



August 25, 2025

James Bergeron
Acting Under Secretary
US Department of Education
400 Maryland Ave
Washington, DC 20202

Re: Workforce Pell Grant Program (Docket No. ED-2025-OPE-0151)

Dear Mr. Bergeron:

On behalf of the Data Quality Campaign (DQC), I write to provide feedback regarding the US Department of Education's (ED) recently proposed changes to the specified Title IV, HEA programs, including the incorporation of the Workforce Pell Grant program. DQC is a national nonprofit policy and advocacy organization that seeks to promote data policies and related best practices that help generate better results from public investments aimed at supporting students and workers. DQC particularly focuses on data policies, practices, and strategies that will improve the use of statewide longitudinal data systems (SLDSs)—systems that incorporate data spanning early childhood, K–12, postsecondary, and workforce development—in fostering successful journeys through education and the workforce.

Workforce Pell and the Importance of Data

Making Pell Grants available to individuals pursuing shorter-term workforce training programs will make it possible for more people to pursue the education and training opportunities needed to re-skill, upskill, and further their career goals. DQC is supportive of the Workforce Pell Grant program's potential to improve the lives of many learners and workers, but it is critical that these efforts are paired with high-quality data and related support for states as they prepare to oversee and evaluate shorter-term programs within this new context.

As the Negotiated Rulemaking process begins, we urge ED to consider specific data access provisions in the forthcoming regulations. We believe it is critical that ED and other federal partners articulate how and in which ways stakeholders—including states, postsecondary institutions, and others—will have access to the appropriate sources of information to implement the new Workforce Pell Grant program's eligibility and accountability provisions with fidelity. Access to this data will ensure that the guardrails contained in the new program, such as the value-added earnings measure, program completion metric, and job placement rates, are supported by reliable and verifiable data to accurately assess a program's efficacy. In addition, this data is necessary to make other aspects of the recent reconciliation bill successful, including the legislation's new accountability framework for all Title IV eligible programs.

Recommendations

States will need data support—including both technical assistance and capacity support—to implement the legislation and facilitate the program long term. DQC offers the following recommendations to ensure states have the necessary tools and resources to administer a successful Workforce Pell grant program:

- **Support state data quality, capacity, and infrastructure.** Many states do not currently collect data on short-term programs, particularly non-credit ones, and will need time and support to develop data infrastructure and related practices, as well as coordinate with employers to determine their hiring requirements. To address this, ED should support states in leveraging data to accomplish the various accountability and reporting requirements needed to make Workforce Pell successful.

This work may include exploring administrative data options for providing quarterly wage data, which could ensure access to reliable wage record data for programs. Possible ways to accomplish this could include leveraging and expanding existing efforts to match earnings outcomes to postsecondary programs through, for example, Internal Revenue Service (IRS) matching and College Scorecard publication¹ or the postsecondary employment outcomes (PSEO) project operated by the Census Bureau. Other ways to support states' new data needs are to encourage enhanced uses of states' unemployment insurance system data and to clarify data-sharing rules between relevant agencies and institutions/program providers. In addition, ED could consider whether existing funding streams for state postsecondary and labor data systems, such as the Statewide Longitudinal Data Systems (SLDS) and Workforce Data Quality Initiative (WDQI) grant programs, are adequate to support these new efforts.

- **Establish clear metrics and verification standards.** The legislation identifies several specific metrics for states to use in assessing short-term programs, but these metrics are currently undefined. States will need ED's leadership to create shared definitions, related terminology, and common reporting approaches to ensure the Workforce Pell Grant program is implemented in a way that allows for comparability across the nation. It is also important that ED clarify which data will be necessary to uphold the guardrails contained in the new program—such as the value-added earnings measure, program completion, and job placement rates—and how the institution-reported data will be appropriately “verified” by the Department and by states. Moreover, ED will need to identify how program quality will be assessed for accountability purposes in the initial years of program operation given the data lag that will exist for collecting, verifying, computing, and analyzing earnings and value-added data.
- **Provide clarity to align definitions.** The legislation for the new Workforce Pell Grant program requires states to evaluate programs based on whether they prepare students for high-skill, high-wage, or in-demand occupations and related sectors. States will also evaluate programs based on whether they lead to a recognized postsecondary credential that is stackable and portable, unless the program prepares a student for employment in an occupation where there is only one recognized postsecondary credential. Although some states maintain these definitions as part of their Perkins state plans or embed them within other state-level policies, ED will need to clarify the application of existing definitions. For instance, the law seems to suggest states use their Perkins definition of “high-wage,” however, Perkins does not define “high-wage” or even “high-skill, high-wage, or in-demand.” Instead it requires state plans to detail how funds are being used to promote the preparation of students for “high-skill, high-wage, or in-demand industry sectors.” ED will need to provide clarity regarding which

¹ The Bipartisan Workforce Pell Act (HR 6585), introduced in the House by Representatives Stefanik (R-NY), Scott (D-VA), Foxx (R-NC), and DeSaulnier (D-CA), envisioned such a use of IRS matching and the College Scorecard for the collection and publication of, among other metrics, job placement rate.

definitions apply, how they should be used across all states, and what degree of flexibility will be afforded for the purposes of applying existing definitions to this new program.

- **Lead efforts to develop tools for learners and workers.** While the legislation discusses the way data will be used to evaluate program eligibility, it does not clearly identify ways this information can be used to support individuals as they try to make informed decisions about their education and workforce pathways. ED should provide leadership on the development of navigational supports and other tools to help learners navigate their education and workforce pathways.
- **Allow states a provisional period prior to full implementation.** Workforce Pell represents a substantial opportunity but implementing it successfully will create substantial new requirements for both states and institutions and it will take time to develop the requisite legislation, regulations, and data capacity and collection. A potential risk with the current timeline to fully implement the program by the intended July 1, 2026 start date may result in insufficient and poor-quality data access for both states and institutions and inadequate state processes for determining and maintaining eligibility with lasting results. For these reasons, we urge ED to make the first 1–2 years of Workforce Pell’s implementation provisional, with requirements phased in over time to allow states to refine and recalibrate their implementation strategy during this initial period and develop necessary data reporting and transparency policies.

Thank you for your consideration of DQC’s feedback. We look forward to working with ED to ensure the successful implementation of the Workforce Pell Grant program. We welcome the opportunity to discuss these comments further at your convenience. To do so, please contact DQC’s Vice President, Federal Policy, Kate Tromble (kate@dataqualitycampaign.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'JBE', with a long horizontal line extending to the right.

Jennifer Bell-Ellwanger
President and CEO