



## Public Comment to the Department of Education on Workforce Pell Grants

**Darris R. Means**, Clemson University

Dear Secretary McMahon,

My name is Darris Means, and I am a professor of educational leadership at Clemson University. For the past two decades, I have led research and programs focused on postsecondary education access and opportunity for rural students, low-income students, and first-generation college students. For almost eight years, I led a program supporting low-income, first-generation high school students and their families as they explored and pursued postsecondary education. The OBBB Act takes effect in July 2026 and launches the Workforce Pell Grant. While the Act aims to expand postsecondary education options, I want to note two considerations to ensure rural communities are not cut off from the benefits of the Workforce Pell Grant. My commentary reflects my research and expertise and is not a reflection of the opinion of Clemson University.

**Student Enrollment Thresholds Disadvantage Colleges and Universities in Rural Communities:** The Department of Education uses a threshold of 50 students to calculate value-added earnings for the first award year of a program. If there are not at least 50 students for the first award year of a program, The Department will consider the second award year to calculate value-added earnings, and if that still does not include at least 50 students, the Department of Education will consider three years. The Department of Education will also calculate value-added earnings for a program with at least 30 students over a four-year period. Programs without at least 30 students may be considered ineligible for the Workforce Pell Grant. Colleges and universities in rural communities often have smaller enrollments compared to institutions located to suburban and urban communities due to population size. This minimum threshold will disadvantage programs located in rural communities that align well with the aims of the Workforce Pell Grant but may enroll fewer students. This will disadvantage rural community colleges that primarily enroll students in the county or region in which they are located. **The Department of Education should consider enrollment size of the institution and population size of the county in which institutions are located to determine minimum thresholds.**

**The Workforce Pell Grant Overlooks the Realities of Rural Labor Markets:** While the economic and job markets of rural communities differ across the country, rural communities often have higher poverty rates, fewer workforce sectors, and lower median incomes compared to suburban and urban communities. The goal of the Workforce Pell Grant to prepare individuals for “high-wage” positions may leave rural colleges and universities, communities, and citizens behind from taking advantage of the Workforce Pell Grant. The Department of Education should require states to consider how geographic region within a state may differ in terms of wages when determining programs that are eligible for the Workforce Pell Grant. Additionally, there are several in-demand industry sectors in rural communities that require high skills but may not be high-wage positions, such as education and healthcare. Additionally, these sectors are prevalent in rural communities, serve a critical public need, and can lead to middle-wage positions. The Department of Education should

April 8, 2026 <https://scholars.org>

encourage states to consider short-term programs that reflect in-demand sectors in rural communities, serve a public need, and may lead to middle-wage positions. My hope is that rural communities, colleges and universities, and citizens will have expanded postsecondary education access and opportunities due to the Workforce Pell Grant. My comments aim to enhance the potential impact of the Workforce Pell Grant.