



April 8, 2026

Nicholas Kent
Under Secretary
US Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Re: Workforce Pell Grant Program (Docket ID ED-2026-OPE-0133)

Dear Mr. Kent:

On behalf of the Data Quality Campaign (DQC) and the undersigned organizations, I write to provide feedback regarding the US Department of Education's (ED) recently proposed regulations for 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 supporting students and workers. Alongside the undersigned partners, DQC 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.

Making Pell Grants available to individuals pursuing shorter term workforce training programs will make it possible for more people to re-skill, upskill, and further their career goals. We are supportive of the Workforce Pell Grant program's potential to improve the lives of many learners and workers, but also recognize that these efforts must be paired with adequate support for states to develop the high-quality data systems they need to implement, oversee, and evaluate shorter term programs within this new context.

Access to reliable, verifiable data—such as the value-added earnings measure (34 CFR § 690.95) and program completion metrics (34 CFR § 690.93)—will be essential for the success of the Workforce Pell Grant program and will ensure that states have the information necessary to accurately assess program efficacy. To achieve this goal, ED must provide specific sub-regulatory guidance and technical assistance that articulates the data-sharing frameworks through which stakeholders—including states and postsecondary institutions—will collaborate. By providing clearer implementation pathways and aligning federal requirements with existing state data infrastructure, ED can ensure that the Workforce Pell Grant program is supported by a robust data foundation that accurately reflects student outcomes throughout the student's pathway. And we continue to collectively advocate for the public availability of non-personally identifiable data about Workforce Pell in structured, open, linked, interoperable, and durable (SOLID) data formats.

Support for Enhanced Data Specificity and State Leadership

DQC and the undersigned organizations commend ED for prioritizing administrative data and comparable occupational placement, which are essential for a modern, transparent workforce system where workers understand precisely which jobs are likely to lead to increased economic opportunity. Shifting toward the more granular reporting by occupation or comparable occupation is a significant step forward. Understanding alignment is the only way to determine if an education or training program fulfills its promise to the learner.¹

Additionally, we thank ED for the one-year extension on placement rate reporting, which acknowledges the data capacity required of state data systems to effectuate the requirement successfully. To support states in this transition, we encourage ED to create guidance, technical assistance, and Communities of Practice specifically aimed at helping states share best practices in enhancing data systems to include occupational headers. Implementing Workforce Pell will require even stronger data linkages and we urge ED to leverage existing resources, where appropriate, to help support states in implementing the program. Many states are already undertaking this work; for example, California's [AB 1534](#) and Texas's [HB 8](#) demonstrate how states are already aligning their own accountability frameworks with the data standards proposed in these regulations. Assisting states in sharing this information quickly with one another is key to a successful transition from current reporting practices to more detailed, occupation-centric reporting practices.

Recognizing Further Education and Training as Success (34 CFR § 690.94(e))

ED describes the Workforce Pell Grant program as a “stepping stone” for students and institutions alike and prioritizes programs’ stackability and transferability to make it easier for students to continue their educational pathways after completion (91 FR 11378). Indeed, the legislation itself makes clear through the inclusion of transferability and stackability requirements that the intent of the Workforce Pell Grant program is to support eligible shorter term workforce training programs that are part of wider and more comprehensive career pathways and program sequences.

Despite these elements contained both in the legislation and the draft proposal, the proposed regulations would penalize students, programs, and institutions for such outcomes. As currently drafted, if a student completes a Workforce Pell-eligible program and subsequently enrolls in another education program—potentially one that would enable them to secure an even better employment opportunity—they effectively count against the program’s success metrics, in this case placement.

Under 34 CFR § 690.94(e), ED excludes factors “outside a student's control,” such as military deployment, death, or incarceration, from counting against a program's placement. It is counterintuitive that a student pursuing further education—a primary goal of this program and the Higher Education Act (HEA) under which it sits—would be treated less favorably than these other exclusions. Placement

¹ Rutgers Education and Employment Research Center (EERC), https://smlr.rutgers.edu/sites/default/files/Documents/Centers/EERC/Review%20of%20Noncredit%20Outcomes_EERC_1.4.24.pdf

calculations should include all of these students in the numerator and the value-added earnings (VAE) calculation should exclude these students to ensure that programs are not penalized for a student's choice to pursue further education and training opportunities aligned with these experiences. To mitigate risks of "gaming" the placement metric, ED could require that the continued education be aligned with or lead to more advanced opportunities than the initial program. This information could be verified by ensuring the subsequent program falls within the same CIP code family (at the 2- or 4-digit level) or represents a clear upward progression in a related field. We urge ED to use its own justification of benefits to students and institutions of higher education to resolve this inconsistency, ensuring the regulations do not prevent students from choosing relevant post-program pathways—whether that be directly into employment or further education for future, better employment.

Implementation of Interim Completion Rates (34 CFR § 690.93(b)(1)(i))

While many states are working to develop the data connections and capacity necessary for the Workforce Pell Grant program, they will need time and support to accomplish those goals. To facilitate a smooth transition to state-led data collection, DQC and the undersigned organizations recommend the following for the interim period:

- **Institutional Reporting**: In the interim, the easiest path to compliance is for institutions to calculate completion rates and provide supporting documentation (e.g., lists of completers vs. exiters vs. starters) to their respective states. This "bottom-up" approach allows for faster implementation while ensuring states have the verifiable backup needed for oversight.
- **Transition to State Systems**: By the 2028–29 academic year, states must begin pulling completion and placement data directly from their own administrative, state-level data systems. We encourage ED to facilitate Communities of Practice where early-adopter states can share the technical strategies and data-sharing templates necessary to automate these linkages.
- **Mid-Point State Progress Update**: To assess state progress, ED could require states to provide a formal update on their progress toward full administrative data integration at the halfway mark of the three-year delay period. This 18-month update would allow ED to identify which states may need additional technical assistance before the 2028–29 deadline.

Strengthening the Data Foundation (SLDS and Unemployment Insurance Records)

The Workforce Pell Grant program will rely heavily on administrative data to ensure program quality. While states currently have some data elements, many lack the full range of linkages necessary for a smooth program rollout. To strengthen this foundation, we recommend:

- **Unemployment Insurance (UI) Data Guidance**: States require clear, updated guidance and support from both ED and the Department of Labor (DOL) to clarify that states are permitted to match confidential UI data with the state's education data to assess outcomes, incorporate this data into their SLDS, and use the data for public policy purposes. Currently, the [only official guidance](#) that exists unhelpfully limits the sharing of this data to performance measures under the Workforce Opportunity and Innovation Act (WIOA). While many states do share UI data for other purposes, many still do not based on this narrow guidance. We urge ED and DOL to provide new guidance similar to the existing WIOA guidance which also includes and sanctions

all lawful purposes for which they envision states needing to share this information, including for the Workforce Pell program.

- **Grant Alignment:** We recommend that ED and DOL coordinate with federal partners to align the SLDS and Workforce Data Quality Initiative (WDQI) Grant programs with a priority that they be used to improve the data connectivity needed to successfully carry out the Workforce Pell Grant program. ED and DOL have taken a similar approach for other recent grants, including the Strengthening Community Colleges Grant program and the Fund for the Improvement of Postsecondary Education (FIPSE) program. A new round of aligned SLDS and WDQI grants could allow states to fast track their data improvement efforts. As seen in Indiana ([SB 161](#)) and Virginia ([G3 Initiative](#)), integrating financial aid eligibility with real-time labor market data allows states to identify high-value programs and pivot resources toward training that yields a measurable return on investment for both students and taxpayers. Implementing Workforce Pell will require even stronger data linkages and all available federal resources should be directed to those purposes.

Clarification of Interagency Authority

Finally, DQC and the undersigned organizations encourage ED to provide clarity regarding the role of the Secretary of Labor in this process. While interagency collaboration is vital, the statutory authority for the Workforce Pell Grant program resides within the HEA, which places the administration of Title IV programs squarely under the authority of the Secretary of Education (see 20 U.S. Code § 1070). We seek clarification in the final regulations regarding the specific authority under which the Secretary of Labor would request additional information. Ensuring that data requests are streamlined and remain firmly rooted in the HEA framework will prevent duplicative reporting requirements that may otherwise burden state agencies and institutions.

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

Sincerely,

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ALI Coalition
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Data Foundation
Data Quality Campaign

The Education Trust
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