I did a deep dive into degree programs at the public and private institutions in Virginia that meet the 4-digit CIP code or are CIP code adjacent to make a case for inclusion of other degrees. The analysis unearthed some anomalies that may be a state issue but want to ensure that they don't create issues at the federal level with determining what programs are considered professional under the proposed regulations.

Below see a screenshot of the public and private institutions that offer a Theology degree at the 39.06 but may not specifically list it as "M.Div" in the degree category. There are anomalies, so I wanted clarification on whether the institutions that do not use the same M.Div. Language in the proposed regulations would still be included or would they need to change their designation. For some, they include M.Div. In the program name but I wasn't sure if this was sufficient. Virginia may not be an anomaly, so the solution for Virginia may be something that could be clarified in future preamble or DCL language for all states.

| INSTITUTION                       | DEGREE | PROGRAM                      | CIP   | LICENSE? |
|-----------------------------------|--------|------------------------------|-------|----------|
| Regent University                 | DMIN   | Theology/Theological Studies | 39.06 | ?        |
| Virginia Union University         | DMIN   | Theology/Theological Studies | 39.06 | ?        |
| Eastern Mennonite University      | DMIN   | Divinity/Ministry            | 39.06 | ?        |
| Liberty University                | DMN    | Theology/Theological Studies | 39.06 | ?        |
| South University, Virginia Beach  | DOCTOR | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Virginia Christian College        | DOCTOR | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Virginia University of Lynchburg  | DOCTOR | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Washington University of Virginia | DOCTOR | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Dallas Theological Seminary       | MASTER | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Reformed Theological Seminary     | MASTER | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Virginia Christian College        | MASTER | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Virginia University of Lynchburg  | MASTER | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Washington University of Virginia | MASTER | Divinity/Ministry (BD, MDiv  | 39.06 | ?        |
| Liberty University                | MDIV   | Theology/Theological Studies | 39.06 | ?        |
| Regent University                 | MDIV   | Divinity/Ministry            | 39.06 | ?        |
| Virginia Union University         | MDIV   | Divinity/Ministry            | 39.06 | ?        |
| Eastern Mennonite University      | MDV    | Divinity/Ministry            | 39.06 | ?        |
| Liberty University                | MDV    | Divinity/Ministry            | 39.06 | ?        |
| Liberty University                | MDV    | Divinity/Ministry            | 39.06 | ?        |

In addition, there are some institutions that also offer DMIN or DOCTOR. Would these institutions qualify as professional, since they are one step after the M.Div degree.