Re: Comments on Proposed Rule, "Reimagining and Improving Student Education"; RIN 1840-AD98 (34 CFR § 685.102(b) – Definitions of "Professional Student" and "Graduate Student")

Docket ID: ED-2025-OPE-0944

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education

Dear Secretary McMahon,

On behalf of the undersigned coalition of organizations representing professionals and employers across the building and construction industry, we appreciate the opportunity to comment on the Department's proposed amendments to the definitions in 34 CFR § 685.102(b), specifically the proposed definitions of "professional student" and "professional degree".

We respectfully request that the final rule retain a flexible, criteria-based approach and avoid limiting the "professional student" definition to a narrow set of enumerated "professional degree" titles. Maintaining broad access to graduate and licensure-aligned education will help ensure that public-serving professions remain accessible and equipped to meet the nation's growing infrastructure and resilience needs.

Our members include engineers, architects, and related professionals whose work directly protects public health, safety, and welfare through the design and delivery of housing, infrastructure, and resilient communities. We share the Department's goal of improving clarity, transparency, and accountability in Title IV programs, and we strongly support policies that expand access to affordable, high-quality education and training. Because the built environment depends on a highly trained and licensed workforce, maintaining access to both undergraduate

and graduate education is essential to sustaining strong professional pipelines and meeting the nation's housing, infrastructure, and climate resilience needs.

In the building and construction disciplines, educational preparation is intentionally structured to combine academic study with applied professional experience. Entry into licensed practice typically requires:

- completion of an accredited baccalaureate degree;
- advanced technical or graduate-level coursework; and
- state licensure based on examination and supervised experience.

In fields such as structural engineering and architecture, graduate education frequently provides the specialized competencies required for safe practice, particularly in high-risk contexts such as seismic design, infrastructure resilience, and complex building systems. Federal student aid plays a critical role in ensuring that students from a broad range of backgrounds can access these advanced programs. Policies that restrict aid eligibility for these pathways may limit workforce entry into professions that directly serve the public interest. These same professions are already experiencing significant pipeline challenges due to an aging workforce and increasing retirement rates; restricting access to student aid risks further exacerbating these shortages at a time when demand for qualified professionals is growing.

We appreciate the Department's overall framework for defining "professional student" based on programs that prepare students for entry into licensed professional practice and that require advanced, post-baccalaureate education. This functional approach appropriately recognizes that certain professions require preparation beyond the bachelor's degree. However, we respectfully recommend one targeted modification.

The proposed definition includes a closed, enumerated list of eligible "professional degree" fields (e.g., medicine, law, dentistry, pharmacy, and related programs). While these degrees clearly meet the professional criteria described in the rule, limiting the definition to a fixed list risks unintentionally excluding other programs that serve the same professional and public-safety function but are structured differently across disciplines.

In many public-serving technical professions, including engineering, architecture, and construction-related fields, professional preparation often occurs through graduate or advanced study rather than through degrees formally labeled as "professional" programs. These programs:

- require education beyond the baccalaureate level;
- provide advanced technical competencies necessary for safe practice;
- align with state licensure requirements; and
- serve as the primary pathway into regulated professions.

For example, structural engineering and architecture programs often require or strongly incentivize graduate study to meet licensure expectations. These pathways function comparably to the professional programs listed in the proposal and are essential to preparing professionals responsible for life-safety design. A narrow, title-based list may therefore create unintended consequences across professions and reduce Title IV access for students pursuing professional preparation in fields critical to infrastructure, housing, and community resilience.

Recommended Revision to § 685.102(b)

For this reason, we do not recommend substantive changes to the Department's overall definition or criteria. Instead, we respectfully suggest a focused adjustment: remove or revise the enumerated list of eligible degree fields and clarify that the definition applies broadly to programs that meet the stated functional criteria. If examples are retained, they could be framed as "including, but not limited to," rather than as exclusive categories. This targeted revision would preserve the Department's policy intent while avoiding unnecessary exclusions and allowing flexibility as educational models evolve.

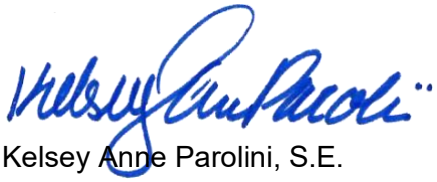
Workforce data underscore why maintaining this flexibility matters. In the built-environment professions, advanced education is a central component of professional readiness. Approximately 37 percent of architects hold master's degrees, along with 26 percent of civil engineers and 22 percent of mechanical engineers (U.S. Bureau of Labor Statistics, Current Population Survey). At the same time, California faces sustained demand and replacement pressure across these fields, including projected growth of approximately 12 percent for civil engineers, 9 percent for construction managers, and 9-10 percent for electricians, with roughly 20-30 percent of the workforce age 55 or older. These trends indicate significant near-term hiring needs to support housing production, infrastructure modernization, and community resilience.

Taken together, these data show that advanced postsecondary education is a core component of workforce preparation and public safety. Restricting aid eligibility for these pathways could disproportionately affect the supply of qualified professionals in occupations that directly protect communities and critical infrastructure. Additional workforce, education, and demographic context is provided in Appendix A, with citations to publicly available sources.

We appreciate the Department's efforts to clarify definitions within § 685.102(b) and to ensure consistent application of Title IV policy. We respectfully request that the final rule retain a flexible, criteria-based approach and avoid limiting the "professional student" definition to a narrow set of enumerated "professional degree" titles. Maintaining broad access to graduate and licensure-aligned education will help ensure that public-serving professions remain accessible and equipped to meet the nation's growing infrastructure and resilience needs.

Thank you for the opportunity to provide comments. We welcome continued engagement.

Sincerely,



Kelsey Anne Parolini, S.E.
President, Structural Engineers Association of California

Undersigned Organizations:

Applied Technology Council (ATC)

Earthquake Engineering Research Institute (EERI)

International Code Council (ICC)

National Council of Structural Engineers Associations (NCSEA)

Structural Engineers Association of Central California (SEAOCC)

Structural Engineers Association of Northern California (SEAONC)

Structural Engineers Association of Southern California (SEAOSC)

Structural Engineers Association of San Diego (SEAOSD)

Appendix A

California Workforce Context: Architecture, Engineering, and Construction Professions

This appendix provides workforce and education context to inform the Department's consideration of the proposed redefinition of "professional degree." The architecture, engineering, and construction (AEC) professions play an essential public-serving role in California, supporting safe housing, infrastructure reliability, economic development, and community resilience. These fields rely on multiple educational and training pathways, including undergraduate degrees, graduate education, apprenticeships, and licensure-aligned professional preparation.

Together, these pathways form an interconnected workforce ecosystem. Federal financial aid policies that preserve broad, flexible access to education across degree levels help sustain this ecosystem and ensure a strong pipeline of qualified professionals. Narrow classifications that unintentionally limit access, particularly to graduate-level programs, risk constraining workforce supply in fields that directly protect public health, safety, and welfare.

The data below provide a snapshot of educational attainment, demographics, and projected workforce demand across California's AEC professions.

Education Pathways and Degree Attainment

California's built-environment workforce includes both degree-based professions and apprenticeship-based careers. The diversity of these pathways underscores the importance of maintaining flexible federal definitions that recognize varied educational models rather than limiting support to a narrow set of degree types.

Licensed Professionals: Architects and Engineers

Licensed design professionals overwhelmingly rely on formal higher education:

- Most architects and engineers hold at least a bachelor's degree, with many completing graduate education, particularly in specialized fields such as structural engineering or architecture.
- National occupational attainment data indicate:
    - Architects: ~44% bachelor's, ~37% master's, ~9% professional/doctoral
    - Civil engineers: ~58% bachelor's, ~26% master's
    - Mechanical engineers: ~57% bachelor's, ~22% master's

Graduate study frequently provides advanced technical competencies in seismic design, infrastructure resilience, and complex building systems, skills especially critical in California.

Source: U.S. Bureau of Labor Statistics (Current Population Survey educational attainment tables) and occupational profiles via Data USA.

Construction Managers

Construction management typically blends education and experience:

- ~27% bachelor's
- ~6% master's
- Significant shares enter through experience and associate-level training

This pathway illustrates how applied learning and formal education often intersect.

Source: BLS/CPS education tables; California Employment Development Department (EDD) Occupational Guides.

Skilled Trades (Electricians, Plumbers, Carpenters)

Skilled trades rely primarily on apprenticeship and vocational education:

- Electricians: ~8% bachelor's, ~2% graduate
- Plumbers: ~5% bachelor's
- Carpenters: ~7% bachelor's

Over 80–90% enter through apprenticeship or trade training rather than traditional degrees.

These pathways remain essential to California's housing and infrastructure capacity.

Source: BLS Current Population Survey; occupational demographic summaries via Data USA.

Together, these findings demonstrate that no single degree level defines professional preparation in the built environment. Instead, preparation ranges from apprenticeship to graduate study. Policies that limit financial aid access for graduate-level programs risk disproportionately affecting specialized professional fields, particularly those like structural engineering, that are often only available at the graduate level.

Workforce Demographics

Gender

Architecture, engineering, and construction occupations remain male-dominated:

- Architecture & Engineering occupations: ~83% men, ~17% women
- Construction managers: ~90% men
- Skilled trades: 95–97% men

Race and Ethnicity

- Architecture & engineering occupations are majority White (~70–80%)
- Skilled trades show higher Latinx representation (~25–40%)
- Black and Asian workers remain underrepresented in many occupations

These disparities highlight the importance of reducing financial barriers to education and training. Expanding access to undergraduate and graduate pathways is a key strategy for broadening participation and diversifying these professions.

Source: Data USA occupational demographic profiles (BLS American Community Survey/CPS).

Age Profile and Retirement Risk

AEC professions have an aging workforce:

- Median age:
    - Architects: ~45
    - Engineers: ~40–42
    - Construction managers: ~44
    - Skilled trades: ~39–42
- Approximately 20–30% of workers are age 55 or older

This indicates significant near-term retirement pressure and replacement demand.

Industry estimates suggest up to 40% of the construction workforce may retire within the next decade, creating urgent needs for new entrants.

Sources: BLS age distribution tables; Home Depot Foundation/Morning Consult construction workforce survey.

California Workforce Demand and Projections

California continues to experience sustained demand across these professions due to housing production, infrastructure modernization, climate adaptation, and disaster resilience.

Selected projections:

- Civil engineers: ~12% growth (2022–2032)
- Construction managers: ~9% growth
- Mechanical engineers: ~9% growth
- Electricians: ~9–10% growth
- Carpenters/plumbers: ~4–5% growth

In addition to growth, replacement needs drive thousands of annual openings.

California's Employment Development Department projects millions of job openings statewide from growth and retirements combined, reinforcing the importance of maintaining strong training pipelines.

Sources: California EDD Occupational Projections; U.S. BLS Employment Projections (2022–2032).

California Workforce Skills Gap and Education Pipeline

Independent California workforce research further underscores the importance of accessible education and training pathways. The Public Policy Institute of California (PPIC) projects that the state faces persistent shortages in “middle-skill” and technical occupations, roles that typically require education or training beyond high school but not necessarily a traditional four-year degree.

PPIC finds that California’s economy increasingly depends on workers with a combination of postsecondary education, applied training, and industry-recognized credentials, yet the state is not currently producing enough workers to meet demand. Fields such as construction, infrastructure, and technical professions are particularly affected, with shortages driven by retirements, housing and infrastructure needs, and insufficient entry into training pipelines.

These findings reinforce the importance of maintaining broad and affordable access to postsecondary and graduate education. Policies that limit financial aid eligibility for certain degree or credential pathways risk further constraining the workforce supply needed to support California’s housing production, infrastructure modernization, and community resilience goals.

Sources: Public Policy Institute of California, *California’s Need for Skilled Workers*; *Addressing California’s Skills Gap.*

Sources

California Employment Development Department (EDD), Labor Market Information Division — Occupational Employment Projections (California-specific growth and job openings)
https://labormarketinfo.edd.ca.gov/data/employment-projections.html

Public Policy Institute of California (PPIC) — Workforce skills gap analysis (background context on middle-skill shortages)
https://www.ppic.org/publication/californias-need-for-skilled-workers/ https://www.ppic.org/wp-content/uploads/R_0416HJ2R.pdf

U.S. Bureau of Labor Statistics (BLS), Current Population Survey — Educational Attainment by Detailed Occupation (education levels, bachelor’s/graduate shares)
https://www.bls.gov/emp/tables/educational-attainment.htm

U.S. Bureau of Labor Statistics (BLS), Employment Projections — Occupational Outlook & 10-Year Growth (national projections used for comparison context)
https://www.bls.gov/ooh/

Data USA (U.S. Census American Community Survey / BLS microdata) — Occupational Demographics & Education Profiles
Architecture & Engineering Occupations
https://datausa.io/profile/soc/architecture-engineering-occupations

Construction Managers
https://datausa.io/profile/soc/construction-managers

Electricians
https://datausa.io/profile/soc/electricians

Carpenters
https://datausa.io/profile/soc/carpenters

Home Depot Foundation & Morning Consult — Skilled Labor Workforce Study (retirement projections and workforce shortage context)
https://corporate.homedepot.com/news/trades-training-and-path-pro/new-research-identifies-construction-skilled-labor-gap