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April 8, 2026

The Honorable Linda McMahon
Secretary
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Re: Docket ID ED-2026-OPE-0133

Dear Secretary McMahon,

I write in response to the Department of Education's (Department's) Notice of Proposed Rulemaking (NPRM) to implement changes to the Federal Pell Grant program in Public Law 119-21 (P.L. 119-21), including the creation of Workforce Pell Grants and the elimination of Pell Grants for students who receive full scholarships.¹

Workforce Pell Grants

P.L. 119-21 amends the *Higher Education Act* (HEA) to allow students in eligible short-term non-degree programs to access Workforce Pell Grants.² The NPRM establishes an approval process for the Department, states, and accreditors to work together to determine which programs are eligible to provide their students with Workforce Pell Grants. Specifically, the NPRM framework requires a governor to determine that a program: aligns with requirements of high-skill, high-wage, or in-demand sectors and occupations in their state; leads to a credential that is portable across multiple employers and stackable with other certificate or degree programs in the same field; and, has a job placement rate and completion rate of at least 70 percent. The NPRM also requires the Secretary of Education to evaluate whether that program's completers meet median earnings requirements and whether the institution is eligible to participate in programs authorized under title IV of HEA (Title IV).

Importance of Workforce Pell

¹ Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants, 91 Fed. Reg. 11378 (Mar. 9, 2026) (to be codified at 34 C.F.R. §§ 600, 668, 690) (*hereinafter* "NPRM").

² Pub. L. No. 119-21 §83002 (2025).

By 2031, roughly 72 percent of all jobs will require some level of postsecondary education or training³, and today, roughly one quarter of the workforce has earned some form of short-term, non-credit credential.⁴ Despite the increased demand for short-term training programs, adult learners are often unable to access high-quality training courses. This is due to rising costs coupled with decades of federal disinvestment in workforce development programs. Over the last four decades, federal spending on workforce development programs, including short-term training programs, has drastically declined, when adjusted for inflation.⁵ As a result, many individuals are left unable to cover the full cost of their education, keeping them from participating in short-term programs in the first place.

Congress has had a longstanding interest addressing the gap in funding while assessing the Federal Pell Grant program's expansion into certain high-quality short-term certificate programs.⁶ Most recently in 2023, I took this exact interest into consideration when I shepherded the passage of the *Bipartisan Workforce Pell Act* out of the House Committee on Education and Workforce.⁷

It is clear the *Bipartisan Workforce Pell Act* served as the foundation of the provisions in P.L. 119-21 that expanded Pell Grant access to students enrolled in short-term programs.⁸ This expansion can alleviate financial barriers many individuals face in accessing and completing short-term training programs, helping prepare workers to compete in the modern workforce. I am specifically eager for community colleges and their students to benefit from this expansion. While this NPRM provides individuals with more opportunities to gain in-demand skills, I believe additional guardrails are necessary to prevent the expansion of federal student aid to low-quality, predatory programs without additional guardrails.

Program Quality & Oversight

It is critical for the Department to establish a regulatory framework that ensures students access the highest-quality programs and prevents unscrupulous, low-quality providers from taking advantage of students and the federal student aid program. Any time the federal government expands access to federal student aid, strong guardrails must be put into place to protect students from low-quality programs and ensure students do not waste their finite federal student aid eligibility. Unfortunately, we are already experiencing an alarming trend shifting away from the traditional higher education program integrity model towards one that erodes oversight of

³ Anthony P. Carnevale et al., *After Everything: Projection of Jobs, Education, and Training Requirements through 2031, National Report*, Ctr. on Educ. & the Workforce, Georgetown U. 13 (2023), <https://cew.georgetown.edu/wp-content/uploads/Projections2031-National-Report.pdf>.

⁴ Amy Laitinen et al., *The Short-term Credentials Landscape: What We See and What Remains Unseen*, New America (May 5, 2021) <https://www.newamerica.org/insights/the-short-term-credentials-landscape/>.

⁵ Mary Clagget et al., *Recommendations for a Fully Funded and Transformed Workforce Development System*, Jobs for the Future (Mar. 25, 2024), <https://www.jff.org/idea/recommendations-for-a-fully-funded-and-transformed-workforce-development-system>.

⁶ See H.R. Rep. No. 118-337 (2023) (providing history and background of Short-Term Pell legislation) <https://www.congress.gov/118/crpt/hrpt337/CRPT-118hrpt337.pdf>.

⁷ *Id.* at 1 (2023).

⁸ Compare Pub. L. No. 119-21 § 83002 (a)-(b) with H.R. 6585 §§ 2-3, 118th Cong. (2023).

consumer protection laws and regulations.⁹ Thus, I suggest several changes to the proposed rule to close loopholes that allow low-quality programs to game the system.

The Department must protect students from low-quality non-Title IV providers by tightening the program outsourcing threshold.

Since developing online degree programs can be costly, many institutions of higher education contract with third-party entities to provide these services, including Online Program Management Companies (OPMs) and other non-Title IV eligible providers.¹⁰ These entities are incentivized to maximize profit with cost, quality, and transparency all optional concerns. Students, institutions, and taxpayers need to ensure institutions and the entities they partner with do business in ways that are transparent and accountable.¹¹ Numerous predatory non-Title IV eligible providers have defrauded students through practices such as misrepresenting labor market outcome expectations, pushing predatory education financing tools like income share agreements (ISAs), and aggressively collecting debt – all of which leave students worse off.¹² Given such practices, I am deeply concerned about the Trump Administration’s reticence to hold these providers accountable, especially given the gutting of the Consumer Financial Protection Bureau¹³, which, under previous Administrations worked to investigate these providers and enforce consumer protections.¹⁴

The NPRM allows colleges to outsource up to 25 percent of instruction to non-Title IV eligible providers.¹⁵ This is a stronger standard than current outsourcing restrictions of 50 percent for other Title IV eligible programs.¹⁶ This will protect students from low-quality, predatory programs and safeguard Title IV funding. I urge the Department to strengthen this threshold, or, at minimum, keep it at 25 percent, with no exception if such arrangements are approved by an accrediting agency as a substantive change. I also request the Department provide clarity in the

⁹ David Halperin, *Trump is Weak on Protecting Americans from Overpriced, Deceptive Colleges*, Republic Report (Mar. 3, 2026), <https://www.republicreport.org/2026/trump-is-weak-on-protecting-americans-from-overpriced-deceptive-colleges/>; Wesley Whistle, *Outsourcing Accreditor Oversight to States: A bad Idea in the Making: Why Letting States Approve Accreditors Puts Students and Taxpayers at Risk*, New America (Jun. 25, 2025), <https://www.newamerica.org/education-policy/edcentral/outsourcing-accreditor-oversight-to-states-a-bad-idea-in-the-making/>.

¹⁰ Lindsay McKenzie, *A Tipping Point for OPM?*, Inside Higher Ed (Jun. 3, 2018), <https://www.insidehighered.com/digital-learning/article/2018/06/04/shakeout-coming-online-program-management-companies>.

¹¹ NPRM at 11433.

¹² Chris Madaio, *An Emerging Threat: States Need to Protect Students from Harmful Short-Term Certificate Programs*, The Inst. for Coll. Access & Success (Jun. 9, 2025), <https://ticas.org/accountability/consumer-protection-state-action-blog-june-2025/>.

¹³ Christopher Rugaber, *Vought orders CFPB to stop investigations and suspend new rules from taking effect*, PBS News (Feb. 9, 2025), <https://www.pbs.org/newshour/politics/vought-orders-cfpb-to-stop-investigations-and-suspend-new-rules-from-taking-effect>; Douglas Gillison & Tim Reid, *US consumer watchdog says it will lay off most remaining staff*, Reuters (Apr. 17, 2025), <https://www.reuters.com/world/us/us-consumer-watchdog-says-it-will-lay-off-most-remaining-staff-2025-04-17/>.

¹⁴ See, e.g., Press Release, Consumer Financial Protection Bureau, CFPB Takes Action Against Coding Boot Camp BloomTech and CEO Austen Allred for Deceiving Students and Hiding Loan Costs (Apr. 17, 2024), <https://www.reuters.com/world/us/us-consumer-watchdog-says-it-will-lay-off-most-remaining-staff-2025-04-17/>.

¹⁵ NPRM at 11432.

¹⁶ 34 C.F.R. § 668.5.

final rule around the definition of an ineligible institution. In doing so, the Department must make clear that the involvement of third-party servicers constitutes program outsourcing, regardless of any bundled student support services the entity provides. As a reminder, this concern was discussed during negotiated rulemaking but failed to make it into the NPRM.

The Department must require substantive change reviews for non-credit programs.

When colleges make significant changes to their programs, including changing program length, credit type, delivery method, or curriculum, federal regulation requires them to go through a substantive change review with their accreditor.¹⁷ In the context of accrediting non-credit programs, this review would ensure that non-credit programs are rigorously evaluated by an institution's accreditor and deemed appropriate for the institution's scope of accreditation. Regrettably, the NPRM is silent on substantive change reviews in this context. Therefore, the Department should include language mandating that institutions that make significant changes to their accredited non-degree programs must seek substantive change reviews from their accreditors for such non-credit programs prior to program approval. I also urge the Department to clarify that the substantive change reviews should not be approved without confirmation of the program's stackability to other credit-bearing programs, as required by P.L. 119-21.¹⁸

The Department should retain the proposed bilateral agreement framework for online programs operating in multiple states.

Although more students are participating in online education, a disparity in learning outcomes between exclusive online education and in-person instruction delivery continues to persist.¹⁹ Despite this disparity, online classes are often the only way for many students to access affordable higher education programs. Thus, it is critical for the federal government to hold online programs accountable for providing their students with the same academic quality and support services, for a similar price, as their peers taking classes on a physical campus.

To address some of the concerns with online programs, the NPRM establishes a bilateral agreement framework that allows students to enroll in an online distance program located in another state, so long as the program leads to a high-skill, high-wage, or in-demand field in the student's home state.²⁰ The bilateral agreement that states must enter into would also require both states to implement data-sharing for purposes of calculating completion and job placement rates. I applaud this framework and urge the Department not to weaken it, as bilateral agreements ensure students can only access online programs that help address local and state workforce needs. These agreements will also hopefully serve as a backstop preventing the rapid scaling of low-quality online programs, a race to the bottom often led by unregulated third-party

¹⁷ 34 C.F.R. § 602.22.

¹⁸ While P.L. 119-21 states that the Governor will determine whether a program leads to a recognized postsecondary credential that is stackable and portable, the accreditor should confirm this has been achieved prior to substantive review change approvals.

¹⁹ Justin Ortagus et al., *The Problem with Exclusively Online Degree Programs*, The Century Found. (Nov. 14, 2023), <https://tcf.org/content/commentary/the-problem-with-exclusively-online-degree-programs/>.

²⁰ NPRM at 11434.

servicers and for-profit colleges.²¹ We must continue to provide sufficient oversight of online programs in the short-term credential space.

Data Collection, Reporting, and Evaluation

For the Workforce Pell Grant program to be successful, it is essential to establish a robust and well-functioning data collection, reporting, and evaluation system. A gold rush mentality, where states and the Department rush to approve as many programs as possible will lead to disaster, as it has in the past.²² Instead, it is critical for states to take a thoughtful approach by establishing strong coordination across higher education and workforce development systems, developing or scaling up comprehensive data systems, and standing up programs best-equipped to be served by Workforce Pell Grants. To support this, I expect the Department to set high standards for data collection requirements while also providing robust guidance and technical assistance for states and institutions. Clear guidance and thorough evaluation will help the field understand how to best target this new federal funding stream.

The Department must establish a pre-approval data collection and enforcement mechanism for value-added earnings requirements.

To be eligible for Workforce Pell Grants, programs must show that their graduates have a positive return on investment through a newly established value-added earnings requirement, which compares the cost of a program to a completers' median discretionary earnings. The NPRM establishes a process for institutions to report this data; however, there is no enforcement of the value-added earnings metric until several years after a program is approved. As drafted, states are not required to calculate or report earnings to the Department for new programs.

The Department is seeking feedback on whether it should develop an interim earnings metric that programs must meet at "initial consideration of eligibility".²³ Due to this new expansion of federal student aid, I strongly urge the Department to develop an interim earnings metric that programs must meet prior to receiving Workforce Pell Grant approval and to make public this initial data. Without this mechanism, we risk letting students waste their Pell Grant eligibility on high-cost and/or low-quality programs that are not serving students or meeting the local workforce demands.²⁴ Since P.L. 119-21 requires programs to be in existence for one year prior to program approval, I also suggest the Department encourage colleges to begin collecting completion and job placement rates to demonstrate their ability to meet these common sense metrics, in addition to value-added earnings, prior to receiving Workforce Pell Grants.

The Department should exclude from the job placement rate any completers who enroll in further higher education.

²¹ Ortagus, *supra* note 19; Stephanie Hall & Taela Dudley, *Dear Colleges: Take Control of Your Online Classes*, The Century Found. (Sep. 12, 2019), <https://tcf.org/content/report/dear-colleges-take-control-online-courses/>.

²² See generally, Robert Shireman, *The For-Profit College Story: Scandal, Regulate, Forget, Repeat*, The Century Found. (Jan. 24, 2017) (highlighting abusive practices by for-profit institutions when access to federal student aid was expanded).

²³ NPRM at 11381.

²⁴ Stephanie Cellini et al., *PEER Center Comments: Regulations to Implement the Reconciliation Law*, Postsec. Educ. And Econ. Rsch. Center, 6 (Aug. 28, 2025), <https://peer-center.squarespace.com/research/comments-reconciliation-rulemaking>.

This NPRM requires programs to lead to a stackable and portable credential.²⁵ This creates an opportunity for learners to pursue stackable programs which allow them to either immediately enter the workforce or use earned certifications to pursue additional postsecondary credentials. Program stackability incentivizes colleges to build and maintain career pathways and ensures long-term employability and wage progression for learners.²⁶ The NPRM proposes categorizing program completers who enroll in college as unemployed. This will skew placement rates for high-quality programs that lead to stackable credentials. It also provides no incentive for institutions to encourage students to enroll in additional postsecondary education. Therefore, I ask the Department to exclude students who enroll in further education from the 70 percent job completion rate. I also encourage the Department to track program completers who continue their education through stackable credentials.

The Department should ensure enrollment of bachelor’s degree graduates does not skew program outcomes.

The NPRM allows bachelor’s degree graduates to access Workforce Pell grants so long as they are not enrolled in graduate-level coursework.²⁷ Since these students will likely have no issues meeting the outcomes requirements due to higher earnings associated with bachelor’s degrees²⁸, they should not be factored the same as students with no degree. The Department should either exclude these students from the earnings calculations entirely or develop a separate calculation for students with bachelor’s degrees. Such a calculation would take into consideration the program-level earnings requirements under the new accountability framework for degree programs expected to be finalized soon through negotiated rulemaking.²⁹ I also urge the Department to consider additional limitations to prevent institutions from arbitrarily inflating the value of their certificate programs purely through enrolling students with bachelor’s degrees or creating programs for post-baccalaureate students who may not need an additional credential to be successful in their field. These changes will force programs to prioritize the completion rates and earnings increases of all students, without relying on those who already have an advantage in the labor market.

The Department should require states to include approved programs on their Eligible Training Provider List.

I am pleased that the NPRM encourages states to “maintain and publish a list of eligible workforce programs in their State.”³⁰ However, I believe the Department should go a step further and expressly *require* states to publish these eligible workforce programs. The programs should be listed as part of the state’s Eligible Training Provider List (ETPL), where states are

²⁵ Wesley Whistle & Lanae Erickson, *Q&A: Expanding Pell Grants to Shorter-Term Programs*, Third Way (Jun. 25, 2019), <https://www.thirdway.org/memo/q-a-expanding-pell-grants-to-shorter-term-programs>.

²⁶ Wesley Whistle, *Why Workforce Pell Implementation Matters Beyond July 2026*, New America (Feb. 9, 2026), <https://www.newamerica.org/insights/why-workforce-pell-implementation-matters-beyond-july-2026/>

²⁷ NPRM at 11432.

²⁸ Annual Earnings by Educational Attainment, Condition of Education, Nat’l Ctr. For Educ. Stats, Inst. of Educ. Sciences, U.S. Dep’t of Educ. (2024), <https://nces.ed.gov/programs/coe/indicator/cba/annual-earnings>.

²⁹ *ED Reaches Consensus on Proposed Regulations for Higher Education Accountability*, Inst. for Higher Educ. Pol. (Jan. 14, 2026), <https://www.ihep.org/ed-reaches-consensus-on-proposed-regulations-for-higher-education-accountability/>.

³⁰ NPRM at 11396.

already required to publish all training providers eligible to participate in programs under the *Workforce Innovation and Opportunity Act* (WIOA). By incorporating programs eligible for Workforce Pell into a state's ETPL, states can minimize any administrative redundancies that may come with establishing a new eligible workforce program list. This requirement will also provide students with an accessible and comprehensive list of where they may utilize federal funding to advance their skills and education.

The Department should provide thorough technical assistance to states and institutions.

For institutions and states to successfully leverage Workforce Pell Grants as a tool for postsecondary education access, the Department must provide robust support at every step of the process. Many states are recognizing a “sobering reality” that they are “not yet equipped to meet the data demands” of the Workforce Pell Grant program,³¹ as there has been limited formalized data collection on the outcomes of short-term and non-credit programs.³² Many states that lack a sufficiently strong data system to provide the data required for program approval are now working to increase their capacity to scale data systems up accordingly.³³

Although this would not be incorporated into the final regulatory language, the Department should publicly commit to providing robust technical assistance to states as they build out their data reporting systems and provide institutions, financial aid officers, and workforce partners comprehensive resources to navigate the interactions between Workforce Pell Grants, WIOA programs, apprenticeship programs³⁴, other federal student aid programs, and Title IV compliance requirements. Given the multitude of other changes that colleges are expected to respond to, including admissions data reporting and the implementation of other components of P.L. 119-21, it is also critical for the Department to work with institutions to provide clear and easy ways to report the required data while remaining compliant with these other competing requirements.

Department of Education Dismantling

For Workforce Pell Grants to serve as a useful affordability tool, the Department should be fully functional and must ensure states and colleges are ready to implement changes. Unfortunately, the ongoing dismantling of the Department risks weakening the success of this program. Therefore, the Department must assure Congress of its ability to faithfully implement the law. I am deeply concerned that the Department's capacity to implement Workforce Pell will be negatively impacted by the ongoing dismantling of the Department. The Department has

³¹ *Workforce Pell is Here and Data Readiness Is the Real Test for Credential Innovation*, Amer. Assoc'n. of Collegiate Registrars and Admissions Officers (Mar 2, 2026), <https://www.aacrao.org/resources/newsletters-blogs/aacrao-connect/article/workforce-pell-is-here-and-data-readiness-is-the-real-test-for-credential-innovation>.

³² Laura Ullrich & Jacob Walker, *Non-Credit Workforce Programs at Community Colleges*, Fed. Res. Bank of Richmond (Feb. 22, 2024), https://www.richmondfed.org/region_communities/regional_data_analysis/regional_matters/2024/rm_02_22_24_no_ncredit_workforce_programs; Wesley Wistle, *Workforce Pell Is a State Data Policy*, New America (Feb. 25, 2026), <https://www.newamerica.org/insights/workforce-pell-is-a-state-data-policy/>.

³³ Angela Perry, *What States Can Do Now to Get Ready for Workforce Pell*, Data Quality Campaign (Mar. 10, 2026), <https://dataqualitycampaign.org/what-states-can-do-now-to-get-ready-for-workforce-pell/>.

³⁴ Wesley Whistle, *Making Workforce Pell Work for Registered Apprenticeships*, New America (Jan. 22, 2026), <https://www.newamerica.org/insights/making-workforce-pell-work-for-registered-apprenticeships/>.

conducted a mass reduction in force³⁵ and notably offloaded responsibilities through ten interagency agreements³⁶, including most recently an attempt to move core functions of the Office of Federal Student Aid (FSA) to the Treasury Department.³⁷ In March, the Department announced that the Treasury Department will eventually “provide operational support” beyond defaulted loans.³⁸ There has been no consideration of these changes within the NPRM, and I have no confidence that this Administration will faithfully implement the law while trying to close the doors at the Department.

While coordination between the Department and the Department of Labor (DOL) on aligning Workforce Pell Grant requirements with other workforce development programs would be appropriate, I have concerns about the Trump Administration’s ability to faithfully comply with the law following the illegal moving of postsecondary and career and technical education programs to DOL. Therefore, consistent with P.L. 119-21, I expect the Department to clearly delineate in regulations that all implementation and oversight responsibilities of the Workforce Pell Grant program be done solely at the Department of Education. I will also continue to conduct robust oversight on the Department’s implementation of this law in accordance with its other statutory responsibilities to protect Title IV funding against waste, fraud, and abuse.

Pell Grant Restrictions

P.L. 119-21 prevents students from receiving Pell Grants if they also receive any grants or scholarships from non-Federal sources (including state and institutional aid and private scholarships) that equals or exceeds a student’s cost of attendance.³⁹ While this may not impact a significant number of students, I am deeply concerned about setting a precedent of reducing federal student aid eligibility due to outside grants and scholarships. Without a Pell Grant, many of these low-income students may “still have high financial need and will struggle to cover [college] costs.”⁴⁰ We should not penalize low-income students simply because they may need additional funding to address their basic needs while in college, especially at a time when families across the country are facing a severe affordability crisis.⁴¹ Despite the Department’s concerns about institutions working to circumvent this harmful law⁴², it is crucial the Department ensure the fewest number of students lose their Pell Grant eligibility due to this new restriction and to provide institutions with clear guidance for how to support students who would otherwise

³⁵ Press Release, U.S. Dep’t of Educ., U.S. Department of Education Initiates Reduction in Force (Mar. 11, 2025), <https://www.ed.gov/about/news/press-release/us-department-of-education-initiates-reduction-force>.

³⁶ Kara Arundel, *Congress green-lights education interagency agreements – with reservations*, K-12 Dive (Feb. 23, 2026) <https://www.k12dive.com/news/congress-education-department-interagency-agreements/812492/>.

³⁷ Press Release, U.S. Dep’t of Educ., U.S. Department of Education and U.S. Department of Treasury Announce Historic Federal Student Assistance Partnership (Mar. 19, 2026), <https://www.ed.gov/about/news/press-release/us-department-of-education-and-us-department-of-treasury-announce-historic-federal-student-assistance-partnership>.

³⁸ *Id.*

³⁹ Pub. L. No. 119-21 §83004 (2025).

⁴⁰ Michele Zampini, *How the Reconciliation Law Changes the Pell Grant Program*, The Inst. for Col. Access & Success (Jul. 24, 2025), <https://ticas.org/affordability-2/reconciliation-2025-pell/>.

⁴¹ Angela Hanks & Julie Margetta Morgan, *Survey: The Affordability Crisis is Here, and It’s Hitting the Working Class the Hardest*, The Century Found. (Dec. 11, 2025), <https://tcf.org/content/report/survey-the-affordability-crisis-is-here-and-its-hitting-the-working-class-the-hardest/>.

⁴² NPRM at 11385.

The Honorable Linda McMahon

April 8, 2026

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be Pell-eligible. I also look forward to Congress reversing this detrimental policy through legislation.

Conclusion

In conclusion, the Department has a responsibility to make sure Workforce Pell implementation benefits, rather than harms, our students. I urge the Department to put students first and ensure only high-quality short-term programs are eligible to participate in the Workforce Pell Grant Program to prepare individuals for the everchanging workforce landscape.

Sincerely,



ROBERT C. "BOBBY" SCOTT
Ranking Member