



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

November 17, 2025

Dear Secretary McMahon,

The National College Attainment Network (NCAN) represents more than 500 college access and success programs nationwide. Our members help students navigate their postsecondary options and make informed decisions about which pathway best supports their career aspirations. Through this work, we witness firsthand the challenges students face in identifying affordable programs that align with their goals and lead to quality employment. We write to share our recommendations for implementing the *One Big Beautiful Bill Act*, enacted on July 1, 2025, including work that will be covered by the AHEAD negotiated rulemaking committee.

Workforce Pell

The new Workforce Pell (WFP) program brings great opportunities and some critical risks. Many students will be able to acquire new skills and obtain better jobs. Others could get sidetracked and use up enough of their lifetime Pell eligibility to put an associate or bachelor's degree out of reach if it turns out to be something they want to pursue later on. To ensure WFP serves students and taxpayers well, we recommend that the U.S. Department of Education include the following protections in the regulations that will be covered by the AHEAD committee:

- **Require Clear Consumer Information** – Before enrolling, students need clear information about how a Workforce Pell program will affect their future options. Without this, they cannot make informed decisions about whether a short-term program aligns with their long-term goals or which programs best serve their needs.

We recommend that institutions be required to provide prospective students with clear, upfront information about:

- ***Remaining Pell eligibility*** – The amount of lifetime Pell eligibility the program will use up
- ***Expected earnings*** – Median annual earnings for the program, to help students understand their likely outcomes in their chosen occupation and/or job
- ***Pathways to further education*** – The stackable credentials and degree programs available to them at that institution and others if applicable, if they complete the Workforce Pell program.

This recommendation mirrors existing federal loan counseling requirements, which help students understand their total debt, monthly payments, and repayment timeline before borrowing. Just as loan counseling helps students assess whether they can afford to repay their debt, Workforce Pell counseling would help students evaluate the likely return on investment and understand the trade-offs of using their limited federal aid on a short-term program.

- **Notify Students When They Have Used Up 200% and 400% of Their Annual Pell Eligibility** – To help students maximize their Pell eligibility on education and training programs that best prepare them for good jobs, we recommend notifying them when they have used 200% and 400% of their annual Pell eligibility on their FAFSA Submission summary and via email. Studentaid.gov provides a clear and useful dashboard where students can see how much Pell they have used and how much they have left. This system is updated when postsecondary institutions report Pell disbursements to COD. Schools are notified when students have used 450% of their Pell eligibility so that they do not over-award Pell. But students are not proactively notified about their remaining Pell eligibility at all under the current approach. They have to log on to studentaid.gov and navigate to the My Aid section to see this information, which many do not even know to do. By sending students an email and including a flag on their FAFSA Submission Summaries when they have reached 200% and 400% of lifetime eligibility usage (LEU), Federal Student Aid will help students to make wise decisions about their taxpayer-funded education and training.

The statute requires Workforce Pell programs to lead to stackable credentials, which reflects a clear legislative intent to allow students who complete short-term programs to retain sufficient Pell eligibility to pursue additional credentials and degrees throughout their lives. Notifying students when they have used two and four years of Pell, respectively, and have only four/two years remaining will help honor this intent.

- **Require States to Establish an Evidence-Based Approval Process** – States must establish rigorous, data-driven processes for approving Workforce Pell programs to ensure students enroll in high-quality programs that deliver on their promise of gainful employment and educational advancement. Such a process should include:
 - ***Prioritizing programs with proven stacking outcomes*** – While the statute requires programs to be stackable, the best measure of stackability is the share of students that continue their education. States should prioritize approving programs with demonstrated track records of students using them as stepping stones to further credentials and degrees. When evaluating whether to approve a program, states should assess the percentage of completers who go on to earn additional credentials and degrees, not just whether pathways exist on paper.
 - ***Establishing clear review processes and timelines*** – To maintain program quality over time, states should be required to establish:
 - **Initial review standards** – A defined timeline for reviewing new programs seeking approval
 - **Periodic re-evaluation** – A schedule for revisiting the approved program list every two years (annual reviews may be too burdensome and could delay timely student aid)
 - **Removal procedures** – A clear process for removing programs that fail to meet established performance criteria.

This framework would ensure that Workforce Pell approval is not a one-time decision, but an ongoing commitment to program quality based on actual student outcomes and reflects changes in an area's job market and local or regional economy. WFP programs can put a student on an improved economic path, but only if they lead to jobs and further education and training that is in-demand and high wage.

- **Calculate Workforce Pell Awards as a Fraction of the Maximum Standard Pell Award** – Calculating lifetime eligibility usage LEU will be complicated for students at Workforce Pell programs because students with the same Student Aid Index (SAI) may receive different Pell Grant amounts based on the duration and hours of the Workforce Pell program that they attend. The Department's COD system assumes that all students with the same SAI have the same total maximum annual Pell award and that each semester's Pell usage can be subtracted in equivalent intervals. To make it possible for

the COD to maintain accurate LEU calculations with varying award levels for students with identical SAIs and ensure that students are able to use their entire LEU, the regulations should require that awards are calculated as a percentage of the total amount of the standard maximum for the regular Pell Grant that would be available to the student.

Pell Grant Prohibition on Students Receiving Full Rides

- **Preserve Pell as First-Dollar Aid** – We support the statutory prohibition on awarding Pell Grants to students whose aid packages exceed the cost of attendance. However, the law was intended to address a very narrow circumstance that affects a small number of students. We urge the Department to confirm the longstanding treatment of Pell Grants as first dollar and the foundation of student aid packages, as outlined in the Federal Student Aid Handbook.

Institutions currently manage aid packages that exceed the cost of attendance by reducing institutional aid or working with outside scholarship organizations to delay disbursements. This approach protects students' Pell entitlement while ensuring compliance with cost-of-attendance limits. The regulations should affirm this practice.

Thank you for considering our recommendations. We would be happy to discuss them with you at your convenience. Please reach out to Catherine Brown (brownc@ncan.org) with any questions.

Sincerely,

Kim Cook

CEO, NCAN