

Docket ID ED-2026-OPE-0133

April 7, 2026

Mr. Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Under Secretary Kent,

National Skills Coalition (NSC) appreciates the opportunity to comment on the Department of Education's proposed rulemaking regarding Workforce Pell. Expanding Pell Grant eligibility to high-quality, short-term programs is a critical step toward increasing access to financial aid for low-income learners and helping local employers meet pressing workforce needs. We commend the Department's progress and look forward to successful implementation.

About NSC

Jobs that require skills training are the backbone of our economy. National Skills Coalition fights for a national commitment to inclusive, high-quality skills training so that more people have access to a better life, and more local businesses see sustained growth. Since 2000, through expert analysis and technical assistance, broad-based organizing, targeted advocacy, and cutting-edge communications, NSC has changed hundreds of state and federal skills policies that have changed thousands of lives and grown local businesses and economies.

We build networks representing businesses, workers, colleges, community organizations, public officials, and advocates. We engage these networks to craft policy proposals and mobilize them to win concrete policy change. Our networks include SkillSPAN (state affiliate coalitions), Business Leaders United for Workforce Partnerships (thousands of small and medium-sized business owners and state affiliates), and Voices for Skills (tens of thousands of workers and grassroots skills advocates). **The following comments draw directly on input from NSC's networks and reflect the real-world experience and expertise of workforce development practitioners across the country.**

Answers to directed questions from the Department

Written Arrangements to Provide Educational Programs (§ 668.5(c))

National Skills Coalition appreciates the opportunity to provide input on whether the proposed 25 percent limit on instruction delivered by ineligible entities is appropriate, or whether a higher threshold should be permitted under certain conditions.

Based on feedback from our national network, **we strongly recommend allowing Title IV–ineligible partners to provide up to 49% percent of program instruction.** This adjustment

would ensure that many existing, high-quality programs—particularly those already operating under a 50 percent partnership model—are not excluded from Workforce Pell eligibility.

Stakeholders across our network emphasized that **current workforce training partnerships often rely on substantial contributions from industry, labor, adult education, and/or community-based partners**. For example, many community colleges partner with the International Brotherhood of Electrical Workers (IBEW) union to provide electrical training as a part of a Registered Apprenticeship, in line with the administration’s goal of reaching 1 million apprentices. This model benefits students by providing access to instructors with up-to-date, real-world experience, and is an approach utilized in other skilled trades fields such as plumbing and HVAC. Under a 25 percent cap, such programs could be rendered ineligible despite their strong outcomes and alignment with industry needs.

Commercial driver’s license (CDL) training programs provide another relevant example. These programs are frequently delivered off-site or in partnership with employers and often rely on ineligible providers for a substantial portion of instruction. Given the high demand for CDL-qualified workers and the strong wage outcomes associated with these roles ([Bureau of Labor Statistics](#)), maintaining a 25 percent limitation risks unnecessarily restricting access to Workforce Pell for programs that otherwise meet the intent of the law.

Additionally, many Title IV–eligible institutions in rural or high-poverty areas face challenges in recruiting and retaining qualified instructors at wages competitive with industry. Partnerships with employers or other training providers help address this gap by enabling current practitioners to serve as part-time instructors.

We also encourage the Department to more clearly define what constitutes “training” for the purposes of this provision. In some cases raised by our network, Title IV–eligible institutions are responsible for key program components—including curriculum development, student recruitment, and academic oversight—while instruction may take place off-site or be delivered in partnership with another entity. Additional clarity would help ensure consistent and accurate application of this standard.

Ineligibility Due to Grant or Scholarship Assistance from Non-Federal Sources (§ 690.5)

National Skills Coalition appreciates the Department’s focus on safeguarding taxpayer investments. It’s worth noting in addressing this directed question that Workforce Pell will intersect with a wide range of state and local aid programs that help students meet basic needs. At present, these systems are not sufficiently resourced to create alignment that ensures clear implementation of cost-of-attendance requirements.

The Department can address these challenges by prioritizing clarity and coordination through sub-regulatory guidance and technical assistance. Specifically, the Department should:

1. Clarify how institutions must track and account for non-federal aid in cost-of-attendance calculations, including state financial aid, institutional aid, and locally funded workforce programs.

2. Coordinate with federal partners, including the U.S. Departments of Health and Human Services and Agriculture, to provide guidance on how supportive services (e.g., child care, TANF, SNAP Employment & Training) interact with Workforce Pell.
3. Provide technical assistance on braiding and sequencing funding, particularly where students access multiple aid sources with differing eligibility and timing requirements.

Improved coordination across education, workforce, and human services systems will both protect program integrity and improve outcomes. When students can effectively combine funding and supports, they are more likely to complete training, secure employment, and reduce long-term reliance on public benefits.

Additional considerations

Recognize Continued Education as a Positive Placement Outcome (§ 690.94(e))

National Skills Coalition urges the Department to revise the proposed job placement metric to count continued education or training as a positive outcome.

As currently drafted, the regulation does not count students who enroll in further education or training as successfully placed. As a result, students who complete a Workforce Pell–supported program, earn a stackable or transferable credential, and then enroll in a related program are counted negatively in a program’s placement rate. This approach risks penalizing programs for supporting student advancement and does not reflect the reality of today’s education and career pathways.

Workforce Pell programs are explicitly required to be stackable, meaning they are designed to enable students to build additional credentials over time. Continuing education is therefore not an alternative outcome—it is often an intended and positive next step. For many learners, particularly first-time or returning postsecondary students, short-term training serves as an entry point into higher education. After completing an initial credential, students may gain confidence, identify new career goals, or recognize the value of pursuing further education.

Our network consistently highlights examples of this progression. For instance, a student who completes a short-term healthcare certificate (such as a Certified Nursing Assistant credential) may choose to enroll in a Licensed Practical Nurse or associate degree nursing program. Similarly, a student who earns an entry-level IT credential may continue into a more advanced cybersecurity or network administration program. In the skilled trades, students often begin with a short-term certificate and then transition into a longer-term apprenticeship or degree pathway. In each of these cases, continued education reflects strong momentum toward career advancement.

Further, given the Department’s efforts to align Workforce Pell with the broader workforce system, adopting a similar approach to the Workforce Innovation and Opportunity Act would promote regulatory consistency and better capture meaningful student success. Under the Workforce Innovation and Opportunity Act (WIOA), performance indicators recognize both employment and continued education or training as positive outcomes.

Support data modernization for successful implementation

Many of our priorities related to data and reporting have been outlined in comments submitted by the Data Quality Campaign. Building on those recommendations, we offer additional context from the field.

Stakeholders consistently emphasize that while institutions may be able to collect the required data, **they often lack the capacity to do so without additional resources**. For example, a community college leader in North Carolina shared that meeting the proposed data requirements would likely require hiring additional staff, and the institution has considered seeking Congressional Directed Spending to support this need. This highlights a critical role for the Department to provide not only technical assistance, but also dedicated and sustainable funding to support implementation.

We have also heard from state leaders that the scale and complexity of the proposed data collection requirements may delay their participation in Workforce Pell altogether. Without sufficient support, some states may postpone implementation for several years.

To mitigate these risks and support broader adoption, the Department should pair any new data requirements with robust technical assistance and targeted investments in state and institutional data infrastructure. In addition, continued collaboration with Congress to advance legislation such as the College Transparency Act would help streamline data collection and reporting over time. Together, these steps would reduce administrative burden, improve data quality, and ensure that more states and institutions are prepared to successfully implement Workforce Pell.

Consistent engagement with employers during implementation

Our Business Leaders United for Workforce Partnerships network has consistently raised the important role of small and mid sized businesses in ensuring successful implementation of Workforce Pell. Small- and mid-sized businesses play a critical role in ensuring Workforce Pell programs are aligned with local and regional labor market needs. These employers often have the most up-to-date insight into hiring demand, in-demand occupations, and required skills, all of which are essential for Governors as they determine program eligibility under Workforce Pell.

Several states have demonstrated effective models for employer engagement in credential and program validation, including Alabama's Compendium of Valuable Credentials and North Carolina's Workforce Credentials List. These efforts show how structured employer input can strengthen program quality and alignment, and the Department of Education can play an important role in helping more states adopt similar approaches.

We further recommend:

- 1) Provide technical assistance and guidance on effective employer engagement strategies, including how states and institutions can meaningfully involve employers—

particularly small- and mid-sized businesses—in program design, validation, and continuous improvement.

- 2) Use federal convening power to elevate employer engagement models, including by partnering with the U.S. Small Business Administration and other federal agencies to better engage small- and mid-sized businesses in Workforce Pell implementation.
- 3) Encourage and support the development of sector partnerships and industry-led collaborations, which can serve as a structured mechanism for employer input and help align training programs with labor market demand.
- 4) Promote alignment with broader federal workforce policy, including encouraging Congress to strengthen support for sector partnerships in the reauthorization of the Workforce Innovation and Opportunity Act (WIOA).

We encourage the Department to engage employer-led networks and intermediaries with deep connections to industry, including Business Leaders United, to inform implementation. Doing so will help ensure that Workforce Pell programs are responsive to real-time hiring needs and support high-quality, demand-driven training.

Leverage Workforce Pell as a Catalyst for Workforce-Education System Alignment and Improvement

As states prepare for Workforce Pell implementation beginning July 1, 2026, early planning efforts are already highlighting longstanding challenges across workforce and postsecondary systems. We urge the Department to ***build on the momentum of Workforce Pell implementation***, by using implementation as a catalyst for broader workforce and education system alignment and reform.

Some progress toward system alignment has already occurred through the rulemaking process, including the integration of apprenticeship training requirements within Workforce Pell. Additionally, the release of the Strengthening Community Colleges Training Grants and the Talent Strategy competition has accelerated progress toward system alignment by prioritizing Workforce Pell implementation. **Strengthening these connections will support the Administration’s goal of expanding apprenticeship opportunities and advance the broader systems improvements outlined in America’s Talent Strategy.**

Particularly, the Department should provide coordinated technical assistance, in partnership with the Department of Labor, on aligning Workforce Innovation and Opportunity Act (WIOA) funding with Workforce Pell. This should address topics our network has raised for us such as how Individual Training Accounts (ITAs) can be used alongside Workforce Pell, particularly given the shift from WIOA as “last-dollar” funding to Pell as “first-dollar” aid; strategies for **braiding and blending funding** across workforce and higher education systems; and how workforce boards and postsecondary institutions can coordinate to support students through the FAFSA process and program enrollment

National Skills Coalition appreciates the opportunity to provide input on this proposed rule. We urge the Department to incorporate these recommendations to support effective implementation and maximize the impact of Workforce Pell for students, institutions, and employers.