



NATIONAL DEFENSE COMMITTEE

July 22, 2026

The Honorable Linda McMahon
Secretary of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

The Honorable Nicholas Kent
Under Secretary of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Secretary McMahon and Under Secretary Kent,

Thank you for issuing the revised professional program list ([CFR § 685.102](#)) amending the RISE Final Rule, on which I had the honor to serve on that Negotiated Rulemaking Committee.

While serving as the Military and Veteran negotiator, I advocated for including Nursing, Speech Language Pathology, Occupational Therapist, Physical Therapist, and Psychologist among professional degree designations. Thus, I am very pleased to see these programs incorporated and encourage the Department of Education to move quickly to finalize this list and not to contest the recent court ruling.

Founded in 2003, the National Defense Committee is a military and veteran advocacy and service nonprofit organization. National Defense Committee advocates for military members and veterans across a broad range of issues, including [educational access](#) and free use of [earned GI Bill benefits](#). As referenced above, I had the privilege of representing military and veteran students on two Department of Education negotiated rulemakings as a primary and alternate negotiator ([PSLF](#) and [RISE](#)).

National Defense Committee completely supports the Trump Administration's mission to return accountability to federal student aid and to devolve federal authority back to the States and the individual students, as much as is legislatively allowed. The prior administration's mass student loan cancellation agenda [debased and devalued veterans' and servicemembers' earned education benefits](#) through such programs as the Post-9/11 GI Bill, which are one of the primary tools to recruit and retain talent in the military.

Earned educational benefits earned through military service are no different than retirement benefits earned through that same military service. For the government to then attempt to leverage the fact the tuition check comes from a government agency, to then try to achieve unrelated policy goals, is unfair to the veteran student who completed his or her side of the military service contractual bargain to earn those benefits, and devalues the present and future value of such benefits for both current members of the military and future veterans.

And those prior administration's restrictions on the use of earned military and veteran educational benefits had, in our opinion, nothing to do with protecting military and veterans students (who are trusted with the lives of the men and women who serve with them, but aren't trusted to make their own educational decisions?), but instead with protecting the traditional market-share of conventional public, private, and state-run college and universities – even when those programs were not a good fit for students' learning and career goals, and often saddled them with massive debt.

Returning to the specific educational fields restored by your update (Nursing (MSN, DNAP, DNP), Occupational and Physical Therapy (OT, MSOT, OTD and PT, DPT), and Psychology (Psy.D.)) we reiterate the concerns I raised during the RISE Negotiated Rulemaking Committee that these fields are in

critical short supply in the Armed Services and Department of Veterans Affairs health systems. A [study](#) late last year revealed a shortage of 1,300 active-duty military nurses, and [more than half](#) of Veterans' Affairs (VA) medical centers report a shortage of psychologists. Just on July 20th, [Military Times reported](#) that nearly 80% of VA hospitals reported a severe shortage of nurses, a 50% increase over the previously reported year.

And that medical support, both for currently serving troops and veterans after they leave the military, is part of the overall "contract" military personnel and veterans expect from these health care systems. The inability of these health care systems to deliver quality health care because of staff shortages (made worse by a lack of staff unable to get the educational loans they need to complete their education and enter this service), factors into many military personnel's decision not to enter military service or to leave the military when they would otherwise reenlist.

That is why National Defense Committee strongly recommends the Department of Education accept these additionally designated professional degree programs and no longer challenge the Court's rulings through the appeals process. Accepting these programs will assist with military recruiting and retention, and improve health care delivered by the VA.

On behalf of National Defense Committee and the servicemembers and veterans I represented on the RISE Negotiated Rulemaking Committee, I ask the Department to finalize these revised professional programs list. "Going to the mat" in the courts will discourage potential students from entering these important areas of study and vocations, which would ultimately hurt our military.

I appreciate your consideration and invite the opportunity to discuss this issue in greater detail.

Very Respectfully,

A handwritten signature in black ink, appearing to read 'Bob Carey', with a stylized flourish at the end.

Captain Bob "Shoebob" Carey, US Navy (Ret.)
Executive Director