

## Current State of Play: One Big Beautiful Bill Act RISE Negotiated Rulemaking Committee

**Negotiated Rulemaking:** The Department of Education (ED) separated rulemaking for the [One Big Beautiful Bill Act](#) into two sessions. The [RISE Committee](#) covered student loan limits, graduate and professional program definitions, repayment, and loan rehabilitation and met at the beginning of October and concluded its work this week. The [AHEAD committee](#) covers the accountability and Pell Grant provisions of the law and convenes in early December and early January. Ahead of the RISE Committee's first convening, APLU joined the higher education in submitting [comments](#) on the negotiated rulemaking.

The RISE Committee reached consensus on its package of proposed regulations, meaning the Department of Education is required to publish the agreed upon text in its Notice of Proposed Rulemaking (not yet published). The package agreed to by the committee included concessions from ED's initial negotiating position as well as language proposed by negotiators. ED may publish the proposed rule as soon as this month.

The consensus proposed rule includes a narrow definition of professional programs, though one slightly expanded from ED's initial position. The definition of professional programs would include the 10 degrees found in [current regulation](#) plus the new addition of certain doctoral degrees in psychology (Psy.D and Ph.D). This list omits many degrees traditionally viewed as professional degrees, including physical and occupational therapy, architecture, social work, and others. For students enrolled in dual degree programs that include a graduate and professional degree, they will be eligible for higher loan limits.

The proposed rule also includes agreements on how to prorate federal student loans under a variety of scenarios, including part time enrollment, transfer students, and changes in enrollment intensity across terms. The committee also reached agreement on borrowers' two permitted loan rehabilitations.

The committee reached agreement on a variety of situations regarding the Repayment Assistance Program (RAP), which replaces income-driven repayment plans with one option. The committee reached agreement on how to consider interest waivers under early and pre-payments as well as how married couples' incomes should be considered when calculating monthly payments.

**Next Steps:** The Department of Education must now publish in the Federal Register a proposed rule that includes the regulatory text agreed to by the committee. Following its publication, the Department will accept comments from stakeholders, likely for only 30 days, and then publish a final rule that incorporates stakeholder feedback, though the rule will likely be substantively similar to the proposed rule. ED could publish the proposed rule as early as this month and almost certainly by the end of the calendar year. Following that general timeline, a final rule is expected at some point in spring 2026. APLU anticipates submitting a comment when the proposed rule is released.

ED's master calendar which guides the timeline of implementation for regulations pertaining to Title IV generally requires regulations to be published by November 1 of the preceding year in order to be effective July 1 of the following year. The committee reached consensus on November 6, and thus ED missed the deadline for a rule to be effective July 1, 2026. ED contends that the effective date prescribed by the legislation (July 1, 2026), and the Secretary's ability to override the statutory master calendar deadline, allows a rule published after November 1 to be effective next July 1.

APLU is aware that implementing the law will require substantial effort from institutions and pose a number of challenges, exacerbated by an abridged timeline of implementation if ED bypasses the master calendar. As the rulemaking process proceeds, APLU will be in contact to coordinate with and support member institutions and communicate views to the Department of Education and other federal partners.

**Additional Background on the One Big Beautiful Bill Act:** Earlier this summer, Congress passed the [One Big Beautiful Bill Act](#), which was signed into law by President Trump on July 4. The legislation includes many provisions related to student aid, including:

- Eliminates GRAD Plus loans and sets annual and aggregate caps on Parent PLUS borrowing (\$20,000 and \$65,000, respectively) and caps lifetime borrowing at \$257,000
- Sets new annual and aggregate loan limits for graduate (\$20,500 annual, \$100,00 aggregate) and professional (\$50,000 annual, \$200,000 aggregate) students while necessitating regulatory action by the Department of Education to define a professional program
- Exempts certain farm and small business assets from student aid eligibility calculations
- Prorates federal student loan eligibility for students enrolled less than full time
- Repeals existing income-driven repayment plans with one Repayment Assistance Plan (RAP)
- Introduces changes to loan repayment calculations and deferment, forbearance, and rehabilitation options for certain borrowers
- Creates a Workforce Pell Program for low-income students enrolled in workforce programs between 150 and 600 hours of clock instruction over 8-15 weeks (counts towards a student's lifetime eligibility limit of 12 semesters)
- Prohibits students whose Cost of Attendance is fully covered by non-federal aid from receiving a Pell Grant
- Implements a new accountability mechanism for Title IV eligibility in which undergraduate programs must demonstrate earnings above certain high school graduates and graduate and professional programs must demonstrate earnings above certain undergraduate programs