



April 8, 2026

U.S. Department of Education
Office of Postsecondary Education
Docket ID-ED-2026-OPE-0133

RE: Accountability in Higher Education and Access through Demand-Driven Workforce Pell; Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants.

On behalf of the Jobs and Careers Coalition, we applaud the expansion of the Pell Grant program in H.R. 1, the One Big Beautiful Bill Act (also known as the Working Families Tax Cuts Act). Our coalition has strongly supported the concept of Workforce Pell since it was introduced in 2017, and we are deeply pleased to see Pell Grant eligibility now being made available to students in short-term career-oriented educational programs, thus putting these workforce programs on a more level playing field with other educational programs.

The Jobs and Careers Coalition (JCC) is a Washington-based business group focused on job training and workforce development. Members include employers and employer associations from a broad range of industries experiencing skills mismatches and worker shortages – construction, manufacturing, IT, retail, and hospitality, among others.

Employer organizations represented by our coalition, including those listed, see Workforce Pell as a crucial step to improve the effectiveness of the public workforce system through increased participation of employer-backed training programs. This will generate more opportunities for workers and strengthen the U.S. economy.

To qualify for Workforce Pell Grants, students must meet the standard financial need criteria for traditional Pell Grants. Also, eligible programs must be offered by accredited institutions that participate in federal financial aid. These programs must last 8–15 weeks (or 150–600 instructional hours) and prepare students for employment in high-skill, high-wage, or in-demand jobs. Training must result in a portable, industry-recognized credential that can count toward an associate or bachelor's degree and meet performance standards.

We applaud the effort and urgency that have gone into promulgating regulations to make Workforce Pell a reality, and have the following concerns with two of the proposals in the NPRM regarding § 668.5(c) and § 690.94(a).

Written Arrangements To Provide Educational Programs (§ 668.5(c)). Comments are sought on the proposal to allow eligible institutions to enter into a written arrangement with an ineligible institution or organization for up to 25 percent of an eligible workforce program. JCC recommends amending this proposal to hew towards the current formula in which eligible institutions may enter into written arrangements with ineligible institutions and organizations to offer a portion greater than 25 percent but less than 50 percent if such written arrangements are reviewed and approved by the eligible institution's accrediting agency as a substantial change. While the proposal's concern with quality assurance is understandable, JCC believes its 25 percent limit will inhibit well-crafted employer and employer-organization training programs from partnering with eligible institutions. The limit would also negatively impact Registered Apprenticeships which are already subject to a rigorous vetting process.

The proposed 25 percent limit could also disproportionately impact rural areas where the partnerships between ineligible training programs and eligible institutions can be essential to maintaining such programs. The 25 percent limit could also stifle the innovation that can come from such partnerships whether rural or in more densely populated areas, and these partnerships can play an important role as “feeder systems” for in-demand occupations.

Components Determined by the Secretary (§ 690.94(a)) The proposed regulation states that after the Governor determines that a program meets requirements (under 34 CFR 690.93), the Secretary will use documentation from an eligible institution to determine that the program has met specific conditions for the 12 months preceding the date on which the eligible institution applied for eligibility for Workforce Pell. This includes a completion rate of at least 70 percent, within 150 percent of the normal time for completion, and a job placement rate of at least 70 percent (calculated as the percentage of students who are employed in the occupations for which the program prepares students).

Given that not all states are currently equipped to provide job placement data that would measure occupations, JCC is pleased to see that ED recognizes this dilemma. Specifically, through the 2028-29 award year ED will allow governors to certify that programs meet the 70 percent job placement rate without the requirement that such placement be in an occupation for which the program prepared the student.

It is obviously important that states have enough time to upgrade their systems to measure placement related to the training an individual receives. However, JCC also recommends job placement criteria not be so rigid that it doesn't count placements in occupations that are sector-related to that for which the student prepared, though not the exact occupation.

Thank you for the opportunity to comment on this important new regulatory framework. JCC is committed to supporting and improving workforce development, and looks forward to collaborating on Workforce Pell implementation.

Sincerely,

American Cement Association
Associated Builders and Contractors
Associated Equipment Distributors
Associated General Contractors of America
Association of Nutrition & Foodservice Professionals
Gaylor Electric
Independent Electrical Contractors
National Asphalt Pavement Association
National Energy & Fuels Institute
National Roofing Contractors Association
National Stone, Sand & Gravel Association