



May 4, 2026

Governor's Workforce Development Board
Maryland Department of Labor
1100 N. Eutaw Street
Baltimore, MD 21201

Submitted via email to: GWDB.Maryland@Maryland.gov

RE: Comments on Maryland Workforce Pell Program Determination Policy, Public Comment Draft

To Whom It May Concern:

Thank you for the opportunity to comment on Maryland's Workforce Pell Program Determination Policy. Workforce Pell represents one of the most significant expansions of federal student aid in decades, extending Pell Grant eligibility to very short-term workforce programs beginning July 1, 2026. Because these programs will be short, often noncredit, and directly tied to labor market outcomes, state implementation will be central to ensuring that Workforce Pell delivers value for students, workers, employers, and taxpayers.

New America's Higher Education Program is a team of researchers, writers, policy experts, and advocates dedicated to examining federal student aid policy and advancing solutions that prioritize students and families. We have broad higher education expertise, including student loan policy, accountability standards, and short-term credentials. We approach this rulemaking with a focus on ensuring students in Workforce Pell programs will achieve the goal of the program, helping students gain the skills necessary to obtain a well-paying job. In addition to our many years of work on this issue, our team is also working to provide technical assistance as states implement the requirements of this new program and colleges prepare to submit programs for approval. To date, we have worked with approximately 30 states and territories, which has greatly informed our comments.

Maryland's draft policy reflects a serious and thoughtful effort to build a strong approval framework. We especially appreciate the state's attention to program quality, labor market alignment, employer validation, stackability, portability, and return on investment. At the same time, several provisions should be revised to better align with federal statute and the Department of Education's proposed regulations.

Thank you for the opportunity to provide comments. Please do not hesitate to contact us if you have any questions pertaining to our comments.

Sincerely,

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Program Length Should Be Revised From 8–15 Weeks to 8–14 Weeks

Throughout the proposed policy, Maryland describes eligible Workforce Pell programs as having “8–15 weeks of instruction” or being “less than 15 weeks.” The executive summary states that eligible programs must have “8 - 15 weeks of instruction,” and Appendix A similarly says programs must be “8-15 weeks of instruction.”

Maryland should revise these references to reflect the federal requirement that eligible programs be at least 8 weeks but fewer than 15 weeks of instruction. The Department’s proposed regulations specify that programs may be 8 through 14 weeks, but not 15 weeks. To avoid confusion for institutions, the policy should consistently state “8 to 14 weeks of instruction” or “at least 8 weeks but fewer than 15 weeks of instruction.”

Registered Apprenticeship Provisions Should Be Narrowed to Match Federal Law and Regulations

Criteria Registered Apprenticeship Programs Automatically Meet

Maryland’s draft policy states that programs serving as a component of a Registered Apprenticeship are considered eligible against criteria 3 through 7, including the recognized credential, employer alignment, completion rate, and job placement requirements. This provision should be revised as they do not align with the proposed regulations from the Department.

The proposed federal regulations do not permit Registered Apprenticeship Programs, or related technical instruction components of Registered Apprenticeships, to automatically satisfy the completion and job placement requirements. The special treatment for Registered Apprenticeship applies only to the state-determined requirements related to providing education aligned with high-skill, high-wage, or in-demand occupations and meeting employer hiring needs. It does not waive the statutory 70 percent completion rate or 70 percent job placement rate requirements. While we understand that the recent bill passed in Maryland states that Registered Apprenticeship programs do not need to provide document on those requirements, that is in direct conflict with the federal regulations.

Maryland should therefore revise the policy to clarify that a program serving as the related technical instruction component of a Registered Apprenticeship may be presumed to satisfy the state’s labor market alignment and employer hiring needs requirements, but must still independently demonstrate compliance with completion, job placement, value-added earnings, credential, stackability, portability, and credit articulation requirements.

Components of a Registered Apprenticeship Program Considered for Workforce Pell

Maryland should also revise language stating that programs seeking eligibility as part of a Registered Apprenticeship “must count both related instruction and on-the-job training conducted under general supervision of the appropriate faculty toward the program duration requirements.” This does not work under the Workforce Pell structure, as the regulations specify that it is only the RTI portion of the Registered Apprenticeship program. While it is our understanding that Maryland’s newly passed law says the curriculum of both the RTI and on-the-job training should be included under the purview of faculty, which we believe is a good requirement, this is not what the regulations require. Including the on-the-job training portion of the program will extend the length that is considered for federal aid, and given the length of most Registered Apprenticeship programs, they would be too long for Workforce Pell. (However, we would note that Registered Apprenticeship programs can already access traditional federal student aid programs. Under [longstanding Department of Education guidance](#), institutions may award academic credit for portions of an apprenticeship program, including certain on-the-job training.)

Recognized Postsecondary Credential Requirement

Maryland should revise its credential language for Registered Apprenticeships. The draft policy states that, for a Registered Apprenticeship Program applying for Workforce Pell, the Workforce Pell-eligible component does not need to culminate in the certificate of completion of the Registered Apprenticeship because the apprentice is expected to receive that credential at the end of the apprenticeship.

That provision should be changed. Under the law and proposed regulations, the Related Technical Instruction component itself must lead to a recognized postsecondary credential. This is especially important for students who do not complete the full apprenticeship. If a student uses Pell eligibility for the related technical instruction component but later exits the apprenticeship, the student should still leave with a meaningful, recognized credential. Maryland should require the RTI component approved for Workforce Pell to culminate in an eligible recognized postsecondary credential, even if the full apprenticeship later leads to a separate certificate of completion.

Strong Support for Maryland’s Interim ROI Screening

We strongly support Maryland’s proposal to pre-screen programs against the value-added earnings requirement before federal data are available. The draft policy states that the Department will eventually calculate value-added earnings, but that in the interim, the Governor or designee will assess return on investment, working with MLDC, MD Labor, the LMI Unit, and others, and will reject programs that do not pass the test.

This is exactly the kind of front-end review states should conduct and it meets the requirement in proposed rule [§ 690.93\(d\)\(9\)](#). Because the federal value-added earnings calculation will not be available until several years after students complete programs, states should not approve programs

that are plainly unlikely to produce sufficient earnings relative to tuition and fees. Maryland's approach appropriately uses state data capacity to protect students before they spend Pell eligibility on programs that are unlikely to deliver economic value.

Support for Maryland's Definitions, With One Needed Addition

Maryland's proposed definitions of high-skill, high-wage, and in-demand occupations are generally strong. We support the use of O*NET Job Zone 3 or higher for high-skill occupations, the use of a median wage above the state median wage for high-wage occupations, and the in-demand test based on annual openings and growth, with a transparent Governor's Strategic Designation option.

We also strongly support Maryland's requirement that if a program is not high-wage, it must demonstrate stackability into at least one high-wage occupational pathway. This is an important safeguard. It recognizes that some entry-level training may be valuable, but only if it connects to a real pathway to higher wages.

Support for Employer Validation

We support Maryland's employer validation framework. The draft policy allows programs to demonstrate alignment through sector partnerships, local workforce boards, or letters from employers confirming hiring demand and alignment of skills and competencies. This is appropriately flexible while still requiring meaningful evidence that the program is connected to actual employer needs.

Conclusion

Maryland's proposed policy is a strong foundation for responsible Workforce Pell implementation. The state deserves credit for building a serious review process, leveraging the ETPL, incorporating labor market data, requiring employer validation, and using interim ROI screening before federal value-added earnings data are available.

These changes suggested here would improve clarity, protect students, and help ensure Maryland's Workforce Pell implementation supports high-quality pathways to good jobs.