



October 1, 2025

The Honorable Nicholas Kent
Under Secretary
US Department of Education
400 Maryland Ave. SW
Washington, DC 20202

RE: Recognition of MBA and MAcc Degrees as Professional Degrees under the One Big Beautiful Bill Act (OBBB)

Dear Honorable Nicholas Kent,

As President and CEO of AACSB International, the world's largest and most respected association of business schools with a constituency of over 630 in the United States, I write to underscore the essential role of business education in America's progress. The strength of a nation rests on education, and business education has long been a cornerstone of economic progress. For more than a century, business education has prepared millions of skilled professionals and leaders for corporate America, laying the foundation for economic growth and national competitiveness.

Our interests align with the government in sustaining this positive trend without disruption. Yet without recognition as professional degrees, the new loan caps under OBBB risk limiting access to impactful business programs and disrupting this trajectory. Business programs are created to meet the needs of business and society, and to enable American growth. Among those currently categorized as graduate degrees, two stand out: the Master of Business Administration (MBA) and the Master of Accountancy (MAcc), distinguished by their pre- and post-degree work requirements, intense coursework that far exceeds most other master's programs, and, in the case of the MAcc, the pathway to CPA licensure. I urge the Department of Education and the RISE Committee to recognize the MBA and MAcc as professional degrees within the framework established by the One Big Beautiful Bill Act (OBBB).

Alignment with Federal Definition

Under 34 C.F.R. § 668.2, a professional degree signifies both completion of the academic requirements necessary for beginning practice in a given profession and attainment of a level of professional skill beyond that of a bachelor's degree. MBA and MAcc programs clearly meet this definition: both require advanced academic preparation, structured experiential learning, and, in the case of the MAcc, direct alignment with licensure.

Just as law, medicine, and pharmacy integrate rigorous coursework with professional readiness, MBA and MAcc programs prepare graduates for immediate entry into practice with significant responsibility for organizational, economic, and public outcomes.

The MBA: A Professional Pathway to Leadership

MBA programs demand substantially more of a student than a typical master's degree. While most master's programs require approximately 36 credit hours, MBA programs generally require 48–60 credit hours, supplemented by applied projects, leadership training, and immersive global or experiential components. Importantly, many MBA programs also require 2–3 years of prior professional experience as admission's prerequisite. This parallels residency and internships integral to law, medicine, and other professions.

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The return on this preparation is evident. According to the 2025 Graduate Management Admission Council Corporate Recruiters Survey, MBA graduates are projected to earn a median starting salary of \$125,000, the

highest among graduate degrees. Beyond compensation U.S. Department of Education College Scorecard data confirms these graduates exhibit consistently low loan default rates, especially in the first four years of repayment. These outcomes reflect not only the strong ROI of the degree but also the stability and public value of the careers it enables. Data from the Foundation for Research and Equal Opportunity reflects a median ROI exceeding \$105,000 for master's level degrees in Business Administration, Management, and Operations.

MBA graduates drive organizational success, innovation, and global competitiveness, functions that directly serve the public interest in economic growth and responsible business leadership.

The MAcc: A Foundation of Professional Licensure for Public Trust

A MAcc degree serves as a gateway to Certified Public Accountant (CPA) licensure enabling graduates to meet the rigorous educational requirements in all 55 U.S. jurisdictions. Licensure further demands 1–2 years of professional experience under the supervision of a licensed CPA. This structure directly parallels the professional apprenticeships in other fields recognized as professional degrees.

The CPA profession plays a uniquely public role: protecting investors, safeguarding the integrity of financial reporting, and ensuring trust in our capital markets. The MAcc degree prepares graduates for this essential societal function. GMAC's 2025 survey projects a median starting salary of \$92,500 for MAcc graduates, and Department of Education data confirm consistently low loan default rates, reflecting both the demands for their expertise and financial viability of the degree.

These outcomes, confirmed by both independent employer surveys and U.S. Department of Education data, demonstrate the professional value of MBA and MAcc programs.

The MBA and MAcc degrees embody the hallmarks of professional education: rigorous preparation, required experiential learning, measurable career outcomes, and accountability to the public interest. These hallmarks align MBA and MAcc programs with the same standards of professional education that underpin medicine, law, and other fields already recognized in federal policy.

The MBA and MAcc degrees are professional by design, by outcome, and by economical contributions. Recognizing them under 34 C.F.R. § 668.2 will ensure federal policy reflects the reality of these practice-based programs, supports students' career pathways, and safeguards the public interest.

We respectfully urge the Department of Education and Committee to recognize MBA and MAcc programs as professional degrees. America's global competitiveness depends on a strong and sustainable business foundation. Thank you for your leadership in shaping a higher education system that reflects outcomes, accountability and the needs of our workforce and society.

With warm regards,



Dr. Lily Bi, CIA, CISA

President and Chief Executive Officer
AACSB International