

April 8, 2026

VIA ELECTRONIC SUBMISSION

Mr. Aaron Washington
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20002

Re: Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; And Workforce Pell Grants (Docket No. ED-2026-OPE-0133).

Dear Mr. Washington:

On behalf of the American Road & Transportation Builders Association (ARTBA) and our more than 8,000 members in the transportation construction industry, we write in support of the U.S. Department of Education's proposal to expand Pell Grant eligibility to short-term workforce training programs.¹ This reform has the potential to help students pursuing careers in transportation construction access the funding needed to complete required training and successfully enter the workforce. ARTBA appreciates the opportunity to comment on this proposal and offers the following recommendation to further enhance the utility of the program.

Background

ARTBA represents all components of the nation's transportation construction industry, including contractors, materials suppliers, planning and design firms, public agencies, research institutions, and equipment manufacturers. Our members design, build and maintain the nation's roads, bridges, airports, ports, transit systems, and other critical infrastructure that supports economic growth, public safety, and mobility.

While delivering these projects, ARTBA members are also continually seeking ways to build the industry's future workforce. Federal, need-based Pell Grants can help. They help students pay for postsecondary education and training, but – unlike student loans – do not require repayment.

The Department's proposed rule would create a new category of "eligible workforce programs," enabling students to use Pell Grants for short-term training within certain parameters. Under the proposal, these programs would need to be between 8 and 15 weeks in length, consisting of 150 to 599 clock hours (or the equivalent credit hours), and offered by an eligible institution² with approval from both the state's governor and U.S. Secretary of Education. They would also need to align with high-skill, high-wage, or in-demand occupations, while leading to a recognized postsecondary credential.³ The proposal also limits the extent to which an eligible workforce program

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. 11,378 (proposed Mar. 9, 2026).

² See Higher Education Act of 1965, Pub. L. No. 89-329, tit. IV, 79 Stat. 1219, 1232 (1965).

³ *Id.* at 11,378-79.

may be delivered by a non-Title IV entity, specifying that no more than 25 percent of the program may be offered through a written arrangement with a non-eligible institution or organization.⁴

ARTBA's Comment on the Proposal

The agency should expand the twenty-five percent cap on non-eligible entity participation.

Short-term workforce training programs typically include both on-the-job experiences and classroom instruction. Today, individuals pursuing careers in the trades often have limited access to federal assistance, which can make participation in these programs cost-prohibitive without full employer sponsorship. Expanding program eligibility for Pell Grants is an important step toward addressing that gap. Apprenticeship programs are a key tool many ARTBA members use to attract and retain skilled labor.

As noted, these newly-qualified programs would need to be offered through an eligible institution (Title IV), with approval from both the governor and U.S. Secretary of Education. While ARTBA recognizes that this framework is required by statute,⁵ the proposed rule allows these institutions to partner with non-eligible⁶ providers for up to 25 percent of the program. In practice, this limitation poses challenges for many workforce apprenticeship efforts. Classroom instruction often encompasses industry training providers, employers' dedicated training facilities, and/or other specialized instructors. A strict 25 percent cap does not reflect the actual structure of many such programs, while risking an unnecessary limit on the practical applicability of Pell Grants as proposed.

ARTBA respectfully requests that the Department revisit this limitation and consider increasing the allowable percentage of instruction that may be delivered through qualified non-eligible providers. Providing additional flexibility would better align the program with existing workforce training models and further the Department's goal of expanding access to Pell Grant funding.

Conclusion

ARTBA appreciates the Department's efforts to expand Pell Grant eligibility to short-term workforce training programs and the opportunity to provide input on this proposal. We respectfully encourage the Department to revisit the proposed limitation on non-eligible entity participation to ensure the program can be effectively implemented across a broader range of workforce training models. Should you have any questions or require additional information please do not hesitate to contact Prianka Sharma, Deputy General Counsel and Vice President for Regulatory Affairs, at psharma@artba.org.

Sincerely,

Prianka Sharma

Prianka P. Sharma

Deputy General Counsel and Vice President for Regulatory Affairs

⁴ *Id.*

⁵ See 20 U.S.C. § 1094(a).

⁶ The term "non-eligible" is drawn from the statute. It should not be interpreted to imply that such institutions do not offer valuable instruction and training.