



August 21, 2025

Alamo Colleges District

Dallas College

Lone Star College

Louisiana Community and
Technical College System

Metropolitan Community
College

Tarrant County College

Virginia Community College
System

Wisconsin Technical College
System

The Honorable James P. Bergeron
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Mr. Bergeron:

On behalf of Rebuilding America's Middle Class (RAMC), I thank the U.S. Department of Education for the opportunity to provide public comment on issues that will be discussed during the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Negotiated Rulemaking Session. RAMC recognizes all Americans, especially low-income and unemployed workers, can benefit from the increased access to affordable postsecondary training and credentialing opportunities enacted by Public Law 119-21. RAMC has identified issues we want to draw the Department's attention to as it undertakes the process of rulemaking for Workforce Pell and other authorities passed into law.

RAMC represents more than 75 community colleges and approximately 1 million students nationwide. Community colleges serve 45 percent of all first-time freshmen and 40 percent of our students are first-generation college students. Community colleges are open access, seek to make higher education accessible and affordable for everyone and match employers' need for a larger, more workforce. We know the importance of preparing more Americans to enter the workforce with the skills necessary to compete for in demand jobs.

With respect to eligibility for noncredit programs, the statutory reference to section 401(d)(2) not applying to eligible workforce programs is confusing as that section deals with several aspects that are currently applicable to Pell Grants. We urge the Department to clarify through rulemaking that students will be able to access Workforce Pell for noncredit courses. Without this change for noncredit programs, students will be hindered from realizing the full benefit of Workforce Pell. Workforce Pell is designed to enable students who are not taking traditional credit bearing courses to receive financial aid for programs that are stackable and lead to high quality employment opportunities – the elimination of noncredit programs here does not sync with that goal.

RAMC has also identified potential operational issues with the value-added earnings language that is applicable to Workforce Pell. First, by requiring programs to provide value-added earnings for three prior years, the regulation creates a challenge for community colleges that are attempting to create new programs that meet the needs of a changing workforce (when another section of the bill requires a program to be in existence for one year prior to eligibility for Workforce Pell). Furthermore, some programs that are already in existence may not have three years of data. We strongly

encourage the Department to consider providing exceptions to the three-year data requirement for new programs that once in operation for three such years must produce such data.

Additionally, given the complexity of collecting the value-added earnings data, we urge the Department to ensure that the data requirements to establish program eligibility are broad enough to not stifle students' ability to access Workforce Pell Grants. RAMC members have raised concerns that if data requirements are overly prescriptive it would make it more difficult for programs to establish eligibility and therefore deny students the promise of this new authority.

With respect to the approval process for Workforce Pell programs, RAMC asks the Department to consider implementing a streamlined process on how States work to approve Workforce Pell programs. Without this type of process, some States may overregulate Workforce Pell and make it difficult for any programs to establish eligibility, denying this important tool to the students that need it the most. On the other hand, some States may under regulate and allow programs that are not high quality and would not serve students well. To ensure that all States have the opportunity to improve their economic development, labor force participation and employment rates some guardrails in establishing the State approval process for Workforce Pell eligibility are necessary.

RAMC has also identified an operational issue with the timeline for approval for Workforce Pell programs. To allow students to take advantage of Workforce Pell as quickly and efficiently as possible, ensuring that the Secretary and Governors approve programs in a timely manner is essential. We ask that the Department consider enforcing reasonable time limits on how long States and the Secretary have to approve Workforce Pell programs. These time limits will be especially essential when Workforce Pell first opens and all programs seeking eligibility will likely be submitting their proposals at once.

Finally, since Workforce Pell Grants are a subset of the regular Pell Grant program, it is imperative that the Department consider the ways in which Workforce Pell programs differ from regular Pell eligible programs. Certain requirements in the Pell Grant program, such as the measure of satisfactory academic progress, would likely operate differently when applied to Workforce Pell programs given the length of such programs. Often, Workforce Pell programs have different measures for success, prioritizing skill development over course credit or time requirements. Making a clear distinction on the different requirements for Pell Grants versus Workforce Pell Grants will be essential to ensure that there is not an undue burden on Workforce Pell programs.

Workforce Pell, once implemented effectively, will change the lives of many students across our nation and provide a new avenue to the middle class. We look forward to continuing to provide our support to the Department as it seeks to implement this important authority and thank you for giving RAMC the opportunity to provide input on Workforce Pell and for considering our views.

Sincerely,



Monty Sullivan

Board President, Rebuilding America's Middle Class (RAMC)
President, Louisiana Community and Technical College System