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February 25, 2026

The Hon. Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

ATTN: Docket ID ED-2025-OPE-0944; Proposed rulemaking on William D. Ford Federal Direct Student Loan (Direct Loan) Program DEFINITIONS (§685.102)

Dear Secretary McMahon:

The American Society of Civil Engineers (ASCE) is grateful for the opportunity to provide public comments to the Department of Education (the Department) on its proposed rulemaking to amend regulations for the federal student loan programs authorized under title IV of the Higher Education Act of 1965, as amended, to implement the statutory changes enacted by the One Big Beautiful Bill Act (OBBA).

Founded in 1852, ASCE is the nation's oldest engineering society. ASCE represents more than 160,000 members of the civil engineering profession in 177 countries. Whether they practice in private firms, government offices, or universities, ASCE's members are committed to advancing the science and profession of civil engineering and protecting public health, safety, and welfare. As the professionals who plan, design, construct, and maintain critical aspects of our nation's infrastructure, ASCE's members have a vested interest in the future of the engineering workforce and welcome the opportunity to offer input on the Department's proposed rulemaking.

ASCE believes adoption of the Department's proposed revisions to the definition of "professional student" may further exacerbate the serious workforce challenges engineering professions in the United States are now facing. Currently, the U.S. Bureau of Labor Statistics (BLS) projects that the employment market for engineers will grow by 7 percent from 2024 to 2034, a rate more than double the overall job market's 3 percent growth. Over the same period, BLS anticipates there will be 114,600 engineering job openings annually. Despite this robust growth, it's estimated that nearly 20 percent of the entire engineering workforce will be eligible for retirement in the next decade. The percentage of workers approaching retirement age by 2034 is even greater among civil engineers, a field of study where the country is already conferring fewer postsecondary degrees - a combined total of 20,728 bachelor's, master's, and doctoral degrees in 2023 - than the approximately 23,600

yearly openings in the profession, a nearly 9 percent shortfall that continues to widen.

When Congress passed the OBBB, it purposefully incorporated by reference the existing, more expansive definition of professional degrees in 34 CFR 668.2. Congress intended to preserve in OBBB the established definition for “professional degree” precisely because it is more illustrative than prescriptive, knowing that this longstanding definition provides the flexibility necessary to educate the high-skilled professional workforce of the future. For over two decades, the meaning of “professional degree” in 34 CFR 668.2 has allowed the United States to produce the best educated and most dynamic workforce in history. Limiting the definition of professional degrees to those expressly listed in the Department’s revised definition will create an unnecessary obstacle to training more qualified civil engineers and other professionals at a time of great need.

Furthermore, in applying its three-part operational test to determine the universe of professions and graduate fields qualifying for higher annual and overall borrowing limits under the Direct Loan Program, ASCE believes the Department does not properly account for the experiential requirements necessary to train a professional engineer. Though requirements vary state to state, generally, those seeking licensure as professional engineers (P.E.) must complete several years of progressive experience under a licensed engineer. In lieu of experience, engineers can often apply postgraduate education towards the experiential requirements. By reducing the borrowing ability of those seeking postgraduate education in engineering, the Department will constrict and extend this pathway to P.E. licensure, placing further stress on the already strained engineering workforce pipeline.

The Department’s proposed revised definition of “professional degrees” may also have unintended spillover effects that have lasting negative impacts on engineering and other professions. While the Department states that its redesignation of professional programs is not a “value judgment” on any given profession, the determinations of the federal government carry significant weight. Engineers have a legal duty to protect the public’s health and safety. If the federal government were to explicitly exclude engineering degrees from a list of recognized professions, the exclusion could be used to justify lowering standards, wages, and other characteristics of the profession that now make it an attractive career path and ultimately jeopardize the welfare of the public at large.

As an organization focused on championing the professionals who plan, design, build, operate and maintain the fundamental elements of our built environment, ASCE believes that this proposed rulemaking will have negative consequences that severely affect the critical work our members perform for the benefit of the health, safety, and welfare of the public. We respectfully request the Department take full and fair consideration of our organization’s comments prior to issuing its final rule.

Respectfully submitted,

American Society of Civil Engineers