other organizations dedicated to gynecologic cancers and related fields, all with the ultimate vision of eradicating gynecologic cancers.

Impact on Oncology Workforce and Cancer Care Access

APPs, including NPs, PAs and CNMs, are integral members of cancer care teams, including those treating patients with gynecologic malignancies. They perform a wide range of clinical duties that are critical to delivering high quality oncology care, including ordering chemotherapy, providing inpatient management and on-call coverage, performing and interpreting tests and biopsies, conducting physical exams, managing the symptoms and side effects of cancer and its treatments, and performing surveillance visits and survivorship care among other services.

Excluding APP degree programs from the professional degree definition will reduce access to federal education loans for these providers. This change would likely increase the financial burden on prospective APPs at a time when the nation faces a **well-documented shortage of gynecologic**

oncologists and other oncology care clinicians amid a growing burden of cancer incidence and survivorship needs in the United States. Federal student loans are often essential for students to complete the extended education and training required to enter this specialized discipline. Exclusion from professional status will deter potential students from entering these programs, worsening workforce shortages that already constrain access to timely, high-quality care for patients with gynecologic and other cancers.

Required Supervision Is Not Indicative of Professional Status

The Department's proposal appears to rest on the premise that APP degrees do not qualify as professional because degree holders practice with some level of supervision under state law. This reasoning is inconsistent with how professional practice is understood in modern health care. APPs are licensed practitioners whose education and certification prepare them to provide independent patient care in accordance with state requirements. In cancer centers and oncology practices, APPs routinely perform advanced clinical functions, including ordering and interpreting diagnostic tests, managing complex chemotherapy regimens under defined collaborative agreements, and independently triaging urgent oncologic issues. Excluding these programs from professional classification on the basis that some degree of collaboration or supervision exists under state licensure and practice requirements undermines the contribution these professionals make to ensuring patient access to care. Furthermore, physician residents require supervision while in training, yet there is no question about their professional status.

Educational Support Should Be Strengthened to Reverse Workforce Shortages

Federal policymakers at both the legislative and executive levels have recognized that workforce shortages, particularly in specialty care and in underserved areas, pose a barrier to access to healthcare for many Americans. Gynecologic and other oncology practices increasingly rely on APPs to extend capacity, improve care coordination, and reduce wait times for critical visits, treatment decisions, and follow-up care. Acutely limiting the availability of federal loan support for APP training will exacerbate existing workforce challenges at precisely the moment when the population of cancer survivors is growing and the need for longitudinal, team-based care is expanding.

Specifically, gynecologic oncology care often requires long-term management beyond surgery and chemotherapy. APPs frequently serve as the primary point of contact for symptom management, survivorship care, genetic counseling coordination, reproductive health preservation discussions, and palliative care planning. Barriers to entering APP programs inevitably translate into fewer providers available to deliver these essential services, especially in rural and medically underserved areas where physician shortages are most severe.

Therefore, SGO urges the Department of Education not to exclude APP degree programs from the definition of "professional degree." Failure to do so will have detrimental effects on the gynecologic oncology workforce, undermine access to care for cancer patients, and place additional strain on an already overextended health care system. We appreciate the opportunity to provide these comments. Should you have any questions or require additional information, please contact Carly Gustafson Léon, SGO's Manager of Health Policy and Government Affairs, at carly.leon@sgo.org.



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Sincerely,

A handwritten signature in black ink that reads 'Karen H. MD'.

Karen H. Lu, MD
President, Society of Gynecologic Oncology