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February 24, 2026

Nicholas Kent
Under Secretary of Education
Office of Post-Secondary Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202-1100

Dear Under Secretary Kent:

On behalf of the Wound Ostomy and Continence Nursing Certification Board (WOCNCB®) I am writing to comment on the proposed rule and its exclusion of post-baccalaureate nursing programs from the definition of a “professional degree.” We represent more than 10,000 individuals who have successfully certified as wound, ostomy, continence, and foot care nurses.

The certified wound ostomy and continence nurse (CWOCN®) is a baccalaureate prepared registered nurse (RN) who has received additional specialized training in the care of patients with wounds, ostomies, and bowel and bladder continence needs. The advanced practice CWOCN (CWOCN-AP®) has completed a graduate-level nursing program (MSN, DNP, PhD) and may work in academia, research, and clinical roles, such as nurse practitioners (NPs), nurse midwives, and clinical nurse specialists (CNS)

Graduate-level nursing programs are essential to continuing and advancing the nursing profession. We urge the inclusion of post-baccalaureate nursing degrees (MSN, DNP, PhD) explicitly in the list of professional degrees. Without federal loan support, many nurses are unable to attend graduate level programs. Moreover, nurse practitioners are needed to fill gaps in health care, particularly in rural areas where fewer health care options exist for patients.

We are writing to you as nurses, but specifically as Certified Wound Ostomy and Continence Nurses (CWOCNs), because this legislative change would significantly impact our specialty. The CWOCNs specialized training in wound ostomy and continence care is critical for positive patient outcomes, since many physicians lack the education and skills to manage this vulnerable population. When a CWOCN® becomes an advanced practice clinician, they are able to provide essential, cost-effective care, including diagnostic testing, prescriptive privileges and performing procedures independently.

With the aging population, it is projected that a large number of nurse educators and nurses will retire soon. The National Academy of Medicine’s “Future of Nursing 2020-2030” report indicates that

nursing education programs are in jeopardy due to decreasing numbers of educators. This will result in a paucity of skilled nurses to replace those who are retiring, unless we increase the number of graduate-level nurses to fill this gap.

The CWOCN® and the CWOCN-AP® conduct and publish adult and pediatric research, quality improvement projects and unique case studies within the specialized areas of wound, ostomy, continence and foot care. Collaborating with peers and other health care providers in research and publication is critical to sharing and disseminating knowledge. Increasing the number of graduate-level nurse researchers will add to and strengthen the quality and quantity of knowledge in our field of nursing.

Historically, nurses have been deemed the most trustworthy profession. For nursing to no longer be considered a “professional degree” is offensive, disrespectful and undermines the important work that nurses do. Nurses with advanced degrees are critical in providing safe patient care, academia, and research.

We urge you to add ALL post-baccalaureate nursing degrees (MSN, CNS, DNP, Ph.D.) to the list of defined “professional degrees”. This revision is necessary to ensure that nurses can access the financial support required to pursue advanced education and continue serving communities across the country. We appreciate your consideration of these comments and the critical role nurses with post-baccalaureate degrees play in the nation’s health care system.

Sincerely,

A handwritten signature in black ink that reads "Linda S. McKenna". The signature is written in a cursive, flowing style.

Linda S. McKenna, MSN RN CWOCN
President