

April 7, 2026

Nicholas Kent
Under Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Docket ID ED-2026-OPE-0133

Dear Mr. Kent:

The Higher Learning Commission (HLC) appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) published by the U.S. Department of Education (ED) on March 9, 2026.

HLC is the largest institutional accreditor in the United States, accrediting approximately 950 member institutions, with a geographic footprint spanning nearly the entire United States. HLC's membership consists of every type of institution of higher education, from large, land-grant public universities to open access community colleges and to small, faith-based institutions. In all, millions of students and thousands of employers rely on HLC's quality assurance.

HLC submits this comment in relation to the aspect of the NPRM that establishes Workforce Pell Grants for students who enroll in an eligible educational program that qualifies as an "eligible workforce program" (commonly referred to as "Workforce Pell").

First, HLC greatly appreciates the inclusion of guidance in the NPRM related to "the role that accrediting agencies play in the eligible workforce program approval process." Specifically, HLC acknowledges and understands the clarification that ED "does not require the accrediting agency to approve each eligible workforce program but an accrediting agency recognized by [ED] may establish its own internal processes regarding the approval of eligible workforce programs, which must follow its established review procedures for substantive changes," with the end result being that an "institution must be able to demonstrate that each program, including eligible workforce programs,—collectively or individually—is included within its grant of accreditation."

As you know, HLC has a strong history of providing quality assurance for shorter-term educational programs, such as certificate programs. In many ways, the shorter-term educational programs that currently exist, and with which HLC is familiar, are similar to the types of educational programs that may ultimately become eligible workforce programs.

Along with this, HLC's Credential Lab has recently endorsed its first short-term credential content providers, and it has recently piloted an Innovation Center to provide resources and programming to institutions and others to develop high-quality short-term credential programs and to foster effective partnerships across higher education. Because of the thorough and deliberate process that

underpins the work of the Credential Lab, HLC is able to leverage the knowledge gained through the Credential Lab regarding shorter-term educational programs to continue to provide robust and reputable quality assurance, including as it relates to those educational programs that may become eligible workforce programs.

Furthermore, HLC has robust substantive change policies and procedures for establishing and documenting that an educational program offered by an institution is within the scope of the institution's accreditation, whether following an approval process or a notification process, as determined through HLC's policies and procedures and consistent with 34 CFR §602.22.

HLC's substantive change policies and procedures already apply to all of a member institution's educational programs. As such, they will naturally be inclusive of an institution's credit-bearing undergraduate educational programs that are measured in clock hours or credit hours and could subsequently qualify as eligible workforce programs through the applicable certification and approval processes overseen by a state and ED. Ultimately, HLC has a clear framework for including these types of educational programs in a member institution's HLC accreditation. Once the final rule is published, HLC looks forward to communicating with its member institutions on this topic.

Along these lines, HLC also appreciates the related conclusion evident in the NPRM that while an accreditor will need to track (a) the date on which an educational program that may become an eligible workforce program is first offered and (b) the date on which such an educational program that may become an eligible workforce program is included within the institution's accreditation, an accreditor will not need to track the date on which the educational program is ultimately approved to qualify as an eligible workforce program by a state or ED, as that date will necessarily be at least 12 months after the program began and thus after the program was approved by HLC.

Second, HLC suggests that, following publication of the final rule, ED may wish to consider launching an "FAQ webpage" with frequently asked questions and answers related to the implementation of Workforce Pell. ED uses this approach with respect to prison education programs, and it is an extremely helpful resource for institutions, accreditors, and other stakeholders.

One item that might be useful to emphasize on such an FAQ webpage is the fact that all eligible workforce programs are—as noted in proposed 34 CFR §690.92—undergraduate educational programs that are necessarily **credit-bearing**, regardless of whether they are measured in clock hours (and thus are "noncredit") or are measured in credit hours. This requirement that the educational programs be measured in credit or clock hours is reinforced by proposed 34 CFR §690.93(a)(4)(i), which provides that a student who completes an eligible workforce program and enrolls in a "related certificate or degree program will receive academic credit for the program." While the concept that an educational program that is measured in clock hours is still credit-bearing is axiomatic to the understanding of educational programs, the terminology of "noncredit" that is commonly associated with programs that are measured in clock hours could be confusing to some, and thus adding this information to an FAQ webpage could be beneficial to foster consistent and clear understandings on this issue.

Another item that might benefit from clarification on an FAQ webpage is whether the program name of an educational program that may become an eligible workforce program must include some language designating the program as “Workforce Pell Eligible” (or some similar moniker). Such a requirement might actually create confusion for prospective students and others, given that the educational program will necessarily have been in existence prior to becoming an eligible workforce program, but this is a question that institutions offering educational programs, or accreditors including those programs in an institution’s accreditation, may have.

Finally, while HLC does not have a specific recommendation regarding the maximum amount of an eligible workforce program that may be offered through a written arrangement pursuant to 34 CFR § 668.5, HLC would like to note that it has broad-based experience in reviewing the quality of educational programs involving such written arrangements, including at the certificate level. As noted above, this experience would easily translate to the context of eligible workforce programs. Additionally, as also noted above, HLC’s recent work with the Credential Lab provides a strong basis for providing quality assurance in this area.

Thus, the rationale of limiting the percentage of an eligible workforce program offered through a written arrangement to a lower amount than other educational programs because of a “lack of experience in the accreditation industry in evaluating agreements for short-term programs” is not applicable to HLC.

Thank you for considering these comments. As part of the program integrity Triad, HLC supports both strong consumer protections for students and broader access to higher learning. We stand ready to work with our member institutions and state and federal partners as the Workforce Pell program is put into effect later this year.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Gellman-Danley". The signature is written in black ink and is positioned above the typed name and title.

Barbara Gellman-Danley
President