AANMC AANP Joint Statement on the RISE Proposed Rule and the Definition of "Professional Degree"

January 30, 2026

The Association of Accredited Naturopathic Medical Colleges (AANMC) and the American Association of Naturopathic Physicians are deeply concerned by provisions in the Department of Education's proposed rule "Reimagining and Improving Student Education" (RISE) that would fundamentally redefine which health professions are recognized as "professional degrees" for federal student aid purposes.

This proposed change represents a significant departure from long-standing federal policy and legislative intent.

For decades, naturopathic medicine has been recognized as a regulated healthcare profession, with accredited doctoral-level education, national licensing examinations, and statutory licensure - available for more than half the U.S. population. Naturopathic physicians serve as primary care providers, particularly in areas facing workforce shortages, and are licensed to diagnose, treat, and manage patients within defined scopes of practice.

The RISE proposal would, for the first time, create a narrow federal definition of "professional degree" that excludes naturopathic medicine and many other health professions—despite meeting longstanding criteria used across federal law, accreditation, and licensure frameworks.

Why This Is Concerning

1. It contradicts congressional intent.
Congress has historically defined professional degrees broadly, recognizing that healthcare delivery depends on a diverse workforce. The One Big Beautiful Bill Act (OBBBA) which creates new Direct Loan limits for graduate vs professional students specifically references 34 CFR 668.2, which provides a definition of professional students which is broadly inclusive of the diversity of professions that meet the definition, including naturopathic doctors. The draft rule substitutes regulatory judgment for legislative authority.

2. It places the federal government in the position of choosing "winners and losers."
Healthcare workforce planning has never been based on excluding entire professions. Doing so now—through regulatory definition rather than legislative debate—sets a dangerous precedent. The draft definition would devastate the future pipeline of students in dozens of professions,

especially those in the fields of integrative medicine, at a time when patients are demanding **more** choices in healthcare—not fewer.

3. It undermines healthcare access at a critical moment.
The United States faces well-documented shortages in primary care, rural healthcare, and preventive medicine. Naturopathic physicians help fill these gaps. Policies that restrict educational pathways into licensed health professions will reduce access to care, particularly in underserved communities, and directly contradict healthcare workforce development priorities and initiatives of other parts of the government.

4.The proposed definition relies on an outdated framework that does not reflect the realities of today's U.S. healthcare workforce.

- Naturopathic medicine has been recognized by the U.S. Department of Education as a First Professional Degree since 1999 (which was subsequently simplified to just "Professional Degree"), reflecting the level of education and clinical preparation required for entry into practice.
- Numerous federal and state references recognize naturopathic medicine as a profession, including licensure statutes, accreditation standards, and workforce classifications.
- Naturopathic medicine clearly meets the established three-part test for professional degrees as designated in federal statute; excluding the ND degree in the draft rule is arbitrary, inconsistent with the Department's own history or recognition, and unsupported by law.
- The proposed definition includes other professions that meet the same criteria applied to naturopathic medicine, yet excludes NDs without a legally or empirically sound justification.

This inconsistent application of standards creates an anti-competitive and anti-business framework, discouraging innovation and deterring the development of emerging healthcare professions.

Taken together, the proposed approach reflects an unjustified narrowing of the professional definition that does not align with statutory intent, workforce realities, or long-standing federal recognition of naturopathic medicine.

The AANMC and the AANP will continue to pursue every available avenue on behalf of the naturopathic profession to ensure that administrative rules align with the law as written and the broader policy goals of expanding - not shrinking - the healthcare workforce and patient access to care.

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