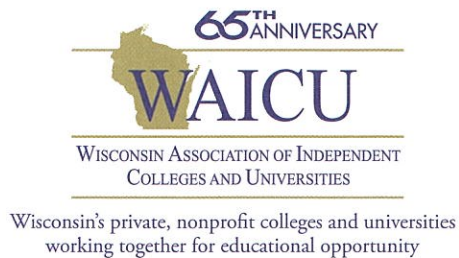


Alverno College
Bellin College
Beloit College
Carroll University
Carthage College
Concordia University Wisconsin
Edgewood University
Herzing University
Lakeland University
Lawrence University



Marian University of Wisconsin
Marquette University
Medical College of Wisconsin
Milwaukee Institute of Art & Design
Milwaukee School of Engineering
Mount Mary University
Ripon College
St. Norbert College
Viterbo University
Wisconsin Lutheran College

April 8, 2026

Aaron Washington
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 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 (AHEAD): Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants

Dear Mr. Washington,

The Wisconsin Association of Independent Colleges and Universities (WAICU) appreciates the opportunity to comment on the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee's Notice of Proposed Rulemaking. WAICU is the official organization of Wisconsin's 20 private, nonprofit colleges and universities, which collectively serve more than 52,000 students. Our institutions confer 22 percent of the state's bachelor's degrees and 34 percent of all advanced degrees.

WAICU offers comments on two elements critical to successful implementation of the new Workforce Pell program and to ensure alignment with its intended purpose of creating stackable and portable programs to meet workforce needs. First, we recommend the Department ensure clear, proactive communication is provided to students about their Pell Grant Lifetime Eligibility Used (LEU). Second, we recommend excluding Workforce Pell recipients from the proposed 70 percent employment outcome metric when students continue their education rather than immediately enter the workforce.

Clear and accurate communication regarding Pell LEU is essential, particularly for students enrolled in short-term, stackable programs. Because LEU directly affects a student's ability to complete an entire credential pathway, insufficient information at the outset may lead students to unknowingly exhaust eligibility needed for subsequent credentials with higher labor-market value, disproportionately affecting first-generation, low-income, and returning adult learners. WAICU recommends the Department provide standardized disclosures for Workforce Pell recipients that clearly outline Pell usage and remaining eligibility at enrollment.

We also encourage the Department to exclude continuing students from the 70 percent employment metric, or adjust the metric to avoid penalizing progression. Many programs are designed as on-ramps into higher-level credentials. Counting a student as "not employed" when they immediately enroll in an advanced program creates a disincentive for the stackable pathway design and undermines both regional workforce strategies and student success. This concern is especially relevant in fields where employers preferentially hire and advance completers of the next credential.

Aaron Washington
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To address this issue, WAICU recommends the Department exclude from the employment calculation those students who enroll in an equal or higher-level education program. Alternatively, the Department could include students that continue their education as positive outcomes equivalent to employment for purposes of meeting the 70 percent threshold. Either approach preserves accountability while aligning metrics with Congressional intent to support stackable programs that lead to continued credential and degree attainment.

While WAICU appreciates the Workforce Pell program's goal of expanding access to high-quality, short-term credentials, clear, student-centered LEU communication is essential to ensure that those students who continue their education do not penalize institutional outcomes. These changes will better protect students, align incentives with stackable pathways, and advance equitable economic mobility.

Thank you for the opportunity to provide these comments.

Sincerely,



Eric W. Fulcomer, PhD
President and CEO