To: Members of Congress

Re: Bipartisan Workforce Pell Act and Student and Borrower Protections

Date: February 23, 2024

On December 12, 2023, the House Committee on Education & the Workforce held a markup on the Bipartisan Workforce Pell Act (H.R. 6585). In advance of a House floor vote, we jointly write to express our serious, shared concerns about the lack of strong provisions protecting the interests of students and the integrity of the Pell Grant program. We ask that you oppose H.R. 6585 because the bill:

- **Opens the Pell Grant to potential abuse by for-profit short-term program providers.** For-profit operators offer few of the kinds of short-term training programs to which the bill would open Pell Grant eligibility. However, given the long and well-documented history of abuses of Title IV programs and provision of high-cost, low-quality programs to students by for-profit colleges, lawmakers should expect a rush to stand up these programs in pursuit of boosting revenue with Pell dollars. Low-quality programs and wasted Pell dollars could potentially exacerbate racial and economic inequities, as predatory for-profits most often target communities of color and low-income areas.

- **Risks supporting online-only programs that provide poor workforce training.** The proliferation of online education over the last decade – and especially in the wake of Covid-19 – has increased the risk of students enrolling in online-only programs that include few quality assurance protections. For-profit operators may market the flexibility of online programs without providing high-quality curriculum, ultimately leaving students with diminished lifetime eligibility for Pell grants and significantly lower earning potential than they were led to believe they would have after program completion. We are especially concerned about the proliferation of online-only programs that are inadequate to prepare students for career success in their chosen fields, particularly in fields where inadequate preparation could lead to health and safety concerns.

- **Encourages fast-tracking approval of unproven programs.** Although the bill includes a process for reviewing and accrediting short-term programs, we are conscious of systemic challenges with accreditation and the U.S. Department of Education’s process for reviewing accreditors. We welcome the Department’s attention to accreditation in the ongoing negotiated rulemaking process, with the committee’s work set to conclude on March 7. The process laid out in the bill text, however, would encourage quick reviews and approvals by accreditors and the Department of Education, including allowing programs with little to no data for demonstrating value for students to launch with full access to Pell Grant dollars.
Thank you for your leadership and consideration.

Respectfully,

American Association of University Women (AAUW)

National Association for College Admission Counseling (NACAC)

New America Higher Education Program

Project on Predatory Student Lending

Student Borrower Protection Center

The Education Trust

The Institute for College Access & Success

UnidosUS

Veterans Education Success

Young Invincibles

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