

# Threatening the Social Work Pipeline: A Policy Analysis of the U.S. Department of Education's Proposals to Reclassify MSW & DSW Degrees

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## Abstract

*Recent federal student loan reforms proposed under the One Big Beautiful Bill Act (OBBBA) would redefine “professional degree programs” for purposes of federal borrowing limits, excluding Master of Social Work (MSW) and Doctor of Social Work (DSW) degrees from eligibility for higher loan caps. This policy analysis examines the potential consequences of reclassifying social work degrees as non-professional, with particular attention to educational access, workforce sustainability, and equity. Guided by a normative, advocacy-oriented evaluative framework and an ecological lens, the analysis draws on federal rulemaking documents, workforce projections, accreditation standards, and existing research on student debt and enrollment behavior. Findings suggest that reduced federal loan access may suppress MSW and DSW enrollment, disproportionately affect first-generation, low-income, and BIPOC students, and exacerbate behavioral health workforce shortages. The analysis concludes that the proposed reclassification risks undermining both social work education infrastructure and community well-being, and it offers policy-relevant considerations to better align loan reform with workforce and equity priorities.*

**Keywords:** social work education, graduate student loan policy, behavioral health workforce, education access and equity, professional degree classification, MSW/DSW reclassification

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Several professional associations have noted that the Department of Education's Reimagining and Improving Student Education (RISE) Committee has reached a preliminary agreement on a proposed definition of "professional degree programs" under the One Big Beautiful Bill Act (OBBBA) (Association of Schools and Programs of Public Health, 2025; Blake, 2025). The proposed rule implementing P. L. 119-21 would eliminate future Grad PLUS loans and establish separate borrowing limits for graduate and professional students. To qualify for the higher "professional student" loan limits, a student must be enrolled in a generally doctoral-level program that requires six years of postsecondary education and falls within one of 11 specific fields, such as medicine, law, or clinical psychology.

By contrast, students in excluded fields—including social work, nursing, and architecture—would be reclassified as graduate students and subject to significantly lower annual and aggregated borrowing caps. Specifically, Master of Social Work (MSW) and Doctor of Social Work (DSW) degrees are excluded because MSWs are not doctoral-level and DSW programs fall outside the approved taxonomic classification (CIP Codes) categories. While proponents argue these new caps will curb federal expenditures and exert downward pressure on tuition pricing, critics contend the changes could push students toward private loans or deter them from pursuing advanced degrees entirely (Hegji, 2025). The proposed definition has sparked concern and disappointment among multiple stakeholders and human and health service professions (Laws, 2025).

The Bachelor of Social Work (BSW), MSW, and DSW collectively shape the social work profession by aligning educational preparation with distinct levels of practice and responsibility. The BSW, which serves as the minimum educational requirement for many entry-level positions, prepares graduates for generalist practice, including case management, resource coordination, and needs assessment. In contrast, the MSW provides advanced competencies necessary for specialized or clinical roles such as diagnostic assessment, therapeutic intervention, and supervisory or

administrative practice. Social workers licensed at the MSW level constitute a critical segment of the mental and behavioral health workforce (Council on Social Work Education [CSWE], n.d.b). Because the MSW is also the minimum credential required to teach in accredited BSW programs—and the foundational credential required for faculty eligibility in accredited MSW programs—restricted access to MSW education threatens not only the professional workforce pipeline but also the academic infrastructure responsible for preparing future practitioners. Full-time faculty in accredited MSW programs must hold an MSW from a CSWE-accredited program and a doctoral degree, preferably in social work, to meet accreditation standards (CSWE, 2022). The DSW further supports the profession by preparing graduates for advanced clinical leadership, applied scholarship, and academic or administrative roles (CSWE, n.d.b). Thus, the MSW degree functions not only as the essential credential for advanced practice but also as a gatekeeping qualification necessary to sustain the entire social work education pipeline.

The proposed changes and the limited funding projected for graduate-level social workers carry implications that extend well beyond financial concerns. Such revisions pose significant risks to community well-being, equity, and educational access—factors that could profoundly weaken the behavioral health workforce responsible for serving some of the nation's most vulnerable and marginalized populations. According to the U.S. Department of Health and Human Services (2024), social workers comprise 56% of the behavioral health workforce. Clinical social workers, in particular, deliver a broader range of behavioral health services across more settings than any other provider group, spanning both public and private sectors. As a result, they represent a cornerstone of the American mental health system (American Board of Clinical Social Workers, n.d.). Despite their central role, current projections indicate a substantial shortage of behavioral health providers by 2037, a trend that exacerbates existing challenges in accessing care. These challenges include high out-of-pocket costs, insurance coverage gaps, rising prevalence of mental health conditions among adults (23% of U.S. adults), and

the alarming reality that nearly half of those affected do not receive treatment (U.S. Department of Health and Human Services, 2024).

The purpose of this policy analysis is to examine the potential consequences of the proposed reclassification of MSW and DSW degrees, with particular attention to how such changes may affect student access to graduate education, the stability of the social work workforce pipeline, and the ability of communities—especially marginalized and underserved populations—to obtain equitable, high-quality social services.

## Framework and Methodology

This policy analysis employs a normative advocacy-oriented evaluative framework, which explicitly integrates normative analysis, policy effects evaluation, and an advocacy orientation. Normative policy analysis is concerned not only with describing policy effects, but with evaluating policies against explicit value-based criteria, such as equity, access, and societal benefits, to inform and advocate for preferred policy alternatives (Maarse, 2023). Accordingly, this analysis evaluates the U.S. Department of Education's proposed reclassification of MSW and DSW degrees under the OBBBA against clearly articulated normative criteria rooted in social work ethics and public interest principles.

### Analytical Framework

This analysis is guided by an ecological framework, which conceptualizes policy impacts as operating across interconnected levels: individuals (students), institutions (educational programs and workforce pipelines), and community/societal systems. This approach is particularly appropriate given social work's central role in the behavioral health infrastructure and its ethical mandate to promote social justice, equity, and community well-being.

Four analytical criteria guide the evaluation:

### *Educational Access and Equity*

The extent to which the proposed policy facilitates or constrains access to graduate social work education, particularly for first-generation, low income, and Black, Indigenous, and People of Color (BIPOC) students who disproportionately rely on federal financial aid.

### *Workforce Sustainability and Capacity*

The policy's implications for maintaining a sufficient, diverse, and professionally prepared social work and behavioral health workforce capable of meeting growing service demands.

### *Community and Public Impact*

Anticipated downstream effects on service availability, quality of care, and community well-being, especially in marginalized and underserved populations that rely heavily on social workers.

### *Policy Alignment and Feasibility*

The degree to which the proposal aligns with accreditation standards, licensure requirements, and national behavioral health workforce priorities, as well as its internal coherence with stated federal goals.

These criteria reflect both the professional realities of social work education and broader public policy concerns regarding equity, workforce development, and public welfare.

### *Analysis of MSW and DSW Eligibility Under the Proposed Definition*

The CSWE is the recognized accrediting body for master's-level social work programs in the United States and is responsible for establishing the Educational Policy and Accreditation Standards (EPAS). The MSW program is a professional degree that prepares students for generalist and advanced specialized practice and is explicitly designed to support licensure eligibility. As part of accreditation, programs are required to ensure that students demonstrate competence across nine core social work domains, which serve as the foundation for professional practice. Practicum education is central to MSW training and is considered the signature pedagogy of the

profession, socializing students into their roles through applied learning. To meet CSWE accreditation requirements, MSW students must complete a minimum of 900 hours of supervised practicum education – more than double the 400 hours required at the baccalaureate level (CSWE, 2022). Additionally, the educational pathway to licensure typically spans six years of postsecondary study, including a four-year undergraduate degree followed by a two-year MSW program.

Despite these professional standards, the Department of Education's proposed definition of "professional degree programs," as developed by the RISE Committee, limits eligibility for higher federal loan caps to fields that:

1. Require a doctoral-level program
2. Require at least six years of postsecondary education,
3. Generally require professional licensure to begin practicing in the field, and
4. Fall within one of 11 enumerated fields, such as medicine, law, dentistry, and clinical psychology (Hegji, 2025).

While the MSW clearly meets the six-year postsecondary study requirement and aligns with the core purpose of a professional degree—preparation for licensed, regulated, and socially necessary practice—it does not fully satisfy the first and fourth criteria outlined. Likewise, although DSW programs are doctoral level, they often fall outside the Department's narrowly defined CIP groupings.

### **Methodological Approach**

This analysis employs a qualitative, document-based policy analysis drawing on multiple sources beyond peer-reviewed literature, consistent with applied policy evaluation methods. Data sources include federal rulemaking documents and negotiate rulemaking summaries from the U.S. Department of Education; workforce and labor projections from the Bureau of Labor Statistics (BLS) and the Health Resources and Services Administration (HRSA); enrollment, borrowing, and loan limit analyses from national

policy research centers; and formal policy statements and impact briefs issued by professional associations and advocacy organizations.

Historical contextual analysis is incorporated to situate the proposed reclassification within a longer trajectory of debates concerning the professional legitimacy of social work education. This approach allows for examination of how contemporary policy decisions reproduce or challenge longstanding structural patterns that affect access to professional education and workforce recognition.

Empirical claims within the analysis are based on reasoned policy inference rather than predictive modeling. For example, the assertion that reduced federal loan limits are likely to suppress enrollment in MSW and DSW programs draws on established policy evaluation approaches. These projections are informed by (a) historical comparisons to prior periods of higher education funding contractions, (b) established research demonstrating negative associations between increased educational cost, constrained financial aid, and graduate enrollment, and (c) expert policy analyses projecting enrollment and workforce impacts under the OBBBA loan caps. Within normative policy analysis, such inferential reasoning is a recognized method for evaluating anticipated policy effects when experimental or longitudinal data are unavailable.

The selection of impacts examined in this analysis was guided by policy salience and population vulnerability. Given that social workers constitute a majority of the behavioral health workforce and serve populations already experiencing significant access barriers, impacts related to educational access, workforce supply, and service delivery were prioritized. This focus reflects both the stated goals of federal behavioral health policy and the ethical commitments of the social work profession.

## Literature Review

### *Student Loan Policy, Cost-Sharing, and Educational Access*

Research consistently demonstrates that reductions in public subsidy and increased reliance on student borrowing shift educational risk from the state to individuals, with measurable consequences for access, enrollment, and degree attainment. Beginning in the late twentieth century, higher education financing in the United States underwent a structural transformation characterized by declining state investment and rising tuition, particularly within public institutions (Lopez, 2015; Mitchell et al., 2017).

Scholars demonstrate that financial aid availability plays a critical role in shaping college-going behavior, with reductions in aid disproportionately discouraging enrollment among students with limited economic resources. Hence, financial aid and rising borrowing costs suppress enrollment, especially among low-income and first-generation students (Dynarski, 2008). Similarly, Baker and colleagues (2017) find that student loan availability is closely tied to both access and completion, emphasizing that financial barriers do not simply delay enrollment but can foreclose educational pathways altogether. These effects are not evenly distributed; populations already facing structural disadvantages are most sensitive to increases in cost and uncertainty.

At the graduate level, evidence suggests that enrollment decisions are particularly responsive to anticipated debt burden. Malcom and Dowd (2012) show that undergraduate debt significantly reduces the likelihood of pursuing graduate education, highlighting how cumulative financial strain shapes advanced degree decisions. Graduate students, unlike many undergraduates, often make enrollment choices based on projected return on investment, expected earnings, and the feasibility of managing long-term debt alongside professional and family obligations. As a result, policies that restrict loan availability or increase reliance on private borrowing can have an outsized impact on graduate enrollment patterns.

### *Student Debt, Career Choice, and Public Service Pathways*

Beyond shaping access to graduate education, student debt plays a significant role in influencing graduates' occupational decision-making and long-term trajectories. A growing body of scholarship demonstrates that educational borrowing constrains career flexibility, particularly for individuals pursuing lower-paid public service professions. Rather than functioning solely as temporary financing mechanisms, student debt operates as structural force that shapes post-graduate labor market behavior.

Research on racialized patterns of student debt underscores how these constraints are unevenly distributed. Houle and Addo (2019) document persistent racial disparities in student loan accumulation, showing that Black borrowers carry significantly higher debt burdens than their White counterparts even after accounting for degree attainment and socioeconomic background. Kim and colleagues (2017) similarly find that students from marginalized racial ethnic groups are more likely to rely heavily on loans and to graduate with higher debt balances. These disparities amplify financial risk and narrow the range of viable career options available to graduates from historically underrepresented groups.

Debt burden has also been shown to influence decisions about whether – and how long – to pursue additional education. Malcom and Dowd (2012) find that undergraduate debt reduces the likelihood of graduate school enrollment, particularly in fields with modest earnings trajectories. This relationship has important implications for service-oriented professions, where advanced credentials are often required for licensure or leadership but financial rewards remain comparatively limited. When debt accumulation is high, graduates may delay further education, select higher-paying private-sector roles, or exit public service fields altogether.

Collectively, this literature suggests that student debt does not merely affect who enters graduate programs but also shapes who remains in public service careers once trained. For professions such as social work—where advanced education is

essential and workforce demand is high—policies that increase borrowing risk may inadvertently discourage entry into critical service roles.

### *Professional Education, Workforce Supply, and Service Capacity*

Professional education functions as a critical pipeline shaping the size, composition, and capacity of the social and behavioral health workforce. In service-oriented professions, access to graduate education is directly linked to workforce supply, as advanced credentials are often required for licensure, clinical practice, and leadership roles. Research consistently demonstrates that constraints on educational access translate into downstream labor shortages, particularly in fields that rely on public-sector employment and serve high-need populations.

Social work exemplifies this relationship. Social workers constitute the majority of the behavioral health workforce in the United States and provide services across healthcare, child welfare, aging, disability, and community mental health systems (Council on Social Work Education [CSWE], n.d.-b; U.S. Department of Health and Human Services, 2024). National projections indicate continued growth in demand for social workers over the next decade, driven by population aging, increased prevalence of mental health conditions, and expanded recognition of behavioral health needs (BLS, 2025). At the same time, workforce shortages persist, particularly in rural and underserved communities, limiting service availability and increasing caseload strain (National Council for Mental Wellbeing, 2023).

The literature on workforce development underscores that educational barriers—such as cost, debt burden, and restricted financing—reduce entry into professions with high training requirements and comparatively modest wages. When graduate education becomes less accessible, the effects are not evenly distributed across occupations; professions tied to public service and community care are especially vulnerable. National and state policy analyses have emphasized that sustaining the behavioral health workforce requires intentional alignment between education financing

and workforce needs (National Conference of State Legislatures [NCSL], 2024).

Within this context, policies that constrain access to graduate professional education risk exacerbating existing workforce shortages and undermining service capacity. For social work, reduced access to MSW and DSW education threatens not only individual career pathways but also the stability of the systems that depend on licensed practitioners to deliver essential services.

### *Equity in Graduate Education and Racialized Access*

Research on graduate education consistently demonstrates that disparities in access are not the result of individual choice alone, but rather the cumulative outcome of structural financing arrangements, labor market dynamics, and institutional practices. Scholarship on student debt and higher education equity emphasizes that loan-based financing systems disproportionately burden students from historically marginalized racial and socioeconomic backgrounds, shaping both enrollment and persistence in graduate education. High reliance on loans is also evident among other marginalized groups, with 51% of Hispanic students, 62% of American Indian/Alaska Native students, and 72% of Black students depending on student loan assistance (Dynarski, 2008).

Houle and Addo (2019) document how racial disparities in student loan debt persist even among similarly educated borrowers, reflecting broader patterns of wealth inequality, differential family resources, and unequal exposure to financial risk. Structural barriers—including inequities in social and cultural capital—further compound these challenges and limit access to advanced degrees in service-oriented fields (Beattie, 2018). These disparities are compounded at the graduate level, where students often rely on substantial borrowing to meet the cost of attendance. Kim et al. (2017) similarly find that Black and other marginalized students are more likely to accumulate higher loan balances, placing them at heightened financial vulnerability upon degree completion.

Access inequities are further reinforced by structural barriers tied to first-generation status and

limited social and cultural capital. Beattie (2018) highlights how institutional norms, advising structures, and hidden curricula disproportionately disadvantage first-generation students navigating advanced education pathways. Financial aid systems that assume access to familial resources or tolerance for high debt thus operate in ways that systematically exclude those least able to absorb risk.

From a policy perspective, Dynarski (2008) demonstrates that reductions in financial aid availability disproportionately deter enrollment among low-income students, reinforcing stratification within higher education. Taken together, this literature underscores that equity in graduate education cannot be achieved through neutral policy mechanisms alone. Instead, financing structures actively shape who can pursue advanced credentials, reproducing racial and socioeconomic inequalities unless equity considerations are explicitly embedded in policy design.

### **Expanded Empirical Equity Consideration in MSW Education**

#### *Racial and Institutional Variation in MSW Debt Burden*

Research consistently shows that graduate students from historically marginalized backgrounds, particularly Black and first-generation students, incur higher debt loads. In the context of social work education, these disparities are particularly pronounced. According to the CSWE (2020), Black MSW graduates report higher average debt than their white peers, with many accumulating over \$60,000 in loans compared to \$45,000 for White graduates (CSWE, 2020). However, student loan debt accumulation does not start in graduate schools and often the collection of more student loan debt will discourage students from entering graduate programs (Dynarski, 2008; Malcom & Dowd, 2012). According to Soliz and Rubin (2025), although Minority Serving Institutions (MSIs) and Predominantly Black Institutions (PBIs) enroll significantly more students awarded Pell Grants compared to non-MSI community colleges in the same states and receive similar amounts of public funding as other community colleges, they still have fewer resources

for the students who may need the most support. Without additional support mechanisms, students at these schools may face steeper financial barriers to MSW enrollment and completion.

#### *Geographic Impacts and Underserved Area Enrollment Risks*

MSW programs located in rural and underserved areas play a critical role in preparing practitioners for service in high-need communities. However, students in these regions face layered financial and geographic barriers to higher education. Data from the National Center for Education Statistics (2022) indicate that students from households within lower economic resources face significant barriers to pursuing higher education and are reliant on federal grants, underscoring persistent affordability challenges. Rural students, in particular, demonstrate high levels of financial need, as evidenced by elevated Pell Grant receipt rates and higher average borrowing during their first year of enrollment compared to national figures (Postsecondary National Policy Institute, 2023).

Geographically, rural students are further disadvantaged by limited access to nearby public institutions, longer travel distances to campuses, and residence in “education deserts,” where higher education options and broadband infrastructure are scarce – restricting both in-person and online learning opportunities (Chandler & Baeta, 2023). In this context, the implementation of aggregated loan caps may disproportionately suppress enrollment in rural MSW programs, ultimately weakening behavioral health infrastructure in regions already experiencing workforce shortages. These intersecting financial and geographic disparities warrant careful policy consideration to ensure that loan reforms do not exacerbate existing access gaps.

#### *Private Loan Risks and Debt Aversion*

In the absence of sufficient federal loan access, many students may turn to private lenders, which introduce additional risks and unfavorable terms, such as steep interest rates (Jackson & Reynolds, 2013). The Consumer Financial Protection Bureau’s (CFPB) Student Loan

Ombudsman Report (2016) found that private student loans are frequently associated with servicing and collection failures that disproportionately affect vulnerable borrowers, including racial minorities who already face greater economic barriers and higher risks of delinquency and default. The report further raised concerns that many borrowers do not receive adequate information about repayment options. Consistent with these findings, the CFPB received approximately 5,500 private student loan complaints, with borrowers reporting limited access to flexible repayment options during periods of financial distress – highlighting weaker consumer protection compared to federal loan programs. Research demonstrates that minority students, particularly Black students, experienced a more than threefold increase in private loan participation between 2004 and 2008, exposing them to elevated financial risk. This risk is driven by reliance on largely unregulated private student loans, which frequently carry high interest rates—sometimes reaching 19 percent—and offer limited options for payment deferment during financial hardship. This situation is further exacerbated by the fact that low-income students, including minorities, are less likely to have a financial safety net from parents if they encounter difficulties repaying their loans, which contributes to the higher default rates historically seen among minority students (Jackson & Reynolds, 2013). In addition, several studies note that underrepresented students are more likely to exhibit debt aversion – that is, an unwillingness to take on large loans to finance education – even when the long-term return is positive (Boatman et al., 2016). This combination of barriers may lead students from marginalized backgrounds to forgo or delay MSW education, further diminishing the pipeline into social work professions.

#### *Workforce Pipeline Implications of Reduced Diversity*

The erosion of diversity in MSW programs has far-reaching implications not only for educational equity but also service delivery outcomes. Evidence suggests that BIPOC social work graduates are uniquely positioned to address the needs of underserved communities by leveraging their lived and learned experiences,

which acts as an instrument for social change (NASW, 2021). A diverse behavioral health workforce is a critical element to achieving health equity, as it is pivotal for engaging populations with historical disparities and establishing trust with providers and the healthcare system (Health Management Associates, 2022). This representation is essential because an individual's identity and cultural background influence their perception of which treatments, coping mechanisms, and supports are effective, necessitating care that is specifically tailored to their culture and life experiences (NAMI, n.d.). If federal policy changes reduce access for underrepresented students, the resulting workforce may be less prepared to meet the needs of diverse communities. This weakens the behavioral health safety net and undermines broader public health and equity goals.

#### *Loan Policy Reform, Cost Containment, and Unintended Consequences*

Concerns about unsustainable graduate borrowing and institutional cost inflation form the core rationale underlying recent federal student loan reforms. Research and policy analyses have documented that unlimited access to federal loans can reduce price sensitivity and enable institutions to increase tuition with limited accountability for labor market outcomes (Mitchell et al., 2017; Cooper, 2025). From this perspective, loan caps are framed as a mechanism to curb excessive borrowing, protect taxpayers, and discourage low-return educational investments.

These concerns are not unfounded. Evidence indicates that some high-cost graduate programs—particularly those with weak employment outcomes—have relied heavily on unrestricted federal lending to sustain inflated tuition models. The now-defunct online MSW program at the University of Southern California, where median student debt exceeded \$115,000, exemplifies how loan availability can facilitate unsustainable program structures disconnected from typical earnings in public service professions (Cooper, 2025).

However, the literature also cautions against blunt policy instruments that fail to

distinguish between problematic programs and those tied to essential workforce needs. Broad loan restrictions applied uniformly across graduate education risk generating unintended consequences, particularly for professions characterized by strong labor demand but modest wages. National workforce analyses emphasize that behavioral health and social service occupations already face persistent shortages, especially in rural and underserved communities (National Council for Mental Wellbeing, 2023; NCSL, 2024).

Research suggests that nearly 60 percent of tuition inflation is driven by demand-side factors, particularly rising income inequality and the increased purchasing power of high-income families – trends that supply-side cost containment policies fail to address. Consequently, ignoring the occupational context of essential service fields can suppress enrollment among low-income students who lack a parental financial safety net to offset the high-debt, low-return nature of these public service pathways (Horwitz, 2021). A more effective strategy is a targeted, data-driven approach that distinguishes between high-debt, low return on investment (ROI) programs and essential service pathways. This approach promotes both fiscal responsibility and workforce sustainability by enforcing accountability measures where needed while preserving access to critical professions. Notably, over 98% of public service programs already meet proposed performance metrics, indicating that most do not contribute to the accountability failures that these policies aim to correct (Arnold Ventures, 2025; Romans, 2025).

#### *Positioning the Present Analysis*

This analysis builds on existing scholarship by integrating research on student loan policy, educational access, workforce development, and equity to evaluate a specific federal reclassification proposal affecting social work education. While prior studies have examined loan limits, debt burdens, and enrollment outcomes in believe, this paper applies a normative advocacy policy framework to assess whether cost containment goals can be achieved without undermining essential behavioral health workforce pipelines. By situating the OBBBA proposal within historical,

equity, and workforce contexts, this analysis contributes a policy-relevant evaluation that centers both fiscal accountability and the public value of service-oriented professions.

#### **Policy Background**

##### *Origins of Social Work Professional Education*

The origins of social work education in the United States date back to 1898, when the first formal social work course was offered at Columbia University—then known as the New York School of Philanthropy (National Association of Social Workers, n.d.-c). Shortly thereafter, in 1903, Graham Taylor established the Chicago School of Civics and Philanthropy while directing the Chicago Commons Settlement House. In 1904, Harvard University and Simmons Female College, in collaboration with Robert Woods of the Boston Associated Charities, founded the Boston School for Training Social Workers under the leadership of Jeffrey Brackett. This institution later evolved into the Simmons College School of Social Work (Chaiklin, 2013). The near-simultaneous development of these three pioneering programs laid the groundwork for professionalization and formal academic training that define social work education today. Tulane University's social work program was among the first in the United States to be accredited in 1927, the inaugural year for national accreditation standards. This accreditation was administered by the American Association of Schools of Social Work (AASSW), the predecessor to the modern CSWE established in 1952 (Kayser, 2000; Tulane University School of Social Work, 2025). Initially, the Council on Social Work Education (CSWE) accredited only master's-level programs, reflecting the prevailing belief that professional preparation for social work practice should occur at the graduate level (CSWE, n.d.-a).

Despite the expansion of formal social work training programs at the turn of the twentieth century, the profession quickly became the subject of influential criticism that shaped its development for decades. In his 1915 address, *Is Social Work a Profession?*, Abraham Flexner asserted that social work did not yet meet the criteria necessary for full professional status, arguing that the field lacked a

sufficiently defined body of knowledge to be taught systematically (Daley & Pittman-Munke, 2021; Flexner, 1915). Flexner characterized social workers primarily as intermediaries who connected individuals to agencies rather than as autonomous professionals (Daley & Pittman-Munke, 2021; Stuart, 2007). Although he openly acknowledged his limited expertise in evaluating the field, his remarks—delivered by someone nationally recognized for his authoritative assessments of educational preparation, particularly following his seminal report on medical education—carried significant weight (Daley & Pittman-Munke, 2021; Flexner, 1910; Flexner, 1915). His critique contributed to enduring public and institutional skepticism about social work's legitimacy and reinforced longstanding efforts to marginalize or delegitimize the profession. This early challenge to social work's professional status offers critical historical context for interpreting contemporary policy decisions, including the Department of Education's proposed reclassification of MSW and DSW degrees, which mirrors a century-long pattern of questioning the value and significance of social work despite its essential role in society. As social work education continued to expand, debates about the profession's legitimacy shaped alter developments in accreditation and training.

By the 1960s, interest in undergraduate social work education began to grow. In October 1961, the CSWE Board adopted *Social Welfare Content in Undergraduate Education* to support institutions seeking to develop baccalaureate programs. This effort expanded in 1973, when CSWE released accreditation standards detailing requirements for curriculum content, faculty qualifications, and program organization at the undergraduate level. In 1974, the National Commission on Accrediting formally authorized CSWE to accredit baccalaureate social work programs. A revised curriculum policy statement issued in 1982 further refined expectations for BSW programs, and CSWE's Educational Policy and Accreditation Standards were most recently updated in 2015 (CSWE, n.d.-a).

### *Federal Higher Education Financing Shifts*

Beginning in the 1980s, state governments steadily reduced their financial investment in public higher education, transferring a growing share of costs to students and families (Lopez, 2015). While tuition rose sharply – particularly at public institutions – public subsidies failed to keep pace. Between 1993 and 2013, tuition increased 79% at public institutions and 44% at private colleges, far outpacing inflation and income growth. This cost-shifting intensified during and after the Great Recession, when collapsing state revenues led to deep and persistent cuts in higher education funding.

From 2000 to 2010, state and local funding for public higher education fell 21% per student, while institutional costs rose by more than 33% (Lopez, 2015). Even a decade after the recession, state funding remained nearly \$9 billion below 2008 levels after adjusting for inflation. To compensate, public colleges raised tuition, reduced faculty and course offerings, limited student services and in some cases closed campuses (Mitchell et al., 2017).

Federal aid programs failed to offset these losses. The Pell Grant, which once covered approximately 75% of in-state tuition, now covers less than 30%, increasing student reliance on loans. As a result, student debt has become a defining feature of postsecondary education, with younger households spending more monthly on student loan payments than on groceries (Lopez, 2015).

Critically, this funding retrenchment occurred alongside rising enrollment demand, especially during economic downturns, placing additional strain on institutions and students. The long-term consequences has been declining affordability, growing debt burdens, and concerns about workforce readiness and educational access – particularly for low-income and marginalized populations.

### *The OBBBA and RISE Committee Reforms*

According to the U.S. Department of Education (2025), negotiations have concluded with the RISE Committee reaching full consensus

on the federal student loan provisions advanced through the OBBBA. Building on changes initiated during the Trump administration, the Department's rulemaking agenda will eliminate the Grad PLUS loan program, citing concerns about unsustainable graduate-level borrowing. The new framework also introduces caps on Parent PLUS loans, streamlines the complexity of existing repayment options, and establishes a simplified Repayment Assistance Plan (RAP).

**Table 1**

*Annual and aggregated direct loan limits for graduate and professional students as amended by P.L. 119-21 (by borrower type)*

Borrower Type	Direct Unsubsidized Loans		Direct Plus Loans	
	Annual Limit	Aggregate Limit	Annual Limit	Aggregate Limit
Graduate Students	\$20,500	\$100,000 <sup>a</sup> , or \$200,000 minus amount borrowed as a profession al student <sup>b</sup>		Loan type eliminated
Professional Students	\$50,000	\$200,000 <sup>c</sup> , or \$200,000 minus amounts borrowed as a graduate student <sup>d</sup>		Loan type eliminated

**Source:** HEA §455(a)(3) and (4).

**Note:** Reproduced from U.S. Department of Education (2025). Amended limits do not apply to individuals who, as of June 30, 2026, are enrolled in a program of study and have received a Direct Loan for that program for the lesser of three academic years or the remaining time to completion of their program of study.

*a. Applies to a graduate student who is not (and has not been) a professional student.*

*b. Applies to a graduate student who is (or has been) a professional student.*

*c. Applies to a professional student who is not (or has not been) a graduate student.*

*d. Applies to a professional student who is (or has been) a graduate student.*

Under the OBBBA, beginning in July 2026, annual borrowing for new graduate students will be capped at \$20,500 with a \$100,000 aggregate limit. Professional students, by contrast, will be limited to \$50,000 annually and \$200,000 in total borrowing. See Table 1 for details on the proposed annual loan limits (U.S. Department of Education, 2025). This marks a significant departure from previous policy, which allowed graduate and professional students to borrow up to the full cost of attendance—a structure that, according to the Department, encouraged institutions to offer increasingly expensive graduate programs, some with limited or negative ROI (U.S. Department of Education, 2025).

According to Desjean (2025), the RISE Committee endorsed the U.S. Department of Education's proposed definition of a *professional degree* for Direct Loan purposes. Under this definition, a professional degree includes the 11 programs identified in 34 C.F.R. § 668.2, including clinical psychology. Additionally, any program sharing the same four-digit Classification of Instructional Programs (CIP) code as those listed may also qualify as a professional degree if it meets the following criteria:

- It signifies completion of the academic requirements necessary to enter practice in a designated profession and reflects a level of professional expertise beyond that required for a bachelor's degree;
- It is generally offered at the doctoral level and requires a minimum of six academic years of postsecondary coursework, including at least two years of post-baccalaureate study; and
- It typically requires professional licensure as a condition of entry into practice (Desjean, 2025).

With the passage of the OBBBA, Congress enacted substantial reforms to the federal student loan system, projected to reduce federal expenditures by approximately \$307 billion. One anticipated benefit arises from the new income-driven repayment plan, designed to prevent loan balances from increasing over time and to help most borrowers repay their loans more efficiently (Cooper, 2025). Cooper (2025) also notes that many students enrolled in non-professional programs borrow amounts exceeding the standard annual limits. However, a key objective of the OBBBA is to curb institutional incentives to raise tuition by restricting the extent to which students—and ultimately taxpayers—can absorb escalating costs through federal loans.

Importantly, the U.S. Department of Education has clarified that its classification of “professional degrees” is intended solely for determining eligibility for higher federal loan limits. According to the Department, this designation “has no bearing on whether a program is professional in nature or not” and is not meant to devalue the role or rigor of programs excluded under the new definition (Burke, 2025).

Although the new loan caps may reduce debt accumulation in some high-cost programs, most MSW students do not tend to borrow excessively. A notable exception is the online MSW program previously offered by the University of Southern California in partnership with a for-profit company, where students accumulated median debts of approximately \$115,000.

## Problem Definition and Stakeholder Analysis

### *Problem Definition*

From an ecological perspective, the proposed declassification of MSW and DSW degrees threatens multiple levels of the social work ecosystem by limiting access to affordable graduate education and pushing students toward higher-interest private loans, a shift that will disproportionately burden first-generation, low-income, and BIPOC learners (Cohn, 2025). Reduced affordability is likely to suppress enrollment in social work programs, weakening the educational pipeline that prepares future

practitioners and diminishing the diversity and representativeness of the profession (Mitchell et al., 2017; NASW Florida, 2025). These changes have broader community and societal implications, as the social work workforce plays a central role in delivering behavioral health and social services—particularly in marginalized and underserved communities. Consequently, the proposal risks destabilizing the long-term capacity, strength, and diversity of the social work profession (NASW Florida, 2025).

### *Equity Implications of Loan Policy Changes*

Against this historical and policy backdrop, the consequences of the proposed reclassification become more apparent across multiple ecological levels as it threatens multiple interconnected dimensions of the educational and behavioral health ecosystem. The policy disproportionately affects prospective MSW and DSW students, particularly first-generation, low-income, and BIPOC learners who rely heavily on federal financial aid to access graduate education (Watson, 2025). Existing disparities already place these groups at heightened financial vulnerability; African American students, for example, accumulate more federal student loan debt than peers from other racial and ethnic backgrounds (Houle & Addo, 2019; Kim et al., 2017). Federal grants and loans therefore play a critical role in mitigating these inequities by supporting enrollment and improving degree completion among diverse student populations (Baker, Andrews, & McDaniel, 2017). Under the OBBBA, reduced federal borrowing limits will significantly restrict affordable pathways into MSW and DSW programs, leading to declines in enrollment and undermining workforce diversity (NASW Florida, 2025; Watson, 2025). At a national scale, the policy is projected to affect approximately 370,000 students and eliminate more than \$8 billion in federal loan availability—representing 22% of annual federal loan disbursements—ultimately destabilizing the future behavioral health workforce pipeline (CSWE, 2025; Matsudaira et al., 2025).

### *Stakeholder Groups*

The proposed reclassification of MSW and DSW degrees under the OBBBA affects a diverse range of stakeholders, with disproportionate consequences for students and institutions committed to public service. Chief among the impacted groups are prospective and current MSW and DSW students – particularly those who are first-generation, low-income, and BIPOC – who rely heavily on federal financial aid to access graduate education (Watson, 2025). These students already face heightened financial vulnerability and structural inequities, with Black graduates accumulating higher student debt on average than their white peers (Houle & Addo, 2019; Kim et al., 2017). Graduate programs at MSIs, regional public universities, and institutions located in rural or undeserved communities are also at risk, as they disproportionately serve financially vulnerable students and operate with more limited institutional aide resources (Soliz & Rubin, 2025). Additionally, employers – including behavioral health agencies, school systems, and community services organizations – depend on a robust, diverse social work workforce to meet growing demand (Kirchner & Cuneo, 2022). As such, the policy's downstream effects extend beyond students to the communities they serve, particularly in high-need settings (BLS, 2025; CSWE, 2025; Hall, 2025). Finally, professional organizations like CSWE and NASW, and state licensure boards are key stakeholders responsible for advocacy, accreditation, and workforce planning (CSWE, 2022; NASW, n.d.-a).

### *Enrollment and Workforce Impact Analysis*

To understand the full implications of this policy change, it is essential to examine how the reclassification will affect educational access, workforce diversity, and service delivery across ecological levels. Reducing federal loan limits for MSW and DSW students is expected to diminish the affordability of graduate social work education, increase reliance on high-interest private loans, and suppress enrollment in graduate programs (Matsudaira et al., 2025; Mitchell et al., 2017; NASW Florida, 2025).

When Congress eliminated subsidized Stafford loans for graduate students in 2011 (effective July 2012), graduate enrollment growth stalled and even declined modestly in certain master's programs. For example, public-service related disciplines (e.g., public administration, education, social services) saw degrees completion level off or dip slightly after 2011 (Jaschik, 2012; Maciag, 2017). These overall declines were relatively small, but they hid much larger drops in specific fields. For example, education programs – a field preparing many public-health service professionals – experienced a 9.3% plunge in first time master's enrollments in 2011, far exceeding the average decline. Furthermore, arts and humanities fields saw similar above-average losses, whereas higher-paying fields like business and engineering held steady or grew (Jaschik, 2012). National data indicated the college enrollment fell by roughly half a million in fall 2012, mostly among older students (25+), which would include many graduate students (United States Census Bureau, 2013).

Importantly, the enrollment declines were uneven across fields. Programs leading to lower-paying “social impact” careers, such as social work, education, and similar fields serving economically vulnerable populations appear especially sensitive to increased financial burdens. Analysts have long warned that shifting more loan costs onto graduate students would disproportionately discourage low-income and debt-averse students from entering these fields (Beebe, 2025; Hall, 2025). For instance, social work graduates typically accrue substantial debt despite modest salaries, making them acutely vulnerable to funding cuts (Hall, 2025). Policy experts note that reducing loan subsidies or capping graduate borrowing without offsets could harm access for low-income students, particularly in high-need fields like social work, potentially leading to enrollment declines in those programs (Hall, 2025). In sum, after the 2011 subsidy elimination, master's enrollments saw modest overall declines with outsized impacts in lower-ROI public service fields – patterns consistent with the greater price-sensitivity of students in programs like social work that serve economically disadvantaged communities.

At the individual level, these financial barriers limit access to advanced training for future social workers. These micro-level impacts have mezzo-level consequences for the behavioral health workforce, as social workers constitute the majority of mental and behavioral health providers in the United States and serve as essential supports for children, older adults, veterans, and other vulnerable populations (CSWE, 2025). National labor projections indicate that demand for social workers will continue to increase over the next decade, even as many communities already face significant workforce shortages (BLS, 2025). Ensuring access to affordable graduate education is therefore central to sustaining a robust and stable workforce (CSWE, 2025). Increasing barriers to the educational pipeline also contradicts national priorities aimed at expanding and strengthening the behavioral health workforce (National Conference of State Legislatures [NCSL], 2024).

At the community level, these challenges arise during a period when access to behavioral health services remains strained and the prevalence and severity of mental health and substance use conditions have escalated, in part due to the long-term effects of COVID-19. Existing shortages in mental health and substance use treatment fields have already limited-service availability and made it more difficult for individuals to receive timely and appropriate care (National Council for Wellbeing, 2023).

## Strategic Recommendations

The proposed exclusion of MSW and DSW degrees from the “professional” classification creates fundamental misalignment between federal loan policy and the educational structure of the social work profession. To respond effectively to the policy changes introduced by the OBBBA, this section outlines a multi-tiered approach integrating immediate advocacy, institutional adaptation, and long-term reform. Each tier addresses a different dimension of the challenge – federal classification, affordability and access, and structural workforce sustainability – grounded in evidence, policy precedent, and implementation feasibility. Together, these recommendations aim to preserve equitable access to social work education while

advancing solutions aligned with public service needs.

The following tiers expand on approaches in greater detail:

### *Tier 1: Advocacy Feasibility*

- **Social Workers in High-Need Sectors:** MSW graduates frequently serve in critical public service roles—they provide the majority of U.S. mental health services and support vulnerable groups like children, older adults, veterans. Demand for social workers is projected to keep rising, even as many communities already face workforce shortages (BLS, 2025; CSWE, 2025). Ensuring a robust social work pipeline is vital to address persistent shortage in mental health, child welfare, and other high-need services (Kirchner & Cuneo, 2022).
- **Moderate Debt Relative to Earnings:** Data indicates that typical MSW student debt loads, while significant, are modest relative to earnings when compared to truly high-debt/low-ROI fields. Recent surveys show MSW graduates carry about \$46,000 in student debt on average, and a social workers median annual salary is roughly \$50,000 (NASW, n.d.-c). Crucially, most MSW programs do confer a positive financial return over a graduate career – one analysis found 88% of MSW programs produce a net lifetime ROI for students, albeit usually a small one. In contrast, around 40% of master’s programs overall leave students financially worse off (negative ROI). Many notoriously expensive graduate programs (e.g., certain for-profit arts and humanities degrees) saddle students with debt far out of proportion to earnings. By comparison, the MSW is a more balanced investment: it boosts median graduate earnings about 30% by mid-career, and only a small fraction of MSW programs have debt-to-income outcomes in the extreme “high debt, low earning” category seen elsewhere. This suggests social work

graduates' debt loads are generally proportionate to their career earnings gains, unlike the truly high-debt/low-pay programs that loan cap policies are aimed at curbing (Cooper, 2022).

- Distinguishing Social Work from Predatory Programs: Advocacy should underscore that social work education is not equivalent to the for-profit or low-value programs that have raised alarms in higher education. Research consistently finds that graduates of for-profit colleges incur greater debt and default more frequently, with worse employment outcomes, compared to similar students at public or nonprofit institutions (National Bureau of Economic Research, 2018). In contrast, MSW programs are predominately nonprofit (often public) and produce licensed professional meeting critical workforce needs. NASW points out that Congress's recent loan limits and "low-earnings" rules risk penalizing helping professions like social work and nursing, rather than addressing the underfunding of those professions' salaries (NASW, 2025). Social work programs are accredited, mission-driven, and yield measurable public benefits – they should not be lumped in with unscrupulous for-profit programs. Advocates can thus make the case that loan policy solutions should exempt or specially consider fields like social work, which offer clear social ROI, rather than apply blunt caps that arose largely in response to abuses by predatory institutions (NASW, 2025; National Bureau of Economic Research, 2018).

#### *Tier 2: Institutional Responses*

- Accelerated & Advanced-Standing Programs: Universities can mitigate loan cap impacts by enabling students to complete MSW degrees faster and at lower cost. Advanced-standing MSW tracks, available to students with a BSW, shorten the graduate program to roughly 1 year (about 30-39 credits instead of ~ 60) –

reducing tuition cost by up to 30% compared to a traditional 2-year MSW (Bouchrika, 2025). Many schools are adopting 4 + 1 BSW-to-MSW bridge programs (earn both degrees in 5 years) to streamline education. By cutting total time enrolled, these accelerated pathways limit the amount students need to borrow and help more students from diverse backgrounds attain an MSW before hitting new aggregate loan limits (Bouchrika, 2025). Hence, suggesting that such programs successfully lower student debt burdens without compromising educational outcomes, thereby maintaining access for low-income and minority students who might otherwise be deterred by time and cost.

- Tuition Restructuring and Discounts: Institutions are also pursuing tuition reforms that keep social work degrees affordable under new loan constraints. For example, the University of Maryland School of Social Work recently began offering in-state tuition rates to out-of-state students, which cuts tuition by 48% for those students. As UMD's academic dean noted, the goal is to "reduce the amount of debt our students carry" through targeted tuition discounts and expanded scholarships so that finances do not prevent talented students from pursuing social work (Schelle, 2024). Other universities have launched tuition assistance partnerships programs with major employers – e.g., offering tuition reductions for employees of partner health agencies or school districts (Council for the Accreditation of Education Preparation, n.d.; Ripma, 2023). These arrangements incentivize employers to invest in staff credentials while lowering students' need to borrow. Overall, creative tuition pricing and scholarships (especially when tied to workforce needs) can help social work programs remain accessible despite tighter loan caps.

- Employer Partnerships & Stipend Programs: Partnering with employers and agencies to fund social work education is proven strategy to offset loan limits. A flagship example is the federal Title IV-E stipend program in child welfare; in collaboration with universities, public child welfare agencies provide tuition stipends (often \$10,000+ per student) and specialized training to MSW/BSW students who commit to work in child welfare after graduation (Virginia Commonwealth University, n.d.). These programs have shown impressive results – they improve recruitment and retention of social workers in high-turnover fields and product graduates who are better prepared for the job. Agencies report that IV-E stipends graduates are more likely to stay beyond their required work term and have higher commitment to the field, contributing to a more stable workforce (Virginia Commonwealth University, n.d.). Universities can expand such models beyond child welfare: for instance, healthcare systems or school districts facing staff shortages can offer “grow-your-own” MSW scholarships or loan-forgiveness in exchange for a service obligation. The University of Maryland, as one example, created a School-Based Mental Health Fellowship to address school counselor shortages – it provides MSW students a \$15,000 tuition scholarship plus an \$8,000 stipend if they commit to work in high-need K-12 schools, thereby directly places graduates into understaffed areas (Schelle, 2024). By leveraging employer funding, these partnerships reduce students’ loan needs while filling critical workforce gaps – a win-win approach under tighter loan caps.
- Program Delivery Innovations: Schools of social work are also rethinking program delivery to reduce financial barriers. Many offer flexible scheduling (evening/weekend, online hybrid programs) that let students continue work while in school, using income to defray tuition and avoid excess borrowing (Saginaw Valley State University, n.d.; Schelle, 2024). Some students receive field placement stipend programs and paid internships (Michigan Department of Health and Human Services, n.d.; U.S. Department of Veterans Affairs, n.d.). Collectively, these institutional responses – accelerated degrees, tuition reduction initiatives, employer-backed funding, and flexible scheduling – act to mitigate access risks. These help ensure that aspiring social workers can still afford graduate education and enter the field, despite the stricter federal loan limits.

### *Tier 3: Structural Reforms*

- Expand and Strengthen Loan Forgiveness Programs: At the policy level, one of the most impactful steps is bolstering Public Service Loan Forgiveness (PSLF) and creating social work-specific loan relief. PSLF, which forgives remaining federal loans after 10 years of public/nonprofit service, is widely seen as “a crucial investment in the nation’s public service workforce,” enabling social workers with heavy debt to pursue lower-paid service careers. (NASW, 2025b). NASW (2025b) warns that without PSLF, the future growth of professions like social work will be in jeopardy, as fewer graduates could afford to enter these fields. To that end, lawmakers should consider expanding PSLF eligibility. For example, counting work at certain nonprofits or for-profit hospitals that are currently excluded and ensuring the program’s stability. In parallel, targeted loan forgiveness or repayment programs for social workers can address specific workforce shortages (HRSA, n.d.). Research shows that such field-specific incentives programs are highly effective in recruiting and retaining professionals in underserved areas (Podolsky & Kini, 2016). For instance, the federal NHSC offers loan repayment of up to \$50,000 for

licensed clinical social workers who serve at least two years of full-time service in Health Professional Shortage Areas (HPSAs) (NASW, n.d.-c.). This not only eases individuals' debt but directly channels practitioners into the communities with acute needs. Expanding funding for programs like NHSC, or establishing a new loan forgiveness program dedicated to social workers (e.g., in child welfare or mental health), has strong precedent as a workforce strategy (NASW, n.d.-c.). Multiple students (in education, medicine, and behavioral health) confirm that sizable loan forgiveness awards tied to service commitments successful attract and retain talent in shortage fields (Podolsky & Kini, 2016). By reducing the long-term debt burden, these programs make social work careers more feasible financially, helping to stabilize critical sectors.

- **Policy Advocacy by Professional Organizations:** Key stakeholders are calling for systematic monitoring and adjustment of loans policies to safeguard the social work profession. The CSWE, NASW, and allied groups have pressed federal officials to assess the impact of graduate loan caps on essential workforces and to refine definitions so that fields like social work are recognized for their professional importance. During the U.S. Department of Education's rulemaking, higher education advocates urged that social work (along with nursing and teaching) be included in the "professional" degree category eligible for higher loan limits (Toppo, 2025). They argue that failing to do so could "significantly limit student loan access" for fields serving the public interest. In response to such concerns, the social work community has mobilized: CSWE and partner coalitions have submitted data and unified recommendations to policymakers, highlighting that over 99% of social work programs meet new outcome standards and that loan caps, if set too low, risk

undermining diversity and access in graduate education (Society for Social Work and Research [SSWR], 2025). Likewise, NASW is actively involved in coalitions like the PSLF Coalition and works with the Student Borrower Protection Center to advocate for social workers' debt relief needs. Likewise, NASW is actively involved in coalitions like the PSLF Coalition and works with the Student Borrower Protection Center to advocate for social workers' debt relief needs, emphasizing that loan policies must be responsive to real-world outcomes. (NASW, n.d.-c.). In sum, the profession's leaders support not only specific fixes like PSLF expansion and forgiveness programs, but also a framework for systematically evaluating the loan cap policy's impact on graduate social work education and the supply of social workers, with the goal of making evidence-based policy changes to prevent unintended workforce consequences.

## Conclusion

The proposed reclassification of MSW and DSW degrees presents a substantial risk to the social work profession, the behavioral health workforce, and the communities that rely on these services for safety, stability, and well-being. Limiting federal loan access for prospective social workers would exacerbate existing workforce shortages, restrict educational opportunities for first-generation, low-income, and BIPOC students, and diminish the nation's ability to respond to growing behavioral health demands. As this analysis demonstrates, the implications extend well beyond the domain of higher-education finance; they directly threaten national priorities related to equity, community health, and access to high-quality care. Safeguarding the professional-degree status of social work, reducing institutional barriers to affordability, and expanding accessible educational pathways are essential to cultivating a diverse, well-prepared, and resilient workforce. These steps are not merely policy preferences, they are prerequisites for maintaining the nation's capacity to address complex social, economic, and

behavioral health challenges both now and in the decades ahead.

### Limitations

This policy analysis is inherently prospective and relies on a review of secondary literature, descriptive statistics, and publicly available policy documents. As such, it does not incorporate primary data collection such as interviews, surveys, or direct institutional case studies. Because the Department of Education's final regulatory language and implementation guidance have not yet been released, specific programmatic implications may evolve, and early interpretations of stakeholder impact should be considered provisional. Moreover, the national focus may obscure important state-level variation in financial aid systems, tuition structures, and workforce demand. Loan policy changes may have differing consequences depending on institutional context, regional labor needs, and local student demographics. This analysis also centers on access and equity considerations but does not directly assess program quality or learning outcomes, which are equally critical to long-term workforce capacity and student success. Finally, the time horizon is necessarily short-term; longitudinal monitoring will be essential to fully assess the long-range implications of federal loan reform on graduate enrollment and professional workforce diversity.

### Future Research Directions

This analysis highlights several areas where further empirical research is urgently needed to inform policy development and institutional response. First, more rigorous, disaggregated data on MSW student borrowing is essential—particularly across race/ethnicity, institutional type, and geographic region. While national figures provide useful context, program-level data would help clarify which institutions and student populations are most vulnerable to federal loan limits.

Second, future studies should examine the short- and long-term enrollment impacts of graduate loan policy changes, including the 2011 elimination of subsidized Stafford loans and the anticipated implementation of the OBBBA.

Evaluating differential impacts across disciplines—especially in fields like social work, education, and public health—would clarify whether service-oriented programs face unique risks under cost-containment regimes.

Third, further research should assess how institutions respond to constrained federal aid: whether they reduce tuition, shift costs elsewhere, increase reliance on private loans, or alter program delivery models (e.g., cohort-based or accelerated MSW tracks).

Finally, future research should explore the downstream implications of constrained MSW access on behavioral health workforce capacity and service delivery—particularly in underserved areas. Tracking changes in professional diversity, geographic distribution, and service coverage will be essential to evaluating the equity and effectiveness of graduate loan reform.

## References

American Board of Clinical Social Work. (n.d.). What is Clinical Social Work? <https://www.abcsw.org/what-is-clinical-social-work>

Arnold Ventures. (2025). College accountability and public service: Debunking the teacher and social worker shortage myth. [https://assets.arnoldventures.org/uploads/PDFs/HE\\_College-Accountability-Public-Service.pdf](https://assets.arnoldventures.org/uploads/PDFs/HE_College-Accountability-Public-Service.pdf)

Association of Schools and Programs of Public Health. (2025). Department of Education proposal excludes public health degrees from “professional degree” definition. <https://aspph.org/department-of-education-proposal-excludes-public-health-degrees-from-professional-degree-definition/>

Baker, A. R., Andrews, B. D., & McDaniel, A. (2017). The impact of student loans on college access, completion, and returns. *Sociology Compass*, 11(6), e12480. <https://doi.org/10.1111/soc4.12480>

Beattie, I. R. (2018). Sociological perspective on first-generation college students. In L. J. McCluskey et al. (Eds.), *Handbook of the sociology of education in the 21st century* (pp. 171-191). Springer. [https://doi.org/10.1007/978-3-319-76694-2\\_8](https://doi.org/10.1007/978-3-319-76694-2_8)

Blake, J. (2025, November 6). ED releases latest proposal for defining professional programs. Inside Higher Ed. <https://www.insidehighered.com/news/quick-takes/2025/11/06/ed-releases-proposal-defining-professional-programs>

Boatman, A., Evans, B., & Soliz, A. (2016). Understanding loan aversion in education: Evidence from high school seniors, community college students, and adults (CEPA

working paper No. 16-15). Stanford Center for Education Policy Analysis.  
<https://cepa.stanford.edu/sites/default/files/wp16-15-v201608.pdf>

Bouchrika, I. (2025, December 8). 2026 advanced standing vs. traditional MSW: Explaining the difference. Research.com. <https://research.com/advice/advanced-standing-vs-traditional-msw#:~:text=reducing%20tuition%20costs%20by%20up,covers%20foundational%20theory%20and%20practice>

Bureau of Labor Statistics. (2025). Social workers: Occupational outlook handbook. U.S. Department of Labor. <https://www.bls.gov/ooh/community-and-social-service/social-workers.htm#tab-6>

Burke, M. (2025, November 27). Trump administration says nursing isn't a professional degree amid new limits on loans. NBC News. <https://www.nbcnews.com/news/education/trump-administration-says-nursing-isnt-professional-degree-new-limits-rcna245911>

Chaiklin, H. (2013). The history of social work education and the profession's structure. Social Welfare History Project. <https://socialwelfare.library.vcu.edu/social-work/history-of-social-work-education-and-the-professions-structure/>

Chandler, J. & Baeta, D. (2023, December 19). National rural college completion trends, challenges, and solutions. The Institute for College Access & Success. [https://ticas.org/wp-content/uploads/2023/12/2023-Rural-College-Completion-National-Primer\\_v2.pdf](https://ticas.org/wp-content/uploads/2023/12/2023-Rural-College-Completion-National-Primer_v2.pdf)

Chernikoff, S. (2024, July 27). Michigan joins list of states that offer tuition-free community college. USA Today. <https://www.usatoday.com/story/news/education/2024/07/27/states-with-free-community-college/74536008007/>

Cohn, J. (2025, July 24). How new federal student loan limits could affect borrowers. Urban Institute. <https://www.urban.org/urban-wire/how-new-federal-student-loan-limits-could-affect-borrowers>

Consumer Financial Protection Bureau. (2016, October). Annual report of the CFPB Student Loan Ombudsman. [https://files.consumerfinance.gov/f/documents/102016\\_cfpb\\_Transmittal\\_DFA\\_1035\\_Student\\_Loan\\_Ombudsman\\_Report.pdf](https://files.consumerfinance.gov/f/documents/102016_cfpb_Transmittal_DFA_1035_Student_Loan_Ombudsman_Report.pdf)

Cooper, P. (2022, February 24). Is grad school worth it? A comprehensive return on investment analysis. Foundation for Research on Equal Opportunity. <https://freopp.org/whitepapers/reforming-state-authorization-of-colleges-to-boost-competition-and-lower-tuition/>

Cooper, P. (2025, July 16). An analysis of the one big beautiful bill act's effect on student loans. American Enterprise Institute. <https://www.aei.org/research-products/report/an-analysis-of-the-one-big-beautiful-bill-acts-effect-on-student-loans/>

Council for the Accreditation of Education Preparation. (n.d.). Partnership. <https://caepnet.org/terms/partnership/>

Council on Social Work Education. (2020). Survey shows black social work students face higher costs than others. [https://www.cswe.org/news/newsroom/survey-shows-black-social-work-students-face-higher-costs-than-others/#:~:text=Debt%20from%20their%20social%20work,new%20MSWs%20was%20only%20%20%2447%2C100](https://www.cswe.org/news/newsroom/survey-shows-black-social-work-students-face-higher-costs-than-others/#:~:text=Debt%20from%20their%20social%20work,new%20MSWs%20was%20only%20%2447%2C100)

Council on Social Work Education. (2022). *Educational policy and accreditation standards (2022 EPAS)*. <https://www.cswe.org/getmedia/bb5d8afe-7680-42dc-a332-a6e6103f4998/2022-EPAS.pdf>

Council on Social Work Education. (n.d.-a). Early accreditation: U.S. master's, U.S. bachelor's, and Canadian programs. <https://www.cswe.org/about-cswe/cswe-a-brief-history/early-accreditation/>

Council on Social Work Education. (n.d.-b). Social work at a glance. <https://www.cswe.org/students/prepare-for-your-education/social-work-at-a-glance/>

Council on Social Work Education. (2025, November 12). CSWE: Education department definition limits access to social work education. <https://www.cswe.org/news/newsroom/cswe-education-department-definition-limits-access-to-social-work-education/>

Daley, M. R. & Pittman-Munke, P. (2021). Flexner and the social work profession: Myth versus history. *Journal of Sociology and Social Work*, 9(2), 1 – 12. <https://doi.org/10.15640/jssw.v9n2a1>

Desjean, J. (2025). You have questions; we have answer: Making sense of the student loan changes from OBBBA's RISE committee. National Association of Student Financial Aid Administrators. [https://www.nasfaa.org/news-item/37700/You\\_Have\\_Questions\\_We\\_Have\\_Answers\\_Making\\_Sense\\_of\\_the\\_Student\\_Loan\\_Changes\\_from\\_OBBBA\\_s\\_RISE\\_Committee](https://www.nasfaa.org/news-item/37700/You_Have_Questions_We_Have_Answers_Making_Sense_of_the_Student_Loan_Changes_from_OBBBA_s_RISE_Committee)

Dynarski, S. (2008). Building the stock of college-educated labor. *Journal of Human Resources*, 43(3), 576–610. <https://doi.org/10.3386/jhr.43.3.576>

Flexner, A. (1910). Medical education in the United States and Canada: A report to the Carnegie Foundation for the Advancement of Teaching. Carnegie Foundation for the Advancement of Teaching. [http://archive.carnegiefoundation.org/publications/pdfs/elibrary/Carnegie\\_Flexner\\_Report.pdf](http://archive.carnegiefoundation.org/publications/pdfs/elibrary/Carnegie_Flexner_Report.pdf)

Flexner, A. (1915). Is social work a profession? Social Welfare History Project. <https://socialwelfare.library.vcu.edu/social-work/is-social-work-a-profession-1915/>

Hall, S. (2025). How to finance high social value graduate training in a new era of student loan policy. Third Way. <https://www.thirdway.org/memo/how-to-finance-high-social-value-graduate-training-in-a-new-era-of-student-loan-policy>

Health Management Associates. (2022, July 12). Diversity, equity, and inclusion: Emerging opportunities for the behavioral health workforce (Issue brief). <https://www.healthmanagement.com/wp-content/uploads/BH-Workforce-DEI-7.12.22.pdf>

Health Resources & Services Administration, National Health Service Corps. (n.d.). Determine state loan repayment program eligibility and application requirements. <https://nhsc.hrsa.gov/loan-repayment/state-loan-repayment-program/application-requirements>

Hegji, A. (2025, December 17). The Department of Education's proposed rule to define "professional student": Frequently asked questions. (CRS Report No. R48768). Congressional Research Service. [https://www.congress.gov/crs\\_external\\_products/R/DF/R48768/R48768.1.pdf](https://www.congress.gov/crs_external_products/R/DF/R48768/R48768.1.pdf)

Houle, J. N., & Addo, F. R. (2019). Racial disparities in student debt and the reproduction of the fragile black middle class. *Sociology of Race and Ethnicity*, 5(4), 562–577. <https://doi.org/10.1177/2332649218790989>

Horwitz, J. (2021, September 30). As the rich get richer, the price of college soars. Federal Reserve Bank of Minneapolis. <https://www.minneapolisfed.org/article/2021/as-the-rich-get-richer-the-price-of-college-soars>

Jackson, B. A. & Reynolds, J. R. (2013). The price of opportunity: Race, student loan debt, and college achievement. *Sociological Inquiry*, 83 (3), 335-354. <https://doi.org/10.1111/soin.12012>

Jaschik, S. (2012). The missing American: New graduate enrollments fall, with notable declines in students from the U.S. Inside Higher Ed. <https://www.insidehighered.com/news/2012/09/28/now-graduate-enrollments-are-down>

Kayser, J.A. (2000). The early history of racially segregated, Southern schools of social work requesting or receiving funds from the Rockefeller philanthropies and the responses of social work educators to racial discrimination. IssueLab. <https://www.issuelab.org/resources/27812/27812.pdf>

Kim, J., Chatterjee, S., Young, J., & Moon, U. J. (2017). The cost of access: Racial disparities in student loan burdens of young adults. *College Student Journal*, 51(1), 99–114.

Kirchner, J. & Cuneo, I. (2022). Help wanted: Building a pipeline to address the children's mental health provider workforce shortage. National Governors Association. <https://www.nga.org/news/commentary/help-wanted-building-a-pipeline-to-address-the-childrens-mental-health-provider-workforce-shortage/>

Lopez, L. (2015). America's student debt nightmare actually started in the 1980s. Business Insider. <https://www.businessinsider.com/student-debt-crisis-started-in-the-1980s-2015-10>

Maarse, H. (2023). *Health Policy Analysis: An Introduction*. Maastricht University Press. <https://doi.org/10.26481/mup.2303>

Maciag, M. (2017). Fewer people are getting degrees in public service. *Governing*. <https://www.governing.com/archive/gov-public-service-degrees.html>

Malcom, L. E. & Dowd, A. C. (2012). The impact of undergraduate debt on the graduate school enrollment of STEM baccalaureates. *The Review of Higher Education*, 32(2), 265-305. <https://dx.doi.org/10.1353/rhe.2012.0007>

Matsudaira, J., Caldwell, T., Welch, M., & Vasquez, M. L. (2025). How will graduate student and parents borrowing be affected by New Federal Loan Limits? Postsecondary Education & Economics Research Center. [https://www.american.edu/spa/peer/upload/loan-limits-from-npsas\\_rpt\\_final.pdf](https://www.american.edu/spa/peer/upload/loan-limits-from-npsas_rpt_final.pdf)

Michigan Department of Health and Human Services. (n.d.). Michigan behavioral health internship stipend program (MI-BHISP). <https://www.michigan.gov/mdhhs/inside-mdhhs/legislationpolicy/workforce-access-and-grants-management-section/mi-bhisp>

Mitchell, M., Leachman, M., & Masterson, K. (2017). A lost decade in higher education funding: State cuts have driven up tuition and reduced quality. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/state-budget-and-tax/a-lost-decade-in-higher-education-funding>

Mitchell, M., Leachman, M., & Saenz, M. (2019). State higher education funding cuts have pushed costs to students, worsened inequality. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/state-budget-and-tax/state-higher-education-funding-cuts-havepushed-costs-to-students>

National Association of Social Workers. (2021, June). Undoing racism through social work: NASW report to professional on racial justice priorities and action. <https://www.socialworkers.org/LinkClick.aspx?fileticket=29AYH9qAdXc%3d&portalid=0>

National Association of Social Workers. (2025a, August). Now the reconciliation bill passed, what is next? <https://www.socialworkers.org/Advocacy/Policy-Issues/Now-the-Reconciliation-Bill-Passed-What-is-Next>

National Association of Social Workers. (2025b, September 17). Comments to Department of Education in response to the proposed rulemaking; docket ID ED-2025-OPE-0016. <https://www.socialworkers.org/LinkClick.aspx?fileticket=eljmlFU4Vck%3D&portalid=0>

National Association of Social Workers. (n.d.-a). NASW's mission and purpose. <https://www.socialworkers.org/About/NASWs-Mission>

National Association of Social Workers. (n.d.-b). Social Work History. <https://www.socialworkers.org/News/Facts/Social-Work-History>

National Association of Social Workers. (n.d.-c). Student loan debt relief for social workers. <https://www.socialworkers.org/Advocacy/Policy-Issues/Student-Loan-Debt-Relief-for-Social-Workers/Student-Loan-Forgiveness-Update#:~:text=and%20master%E2%80%99s%20social%20work%20graduates,compared%20to%20%2424%2C%683%20in%202009>

National Association of Social Workers Florida. (2025, November 20). What DOE's proposed change means for social work degrees. <https://naswfl.socialworkers.org/Advocacy/Legislative-Updates/ID/3303/What-DOEs-Proposed-Change-Means-for-Social-Work-Degrees>

National Bureau of Economic Research. (2018, December). An unintended consequence of limiting FX borrowing by banks. <https://live-nber.pantheonsite.io/sites/default/files/2019-08/dec18.pdf>

National Conference of State Legislatures. (2024, April 29). Behavioral health workforce shortage and state resources systems. <https://www.ncsl.org/labor-and-employment/behavioral-health-workforce-shortages-and-state-resource-systems>

National Council for Mental Wellbeing. (2023, April 25). New study: Behavioral health workforce shortage will negatively impact society. <https://www.thenationalcouncil.org/news/help-wanted>

Laws, J. (2025, November 21). Full list of degrees not classed as 'professional' by Trump admin. Newsweek. <https://www.newsweek.com/full-list-degrees-professional-trump-administration-11085695>

Podolsky, A. & Kini, T. (2016). How effective are loan forgiveness and service scholarships for recruiting teachers? Learning Policy Institute. <https://learningpolicyinstitute.org/product/how-effective-are-loan-forgiveness-and-service-scholarships-recruiting-teachers>

Postsecondary National Policy Institute. (2023, March). Rural students in higher education: Census overview. [https://pmpi.org/wp-content/uploads/2023/03/RuralStudents\\_Mar23.pdf](https://pmpi.org/wp-content/uploads/2023/03/RuralStudents_Mar23.pdf)

Ripma, T. A. (2023). Building school-based health partnerships: Opportunities and challenges for education leaders. *Journal of Cases in Educational Leadership*, 27(1), 59-69. <https://doi.org/10.1177/15554589231204061>

Romans, M. A. (2025, February 25). Beyond budget cuts: A strategic approach to financial sustainability in higher education. Gray Insights. <https://www.graydi.us/blog/gray-insights/beyond-budget-cuts-a-strategic-approach-to-financial-sustainability-in-higher-education>

Saginaw Valley State University, Master of Social Work. (n.d.). Master of Social Work (MSW). <https://www.svsu.edu/msw/>

Schelle, C. (2024). University of Maryland school of social work offers in-state MSW tuition for Washington, D.C., residents. University of Maryland, Baltimore. <https://www.umaryland.edu/news/archived-news/october-2024/in-state-msw-tuition-for-dc.php>

Society for Social Work and Research. (2025, December 8). 12.9.2025 policy update for SSWR members. <https://sswr.org/12-9-2025-policy-update-for-sswr-members/>

Soliz, A. & Rubin, B. (2025, July). The relationship between funding and student outcomes at public, two-year minority serving institutions. State Higher Education Executive Officers Association. <https://sheeo.org/wp-content/uploads/2025/07/Soliz-Rubin.pdf>

Stuart, P. H. (2007). Bridging borders: How social workers build ties and transform relationships. *Journal of Baccalaureate Social Work*, 12(2), 13-25. <https://doi.org/10.18084/1084-7219.12.2.13>

Toppo, G. (2025, December 10). Nurses, social workers face 'bad situations' under proposed loan limits. The 74. <https://www.the74million.org/article/nurses-social-workers-face-bad-situation-under-proposed-loan-limits/>

Tulane University, School of Social Work. (2025, January 24). The Importance of a CSWE Accredited Program in Social Work. <https://socialwork.tulane.edu/blog/importance-of-cswe-accredited-program/>

U.S. Department of Education. (2025, November 6). U.S. Department of Education concludes negotiated rulemaking session to implement the one big beautiful bill act's loan provisions. <https://www.ed.gov/about/news/press-release/us-department-of-education-concludes-negotiated-rulemaking-session-implement-one-big-beautiful-bill-acts-loan-provisions>

U.S. Department of Health and Human Services. (n.d.). Enrollment in higher education. <https://odphp.health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/enrollment-higher-education>

U.S. Department of Health and Human Services, Health Resources and Services Administration, Bureau of Health Workforce. (2024, November). State of the behavioral health workforce, 2024. <https://bhw.hrsa.gov/sites/default/files/bureau-health-workforce/state-of-the-behavioral-health-workforce-report-2024.pdf>

United States Census Bureau. (2013). After a recent upswing, college enrollment declines, Census Bureau reports. <https://www.census.gov/newsroom/archives/2013-pr/cb13-153.html>

U.S. Department of Veterans Affairs. (n.d.). HINES MSW field placement and internship. <https://www.va.gov/hines-health-care/work-with-us/internships-and-fellowships/hines-msw-field-placement-and-internship/>

Virginia Commonwealth University, School of Social Work. (n.d.). Child welfare stipend program & community impact. <https://socialwork.vcu.edu/uncommon-strengths/child-welfare-initiatives/child-welfare-stipend-program--community-impact/>

Watson, J. (2025, February 18). No department of education? Here's how it could impact enrollment. The Parish Group. <https://parishgroup.com/2025/02/no-department-of-education-heres-how-it-could-impact-enrollment/>

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*Dr. Sanders' research examines Black family systems, relationships, and mental health through a strengths-based and equity-centered lens. Her dissertation explored the impact of father absence on the marital satisfaction of African American women. Building on that work, she has expanded her scholarship to include father-daughter relationships, Black men's mental health, race-based trauma, and the broader family and community contexts that shape relational well-being. Her research has been supported by competitive institutional and foundation grants.*

*Dr. Sanders has received a Dow Visiting Scholar & Artist Award and faculty research grants supporting her mental health scholarship. Her work includes peer-reviewed journal publications and a scholarly book chapter. Notably, her research on the consequences of misdiagnosing race-based trauma in Black men appears in Social Work in Public Health,*

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*In addition to her publications, Dr. Sanders regularly disseminates her scholarship through national conference presentations, workshops, and invited trainings focused on cultural humility, mental health, and family well-being. She is committed to advancing research that centers Black families through a strengths-based framework while challenging deficit-oriented narratives and contributing to meaningful change within the communities she serves.*