

Comment on Reimagining and Improving Student Education Proposed Rule
Federal Register Number: 2026-01912
Submitted by: Architecture Organizations Alliance

Summary

The Architecture Organizations Alliance, consisting of The American Institute of Architects (AIA), the American Institute of Architecture Students (AIAS), the Association of Collegiate Schools of Architecture (ACSA), the National Architectural Accrediting Board (NAAB), the National Council of Architectural Registration Boards (NCARB), and the National Organization of Minority Architects (NOMA), submit these comments on the Department of Education's (ED or the Department) proposed regulations implementing changes to federal student loan programs under the One Big Beautiful Bill Act (OBBBA), including the proposed definition of "professional" degree programs.

The Alliance urges the Department to recognize NAAB-accredited Master of Architecture (M.Arch) and Doctor of Architecture (D.Arch) programs as professional degree programs for purposes of federal borrowing limits. Failure to do so would misclassify a licensed, regulated profession, restrict access to required professional education, and create downstream bottlenecks in the construction and housing economy at a time of acute national need.

The proposed rule, as drafted, risks undermining congressional intent by constricting the workforce pipeline for architects (key professionals necessary for protecting the health, safety, and welfare of Americans, housing production, infrastructure delivery, and economic growth) without reducing the underlying cost drivers of professional education. It also penalizes students arbitrarily based on how the schools choose to structure their programs.

In addition, by limiting recognition to a fixed list of legacy fields while excluding architecture, the rule rewards less efficient educational models and destabilizes an established, licensure-aligned professional pathway.

Accordingly, we respectfully urge the Department to: (1) classify NAAB-accredited M.Arch and D.Arch programs as professional degree programs for loan-limit purposes, using clear, criteria-based definitions; (2) support congressional action to remedy the statute's static loan caps; (3) delay implementation to avoid retroactive harm to current and entering students; and (4) rigorously assess the rule's effects on the architecture workforce, housing supply, and related national economic priorities.

Statutory Context and Congressional Intent

OBBBA restructured federal student lending by establishing fixed annual and aggregate borrowing caps and eliminated the Grad PLUS program, which previously allowed borrowing up to the full cost of attendance. Congress directed the Department to distinguish between "graduate" and "professional" degree programs but did not define those terms in statute.

Congressional intent, as reflected in OBBBA's structure, was to promote fiscal discipline while preserving access to education programs that are essential to regulated professions and the

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national economy. Nothing in the statute suggests an intent to disrupt licensed professional pipelines or to reclassify long-recognized professions in a manner that impedes workforce supply.

The Department's implementing regulations therefore play a decisive role in determining whether OBBBA is applied in a manner consistent with its economic and workforce objectives.

Architecture Is a Licensed, Regulated Profession with Professional Degree Requirements

Architecture is a state-licensed profession responsible for designing buildings and infrastructure that meet public health, safety, and welfare standards. In all U.S. jurisdictions, licensure requirements recognize:

- Completion of a NAAB-accredited professional degree
- Completion of a multi-year supervised practice requirement; and
- Passage of the Architect Registration Examination (ARE).

NAAB-accredited M.Arch and D.Arch programs are terminal professional degrees for many pathways into practice. They are explicitly designed to meet licensure requirements and are regulated through specialized accreditation and state oversight, comparable to law and medicine.

The Proposed Rule's own definition of a professional program assumes that completion of the listed degree is the standard, necessary academic path into licensed practice, but that is not actually true for every one of the enumerated degrees. In at least four states (California, Vermont, Virginia, and Washington) candidates may sit for the bar exam and become licensed attorneys through structured legal apprenticeships without ever earning a Juris Doctor (J.D.) from an accredited law school. That means the J.D. itself is not universally required for initial licensure. This undercuts the Department's claim that its enumerated professions are uniquely defined by a single, degree-based licensure pathway and shows it is applying its own "required for licensure" test inconsistently.

Like other licensed professions, architectural education is explicitly structured around protecting public health, safety, and welfare through rigorous design, technical, and ethical training. State licensing boards, the National Architectural Accrediting Board (NAAB), and the National Council of Architectural Registration Boards (NCARB) all formally designate these programs as professional degrees and this should be mirrored in federal student aid policy.

Although the Bachelor of Architecture (B.Arch.) is a recognized professional architecture degree for licensure purposes, it is not a graduate-level credential and therefore does not fit the rule's graduate/professional degree definition that governs higher loan limits above the bachelor's level. The NPRM itself explains that certain listed degrees—specifically the Bachelor of Laws (L.L.B.) and theology degrees such as the Master of Divinity (M.Div.) and Master of Hebrew Letters (M.H.L.)—are included as illustrative exceptions.

By contrast, the M.Arch and D.Arch are post-baccalaureate professional degrees that cleanly satisfy the three-part test and need no such exception. The L.L.B. is a legacy bachelor-level law degree and as such does not meet the second part of the test, and the theology degrees, M.Div.

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and M.H.L., are included even though professional licensure is not generally required, making them explicit departures from the third part of the test. **It simply does not make sense to claim that an agency is applying a test while it enumerates degrees that fail that test and excludes degrees that clearly satisfy it.**

In addition, by listing only a limited set of “professional” fields in regulation, the Department risks unintentionally locking federal policy into an outdated list that excludes professions that exist today (such as architecture) or may emerge in the future. A flexible, criteria-based definition would better reflect congressional intent and protect the rule against obsolescence.

Architecture Post-Graduate Degree Programs Are Efficient

Architecture has multiple pathways to licensure that promote efficiency without sacrificing standards. Options include both integrated five-year Bachelor of Architecture (B.Arch) programs for students who identify the profession as early as high school and Masters/Doctoral (M.Arch/D.Arch) options that serve students who decide later to pursue licensure. This flexibility ensures that early deciders are not forced into redundant schooling while late entrants are not locked out of the profession, aligning architectural education with the Department’s stated goals of affordability, access, and workforce responsiveness. **Nearly half of the states do not have a B.Arch program available to students within state lines.** Recent data show Masters/Doctoral (M.Arch/D.Arch) graduates make up 63% of the students graduating from accredited architecture programs, solidifying these degrees as the primary pathway to the licensed profession.

By contrast, aspiring lawyers in the United States must complete a four-year undergraduate degree followed by a three-year Juris Doctor from an ABA-approved law school as a prerequisite to bar and licensing eligibility. There is no inherent educational logic in this seven-year sequence: undergraduate study is neither required to be in law nor structured as a coherent pre-law curriculum, and students may major in any field before taking the LSAT and entering law school. The system is thus time-consuming and expensive without being meaningfully aligned to professional content, illustrating that the U.S. legal education model is a policy choice, not an efficiency benchmark.

By restricting the definition of a “professional” program to those that require a separate undergraduate degree followed only by graduate study, the rule not only penalizes late-deciding architecture students who are already nearing or have completed undergraduate coursework, it also creates a perverse incentive structure. It rewards, through access to higher federal borrowing, education models that have not creatively, efficiently, and thoughtfully designed multiple pathways to meet students at different points in their educational journey.

Professional Liability and Long-Term Legal Risk

Licensed architects bear ongoing legal and financial responsibility for the buildings they design. Unlike many graduate disciplines, architectural practice involves long-term professional liability exposure related to life safety, structural integrity, and code compliance. When buildings fail, architects face legal claims, insurance consequences, and professional discipline tied directly to their licensed status. This perpetual liability underscores that architecture is not an academic or

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purely creative field, but a regulated profession in which practitioners assume substantial, long-term business and legal risk comparable to that borne by physicians, attorneys, and other professionals already recognized as “professional” for federal student loan purposes.

Classifying these programs as “graduate” rather than “professional” is inconsistent with their function, regulatory treatment, and economic role and creates a disconnect between federal student aid policy and state licensure systems.

Workforce and Business Impacts on the Architecture and Construction Sectors

Architects are a critical entry point in the construction pipeline. No multi-family housing, commercial development, public building, or infrastructure project can proceed to permitting or construction without licensed architectural services.

Constraining access to required architectural education will:

- Reduce enrollment in M.Arch and D.Arch programs over time;
- Shrink the pool of licensed architects available to serve communities and businesses; and
- Create bottlenecks that delay or prevent projects from advancing to construction.

Restricting access to required professional education in a field where practitioners assume lifelong liability for public safety further discourages entry into the profession and exacerbates workforce shortages that directly affect housing production and economic activity.

These effects compound over time. Because professional education, supervised practice, and licensure take many years, workforce disruptions caused by today’s financing policies will persist for more than a decade. Last year, NCARB reported a 4% decrease in the number of architects licensed to practice in the United States. Restricting funding for graduate professional students will hinder the pathway into the profession of architecture, leading to outsized impacts on the economy.

From a business perspective, fewer architects mean fewer viable projects, slower development timelines, and reduced economic activity across construction, engineering, manufacturing, and related trades, because licensed architects are required on virtually every significant economic development project and serve as the linchpin that moves work from concept to permitting and construction. The result would inflict significant harm to the national economy.

Implications for Housing Supply and Affordability

The United States faces a well-documented housing shortage that is driving affordability challenges nationwide. Expanding housing supply such as multifamily, mixed-use, and affordable housing depends on a sufficient supply of licensed architects to design code-compliant, financeable projects.

By restricting federal financing for the degree required to become an architect, the proposed rule risks:

- Slowing housing production;
- Increasing development costs due to professional scarcity; and

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- Exacerbating affordability pressures for renters and homebuyers.

These outcomes directly conflict with stated federal priorities to increase housing supply, reduce regulatory friction, and support economic growth through construction and development.

Financial Access, Market Distortion, and Unintended Consequences

Architecture students have borrowing levels commensurate with the length and intensity of required professional education. The elimination of Grad PLUS and imposition of lower aggregate caps for misclassified programs does not reduce educational costs; instead, it shifts risk and cost to students and families.

As a result, students will be forced to:

- Rely on private credit markets with higher costs and fewer protections
- Depend on family resources, disadvantaging students without wealth
- Work excessive hours during school, reducing educational outcomes; and/or lengthening time to graduation
- Abandon their degree
- Exit the profession completely

These financing restrictions will also have equity consequences. Students from underrepresented backgrounds and first-generation college graduates are more reliant on federal loans than their peers. Reducing access to federal credit while steering borrowers toward private loans or family resources will deter talented candidates who lack intergenerational wealth and reverse recent progress within the profession. These distortions undermine efficient labor-market outcomes and discourage qualified individuals from entering a profession critical to economic development.

Loan Caps Are Not Tuition Caps

The Department's assertion that new loan limits will generate savings and exert downward pressure on tuition overlooks the realities of rigorous standards in licensed professional programs like architecture that are not responsive to marginal changes in borrowing capacity. Institutions cannot simply "create efficiencies" by cutting faculty-intensive courses, technical coursework, or practice-based learning without undermining the skills, competencies, and professional outcomes these programs are explicitly designed to produce. **Borrowing caps will simply shift the source of loans, not meaningfully reduce program expenses.** Limits instead function as a de facto rationing mechanism, constraining entry into a required professional pipeline while leaving underlying cost such as facility and technology unchanged. To the contrary, suppressing the future supply of licensed architects, would raise development and construction costs and ultimately feed upward pressure on housing prices and infrastructure costs, directly conflicting the proposed rulemaking's suggestion that borrower-facing caps alone will "rein in" prices and generate lasting savings for taxpayers.

Alignment with Administration and Department Priorities

Recognizing M.Arch and D.Arch programs as professional degrees would:

- Support workforce development in a regulated, high impact profession;
- Reduce friction between federal policy and state licensing systems;

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- Promote housing production and infrastructure delivery; and
- Align student aid policy with real-world labor market needs, rather than academic labels.

Conversely, misclassification introduces unnecessary regulatory complexity, market distortion, and economic drag—outcomes inconsistent with the goals of efficiency, growth, and affordability. Aligning definitions of “professional” with licensure requirements avoids confusing students and families about whether architecture is recognized as a true profession. Misalignment between federal and licensing definitions can undermine the credibility of professional accreditation, create mixed signals to institutions, and cause reputational harm to the field.

Recommendations

We respectfully recommend that the Department:

1. **Recognize NAAB-accredited M.Arch and D.Arch programs as professional degree programs** for purposes of federal borrowing limits by way of criteria-based definitions of “professional” programs.

Should the Department decide to move forward with this deeply problematic approach despite multiple concerns, it should at least:

2. **Formally recommend to Congress that they fix the cap’s static nature.** The new statutory loan limits under OBBBA are fixed in nominal dollars and, unlike tuition and living costs, are not changed with inflation. Without periodic adjustment, these caps will erode in real value over time, progressively reducing access to professional education.
3. **Delay implementation by at least one year** to prevent retroactive harm to students who enrolled or accepted admission under the prior federal lending framework.
4. **Assess workforce and housing impacts** by analyzing the effects of the proposed caps on enrollment, licensure rates, and professional supply in architecture and other licensed fields.

Conclusion

Architecture is a licensed profession essential to housing, commercial, industrial, institutional, governmental, public and healthcare facility production, infrastructure delivery, and economic growth. NAAB-accredited M.Arch and D.Arch programs meet the same functional and regulatory criteria as other degrees already recognized as professional under the proposed rule.

Failing to recognize these programs as professional degrees will constrict the architecture workforce, slow construction activity, and worsen housing affordability—outcomes inconsistent with congressional intent and national economic priorities.

We respectfully urge the Department of Education to revise the proposed rule to ensure that federal student aid policy supports, rather than constrains, the professional workforce necessary to meet the nation’s housing and infrastructure needs.

Sincerely,

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American Institute of Architects
American Institute of Architecture Students
Association of Collegiate Schools of Architecture
National Architectural Accrediting Board
National Council of Architectural Registration Boards
National Organization of Minority Architects

Description of Signatories

The *American Institute of Architects* (AIA) is the voice of the architecture profession, representing over 100,000 licensed architects and allied professionals. Since our founding in 1857, AIA has been a driving force for progress, shaping the built environment through advocacy, expertise, and a steadfast commitment to design excellence. AIA's leadership reflects the profession's purpose— a unified force working to create a more resilient, healthy, and fair built environment.

The *American Institute of Architecture Students* (AIAS) is an independent, nonprofit, student-run organization representing more than 54,000 architecture students in the United States and a growing global network worldwide. Dedicated to providing unmatched programs, information, and resources on issues critical to architecture and the experience of education, AIAS promotes excellence in architectural education, training, and practice; fosters an appreciation of architecture and related disciplines; enriches communities in a spirit of collaboration; and unites students to advance the art and science of architecture at both the national and international levels.

The *Association of Collegiate Schools of Architecture* (ACSA), founded in 1912, is a nonprofit membership organization representing accredited schools of architecture and architectural educators across the United States and internationally. Our membership includes architecture programs at public and private colleges and universities, as well as the more than 5,000 faculty who collectively educate the future licensed architects, designers, and built-environment leaders of this country.

The *National Architectural Accrediting Board* (NAAB) provides quality assurance in architecture education through accreditation of 176 accredited programs and serves as the primary educational component leading to professional licensure for 54 States and U.S. territories. Established in 1940, NAAB offers an accreditation system that enhances the value, relevance, and effectiveness of the profession of architecture through outcomes-based assessment that prepares graduates to enter the profession.

The *National Council of Architectural Registration Boards* (NCARB) is made up of the architectural licensing boards of the 50 states, the District of Columbia, Guam, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands. NCARB, in collaboration with these boards, facilitates the licensure and credentialing of architects to protect the health, safety, and welfare of the public. To achieve these goals, NCARB works with its Member Boards and volunteers to develop and facilitate standards for licensure, including the national examination and experience program.

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The *National Organization of Minority Architects* (NOMA) is a nonprofit serving as the premier advocate for equity and inclusion within architecture and design, representing a growing collective of students and professionals. NOMA's mission is to ensure every voice has the power to shape the built environment. Since its founding in 1971 to support the pioneering few Black licensed architects, NOMA has evolved into an essential anchor of over 4,000 members of all origins, working tirelessly to increase the representation of underrepresented groups through advocacy, professional development, and design excellence. NOMA empowers its members to shape a more equitable profession that reflects the rich diversity of the communities we serve.