



March 2, 2026

Secretary Linda McMahon  
U.S. Secretary of Education  
Lyndon Baines Johnson Building  
400 Maryland Avenue SW  
Washington, DC  
20202

**Re: Reimagining and Improving Student Education (RIN 1840-AD98)**

Dear Secretary Linda McMahon,

The American Medical Informatics Association (AMIA) appreciates the opportunity to comment on the proposed rule, *Reimagining and Improving Student Education*. AMIA strongly disagrees with the proposed changes to MSN and DNP professional designations.

AMIA is the professional home for more than 6,000 informatics professionals, representing frontline clinicians, researchers, public health experts, and educators who bring meaning to data, manage information, and generate new knowledge across the research and healthcare enterprise. As the voice of the nation's biomedical and health informatics professionals, AMIA plays a leading role in advancing health and wellness by moving basic research findings from bench to bedside, and evaluating interventions, innovations, and public policy across care settings and patient populations.

Nursing must remain classified as a professional degree. Nursing education is not an academic enrichment pathway; it is formal professional preparation for entry into and advancement within a licensed, regulated profession accountable for protecting public health. Registered nurses complete accredited educational programs and sit for national licensure examinations, and graduate-prepared nurses assume expanded clinical, leadership, education, and systems-level responsibilities. Across undergraduate and graduate pathways, nursing education leads to state licensure, supports national certification, and requires compliance with legal, regulatory, and competency standards established by boards of nursing, accreditors, and certifying bodies. These are defining features of a profession. To remove nursing from the professional designation fundamentally mischaracterizes its purpose, its regulatory structure, and its role in preparing a workforce essential to safe, high-quality care.

This proposed change would create immediate and harmful consequences. Lower federal loan limits would increase barriers to entry into nursing, restrict equitable access to nursing education, and worsen existing workforce shortages at a time of persistent and increasing national need for nurses, advanced practice nurses, nurse leaders, nurse

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**American Medical Informatics Association**

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faculty, and nurse scientists. It would weaken the educational pipeline, reduce advancement into critical clinical and leadership roles, and diminish the profession's ability to generate the nursing knowledge needed to improve care delivery and outcomes. The proposal also conflicts with broader national investments in healthcare workforce expansion, digital health modernization, interoperability, data governance, and the safe implementation of AI in healthcare, all of which depend on a strong nursing workforce. Because nursing is composed predominantly of women and includes many individuals from diverse backgrounds, restricting financial access to nursing education also risks reinforcing structural inequities in higher education and the health professions. The Department should revise the proposed rule to explicitly include undergraduate and graduate nursing education within the professional degree designation.

Thank you for your attention to these comments. For questions or additional information, please contact Tayler Williams, AMIA's Senior Manager of Public Policy, at [twilliams@amia.org](mailto:twilliams@amia.org).

Sincerely,



Eileen Koski  
Public Policy Committee Chair