

April 07, 2026

Nicholas Kent  
Under Secretary  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

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

Dear Under Secretary Kent:

On behalf of Advance CTE, the nation's longest-standing not-for-profit that represents State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories and the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, we are writing in response to the U.S. Department of Education's (ED's) Notice of Proposed Rulemaking (NPRM) establishing program eligibility requirements for the Workforce Pell Grant program, published in the *Federal Register* on March 9, 2026.<sup>1</sup>

Our organizations have been steadfast advocates for expanded federal Pell Grant eligibility for high-quality, shorter-term postsecondary CTE and workforce development programs since 2014. We strongly support the creation of the Workforce Pell Grant program as part of the *One Big Beautiful Bill Act* (OB3) and were encouraged that federal negotiators reached consensus with the AHEAD Committee on a regulatory framework that reflects many of the principles we have consistently advanced over the last decade: leveraging existing state definitions under the Carl D. Perkins Career and Technical Education Act (Perkins V) and the Workforce Innovation and Opportunity Act (WIOA), recognizing the central role of states in program approval and oversight, and establishing meaningful accountability that ensures both strong program quality and student outcomes.

CTE sits at the critical intersection of education and workforce development, helping to align these systems while empowering learners to cultivate the academic knowledge, technical skills, and employability competencies that are necessary for postsecondary success and career readiness. Our respective memberships will play a critical role in Workforce Pell implementation—both as direct providers of eligible programs as well as part of the state infrastructure under Perkins V and WIOA for defining eligible occupations and sectors; maintaining credentials of value lists; and tracking learner outcomes which will be foundational to the significant new state-level implementation responsibilities placed on state Governors throughout this draft rule. We therefore have a significant interest in ensuring the proposed regulations are workable for states and aligned with existing education and workforce systems to the greatest extent possible.

While we are broadly supportive of the consensus framework reflected in this NPRM, we write to offer specific feedback on several directed questions posed by ED as well as recommendations to strengthen the final rule. Our comments focus on areas where the proposed regulations should be improved to better reflect the intent of the statute, address implementation challenges facing states and eligible institutions, and ensure that Workforce Pell programs deliver meaningful outcomes for

---

<sup>1</sup> <https://www.federalregister.gov/documents/2026/03/09/2026-04520/accountability-in-higher-education-and-access-through-demand-driven-workforce-pell-pell-grant>

learners—objectives that we were glad to see are shared by ED during the earlier negotiated rulemaking process.

## **Responses to Directed Questions**

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

ED proposes limiting written arrangements with ineligible institutions or organizations to no more than 25 percent of an eligible workforce program’s instruction. Our organizations are generally supportive of this limitation. Given the compressed duration of eligible workforce programs (8–14 weeks), even a 25 percent arrangement represents a meaningful share of a program’s total instruction. Maintaining a conservative cap in the program’s early years is also likely a prudent limitation while states, accreditors, and ED develop the experience and oversight capacity needed to assess the quality of these arrangements in the context of newly eligible Workforce Pell grant programs.

That said, we recognize that in certain circumstances—particularly in rural areas, in emerging technology fields, and in high-demand occupational areas—institutions may need to rely more heavily on employer-based or industry partnerships to deliver instruction that is directly aligned with current workplace standards and practices. In these cases, a 25 percent cap could inadvertently exclude otherwise strong programs that depend on collaborative delivery models and employer expertise. We therefore recommend that ED consider providing limited flexibility for programs where the ineligible partner is an active employer or industry partner directly involved in the program’s development and implementation, provided that the related Workforce Pell program accreditor formally affirms or otherwise approves of the quality of such an arrangement. Any such flexibility should not exceed the 49 percent maximum that already applies to other Title IV programs with accreditor approval under 34 CFR 668.5. We further recommend aligning the draft rule to the additional limitations that are already placed on these arrangements in current federal regulation.

### ***Ineligibility Due to Grant or Scholarship Assistance from Non-Federal Sources (§ 690.5)***

The proposed regulation addresses a new statutory prohibition included in the OB3 on all federal Pell grant recipients when non-Federal grant or scholarship aid equals or exceeds a student’s cost of attendance. We appreciate and support ED’s clarification that “non-Federal sources” in this context do not include tax credits, 529 distributions, or emergency financial assistance. However, we are concerned that the interaction between Workforce Pell and existing state and local financial aid programs for short-term workforce training has not been adequately addressed in the draft regulation.

A growing number of states operate grant programs specifically designed to support learners in short-term credential programs. These programs will likely overlap significantly with newly eligible Workforce Pell programs. Many of these state programs function as “last-dollar” awards that fill remaining tuition gaps after other aid is applied, whereas Pell has traditionally functioned as “first-dollar” student aid. While we acknowledge that related statutory provisions of the Higher Education Act further clarify “other financial assistance” is inclusive of assistance “. . . provided by a State and is designated by such State to offset a specific component of the cost of attendance” this is not clearly articulated in the NPRM.<sup>2</sup>

---

<sup>2</sup> 20 U.S.C. 1087vv.

Without clearer guidance on how these programs should and will interact, states and institutions risk inadvertently disqualifying students from Workforce Pell grants or creating administrative confusion that can delay aid disbursement. We recommend that ED issue sub-regulatory guidance and technical assistance clarifying how institutions and states should best coordinate Workforce Pell with existing state college access and workforce training grant programs, including guidance on the effective braiding and blending of Pell, WIOA funding, state grant aid, and employer-provided tuition assistance. This guidance should be developed in close coordination with the U.S. Department of Labor (DOL) to ensure alignment across federal funding streams.

***Components Determined by Governors: Interstate Agreements (§ 690.93(h))***

The draft rule proposes to allow two governors to enter into bilateral agreements permitting an eligible institution in one state to offer an eligible workforce program to students in another state through distance education. ED has also explicitly rejected nationwide reciprocity, citing concerns about the proliferation of low-quality programs and the potential for circumvention of state-specific workforce alignment requirements. We are sympathetic to these concerns regarding nationwide reciprocity and do not support leveraging existing state authorization reciprocity mechanisms, such as NC-SARA, to serve as a proxy for the program-level approval process that Congress intended specifically for the Workforce Pell program.

We see potential value in wider interstate agreements on a *regional* basis, however, where neighboring states share labor markets, industry sectors, and workforce needs. Regional agreements may be particularly valuable in metropolitan areas that span state lines, where learners and employers regularly operate across borders. However, we urge ED to ensure that any such interstate agreement framework—whether bilateral or multilateral—addresses two critical concerns.

First, the data requirements associated with interstate program enrollment are significant. States entering into these agreements must maintain the capacity to calculate and verify completion and placement rates for students enrolled through the entire agreement, including the ability to track employment outcomes across state lines using wage records. If states choose to enter into these agreements, they should not subsequently receive accommodations or exemptions from the outcomes data requirements that apply to all other eligible Workforce Pell programs. The integrity of the accountability framework depends on consistent application of these requirements regardless of delivery modality or the geographic footprint of a provider. ED should use such arrangements as an opportunity to actively encourage multistate data sharing arrangements whenever feasible.

Second, interstate agreements must clearly assign responsibility for ensuring prospective students have access to accurate, complete information about program quality and outcomes. Learners must also be positioned to fully understand whether the program aligns with workforce needs, legal or licensure requirements, and employment opportunities in the state where they intend to work. ED should require that any bilateral or multilateral agreements include provisions specifying the mechanisms to facilitate these types of public-facing disclosures and how learners will be informed of the occupational and labor market alignment of the program in their home state.

***Value-Added Earnings: Exclusion of Certain Students from the Completer Cohort (§ 690.95(a))***

As part of another directed question contained in the NPRM, ED asks whether additional categories of students should be excluded from the cohort used to calculate the newly created program's value-added earnings accountability measure. We recommend that students who continue their

education after completing an eligible Workforce Pell program be excluded from the VAE calculation.

The rationale for this exclusion mirrors our argument regarding the placement rate found elsewhere in these comments. The statute explicitly requires that eligible programs lead to stackable, portable credentials that prepare students to pursue further education or training through the provision of transferable and recognized postsecondary credit.<sup>3</sup> Learners who act on these foundational design features of eligible programs by enrolling in further education or training after program completion are likely to have reduced or no earnings during the measurement period. This is not because the program failed to deliver meaningful earnings gains for learners, but rather because it succeeded in advancing them along a broader career pathway—one that research increasingly indicates translates into greater earnings for workers.<sup>4</sup>

Including these learners in the VAE calculation would systematically depress the median earnings of programs that are doing precisely what the statute envisions. Their exclusion from the VAE calculation would ensure that the metric more accurately reflects the labor market value of the credential for learners who enter the workforce directly upon program completion, which is the population the metric is designed to assess.

To mitigate the potential for gaming, ED could require that continued education or training be demonstrably related to the initial program or otherwise further advance the individual toward their career goals. Workforce Pell-eligible programs are by definition shorter-term and occupationally focused. They are not exploratory or general by their very nature. ED's stated concern that a student might be re-enrolled in adjacent programs to defer accountability is therefore applicable in this narrow context. A reasonable compromise approach might require that the subsequent program reflect clear occupational or skills progression from the initial program, whether verified through CIP code proximity, through a comparable same-field-of-study determination made at the state or institutional level, or another good faith effort to ensure learners are continuing to meaningfully advance in their education and training journey. If ED elects to take this approach, we strongly believe that the Department make clear that this type of verification strategy is not appropriate for longer-term programs or course sequences, where students more often develop and/or redirect their pathways over time.

### **Additional Recommendations**

#### ***Recognize Continued Education as a Positive Placement Outcome (§ 690.94(e))***

Our most significant concern with the proposed regulation relates to the treatment of students who continue their education after completing an eligible Workforce Pell program. As currently drafted, the proposed regulations do not count students who enroll in further education or training as successfully placed for purposes of the job placement rate. This means that when a student completes a Workforce Pell program, earns a credential that is stackable or transferable to another pathway or program, and enrolls in that related pathway or program—exactly the type of learner trajectory the statute is designed to support—that student counts *against* the program's calculated placement rate.

Programs that successfully advance learners along career pathways will be disadvantaged relative to programs that exclusively lead to direct employment for all completers, regardless of whether

---

<sup>3</sup> One Big Beautiful Bill Act, Pub. L. No. 119-21, § 830002(b)(2)(iii)(III) & (IV)

<sup>4</sup> For example: [https://www.rand.org/pubs/research\\_reports/RRA2484-1.html](https://www.rand.org/pubs/research_reports/RRA2484-1.html)

those employment outcomes represent the best long-term outcome for the learner. This creates a perverse incentive for programs and institutions to discourage learners from pursuing further education and credential stacking—undermining a core purpose of the statute and running counter to well-established research on the relationship between educational attainment and subsequent economic outcomes.

For example, data published annually by the Bureau of Labor Statistics (BLS) consistently demonstrate that as workers' educational attainment rises, their unemployment rates decrease and earnings increase.<sup>5</sup> The most recent BLS data show that workers without a high school diploma had the highest unemployment rate (6.2 percent) and lowest median weekly earnings (\$738) in 2024, with outcomes improving at each successive level of educational attainment. An accountability framework that treats further education and training as a negative outcome is difficult to reconcile with the statute's other requirements (outlined in greater detail below) and with the federal government's own economic data demonstrating that additional education and training leads to higher earnings and lower unemployment—the exact outcomes this program is designed to promote.

Throughout the regulatory process, ED has repeatedly invoked WIOA's performance accountability framework as a model for Workforce Pell—both at the negotiated rulemaking table last December and throughout this NPRM. For example, ED justified using “exiters” for determining the underlying student cohorts implicated in both the placement and completion measures by arguing that doing so would reduce reporting burden on states and saying, in part:

*“The Department chose this approach because all states currently report on this indicator for their WIOA programs and should be able to use existing administrative data sources, including wage records, and collection methodologies to assess and certify this requirement.”*

We urge ED to be consistent when seeking to align to these aspects of WIOA. Current WIOA regulation and implementation guidance explicitly count further education and training as a positive outcome when calculating second and fourth quarter employment measures for Youth Title I programs.<sup>6</sup> As currently operationalized, WIOA currently defines second and fourth quarter employment in these contexts as:

*“... the percentage of title I Youth program participants **who are in education or training activities**, or in unsubsidized employment, during the second quarter after exit from the program.”<sup>7</sup>*

In addition, current placement measures used within the context of Perkins V also recognize and equally weight direct employment, further education and training, and national and military service, correctly recognizing these same dynamics at both the secondary and postsecondary learner levels.<sup>8</sup> These approaches should serve as an example for the Department to emulate here

---

<sup>5</sup> <https://www.bls.gov/careeroutlook/2025/data-on-display/education-pays.htm>

<sup>6</sup> Training and Employment Guidance Letter (TEGL) No. 10-16, Change 3, pps 8-9: <https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2023/TEGL%2010-16%20Change%203/TEGL%2010-16%20C%20Change%203%20-%20Accessible%20PDF.pdf>.

<sup>7</sup> Ibid, pps 8-9, emphasis added.

<sup>8</sup> 20 USC 2323(b)(2)(A)(v) and 20 USC 2323(b)(2)(B)(i). See also: <https://cte.ed.gov/accountability/core-indicators>

in the context of Workforce Pell, particularly given the significant overlap in these programs' core purposes and wider design.

Congress also made its intent clear throughout the statutory text contained in OB3. As previously mentioned, eligible Workforce Pell programs are required to lead to credentials that are stackable and portable.<sup>9</sup> It also requires eligible programs to prepare students to pursue further certificate or degree programs at one or more eligible institutions, meaning these programs must be able to articulate or be used to support further postsecondary education and training experiences.<sup>10</sup>

The proposed regulations' treatment of continued education as a non-outcome is directly at odds with its statutory design. Under § 690.94(e), the Department already recognizes that certain student outcomes should not count against a program's placement rate, including cases involving death, serious medical conditions, military deployment, and incarceration. If the accountability framework already protects programs from being penalized when circumstances beyond their control produce negative outcomes, it should not simultaneously penalize programs when their own design produces positive ones.

In the strongest possible terms, we therefore urge ED to revise the proposed job placement metric to count students who continue their education after program completion as a positive placement outcome. To ensure data quality and to facilitate a better understanding of how eligible Workforce Pell grant programs support students' wider postsecondary and career trajectories, an amended placement measure should be disaggregated at the program-level to allow for differentiation between placement in employment and placement in further education or training. This approach leverages the same state-level data infrastructure that governors are already using to calculate placement rates under Perkins and WIOA and would impose no additional data collection burden on institutions or states.

#### ***Clarify Interagency Roles and Authorities***

The proposed regulations reference the Secretary of Labor in several contexts, including data sharing, wage record access, and the potential to request additional information from governors and institutions. We support close coordination between ED and DOL—indeed, several of our recommendations in this comment depend on it, particularly regarding UI wage record guidance and the alignment of WIOA supportive services with Workforce Pell.

However, the statutory authority for the Workforce Pell program resides within the Higher Education Act, which places the administration of Title IV programs explicitly under the authority of the Secretary of Education. As ED finalizes these regulations and develops sub-regulatory guidance, we encourage the Department to clearly delineate which requirements flow from ED's authority and which involve DOL, and to ensure that any interagency coordination does not result in duplicative or conflicting reporting obligations for states and institutions that are already navigating substantial new requirements under this program.

#### ***Alignment of High-Skill, High-Wage Determinations With Perkins V State Planning (§ 690.93(b)(1)(i))***

As currently structured, the NPRM implies that high-skill and high-wage designations are governed by and synchronized with WIOA state planning and plan modification requirements. Yet, Perkins V is the federal legislation establishing the framework for states to subsequently define both high-

---

<sup>9</sup> One Big Beautiful Bill Act, Pub. L. No. 119-21, § 830002(b)(2)(iii)(III).

<sup>10</sup> One Big Beautiful Bill Act, Pub. L. No. 119-21, § 830002(b)(2)(iii)(IV).

skill and high-wage— both for the purposes of Perkins V implementation as well as the newly created Workforce Pell grant program which explicitly cross-references these terms, as formally outlined in Perkins V.<sup>11</sup> Despite these statutory requirements, ED appears to have tethered these key terminology requirements exclusively to a WIOA-driven state planning process. This is both incongruent with the statutory text of the new program and has the potential to create confusion about which state planning frameworks and entities will ultimately be held responsible for these determinations.

We support a two-year review requirement for each of these definitions given their importance to Workforce Pell implementation, along with the need to keep the data and information used to make these determinations as timely as possible. However, the regulatory text must be revised to clarify that high-skill and high-wage determinations are made pursuant to Perkins V rather than WIOA as follows:

- (i) The State's methodology to determine and periodically review which occupations and industry sectors are high-skill, high-wage (as identified by the State pursuant to section 122 of the Carl D. Perkins Career and Technical Education Act ([20 U.S.C. 2342](#))), or in-demand, including the competencies needed in such industries and occupations, as identified by the State pursuant to section 102 of the Workforce Innovation and Opportunity Act ([29 U.S.C. 3112](#)), and where the list of such occupations and sectors will be made publicly available. Such review shall be done not less than every two years concurrent with development and modification of the State Plan under Section 102(c) of the Workforce Innovation and Opportunity Act **and the development and submission of the State Plan under Sec. 122 of the Carl D. Perkins Career and Technical Education Act (20 USC 2342)**;

#### ***Clarify Distinct Cohort Definitions Across Accountability Metrics***

The statute's accountability framework relies on three distinct metrics—completion rates, job placement rates, and value-added earnings—each with different student cohort construction, inclusion criteria, and measurement timelines. The completion rate draws from all students who enroll in a program; placement rates are calculated for all completers; and the VAE calculation is limited to completers who received Pell Grants and who are working during the earnings measurement period, using a cohort from several years prior. Despite these differences in scope and timing, the proposed regulations do not clearly delineate how each metric's cohort is defined and how the exclusions under § 690.94(e) apply across all three measures.

This lack of clarity has the potential to create confusion for states and institutions attempting to operationalize these requirements. We urge ED to provide clear and precise definitions in the final rule. Alternatively and at minimum, ED should specify in accompanying subregulatory guidance which learners are included in the denominator and numerator of each metric, how the cohort periods align across the three measures, and how exclusions (such as those under § 690.94(e) and elsewhere) apply to each. Consistent and well-defined cohort specifications will be essential for states to build the data infrastructure and reporting processes needed to implement these requirements accurately and equitably across all eligible programs.

#### ***Invest in State Data Infrastructure and Provide Clear Federal Guidance***

The successful implementation of Workforce Pell will depend in no small part on states' ability to collect, link, and report data across education and workforce systems. Yet, these are capabilities that many states are still at different developmental stages. Calculating occupation-specific job

---

<sup>11</sup> One Big Beautiful Bill Act, Pub. L. No. 119-21, § 830002(b)(2)(iii)(I).

placement rates, linking education records with Unemployment Insurance (UI) wage records, and tracking outcomes for students in noncredit programs all require data infrastructure and systems coordination that does not yet exist in many states. Recognizing this, we appreciate ED's decision to provide a phased transition for completion and placement rate calculations, with governors using available administrative data through the 2028–29 award year. However, this transition period will only be meaningful if it is accompanied by concrete federal support. We recommend that ED take the following steps:

- **Clarify UI Data Access**: Issue joint guidance with the Department of Labor that explicitly authorizes and encourages states to match UI wage records with education data for Workforce Pell implementation purposes. Current DOL guidance narrowly limits UI data sharing to WIOA performance accountability, creating legal uncertainty for states that will need to use these wage records for Workforce Pell program oversight and implementation. This guidance gap must be addressed before the program launches.
- **Leverage Existing Data System Investment**: The Statewide Longitudinal Data System (SLDS) and Workforce Data Quality Initiative (WDQI) grant programs should be prioritized to support the data connectivity, noncredit program tracking, and data sharing that Workforce Pell requires. ED and DOL have already taken a similar approach with several recent grantmaking efforts in the last few months—future rounds of SLDS and WDQI grants focused on Workforce Pell data readiness would significantly accelerate state capacity in the years ahead.
- **Facilitate State Learning and Continuous Improvement**: Establish communities of practice where leading states can share technical strategies, data-sharing templates, and implementation lessons learned with states that are building these systems for the first time. Several states, many with existing programs to support shorter-term education and training programs, have already made significant progress in aligning their education and workforce data systems with accountability frameworks comparable to what Workforce Pell requires. Their experience should be systematically shared across the field and ED has a key role to play in such efforts.
- **Provide Directed Data Support for Institutions**: Provide specific subregulatory guidance that articulates the data elements, reporting timelines, and verification standards states and institutions must meet. States will need shared definitions, common reporting approaches, and clear specifications for how institution-reported data will be verified by ED and by governors. This guidance should be issued well in advance of the July 1, 2026, effective date to ensure the field has time to adequately prepare for implementation.

### ***Provide Adequate Implementation Resources for States***

Workforce Pell represents a substantial new set of responsibilities for governors, state agencies, and institutions, including the development of approval processes, data systems, reporting infrastructure, and interagency coordination mechanisms. These responsibilities come without any new dedicated federal funding for state-level implementation.

We urge ED to work with Congress and federal partners to identify resources—whether through existing discretionary grant programs, targeted technical assistance, or new appropriations—that can lawfully support states in standing up the administrative and data infrastructure needed for successful implementation. Without adequate support, states that are otherwise eager to implement this program may lack the resources to do so effectively, resulting in uneven

implementation across the nation that limits the program’s potential to expand access to high-quality career pathways and related programs. At the same time, however, we encourage ED and DOL not to redirect essential resources from other long-standing programs solely for this purpose, as merely shifting funding from one program to another does not address overall capacity in the system.

### ***Support Development of an Interim Value-Added Earnings Metric***

The NPRM notes that the first VAE calculation will not occur until the 2030–31 award year for programs that begin in 2026–27. This means that for the first four years of the program, eligible Workforce Pell programs will operate without any formal assessment of whether their tuition and fees are justified by the earnings outcomes they produce.

We are supportive of ED’s interest in developing an interim VAE metric and encourage the Department to move forward with this approach. An interim measure must not be punitive in the early phase of the rule’s implementation, but it should be calculated and made publicly available to inform prospective students and to give programs an early signal of whether they are on track to meet the statutory threshold when the official VAE calculation is scheduled to take effect. ED should work with governors and state leaders to identify the most reliable available data sources for this purpose and provide technical assistance to support consistent methodology across states.

### ***Leverage WIOA Infrastructure for Supportive Services and Student Completion***

Workforce Pell programs serve learner populations—including first-generation students, adult workers, and individuals re-entering the workforce—that often require wraparound supports to successfully complete shorter-term training. These supports can include transportation assistance, childcare, career navigation, and other services that are critical to completion but often will fall outside the immediate scope and likely use of Pell Grant funding. These limitations are also due, in part, to Workforce Pell grants being prorated based on program length, meaning aid amounts will be substantially lower than the current maximum Pell grant.

The public workforce system authorized by WIOA already provides many of these supportive services through local workforce development boards and American Job Centers. We encourage ED to issue guidance, in coordination with DOL, that clarifies how career and supportive services authorized under WIOA can be effectively braided with Workforce Pell to support learner completion and post-program employment. This guidance should address the interaction between the Pell grant program as first-dollar aid and WIOA funding and should help states and local workforce boards develop coordinated enrollment and referral processes that connect Workforce Pell students with available supports. Strengthening this coordination will be particularly important for meeting the 70 percent completion rate threshold, which will be difficult for many programs to achieve if students lack access to the non-tuition supports that are well documented to enable program completion.<sup>12</sup>

### ***Ensure Transparency in Governor Approval Processes and Program Outcomes***

We appreciate ED’s encouragement that governors maintain and publicly publish lists of eligible Workforce Pell programs. We urge ED to go further in the final rule by requiring that governor approval processes, criteria, and the resulting lists of approved programs be made publicly available in accessible, searchable formats as well. Greater transparency is essential for program accountability, for consumer protection, and for ensuring that prospective students can make

---

<sup>12</sup> <https://evidencebasedprograms.org/document/cuny-asap-evidence-summary/>

informed decisions about which pathways will lead to meaningful employment in their state and region.

We also support ED's exploration of publishing completion and placement rates for eligible Workforce Pell programs and encourage the Department to move forward with this effort. Public availability of outcomes data—including completion rates, placement rates, and, when available, earnings outcomes—will strengthen the program's accountability framework and provide prospective students, employers, and policymakers with the information they need to evaluate program quality. Wherever possible, this data should be integrated with existing federal transparency tools, such as the College Scorecard, to ensure broad accessibility and visibility and disaggregated by learner populations wherever possible.

---

We appreciate your consideration and the opportunity to provide these comments. The work of the AHEAD Committee negotiators in developing a consensus regulatory framework reflects the significant role states and CTE systems will play in Workforce Pell implementation. We look forward to continued engagement as ED finalizes these regulations and issues much needed sub-regulatory guidance for successful implementation. Should you have any questions or wish to further discuss the issues raised here, please do not hesitate to contact ACTE's Chief Policy, Research and Content Officer Alisha Hyslop ([ahyslop@acteonline.org](mailto:ahyslop@acteonline.org)) or Advance CTE's Policy Advisor Steve Voytek ([svoytek@careertech.org](mailto:svoytek@careertech.org)).

Sincerely,



LeAnn Curry  
Executive Director  
ACTE



Kate Kreamer  
Executive Director  
Advance CTE