



August 20, 2025

Department of Education  
Office of Postsecondary Education  
Docket No. ED-2025-OPE-0151

Re: Workforce Pell negotiated rulemaking committees

The Jobs and Careers Coalition is pleased to comment on the Education Department's declared intent to establish a negotiated rulemaking committee, the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee.

For nearly a decade, the business associations in our coalition have supported expanding the federal Pell Grant program to assist learners in short, agile community college workforce education programs. We were deeply pleased to see Workforce Pell included in the One Big Beautiful Bill Act, and we write to encourage that negotiated rulemaking for the future of federal student aid consider the employer perspective and include an employer voice.

The Jobs and Careers Coalition 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.

The economy is changing, and with it, America's need for high-quality workforce training. Technological change is transforming the workplace, driving sharply increased demand for skilled technical workers. A high school education is no longer enough to prepare job seekers for well-paying jobs in many evolving industries. But not all workers need an academic education, and many have neither the time nor the inclination to spend four years in pursuit of an academic degree.

Community colleges have an answer for learners like these: short, streamlined, skills-focused workforce education programs, often offered on the nonacademic or noncredit side of the college where students do not have to meet extraneous academic requirements. These programs serve learners in a hurry to acquire the skills they need to get a job or a better job. They also serve employers seeking to partner with colleges to provide workforce training – employers often find it easier to work with the agile, skills-oriented noncredit side of the college than with traditional academic educators on the credit side of the house.

The problem: even as noncredit workforce education has evolved, emerging over the past decade as a highly valued option for both learners and employers, the federal government has not kept up. Before passage of the One Big Beautiful Bill Act, federal Pell Grants were available only to students enrolled in semester-long college programs, and as a practical matter, most learners in noncredit programs were ineligible for federal financial aid.

The Big Beautiful Bill's Workforce Pell provisions are an important breakthrough – for learners, employers and regions seeking to attract businesses that employ skilled technical workers. But there are still many issues to be resolved during negotiated rulemaking, and we urge the department to ensure that employers have a robust voice in any conversation about how the government will implement the act.

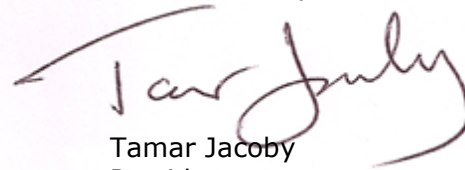
How is a governor to determine if college programs seeking to qualify for Workforce Pell provide instruction “aligned with the requirements of “high-skill, high-wage, or in-demand industry sectors or occupations,” as required by the law? How will he or she know if the training in question meets the hiring needs of local employers? How will states ascertain what postsecondary credentials are portable across companies in the state? Should apprenticeship programs be eligible for Workforce Pell? What about shorter apprenticeship-like earn-and-learning training?

These are just some of the questions that will need to be answered during negotiated rulemaking – and it’s hard to imagine resolving them adequately without ample, detailed, ongoing employer input.

We congratulate Congress on passage of Workforce Pell – a major step forward for employers and employees alike – and look forward to working with the Education Department to ensure that implementation makes the most of this historic legislative provision.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Tamar Jacoby", is written over a light pink rectangular background.

Tamar Jacoby  
President  
Opportunity America