



NEBRASKA ASSOCIATION OF PUBLIC EMPLOYEES

February 25, 2026

Linda McMahon
Secretary, Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Submitted via [regulations.gov](https://www.regulations.gov)

Re: Reimagining and Improving Student Education; ED-2025-OPE-0944

Dear Secretary McMahon,

On behalf of the Nebraska Association of Public Employees/AFSCME Local 61, I write in opposition to the Department of Education's proposal to restrict access to student loans for certain advanced degree programs by excluding them from what counts as a professional degree.

Our union represents more than 8,000 frontline State of Nebraska employees, who perform more than 400 unique jobs, for 43 different state agencies, in all 93 counties in our state. This includes approximately 1,000 nurses, social workers, and public health professionals.

We strongly oppose the proposed rule because it excludes nurses, social workers, public health workers and others from being considered "professionals." This will restrict their access to federal student loan programs commensurate with the cost of pursuing advanced degrees in their fields, thereby making it harder for our members (as well as future members) to obtain additional training and credentials, via graduate programs, in these fields that are critical to public service.

These honorable professionals deserve respect for the work they do, not roadblocks to advancement. We should be finding ways to make it easier and more affordable for people to pursue additional training and certifications, because their service to our communities is vital.

We also are very concerned that in addition to obstructing individual workers' advancement in their fields the proposed rule will shrink the pool of talented public service professionals at a time when many of our members on the front lines are already stretched thin and overworked. Advanced degree holders not only work in these fields; many of them educate and train the next generations of entry level workers in them, like registered nurses. The fewer advanced degree holders there are, the fewer education slots there are likely to be for people who want to enter these fields.

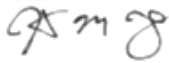
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We have significant staffing shortages at our Veterans' Homes, Correctional Institutions, state psychiatrist hospitals, and other institutions among health care, behavioral health care, and social work teams. This is especially true at facilities located in rural communities such as Kearney, Norfolk, and Scottsbluff, Nebraska. We must support all efforts to recruit and retain professional healthcare staff in these communities.

Nurses, social workers, and public health workers are professionals, plain and simple. We must ensure the next generation of public service professionals can access the education they need to keep us all safe and healthy. Therefore, we urge the Department to change the proposed rule by including these and other fields in what counts as professional degrees.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hubly".

Justin Hubly
Executive Director