
A coalition of workforce development organizations: Advance CTE, Association for Career and Technical Education, Data Quality Campaign, Local Initiatives Support Corporation (LISC), Midwest Urban Strategies, National Association of Regional Councils, National Association of Workforce Boards (NAWB), National Skills Coalition

August 25, 2025

Tamy Abernathy
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue SW, 5th Floor
Washington, DC 20202

Re: Public Hearing Notice “Negotiated Rulemaking Committees” (Docket ID ED-2025-0151)

Dear Ms. Abernathy:

The undersigned organizations write in response to the U.S. Department of Education’s (ED) recent Federal Register notice announcing its intent to establish two negotiated rulemaking committees to implement recent statutory changes to Title IV programs authorized by the Higher Education Act. Specifically, we are writing regarding the creation of the *Accountability in Higher Education and Access through Demand-driven Workforce PELL* (AHEAD) Committee to **recommend that a workforce development subject matter expert be added and designated as a non-voting advisory member to the AHEAD Committee.**

We are encouraged that the AHEAD Committee is set to include representation from a wide array of stakeholders that will be impacted by the newly created Workforce Pell Grant program including state workforce entities and groups representing the employer community. However, as proposed, three-quarters of the AHEAD committee includes constituency groups representing the higher education sector with only one slot afforded specifically for workforce development. As you are aware, the Workforce Pell Grant program will require significant alignment with the public workforce systems and a deep understanding of related federal, state, and local processes to ensure the program is implemented with fidelity.

For example, Workforce Pell Grant program eligibility hinges on state-defined alignment with high-skill, high-wage, and in-demand occupations as defined under the Carl D. Perkins Career and Technical Education Act (Perkins V) and the Workforce Innovation and Opportunity Act (WIOA), “verified” job placement and completion rates, and a new “value-added” earnings threshold based on labor market information and wage data. Governors and state workforce boards will play a central role in determining program alignment with employer needs but

often in different ways tailored to the unique needs of their communities. Successful implementation of this program will also require the creation of transparent and interoperable datasets and sources—including wage records and clear, comparable information about program credentials and outcomes—as well as mechanisms to ensure secure access that preserve individuals’ privacy.

A workforce development subject matter expert would provide critical technical expertise on labor market analytics, credential quality and portability, regional and sectoral differences, practical strategies for ensuring effective state-federal coordination, and up-to-date knowledge about wider workforce development trends. This expertise is essential to ensure that these negotiations are informed by the latest evidence and best practices so that regulations developed by the AHEAD Committee are both rigorous and workable while avoiding unintended barriers to the creation of high-quality, programs aligned with the needs of the American economy.

Accordingly, we respectfully request that ED modify the AHEAD Committee’s structure to include a workforce development subject matter expert to serve as a non-voting advisory member to the AHEAD Committee. Thank you for your thoughtful consideration of this request. Our organizations stand ready to provide further input as these efforts move forward this year.

Sincerely,

Advance CTE

Association for Career and Technical Education

Data Quality Campaign

Local Initiatives Support Corporation (LISC)

Midwest Urban Strategies

National Association of Regional Councils

National Association of Workforce Boards (NAWB)

National Skills Coalition