

Aaron Washington
Office of Postsecondary Education
400 Maryland Ave., SW
Washington, DC 20202
submitted electronically

April 8, 2026

Re: RIN 1840-AD99
Docket ID ED-2026-OPE-0133

Dear Mr. Washington,

The undersigned organizations representing veterans, service members, families, and survivors write to submit comments on [proposed regulations](#) regarding the workforce Pell authorized by the 2025 budget reconciliation. Given the statutory framework, we appreciate the approach the Department adopted to regulating the program.

The Department's *Federal Register* notice solicits comments on whether it should allow more than 25% of an eligible workforce Pell program to be outsourced to ineligible entities. We share the Department's stated concerns about the quality assurance of ineligible providers, especially given accrediting bodies' limited experience in reviewing such providers.

In response to the Department's specific request for data on this question, we refer the Department to the findings of the comprehensive multi-agency [Census Bureau report](#) on GI Bill outcomes, which documented worse earnings at programs not eligible for Title IV, and this finding held steady across every sociodemographic group and military characteristic studied. Another [relevant report](#) documented that fewer than half of veterans in unaccredited certificate programs (and only 38% of veterans in such programs run for profit) earned more than a high school graduate 10 years after enrolling.

Given the data, we caution the Department against increasing the percentage of outsourcing beyond the contemplated 25% and indeed recommend prohibiting the outsourcing of any portion of eligible workforce Pell programs to unaccredited and ineligible providers.

Sincerely,

AMVETS
Commissioned Officers Association of the US Public Health Service
Dixon Center for Military and Veterans Services
Fleet Reserve Association
Gold Star Spouses of America
Jewish War Veterans of the United States of America
National Association of State Approving Agencies
Paralyzed Veterans of America
Service to School
Student Veterans of America
Swords to Plowshares
Tragedy Assistance Program for Survivors
U.S. Coast Guard Chief Petty Officers Association and Enlisted Association
Veterans Education Success
Veterans for Common Sense