



NATIONAL BOARD FOR
CERTIFIED COUNSELORS®
AND AFFILIATES

Protect Mental Health Providers' Access to Affordable Student Loans



Established in 1982, the National Board for Certified Counselors ([NBCC](#)) is the nation's premier independent credentialing body for Professional Counselors, who make up the second-largest segment of the behavioral health workforce in the United States and serve millions of individuals each year. NBCC administers national certification for more than 71,000 counselors in over 40 countries, and its [examinations](#) are used for licensure in all 50 states. NBCC supports the broader Mental Health Counseling profession, which includes more than [200,000](#) Licensed Professional Counselors (LPCs) nationwide. More than 57 million U.S. adults received mental health treatment in 2025, according to July 2026 data from the Substance Abuse and Mental Health Services Administration ([SAMHSA](#)).

Counseling Graduate Programs Satisfy the Federal Definition of “Professional Degree”

- **Issue Background:** On May 1, 2026, the U.S. Department of Education (ED) published the Reimagining and Improving Student Education (RISE) [final rule](#), effective July 1, 2026. For most new borrowers, students in “graduate degree” programs may borrow up to \$20,500 annually and \$100,000 in aggregate, compared with \$50,000 annually and \$200,000 in aggregate for students in “professional degree” programs. NBCC submitted [public comments](#) to ED on its RISE rule outlining its concerns on the regulations’ impacts on the mental health workforce’s ability to access affordable federal student loans.
- **A “professional degree” is defined statutorily as one that:** (1) completes the academic requirements for beginning practice and imparts skills beyond a bachelor’s degree; (2) generally requires licensure; and (3) falls within ED’s four-digit Classification of Instructional Programs (CIP) codes. Counseling meets each of these requirements.
 1. Counseling master’s programs generally require at least 60 graduate credit hours and 600–1,000 hours of supervised clinical training following a bachelor’s degree.
 2. Certified Counselors pass a national examination and require professional licensure.
 3. Counseling graduate programs have pre-existing CIP codes, including 13.1101 (Counselor Education), 51.1508 (Clinical Mental Health/Mental Health Counseling), and 51.1501 (SUD/Addiction Counseling).
- **ED’s interim “professional degree” definition is arbitrary:** ED’s guidance lists speech-language pathology, physician assistants, athletic training, occupational therapy, and registered nursing programs under the “professional degree” definition. Despite Mental Health Counseling graduate programs meeting all three statutory elements of a “professional degree”—as passed by Congress and codified in [34 CFR 668.2](#)—graduate Counseling programs continue to be unlisted entirely on ED’s [updated guidance](#), causing significant confusion and a continued lack of clarity on the application of the agency’s interpretation.
 - On June 24, 2026, the U.S. District Court for the District of Columbia preliminarily set aside and stayed portions of ED’s definition of “professional degree” in its RISE final rule. ED then issued a June 29 [interim list](#) of programs treated as professional during the stay but, again, excluded the Counseling profession.

Excluding Mental Health Counselors Worsens the Nationwide Workforce Shortage Crisis

- **The patient access gap is severe and workforce shortages continue to worsen:** In December 2025, the Health Resources and Services Administration ([HRSA](#)) reported that 137 million Americans—40% of the population—live in a Mental Health Professional Shortage Area; 18% of all rural counties lack a Mental Health Counselor.
- **The current projected workforce shortfall exceeds 150,000 providers:** By 2038, HRSA projects workforce shortages of 99,780 Mental Health Counselors, 33,840 Marriage and Family Therapists, and 17,030 mental health and substance use disorder Social Workers. Restricting Counseling students from accessing affordable federal loans further weakens the pipeline.
- **The mental health workforce agrees that ED's professional degree definition should be expanded:** According to HRSA, Counselors, Marriage and Family Therapists, and Social Workers account for more than 80% of the professional behavioral health workforce counted in HRSA's supply table. Through [the public comment process](#), national organizations representing all three professions jointly urged ED to recognize mental health provider programs under the "professional degree" definition and establish a transparent petition process.

ED should immediately add graduate Counseling programs to the definition of "professional degree" and revise related guidance to ensure Counselors' permanent inclusion for Title IV federal student loan purposes. NBCC stands ready to work with ED and Congress on a bipartisan basis to strengthen the mental health workforce.

