

April 8, 2026

The Honorable Linda McMahon
Secretary
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Ave., SW
Washington, DC 20202

Re: Docket ID ED-2026-OPE-0133 – Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants

Dear Secretary McMahon:

On behalf of the undersigned organizations representing construction industry employers and workforce development providers, we appreciate the opportunity to submit comments¹ on the U.S. Department of Education’s Notice of Proposed Rulemaking (NPRM)² to implement the Workforce Pell Grant program.³

We commend efforts by the U.S. Department of Education (the Department) and the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee⁴ for developing consensus language through the negotiated rulemaking⁵ under a tight timeline that is the backbone of this NPRM to expand access to short-term, high-quality workforce development programs aligned with in-demand careers.

Construction Industry’s Interest in Workforce Pell Expansion

The construction industry faces a persistent and growing workforce shortage that threatens the timely delivery of critical infrastructure, energy, manufacturing, telecom, data centers, and housing projects. Industry estimates indicate that the construction sector needs almost 350,000 additional workers to meet current demand in 2026,⁶ and the electrical industry alone

¹ Comments posted for public review at <https://www.regulations.gov/document/ED-2026-OPE-0133-0001>.

² <https://www.federalregister.gov/documents/2026/03/09/2026-04520/accountability-in-higher-education-and-access-through-demand-driven-workforce-pell-grant>.

³ The Workforce Pell was made possible via changes to Title IV of the Higher Education Act included in Pub. L. 119-21—known as the One Big Beautiful Bill Act (H.R. 1)—and later the Working Families Tax Cut Act, passed by Congress via a simple majority budget reconciliation process that President Trump signed into law on July 4, 2025 Subtitle D, Section 83002 of the bill amends Section 401 of the Higher Education Act of 1965 (U.S.C. 1070a) to include Workforce Pell Grants.

⁴ <https://www.federalregister.gov/d/2026-04520/p-123>.

⁵ <https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/higher-education-policy/negotiated-rulemaking-for-higher-education-2025-2026#ahead-committee>.

⁶ <https://www.abc.org/News-Media/News-Releases/abc-construction-industry-must-attract-349000-workers-in-2026-despite-macroeconomic-headwinds>.

must recruit and develop approximately 80,000 net new electricians each year for the next decade⁷ to keep pace with growth and retirements.

At the same time, the Trump administration has set an ambitious goal of expanding the nation's apprenticeship system to create one million new active apprentices⁸ and meet the challenge of America's skilled labor shortage⁹ and Artificial Intelligence dominance¹⁰ goals.

Workforce Pell Grants, if implemented effectively, can play a critical role in achieving these objectives by expanding access to career pathways in the skilled trades and financing the classroom component of workforce development and government-registered apprenticeship programs (RAPs).

We support and align with the broader employer community, which has long advocated for Workforce Pell funding as a means to better integrate employer-driven workforce development programs into the federal student aid system. Ensuring that programs focused on workforce outcomes can meaningfully benefit from Workforce Pell funding will be essential to achieving the Workforce Pell program's intended economic and workforce outcomes.

We also encourage the Department to ensure that Workforce Pell implementation reflects the principles discussed during the negotiated rulemaking process, including the need for flexibility, reduced administrative burden, and strong alignment with employer-driven workforce needs. Policies that are overly rigid or administratively complex risk limiting innovation and hindering the expansion of high-quality and employer-aligned workforce development programs in critical industries such as construction.

We are particularly encouraged that the proposed rule recognizes the potential eligibility of RAPs, as advocated by construction industry¹¹ and apprenticeship¹² stakeholders to the AHEAD Committee. Construction industry apprenticeship programs are a proven, employer-driven model that combines paid On-The-Job (OTJ) learning with structured classroom-based Related Technical Instruction (RTI) and leads to industry-recognized credentials and long-term career opportunities. Apprentices are typically full-time employees, are mentored on a construction jobsite, and receive progressive wage increases, usually leading to a nationally recognized credential upon completion of four- to five-year programs. In typical construction

⁷ See <https://ieci.org/merit-shop-construction-workforce-reaches-record-high/> and <https://ieci.org/pre-apprenticeship-program-accelerates-career-path-for-aspiring-electricians/>.

⁸ See White House Executive Order 14278, Preparing Americans for High-Paying Skilled Trade Jobs of the Future, April 23, 2025, <https://www.federalregister.gov/documents/2025/04/28/2025-07369/preparing-americans-for-high-paying-skilled-trade-jobs-of-the-future>.

⁹ See the U.S. Departments of Labor, Commerce, and Education report, America's Talent Strategy: Building the Workforce for the Golden Age, August 12, 2025. <https://www.dol.gov/sites/dolgov/files/OPA/newsreleases/2025/08/Americas-Talent-Strategy-Building-the-Workforce-for-the-Golden-Age.pdf>.

¹⁰ See workforce development section of the White House report, Winning the Race: America's AI Action Plan, July 2025, <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf#page=20>.

¹¹ See <https://www.regulations.gov/comment/ED-2025-OPE-0151-1097>.

¹² See <https://www.regulations.gov/comment/ED-2025-OPE-0151-0631>.

industry “earn-while-you-learn” RAPs, a minimum of 144 hours of RTI is recommended for every 2,000 hours of OJT.¹³

Despite the benefits of RAPs, more can be done to attract students, new providers, and employer participants to meet construction industry demand.¹⁴

According to DOL apprenticeship data composed of states reporting through RAPIDS¹⁵ and accounting for incomplete federal data from several states,¹⁶ the U.S. had between 313,000 and 336,000 construction industry apprentices in FY2025, which is roughly 47% of America’s apprenticeship enrollment across all industries. Even using generous estimates, the construction industry’s RAP system is producing only about 38,000 to 43,000 completers annually—far short of the construction industry’s workforce needs of roughly 350,000 workers in 2026.

Workforce Pell has the potential to increase the number of RAP providers and participants, but we are concerned that several aspects of the proposed rule, while well-intentioned, may not fully align with the structure and delivery of construction apprenticeship and other employer-sponsored workforce development programs. Without targeted adjustments, these provisions could unintentionally limit the ability of high-quality, demand-driven workforce development programs to participate in Workforce Pell, and, in turn, limit the program’s ability to support the Trump administration’s apprenticeship and talent expansion goals.

We respectfully offer the following recommendations to ensure that Workforce Pell implementation reflects the realities of employer-led workforce development and supports successful apprenticeship pathways.

To improve implementation of the proposed regulations, we recommend the Department revise the following provisions in the NPRM, including §§ 668.5(c), 690.93, and 690.94, as described below.

1. Increase Flexibility for Employer and Industry Workforce Development Providers

¹³ This standard is established through federal regulations governing RAPs, specifically under [29 CFR Part 29](#) (Labor Standards for the Registration of Apprenticeship Programs). See also <https://www.apprenticeship.gov/sites/default/files/bulletins/2026-01%20Registered%20Apprenticeship%20Training%20Approaches.pdf>.

¹⁴ To understand the challenges with the construction industry’s government-registered apprenticeship program system, review more than 40 pages of [comments](#) ABC submitted in response to the Biden DOL’s controversial [proposed rule](#), National Apprenticeship System Enhancements (RIN 1205-AC14), urging the DOL to withdraw its misguided proposed rule, which the Biden administration eventually [withdrew](#) in December 2024. In addition, see IEC’s comments on the NPRM at <https://www.regulations.gov/comment/ETA-2023-0004-2095>.

¹⁵ See U.S. DOL Apprenticeship USA Data and Statistics at <https://www.apprenticeship.gov/data-and-statistics>, which found a total of 267,678 participants and 33,041 completers of construction industry registered apprenticeship programs in FY 2025.

¹⁶ RAPIDS did not receive data from CT, NY, and OR, and the data for MA, MD, NV, WA, and WI is incomplete for the construction industry. Models estimating missing and underreported state data benchmark against peer states in the DOL dataset with a similar population, construction intensity, and apprenticeship utilization.

The proposed limitation that no more than 25% of a Workforce Pell-eligible program may be delivered by an ineligible provider¹⁷ does not reflect the structure of high-quality construction industry apprenticeship and workforce development programs.

In the construction industry's workforce development ecosystem, employer associations, contractor-operated workforce development programs, and vocational and Career and Technical Education schools, and community workforce development programs are generally not Title IV-participating institutions,¹⁸ yet they deliver a substantial majority of classroom instruction, credentialing, academic alignment, and administrative oversight. These stakeholders are essential to ensuring that workforce development remains aligned with real-world job requirements and evolving industry standards.

We urge the Department to increase the allowable percentage of instruction that may be delivered by an ineligible provider from 25% to at least 50%, particularly where such arrangements are reviewed and approved by an accrediting agency.

We further recommend that the Department provide additional flexibility for programs aligned with RAPs, where industry providers are often best positioned to deliver instruction and have teachers, materials, equipment, and space for classroom instruction that can be scaled efficiently with additional enrollment.

The proposed 25% cap may also disproportionately impact rural and underserved areas, where partnerships between employer-led workforce development programs and eligible institutions are essential to maintaining access to workforce upskilling. Additionally, such partnerships often serve as critical feeder systems into in-demand occupations and should be encouraged rather than constrained.

More broadly, Workforce Pell implementation should recognize that employer-led workforce development programs are inherently demand-driven and should not be constrained by regulatory structures that limit the ability of industry to lead program design and delivery.

In short, it may be advantageous for all stakeholders to eliminate the proposed cap and allow the marketplace to partner freely with Title IV institutions.

In addition, the Department should provide clear guidance on how this percentage is calculated, including whether it applies solely to instructional hours or also includes curriculum development, laboratory instruction, simulation-based learning, as well as administrative, compliance, and student support services. If the Department is constrained by a percentage cap of services delivered by eligible providers, one solution is for accredited institutions to get

¹⁷ See discussion in NPRM at <https://www.federalregister.gov/d/2026-04520/p-66>.

¹⁸ Of note, it can be very expensive and take a long time to get accredited as a higher education institution, presenting a limited return on investment for employer, association, and community workforce development providers, as acknowledged by the Department's February 27, 2026, interpretive rule, Regulatory Guidance Relating to the Criteria and Process for Initial Recognition of an Accrediting Agency: <https://www.federalregister.gov/documents/2026/02/27/2026-03953/regulatory-guidance-relating-to-the-criteria-and-process-for-initial-recognition-of-an-accrediting>.

credit for administration, compliance, and student support services, while ineligible providers receive credit for instruction and related classroom development, in order to satisfy a realistic blend of percentages in alignment with current practices.

2. Clarify Eligibility of Registered Apprenticeship Related Technical Instruction (RTI)

RAPs are structured as multi-year workforce development models that combine extensive on-the-job experience and oversight with related technical instruction (RTI). We appreciate the NPRM's recognition that a program which serves as a RTI component of a RAP meets the requirements of paragraph (a)(1) and (a)(2) of § 690.93.¹⁹

We urge the Department to explicitly clarify that the RTI component of a RAP may qualify as a Workforce Pell-eligible program, even when the overall apprenticeship program exceeds the proposed duration and hour limitations. This clarification is critical to ensuring that apprentices can access Workforce Pell funding for classroom instruction while continuing to earn wages through on-the-job experience and upskilling.

3. Provide Flexibility in Program Length, Duration, and Structure

The proposed requirements limiting eligible programs to between 150 and 599 clock hours and 8 to 15 weeks in duration do not align with the structure of most construction apprenticeship programs and federal apprenticeship standards set by the U.S. Department of Labor regulations and the National Apprenticeship Act.

Apprenticeship instruction is typically delivered over an extended period and is often integrated with employment schedules. Requiring programs to fit within a compressed timeframe could lead to artificial restructuring that undermines program quality and concurrent OTJ and RTI instruction for specific skills required by law.

We recommend that the Department allow for modular or segmented program structures that align with apprenticeship models, including the ability to recognize portions of multi-year programs as eligible for Workforce Pell. Likewise, the Department needs to articulate specific examples of how RAPs can qualify for Workforce Pell and provide clear guidance for compliance purposes.

During the negotiated rulemaking process, stakeholders emphasized the importance of avoiding rigid program design constraints that could limit innovation or exclude high-quality workforce development models. We share this concern and urge the Department to provide maximum flexibility in how program hours and duration are structured, particularly for apprenticeship-aligned programs that are delivered over time and integrated with employment.

4. Apprenticeship's Earn-While-You-Learn vs. Pell Structure

¹⁹ See <https://www.federalregister.gov/d/2026-04520/p-332> and <https://www.federalregister.gov/d/2026-04520/p-773>.

Workforce Pell implementation should recognize that RAP participants are employed individuals earning wages while participating in workforce development programs. As a result, program structures, eligibility requirements, and accountability metrics designed for traditional students may not appropriately reflect apprenticeship participation. We encourage the Department to ensure that “earn-while-you-learn” models are not disadvantaged by requirements designed for full-time, classroom-based education programs.

We appreciate that the NPRM recognizes that “wages earned by the student from his or her work for their employer are not grant or scholarship assistance” that would limit Pell Grant eligibility for a student who receives grant or scholarship assistance from non-Federal sources that exceed the student’s cost of attendance.²⁰ If this were not the case, this would effectively kill Workforce Pell eligibility for apprenticeship programs.

5. Eligibility of Individuals with Prior Postsecondary Degrees

We strongly support the inclusion of individuals who have previously earned a bachelor’s degree as eligible for Workforce Pell Grants.²¹ Many individuals seeking to transition into the construction industry and skilled trades—particularly in high-demand fields such as electrical, energy, advanced manufacturing, and data center construction—already hold postsecondary degrees but lack access to career-aligned, hands-on training opportunities.

Removing this barrier appropriately recognizes the evolving nature of today’s workforce, where career changes and reskilling are increasingly common. This policy will help attract a broader and highly capable talent pool into the skilled trades, supporting both individual economic mobility and the construction industry’s urgent workforce needs.

6. Align Accountability Metrics with Apprenticeship Outcomes

We support the Department’s emphasis on accountability and strong outcomes for Workforce Pell programs. However, the proposed completion and job placement metrics may not accurately reflect outcomes for apprenticeship programs.

Participants in RAPs are typically employed at the time they begin programs. As a result, traditional job placement metrics—particularly those focused on employment within a fixed timeframe after program completion—do not capture the value of these programs.

Consistent with stakeholder input during negotiated rulemaking, accountability measures should focus on meaningful workforce outcomes and avoid one-size-fits-all metrics. We also recommend that job placement metrics should explicitly allow for employment in related

²⁰ See discussion of (§ 690.5): <https://www.federalregister.gov/d/2026-04520/p-67>.

²¹ See discussion on Student Eligibility (§ 668.32(c)) <https://www.federalregister.gov/d/2026-04520/p-179> and Definitions (§ 690.2(c)) <https://www.federalregister.gov/d/2026-04520/p-188>.

occupations within the same industry sector, recognizing that construction career pathways are dynamic and often involve progression across multiple occupational roles.

We recommend that the Department allow alternative outcome measures for apprenticeship-aligned programs, including wage progression, retention, credential attainment, and advancement within the occupation and treat continued education or progression along a stackable credential pathway as a positive outcome.

7. Recognize Industry Credentials and Apprenticeship Completion

Construction apprenticeship programs culminate in industry-recognized credentials, including journeyworker certifications and RAP completion certificates.

We urge the Department to explicitly recognize these credentials as qualifying “recognized postsecondary credentials” for purposes of Workforce Pell eligibility.

8. Support Hybrid, Simulation-Based, and Competency-Based Instruction

Modern workforce development programs increasingly rely on hybrid instructional models, including online learning, simulation-based upskilling, and competency-based instruction.

These approaches are particularly valuable in the skilled trades, where simulation can enhance safety and provide scalable access to hands-on learning experiences across America’s talent pool, regardless of geographic limitations.

We encourage the Department to clarify that simulation-based and hybrid instructional models may be counted toward instructional hours for Workforce Pell-eligible programs.

We also encourage the Department to clarify how competency-based and mastery-based instructional models—particularly those enabled by modern training technologies—can be measured for purposes of clock hour requirements. Rigid adherence to seat-time metrics may limit the effectiveness of innovative training approaches that are widely used in construction workforce development.

9. Clarify Eligibility of Pre-Apprenticeship Programs for Workforce Pell

While many RAPs may face challenges aligning with the proposed program length and hour requirements of the NPRM, we encourage the Department to more explicitly recognize the potential for high-quality pre-apprenticeship programs to serve as an effective and scalable fit within the Workforce Pell framework.

Pre-apprenticeship programs are typically shorter in duration, structured to prepare individuals for entry into RAPs and other workforce development and employment pathways, and often fall within or closer to the proposed 150-599 clock hour and 8-15 week requirements. These programs play a critical role in expanding access to the skilled trades by equipping participants

with foundational skills, safety training, and industry-recognized credentials needed to succeed in apprenticeship and employment.

In the construction industry, pre-apprenticeship programs are frequently developed in partnership with employers, apprenticeship sponsors, community-based organizations, and local educational institutions. These programs are designed to meet local workforce needs, serve diverse populations, and create entry points into long-term, high-quality careers.

We recommend that the Department:

- Explicitly clarify that pre-apprenticeship programs aligned with Registered Apprenticeship pathways may qualify as Workforce Pell-eligible programs;
- Encourage program designs that articulate directly into Registered Apprenticeship programs, including recognition of prior learning or advanced standing;
- Allow flexibility in how pre-apprenticeship outcomes are measured, recognizing that successful transition into apprenticeship or employment is a key indicator of program effectiveness; and
- Ensure that eligibility and accountability requirements do not inadvertently exclude high-quality pre-apprenticeship models that serve as critical entry points into the construction workforce.

Successful participants in pre-apprenticeship programs that fulfill its requirements will receive an industry-recognized credential and would subsequently participate in RAPs that lead to full-time employment and additional workforce development opportunities and credentialing.

At the same time, we caution that Workforce Pell implementation should not prioritize pre-apprenticeship programs at the expense of RAP participation. Rather, both models should be supported as complementary components of a comprehensive workforce development system: pre-apprenticeship as an entry point and apprenticeship and other employer-focused programs as the primary earn-while-you-learn career pathway.

By recognizing and supporting pre-apprenticeship programs within Workforce Pell, the Department can expand access to training opportunities while maintaining alignment with employer demand and long-term career pathways in the skilled trades.

The Department should clarify whether and under what conditions pre-apprenticeship programs—particularly those aligned with RAP pathways—may qualify as eligible workforce programs, including how transition into apprenticeship is treated for purposes of job placement and outcomes.

10. Address Potential Bottlenecks in State and Gubernatorial Program Approval

The proposed rule relies on state-level processes, including gubernatorial designation of “high-skill, high-wage, or in-demand” occupations, as a key component of Workforce Pell program eligibility.²²

While we support the goal of aligning workforce development programs with state workforce needs, this structure may create unintended bottlenecks that delay or limit program approval—particularly in industries like construction where workforce needs are immediate, widespread, and well-documented.²³

Construction labor demand is national in scope and consistently identified across federal and state labor market data. However, variability in state processes, timelines, and criteria for approving eligible programs could result in inconsistent access to Workforce Pell across states.

Without clear guardrails and timelines, state-level approval processes risk becoming a gating mechanism that delays or limits access to Workforce Pell, particularly in high-demand industries where workforce needs are already well-established.

We recommend that the Department provide clear guidance to states, streamline approval pathways for RAPs, and ensure alignment with existing federal and state in-demand occupation lists to reduce duplicative processes.

11. Provide Realistic Timing and Transition Pathways for Apprenticeship Program Eligibility

While we strongly support the inclusion of RAPs in Workforce Pell, we are concerned that the proposed implementation timeline and eligibility requirements may create unintended barriers for existing, high-quality apprenticeship programs.

Many construction apprenticeship programs are already operational, have strong employer demand, and produce successful workforce outcomes. However, these programs may not immediately meet all Workforce Pell eligibility criteria—such as program structure, documentation, or alignment with new federal requirements—without time to adapt.

In addition, the proposed requirement that programs must be in existence for a specified period prior to eligibility may delay the ability of apprenticeship programs to participate, even where those programs are already well-established but require restructuring to align with Workforce Pell parameters.

We recommend that the Department:

²² See Eligible Workforce Program—Requirements for Approval by the Governor (§ 690.92(d)) <https://www.federalregister.gov/d/2026-04520/p-263> and Components Determined by Governors (§ 690.93(a)) through (§ 690.93(h)) starting at <https://www.federalregister.gov/d/2026-04520/p-279>.

²³ See the NPRM’s request for feedback on this topic at: <https://www.federalregister.gov/d/2026-04520/p-72>.

- Provide a clear transition period that allows existing RAPs to become Workforce Pell-eligible without disruption to ongoing programs;
- Allow provisional or conditional approval for programs that demonstrate strong alignment with apprenticeship standards and workforce demand;
- Clarify how existing apprenticeship programs can segment or adapt their Related Technical Instruction (RTI) to meet eligibility requirements without requiring full program redesign; and
- Ensure that implementation timelines do not delay access to funding for programs that are already successfully upskilling workers in high-demand occupations.

Without a practical transition framework, Workforce Pell risks excluding the very programs it is intended to support during the critical early years of implementation.

12. Address Barriers to Title IV Eligibility and Accreditation for Workforce Development Programs

The requirement that Workforce Pell-eligible programs be offered by Title IV-participating institutions presents a significant structural challenge for many employer-sponsored workforce development programs in the construction industry.²⁴

A large share of high-quality apprenticeship and employer-sponsored workforce programs are operated by employer associations, industry organizations, or joint apprenticeship sponsors that are not currently Title IV-eligible institutions and are not accredited as postsecondary institutions.

While partnerships with community colleges and other accredited institutions are common, transitioning existing programs into Title IV-eligible structures can present substantial barriers, including:

- Lengthy and complex accreditation processes;
- Institutional requirements that may not align with employer-driven workforce development models;
- Administrative and compliance burdens that are difficult for smaller program providers to absorb; and
- Limitations on the ability of industry providers to maintain control over curriculum and delivery.

These challenges are particularly acute in the construction industry, where workforce programs are designed to be flexible, employer-responsive, and closely aligned with jobsite realities.

We note that stakeholders in the negotiated rulemaking process raised concerns about the administrative complexity associated with Title IV participation and the need to avoid creating unnecessary barriers for high-quality workforce development providers. Workforce Pell

²⁴ See footnote 18.

implementation should prioritize access and scalability by minimizing duplicative regulatory requirements and supporting practical partnership models between institutions and industry providers.

We recommend that the Department:

- Provide clear guidance and technical assistance on how employer-sponsored workforce development programs can partner with Title IV institutions without undermining program quality or structure;
- Encourage flexible partnership models that allow industry providers to play a central role in program delivery;
- Consider streamlined or alternative pathways for apprenticeship-aligned programs to participate in Workforce Pell; and
- Align Workforce Pell implementation with existing RAP approval processes to reduce duplicative regulatory burdens.

Absent these adjustments, many high-quality construction workforce development programs may face significant barriers to participation, limiting the scale and impact of Workforce Pell.

13. Avoid Unnecessary Regulatory Complexity and Support Scalable Implementation

To achieve its intended impact, Workforce Pell must be implemented in a manner that is accessible and scalable for workforce development program providers, employers, and institutions.

Excessive administrative complexity, duplicative approval processes, or overly prescriptive program requirements could discourage participation—particularly among small and mid-sized employers and workforce development providers that play a critical role in the construction workforce ecosystem.

We encourage the Department to prioritize streamlined processes, clear guidance, and flexibility in program design to ensure that Workforce Pell can be deployed efficiently and at scale.

14. Reduce Administrative Burden and Support Data Reporting

Workforce Pell implementation will require programs to track and report outcomes such as completion, employment, and earnings. While we support these goals, employer-sponsored workforce development programs and apprenticeship sponsors may face challenges in meeting new and duplicative federal reporting requirements.

We also note that many states and institutions do not yet have the data infrastructure to reliably measure employment outcomes tied to specific occupations in the near term. We encourage the Department to provide flexibility in early implementation years and avoid penalizing programs based on data limitations outside their control.

We encourage the Department to provide streamlined reporting pathways, technical assistance, and coordination with the U.S. Department of Labor to align reporting requirements with existing RAP data systems where possible.

15. Strengthen Coordination Across Federal Workforce Systems

Effective implementation of Workforce Pell will require coordination across federal and state workforce and education systems, including alignment with programs authorized under the Workforce Innovation and Opportunity Act (WIOA) and the National Apprenticeship Act.

We encourage the Department to continue its collaboration with the U.S. Department of Labor and to issue joint guidance to support alignment across these systems, including guidance on meshing funding and coordinating program eligibility.

Conclusion

The Workforce Pell Grant program represents a historic opportunity to expand access to high-quality workforce development programs and strengthen the nation's talent pipeline. If implemented in a manner that reflects and supports the structure of employer-driven apprenticeship programs, Workforce Pell can play a central role in addressing the construction industry's workforce shortages and advancing the Trump administration's goal of expanding apprenticeship opportunities to one million Americans.

With targeted adjustments—including increased flexibility for industry workforce development providers, streamlined state approval processes, and practical pathways for apprenticeship participation—the program can fully leverage the proven success of construction industry apprenticeship programs and employer-led workforce development models to meet workforce needs and provide pathways to good-paying careers.

We appreciate the Department's consideration of these comments, and our employer and association workforce development providers stand ready to serve as partners in the implementation of this important program.

Sincerely,

American Pipeline Contractors Association
Associated Builders and Contractors
Independent Electrical Contractors
Power & Communication Contractors Association