Frequently Asked Questions: What Happens Now for Graduate Student Loans?

1. What happened, and when?

On June 24, 2026, the U.S. District Court for the District of Columbia issued a preliminary stay in the consolidated *AANP v. McMahon* and *PA Educ. Assoc. v. ED* cases. The stay temporarily removes the extra requirements the U.S. Department of Education (ED) had added to its professional degree definition under the RISE rule: that a degree be doctoral-level, require six years of postsecondary coursework, fall within specified CIP codes, or require licensure for unsupervised practice. The preliminary stay maintains the professional and graduate-level loan limits codified by the *One Big Beautiful Bill Act (OBBBA)*, signed into law on July 4, 2025.

On June 29, ED published an interim list of programs it will treat as awarding professional degrees for the duration of the court's stay.

Programs on the interim list qualify for professional-level federal loan limits: $50,000 annually and $200,000 aggregate, instead of standard graduate limits, which are $20,500 annually and $100,000 aggregate.

2. How long will this stay last?

The ruling is preliminary, meaning it is in effect only pending further proceedings. The government has an immediate right to appeal and could seek to have it reversed or paused at any time. ED's own notice states that the interim designations may change as litigation proceeds.

3. What are the new federal loan limits?

Programs on the interim list qualify for professional-level federal loan limits: $50,000 annually and $200,000 aggregate, instead of standard graduate limits.

Graduate-level federal loan limits are limited to $20,500 annually and $100,000 aggregate.

4. Which programs are now eligible for professional-level federal loan limits?

For the duration of the stay, ED's interim list includes:

- Physical Therapy (DPT)
- Occupational Therapy (OTD/MSOT)
- Athletic Training (MSAT/MAT)
- Physician Associate/Assistant (MSPA/PA)
- Audiology (AuD)
- Speech-Language Pathology (SLP)
- Anesthesiologist Assistant (CAA)
- Registered Nursing (MSN)*
- Nursing Practice (DNP)*

- Nurse Anesthetist (DNAP)
- Law (L.L.B.; J.D.), Veterinary Medicine (D.V.M.), Dentistry (D.D.S.; D.M.D.), and Medicine (M.D.)
- Additional clinical psychology subfields awarding the Psy.D. and Ph.D.

On July 10, ED published an updated list of eligible programs for the professional-level loan caps. ED clarified the following:

- *The nursing entries, MSN (51.3801) and DNP (51.3818), now carry an asterisk clarifying that they include any program within the same four-digit CIP code, as assigned by the institution or determined by the Secretary, provided it awards the same credential.*
- *Clinical psychology Ph.D. is restored. The initial list showed Clinical Psychology as Psy.D. only. ED now amends it to "Ph.D.; Psy.D.," calling the Ph.D. omission inadvertent.*

5. Which programs are NOT included?

ED's list also names programs that don't qualify for the duration of the stay, described broadly as several psychology, pharmacy, and theology programs. The list does not itemize every excluded program by name. If your program is not included in the list of degree fields that are treated as a professional degree, assume that it is not.

6. Will my higher federal loan limit be available right away?

The notice does not specify an implementation timeline. Confirm with your institution's financial aid office how and when this applies to your account.

7. What happens to federal loans if the stay is reversed later?

Since the stay is preliminary and appealable, ED recommends in its interim list notice that institutions consider capping disbursements at graduate-level amounts for programs temporarily classified as professional. Your institution may hold back from disbursing the full professional-level amount even if your program currently qualifies.

8. What happens to students already enrolled in programs and who have received loans?

All borrowers who receive a loan made on or after July 1, 2026, are subject to an aggregate lifetime loan limit of $257,500, with certain exceptions:

1. Grad PLUS loans that a borrower has received will be included in the new aggregate lifetime limit, unless the borrower qualifies for the interim exception:
    a. *Interim Exception: Borrowers enrolled in a program before July 1, 2026, and who have already received a loan for that program, may continue borrowing under the prior (pre-OBBBA) annual, aggregate, and lifetime loan limits for the lesser of three years or their expected time to credential.*
2. Parent PLUS loans made to a borrower for their dependent students are excluded from a borrower's lifetime limit.

9. Are there legislative avenues to combat the RISE rule?

Yes. Several bills are pending in Congress, though none have passed. The *Loan Equity for Advanced Professionals (LEAP) Act*, introduced by Rep. Tim Kennedy (D-NY-26), would scrap the two-tier system entirely and give all graduate and professional students the same $50,000/$200,000 limits, while the *Professional Degree Access Restoration Act*, introduced by Rep. Ritchie Torres (D-NY-15) in the House and Senator Angela Alsobrooks (D-MD) in the Senate, would roll back the OBBBA loan caps altogether and restore pre-2025 limits for all graduate degree programs. Separately, congressional Democrats led by Rep. Bonamici (D-OR-1) in the House and Senator Jeff Merkley (D-OR) in the Senate introduced Congressional Review Act resolutions in both chambers that sought to overturn the RISE final rule before its implementation on July 1, 2026.

Additional legislation has been proposed in the House and Senate that would carve certain exceptions for programs under the RISE rule and would not target the rule in its entirety. None of the legislation proposed has been passed by both chambers and signed into law. Their outcomes are independent of ongoing litigation.

10. Can the government appeal the court stay?

Yes. The federal government may ask the appellate court to reverse or pause the district court's order at any time.

11. Are there other lawsuits challenging the RISE rule?

Yes. Two other cases are pending, and neither has resulted in a court order changing loan eligibility:

- *State of Maryland, et al. v.* ED: A coalition of 25 states, D.C., and two governors, led by Maryland, filed suit on May 19, 2026, arguing that the RISE rule's professional-degree definition violates the *Administrative Procedure Act*.
- *American Nurses Association v. ED*: A coalition of nursing organizations filed suit on May 29, 2026, challenging the exclusion of certain post-baccalaureate nursing degrees. The court held a hearing on July 1, 2026. No ruling has been issued as of this writing.

Both suits are separate from the *AANP v. McMahon* and *PA Education Association v. ED* case. At the time of writing, the June 24 preliminary stay and the resulting June 29 interim list remain the only court-ordered changes affecting loan eligibility.

Additional Sources and Information:

- *The U.S. Department of Education's Interim List can be found at:* *https://fsapartners.ed.gov/knowledge-center/library/electronic-announcements/2026-06-29/update-list-professional-degree-programs-due-court-order*
- *The Final Rules, published in the federal register, can be found at:* *https://www.federalregister.gov/documents/2026/05/01/2026-08556/reimagining-and-improving-student-education-federal-student-loan-program-final-regulations*