

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,

The organizations authoring these comments represent a wide range of workforce and postsecondary education stakeholders, including community colleges, workforce practitioners, state and local officials, and small and mid-sized businesses. These organizations bring diverse expertise across education, workforce development, and employer engagement, and many will be submitting individual comments reflecting our respective perspectives.

We appreciate the Department's focus on strengthening workforce and postsecondary education through Workforce Pell implementation. As implementation moves forward, we encourage continued engagement with stakeholders to address emerging challenges, recognizing that the July 1, 2026 launch is an important milestone — but not the endpoint, nor a final solution — for addressing broader system challenges.

Across our networks, there are common priorities to support successful Workforce Pell implementation, outlined below.

Responses to directed questions:

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

We appreciate the opportunity to weigh in on the proposed rule which limits Title IV-ineligible partners to providing no more than 25 percent of a Workforce Pell program. We are concerned this will restrict high-quality partnerships that are essential to effective workforce training.

As such, we recommend that the Department **increase the allowable share of training provided by Title-IV ineligible partners to align with the typical 49% maximum for Pell-eligible programs with accreditor approval** (34 CFR 668.5).

Many programs rely on collaborations with community-based organizations, employers, and industry training providers to deliver instruction, provide hands-on learning opportunities, and offer supportive services. This flexibility is further critical for programs in rural areas, emerging technologies, and high-demand fields like Commercial Driver's Licenses and electrical work, where institutions often rely on industry partners due to staffing and capacity constraints.

Further, we anticipate that employer-led and industry partnerships will utilize this 49% cap. Employer led and industry partnerships often provide high-quality, work-based training and create direct pathways to employment. In particular, employer partnerships are critical to ensuring that training is aligned with current industry practices and leads directly to employment.

The current proposed limitation may exclude strong programs that depend on collaborative delivery models and employer expertise.

Limitations on Remedial Coursework That is Eligible for Title IV, HEA Program Assistance (§668.20(b) and (g))

In the above section of the NPRM, the Department states that noncredit programs are not eligible for Workforce Pell if offered in credit hours, but that noncredit programs offered in clock hours could be deemed eligible. We urge the Department to reflect this language in the regulatory language rather than just in the preamble to avoid any future reinterpretations of the statutory authority provided in this area.

Additional recommendations

Reconsider how students who continue their education are accounted for in the Workforce Pell job placement metric (§ 690.94(e)).

We appreciate the Department's recognition of the substantial debate that occurred during the December rulemaking session regarding students who continue their education after completing their program. While the Department has emphasized that Workforce Pell programs are intended to help students quickly access in-demand jobs, this approach does not reflect the reality of many students' education and career pathways.

For many students—particularly first-time or returning postsecondary learners—short-term training programs serve as an entry point into higher education rather than a terminal credential. National Skills Coalition research finds that learners frequently use short-term credentials to “test and re-enter” postsecondary education, building confidence and momentum before pursuing additional education and training. These pathways are especially important for adult learners balancing work and family responsibilities, for whom stackable credentials provide a more feasible route to long-term economic mobility ([Looking for Certainty, National Skills Coalition, 2026](#)).

This framework also does not reflect current labor market demand. Employers across sectors consistently report the need for skilled workers at both entry- and mid-level roles, and emphasize the importance of ongoing skill development rather than one-time credential attainment. Research from small and mid-sized businesses highlights that employers value workers who continue building skills over time and often expect additional training or credentials for advancement, underscoring that continued education is not a deviation from workforce participation, but a core component of it ([Big Insights from Small and Mid-Sized Businesses, National Skills Coalition, 2025](#)).

We also note that the Department has already recognized the importance of excluding certain students from accountability calculations when outcomes are not reflective of program quality. The proposed regulations appropriately remove students from completion and placement rate calculations in cases such as death, serious medical conditions preventing employment, military deployment, or incarceration. Students who continue their education similarly represent a category for whom immediate job placement is not an appropriate or complete measure of program success.

Finally, Congress clearly articulated an intent for Workforce Pell programs to support stackable and transferable credential pathways (H.R. 1 139 STAT. 350 Sec. 82002). Excluding students who pursue additional education from positive placement outcomes runs counter to this intent, as it penalizes programs that are successfully advancing learners along these pathways. We encourage the Department to align its accountability framework with this statutory goal by ensuring that continued education is recognized as a successful outcome.

Recommendations for the Department of Education:

- **Revise the proposed job placement metric to count students who continue their education after program completion as a positive outcome.** We urge the Department to modify the current draft regulation (§ 690.94(e)), so that students who enroll in additional education or training after completing a Workforce Pell program are counted as successfully placed.
- At a minimum, **count students as placed who are in programs for which continued education is an expected outcome.** If the Department does not fully count continued education as a positive placement outcome, it should account for programs—particularly those embedded in stackable credential pathways—where further education is a common and intended next step. This could include programs that demonstrate strong student success but have a significant share of participants pursuing additional credentials.

Support data modernization to strengthen program quality and accountability

Successful Workforce Pell implementation will depend on states' and institutions' ability to collect, share, and analyze data, including outcome data, across systems. However, many states currently lack the infrastructure, processes, and procedures needed to track key metrics, including job placement, occupation, and post-program earnings. Compounding these challenges, education and workforce data systems frequently lack common data standards and interoperability protocols, making it difficult to link records across agencies.

Existing data sources—particularly Unemployment Insurance (UI) wage records—also have limitations that are likely to complicate the implementation of Workforce Pell. For instance, state UI wage records often lack occupation-level detail, exclude certain workers, and are difficult to share across agencies, making it challenging to determine whether programs lead to in-demand jobs, are aligned with the same field of study, or have strong outcomes. In addition, current Department of Labor (DOL) guidance and related regulations limit UI data sharing narrowly for

the purposes of fulfilling WIOA performance accountability requirements. Due to this existing limitation, states may not have the ability to share UI wage record data for the purposes of Workforce Pell implementation without additional clarity and direction from the federal government.

We appreciate the federal investments in data modernization through the Strengthening Community Colleges Training Grants and the Fund to Improve Postsecondary Education.

To address these challenges, the Department should:

- **Provide specific guidance** that authorizes states to match UI wage records with education data for Workforce Pell program implementation purposes.
- **Provide technical assistance and highlight strong models** to support state data system alignment across workforce and postsecondary education agencies.
- **Promote cross-agency data sharing** through guidance, model frameworks, and templates that empower states to advance common data standards and interoperability across education, workforce, and wage data systems.
- **Align the Statewide Longitudinal Data System and Workforce Data Quality Initiative** grant programs' underlying grant priorities to explicitly support the data infrastructure, connectivity, and procedures needed to facilitate Workforce Pell implementation.
- **Support broader federal data infrastructure improvements**, including those called for in the College Transparency Act and other recent legislative proposals.

Without targeted support, data limitations may create barriers to implementation and hinder the ability to accurately measure program success.

We appreciate the Department's leadership in implementing Workforce Pell. We look forward to continued collaboration to ensure Workforce Pell expands access to high-quality training, supports employer needs, and advances a more aligned and improved workforce and postsecondary workforce system. As a coalition of national organizations that regularly convenes, collaborates, and has been deeply engaged in the development of Workforce Pell policy for years, we are available as a resource to the Department as it continues implementation and would welcome ongoing partnership to support successful rollout.

Signed,
Advance CTE
America Forward
Center for Employment Opportunities
Data Quality Campaign
Education Strategy Group
LISC | Local Initiatives Support Corporation
National Skills Coalition
National College Attainment Network

UPCEA – The Online and Professional Education Association
Rebuilding America's Middle Class