Maine's Workforce Pell Program Determination Policy 2026-27
Public Comments Received June 30 – July 14, 2026

Commenter	Public comment	Response
Linda Penkul	Hello State of Maine, Please ensure the state includes nontraditional students, the elderly, and tge disabled. We the People have already, sorts of diversity Acts that ensure inclusiveness and opportunity for subculturals that are looking for a better quality of life, or simply seeking a more comprehensive understanding of thier present existence. Leaning is good no matter what. If the old and or disabled want to flex their minds like everyone else. So be it. Its part of our cultural health; acceptance. Have a nice day.	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. The Workforce Pell policy applies to all eligible students, including non-traditional students. Institutions participating in the Title IV federal student aid programs are required to comply with applicable federal civil rights laws, including Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act.
Tara Kelly, Maine Preservation	Dear Commissioners: Maine Preservation is a statewide nonprofit organization dedicated to promoting and preserving historic places, buildings, downtowns, and neighborhoods—strengthening the cultural and economic vitality of Maine communities. In 2023, we commissioned a report in partnership with statewide historic preservation organizations located in New Hampshire, New York, and Vermont that demonstrates the dearth of historic preservation professionals across the rural Northeast. Our Understanding & Advancing the Preservation Trades study asserts that "property owners, preservation	Thank you for your comment. We appreciate your participation in the public comment process and your feedback.

	organizations, and employers have noted widespread workforce shortages of trades professionals who have skills and knowledge specific to working on older buildings. This problem has been exacerbated by a variety of factors: the increasing number of buildings at a critical age for repairs, the widespread retirement of existing tradespeople, and recent rural in-migration trends across the Northeast region increasing labor demand. The workforce shortage limits [the] means for historic buildings to be maintained, improved, and adapted to current needs." Historic preservation is a critical element of community vitality, fostering a strong sense of place and boosting heritage tourism. Preservation practices also offer important environmental sustainability strategies toward climate change mitigation and resource conservation. Preservation tradespeople are essential to the success of historic preservation more broadly; thus, finding ways to create a stronger workforce throughout Maine will help enable preservation practices that are accessible and available to a broader range of property owners and managers, in turn making more older homes in our rural communities livable and safe, providing much-needed housing opportunities. We write to express our appreciation for inclusion of many of these trades in the draft Maine Workforce Pell Program Determination Policy. It is encouraging that this critical need has been identified by the Department of Labor through workforce data documented by Maine's Center for Workforce Research and Information. With gratitude, Tara Kelly Executive Director	

Rebecca Neithercutt	Dear Members of the Maine State Workforce Development Board, Please accept this formal public comment regarding the Draft Maine Workforce Pell Determination Policy released on June 30, 2026. While the framework establishes necessary guardrails for the state's deployment of federal student financial aid toward short-term credentials, the current draft presents structural risks that could unintentionally penalize training institutions, limit innovation, and exclude Maine's most vulnerable labor demographics. Context & Narrative Summary: Why This Matters for Everyday Mainers To understand why these technical adjustments are critical, we must consider the practical impact on everyday Mainers and local businesses. Imagine a future employee in a rural county trying to re-enter the workforce after fifteen years of raising children. They seek a fast-paced, 8-week bookkeeping certificate funded by the new federal Workforce Pell Grant. Despite the program's potential, they face significant hurdles: resume gaps that trigger automated rejection, a lack of modern digital literacy, and a lack of public transit if personal transportation fails. Under the current draft policy, if a student drops out due to a transportation emergency, the school is penalized for a "failed completion." If they complete the course and secure a remote role with an out-of-state company or an administrative role at a local hospital rather than a traditional accounting firm, the state may flag them as "unemployed" or "out-of-field." Fearing these rigid penalties, schools may stop enrolling non-traditional students, older workers, or people with disabilities to protect their performance metrics.	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Responses to comments are as follows: 1. Per federal rule, the job placement rate is calculated as the percent employed in the occupation(s) for which the program prepares students (as determined by the SOC code(s) in the Program-level data collection) or a comparable high-skill, high-wage, or in-demand occupation. Value-Added Earnings(VAE) will be calculated by the U.S. Department of Education. The VAE calculation will be determined by calculating the difference between the adjusted median earnings of student completers during the earnings measurement period and 150 percent of the U.S.

	Furthermore, Mainers are currently being locked out of the national remote economy. Because Maine lacks tax reciprocity and interstate remote work agreements, many out-of-state employers explicitly avoid hiring Maine residents due to administrative burdens. A Mainer should be able to live in their rural community, secure a high-wage remote position from a state like California, and reinvest those earnings into their local economy. Meanwhile, local professional firms are facing severe worker shortages yet often refuse to hire entry-level graduates due to a lack of prior experience. This creates a paradox: a shortage of workers alongside a barrier blocking entry-level applicants. The recommendations below aim to bridge this gap, ensuring training programs are practically realistic. These adjustments turn short-term certificates into tools that protect students, incentivize remote work, encourage paid internships, and reduce administrative friction. Recommendations 1. Account for Local Realities in "In-Field" and Earnings Metrics - Flexible Skill-to-Employment Mapping: The 70% "in-field" placement rate slated for 2029 should include a flexible appeal mechanism. For instance, an IT graduate taking an operations role in healthcare might be flagged as "out-of-field" despite using their technical skills. - Index Earnings to County-Level Medians: The Value-Added Earnings Test for AY 2030–2031 should index wage premiums to county-level median wages rather than a statewide average, which unfairly penalizes programs in rural or lower-income counties. 2. Safeguard Innovation and Operational Turnaround Times	Federal Poverty Guidelines applicable to a single individual for such tax year. The median earnings will be adjusted by State and metropolitan area regional price parities. The U.S. Department of Education further stated in the Workforce Pell Final Rule that the Value-added earnings will not be calculated until 2030 and the U.S. Department of Education will work with stakeholders and release guidance on the value-added earnings framework. If there is an opportunity for public comment to the U.S. Department of Education on the VAE framework, then the State Workforce Development Board will share the notice on Work Source Maine. 2. It is a federal requirement in statute for programs to be in operation for 12 months prior to approval

	- Conditional Approval for Urgent Employer Needs: I recommend a "Conditional Approval" fast-track for new programs backed by documented employer partnerships or urgent regional demand to avoid the 12-month operational requirement. - Establish Administrative SLAs: To ensure efficiency for the July 20, 2026 rollout, the policy should establish a 15-business-day processing window from submission to the execution of the Gubernatorial Certification Form. 3. Mitigate Rural Transportation Barriers and Support Student Retention - Compassionate Withdrawal Safe Harbor: The policy should include a "Hardship/Medical Compassionate Withdrawal" exemption for verified emergency dropouts so that non-academic crises do not exhaust a student's Pell eligibility or penalize an institution's completion rate. - Braid WIOA Supportive Services: The SWDB should mandate automated cross-enrollment with regional CareerCenters to braid WIOA supportive service funds with Workforce Pell for mileage reimbursements and transit stipends. 4. Promote Equity, Inclusion, and Safe Harbors for Students with Disabilities - Inclusive Recruitment Targets: Introduce an Equity provision rewarding programs that build outreach pipelines with Vocational Rehabilitation (VR) offices and high school transition coordinators. - Disaggregated Placement Data: Track metrics specifically for graduates who identify as having a disability or are co-enrolled in VR services. - Prevent Risk-Aversion: Ensure that minor metric fluctuations in highly inclusive programs trigger technical assistance rather than the automatic revocation of approval.	for Workforce Pell; we do not have the ability to waive that requirement in our policy. However, there is a path to petition to request that a new occupation be added to the Workforce Pell Priority Occupation List. An individual may submit a petition letter to the State Workforce Development Board Director. The petition must demonstrate that the proposed occupation sufficiently aligns with the criteria outlined in the Workforce Pell Determination Policy. The application review process will align with the quarterly meetings of the State Workforce Development Board (SWDB), as the Board is responsible for providing recommendations to the Governor regarding the approval of eligible programs, prior to

	5. Address the Realities of Re-Entry: Caregivers and Older Workers - Retention Tracking: Feature longitudinal tracking at 6 and 12 months post-exit to monitor retention and identify barriers faced by injured or ill workers. - Support for Re-Entering Caregivers: Permit the braiding of Maine Adult Education digital literacy bootcamps with Workforce Pell. Programs with direct hiring agreements that bypass resume-gap filtering should receive preferential scoring. - Pell Disclosure Guardrails: Require institutions to provide signed disclosures explaining how enrollment impacts a student's future federal aid eligibility. 6. Target Professional Shortages, Remote Work, and Inter-State Tax Modernization - Bypass the Experience Trap: Incentivize employers who hire directly from certified Maine Workforce Pell programs through state tax credits for every graduate retained past 90 days and formal scoring preferences in state contract procurement. - Open Inter-State Remote Work Tax Reciprocity: Formally advise the legislature to establish tax reciprocity compacts with major remote-employing states. This allows rural Mainers to work nationally while residing locally. - Remote-First Program Bonus: Incentivize programs for roles like digital legal support or medical billing. Verified remote hiring should count fully toward the 70% "in-field" placement metric. 7. Core Data Infrastructure and Academic Articulation - Automated Inter-Agency Data Matching: Mandate that the MDOL Center for Workforce Research and Information (CWRI) provide automated data-	certification by the U.S. Department of Education. 3. Per federal rule, there are exclusions from performance for the following categories: death, medical condition, military service, or incarceration. The Workforce Pell portal will include language encouraging coordination with workforce system partners. Specifically, it will state that institutions should consider working with Local Workforce Development Boards, WIOA service providers, and other workforce system partners to identify opportunities for co-enrollment and to leverage career and supportive services that promote student success. 4. The State Workforce Development Board is

	matching using UI wage data to verify institutional metrics accurately. - Higher Education Continuing Enrollment Waiver: Verified enrollment in an advanced degree program at an accredited Maine institution should count as a successful placement. - Standardize PLA Mapping: Require institutions to map noncredit programs to formal Prior Learning Assessment (PLA) frameworks to ensure stackable credit pathways. 8. Mandate Employer Follow-Up and Upskill Protocols - Mandatory "Non-Hire" Interview Loops: If a graduate is interviewed but not hired, institutions should conduct a standardized follow-up with the employer to identify specific skill or soft-skill gaps. This data should be used to refine curricula. - Probationary Status Safety Nets: If an employer flags a new hire as struggling during a 90-day probation period, the policy should provide a mechanism for immediate, targeted upskilling or coaching to prevent turnover. Thank you for your dedication to building an accountable and forward-thinking workforce development strategy for Maine. Sincerely, Rebecca Neithercutt Farmington, Maine	committed to implementing inclusive outreach strategies to ensure broad awareness of Workforce Pell opportunities. As part of these efforts, the Board will conduct outreach to organizations that serve and support individuals with disabilities to help ensure they have access to information about Workforce Pell eligible programs and related resources. The State Workforce Development Board will provide technical assistance resources to all institutions to support their efforts to serve diverse learners. While federal regulations do not allow flexibility in performance measures, the U.S. Department of Education stated it will "continue to monitor implementation and determine whether

		additional guidance is warranted to support equitable accountability across varied program structures." The Workforce Pell Data Group will continue to assess data availability and reporting limitations to determine which demographic information may be incorporated into future application processes to support disaggregated outcome analysis and reporting. Demographic elements under consideration include race/ethnicity, military or veteran status, first-generation status, and disability status. 5. Per federal rule, placement data will be measured two quarters after exit from the program. Per federal rule, only Title IV-eligible institutions of

		higher education may offer Workforce Pell-eligible programs. However, these institutions may partner with a non-Title IV training provider to deliver up to 25% of program instruction. For Workforce Pell programs that fulfill the related technical instruction component of a Registered Apprenticeship, a non-Title IV provider may deliver up to 49% of the instruction through a partnership with a Title IV-eligible institution. The institution's application for Workforce Pell will include an attestation that the institution's financial aid officers have all the information necessary to advise students on the eligibility requirements, financial implications, and other impacts of participating in the Workforce Pell program.

		6. Remote workers in Maine would be included in the placement rate calculated using UI wage records, provided they are employed in a job covered by Maine's unemployment insurance program. The other suggestions raised in your comment are beyond the scope of the Workforce Pell Determination Policy; however, your comments will be shared with relevant partners for consideration. 7. CWRI will calculate and verify each institution's employment rate using UI wage data. Per federal rule, students who are enrolled in a subsequent postsecondary program following completion of a Workforce Pell program (and during the mandated time frame— second quarter after exit) are not excluded

		from the placement rate calculation. However, under the federal rule, they are excluded from the Value-Added Earnings calculation. The Workforce Pell Determination Policy requires that Workforce Pell-eligible programs must demonstrate that their programs lead to additional credentials, including credit-bearing pathways, and have broad employer recognition that supports advancement within a career pathway. 8. The issues raised in your comment regarding employer follow- up are beyond the scope of the Workforce Pell Determination Policy; however, your comments will be shared with relevant partners for consideration.

Marshall Archer, State Representative	I write in strong support of the proposed Maine Workforce Pell Program Determination Policy. As a member of the Legislature's Joint Standing Committee on Labor , I regularly hear from employers who cannot find qualified workers and from constituents who want to train quickly for good jobs but cannot afford to. Short-term Workforce Pell, paired with the state review process this policy establishes, answers both needs, and its emphasis on demand-driven alignment, measurable outcomes, and a transparent approval process is well placed. Aligning training with in-demand jobs. Maine remains in a sustained labor shortage, unemployment has held below four percent for 52 consecutive months and labor force participation sits near 59.7 percent, with roughly 0.8 unemployed workers per opening. The Priority Occupations List targets the sharpest shortages: the Maine Nursing Action Coalition projects the state will be about 1,620 RNs short in 2026 and 2,800 short by 2030,2 and the list's LPNs, CNAs, medical and surgical technicians, skilled trades, truck drivers, and behavioral health roles map directly onto that demand. A data-driven, CWRI-maintained list refreshed at least bi-annually keeps public dollars pointed at real need. Expanding access for underserved Mainers. Short-term, Pell-eligible programs are among the best on-ramps for working adults, career-changers, and lower-income learners. Maine's credential attainment is about 55.5 percent against a 70-percent-by-2035 goal,3 a gap we cannot close through degrees alone. I especially commend the "Essential, In-demand Occupations" criterion, which recognizes childcare educators, home health aides, community health workers, and behavioral health counselors, the roles that let other Mainers work. I urge the Board to keep employer-validation and stackability requirements workable for smaller and rural providers so access is broadened, not narrowed by paperwork. Serving Maine's veterans. Maine is home to more than 102,000 veterans whose military training already maps to the trades, health care, and	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Responses to comments are as follows: 1. The employer validation form is designed to impose minimal burden on employers and industry associations. Evidence demonstrating stackability will be submitted by the Title IV provider, not the employer. 2. Prior military credit will be evaluated as part of the prior learning assessment process conducted by Title IV institutions. These institutions are responsible for determining the applicability and award of academic credit for military training.

	technical roles on the list. In applying the stackability and portability criteria, the state should credit prior military training wherever appropriate and coordinate with the Bureau of Maine Veterans' Services and the CareerCenters' veterans' representatives, so veterans move quickly from separation to a recognized, in-demand credential. I respectfully urge the Board to adopt it, with attention to the veteran, rural-provider, and underserved-job seeker considerations above. Thank you for the opportunity to comment. Sincerely, Marshall Archer State Representative	
Joshua Howe, MCCS	Good morning, The Maine Community College System (MCCS) is excited to provide this public comment on the proposed state policy for approval of Workforce Pell programs. MCCS has been honored to participate in Workforce Pell and the development of the Maine Department of Labor (MDOL)/ State Workforce Board (SWB) and the Governor's policy on program approvals. It has been a collaborative process and we look forward to continued partnership. Workforce Pell provides an excellent opportunity for learners to be able to access additional funding to continue their education in valuable short-term training. Sadly, the federal legislation and rules don't fully appreciate the reality of delivering of workforce programs through community college system. MCCS offers workforce programs in a variety of cadences which adapt to learners' and employers' unique needs such as intensive short programs or more extended after work or weekend programs. The requirement that programs are delivered in the exact same timeframe ignores and constrains the flexibility even when these programs have the same hours and learning outcomes, even if they remain within the requirements of the rules. It is MCCS' hope that after a settling in period that Congress and the Department of Education will revisit the legislation and rules and provide greater flexibility and opportunity for education providers to deliver programs that meet the needs of learners and offer additional pathways to higher wages and education.	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Responses to comments are as follows: 1. The Workforce Pell Determination Policy will rely on the federal eligibility requirements for clock hours and weeks of instructional time. The final rule does not distinguish between "program length" and "program duration." Rather, it requires that an eligible workforce program be at least 150 clock hours but less than 600 clock hours and be offered over a minimum of 8 weeks but

	Workforce Pell has as number of requirements and constraints and the proposed policy does an excellent job of adhering to the requirements of the rules without adding additional constraints and requirements. MCCS appreciates that the Maine Department of Labor (MDOL) and State Workforce Board (SWB) have drafted a policy which allows for multiple alternative ways to meet the requirements in the rules. MCCS would like to make suggestions for additions to the policy that will help clarify the boundaries, reduce confusion, and increase flexibility. • Define that there is a difference between program length and duration, and that length is hours and duration is days or weeks. • Add clarifying language that approved program may be modified without seeing reapproval so long as it continues to meet the standards and continues to meet the original competencies, objectives and structure. More substantial changes may require re-approval. This is supported in the response to questions by Federal Department of Education. • To better align with the current credit for prior learning processes, modify the sentence on p13 "*This includes demonstrating that the credential awards transcripted academic credit applicable to a higher-level certificate or degree program and/or is accepted in transfer toward specific credential or program requirements.*" Changing it to "*This includes demonstrating that the **program** or credential is **eligible for** transcripted academic credit applicable to a higher-level certificate or degree program and/or is accepted in transfer toward specific credential or program requirements.*" This is more consistent with the federal rules and clarifies that the program completion is *eligible* for credit towards a certificate or degree should the learner enroll or matriculate into those programs. • To better align with the current credit for prior learning processes, modify the sentence on p7 from "*Ensure that a student receives academic credit*	less than 15 weeks of instructional time. 2. The Workforce Pell Determination Policy has been updated to clarify that credits earned through an eligible program may be "a*pplied toward general education, elective, or core program requirements.*" 3. The Workforce Pell Determination Policy has been updated to reflect: "This includes demonstrating that the program or credential is eligible for transcripted academic credit applicable to a higher-level certificate or degree program and/or is accepted in transfer toward specific credential or program requirements." 4. The Workforce Pell Determination Policy has been updated to reflect that a "student is eligible to receive academic credit for

	for at least one certificate or degree program at one or more eligible institutions." To "*Ensure that a student **is eligible to receive** academic credit for at least one certificate or degree program at one or more eligible institutions.*" • Add clarifying language that the credit that program is eligible for may be applied to general education, elective or core requirements. Thank you again to the Maine Department of Labor (MDOL) and State Workforce Board (SWB) for engaging the Maine Community College System and other partners in the development of this policy, and for providing a strong working document that will help give Maine learners additional pathways to success. Sincerely, Joshua Howe Deputy Executive Director of Workforce Training and Remote Working Harold Alfond Center for the Advancement of Maine's Workforce Maine Community College System	at least one certificate or degree program at one or more eligible institutions." 5. The Workforce Pell Determination Policy has been updated to clarify that credits earned through an eligible program may be "applied toward general education, elective, or core program requirements."
Raymond Rice, Ph.D. President, University of Maine at Presque Isle	Re: Public Comment on Draft Policy PY 26-01, Maine Workforce Pell Program Determination Policy Dear Director Quint: I write on behalf of the University of Maine at Presque Isle to offer comment on the draft Maine Workforce Pell Program Determination Policy. Let me begin with sincere appreciation: the draft accomplishes, on a demanding federal timeline, the difficult work of translating Section 83002 of H.R. 1 and the Department of Education's May 19, 2026 final rule into a coherent, data-informed state process—and it does so with a commitment to transparency that will serve Maine's learners well. UMPI supports the policy's three stated aims without reservation. The comments that follow are offered in that same spirit: not as objections to the architecture, but as refinements intended to ensure that the finished policy serves all of Maine's regions, and all of its public institutions of higher education, equally well.	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Responses to comments are as follows: 1. The exclusion of occupations that typically require a bachelor's degree is intended to reduce duplication with regular Pell grants which are intended for associate and bachelor level programs.

	1. The categorical exclusion of occupations typically requiring a bachelor's degree The draft's Exclusions provision would bar from priority designation any occupation "typically requiring a bachelor's degree or higher." Nothing in the federal statute or the final rule compels this restriction, and I would ask the Board to consider carefully what it forecloses. The policy elsewhere—and rightly—insists that Workforce Pell credentials be stackable: that they carry transcripted academic credit toward a certificate or degree, that they move a learner along a pathway rather than depositing that learner at a dead end. And yet the exclusion bars precisely those occupations in which the degree is the pathway's destination. Put otherwise: the draft asks institutions to demonstrate that short-term credentials ladder into degree programs while simultaneously excluding the occupations to which those degree programs lead. For a rural comprehensive university such as ours—where working adults across Aroostook County stack short-term credentials into online, competency-based YourPace degree programs in business, education, and allied fields—this is not an abstract tension but a structural barrier, and one that will fall hardest on the adult learners the Workforce Pell Grant was designed to reach. I would respectfully urge the Board either to strike the exclusion or to replace it with a case-by-case evaluation under which an occupation ordinarily associated with a bachelor's degree remains eligible where the proposed credential demonstrably stacks toward that degree and where employers validate demand for the intermediate credential itself. 2. The requirement that articulation agreements be in effect for one year Federal law requires that an eligible program ensure a student receives academic credit toward at least one certificate or degree program at one or more eligible institutions; it says nothing about the age of the instrument documenting that assurance. The draft, however, requires that articulation agreements be "fully executed and in effect for a minimum of one year prior to the submission for program approval"—a seasoning requirement that,	2. We removed the requirement that the articulation agreement be in place for 12 months in the policy as that is not the only form of evidence that must be in place for 12 months prior to submitting a Workforce Pell application. The timeline for submitting this and other sources of evidence will instead be addressed in the Step-by-Step Submission Guide. We have updated the Workforce Pell Determination Policy to include catalog and curricular documentation as evidence of internal stackability. 3. Occupations that do not align with at least one of the top three priority industry sectors in one of Maine's three local workforce development areas may still be

	layered atop the federal requirement that a program have operated for twelve months, effectively imposes two overlapping year-long clocks. Moreover, where a credential stacks into a degree program at the same institution, an articulation agreement is arguably the wrong instrument altogether: internal credit applicability—documented in an institution's catalog and curricular records, and governed by the University of Maine System's unified accreditation and Board of Trustees transfer policies—provides evidence at once stronger and more durable than a bilateral agreement. I recommend that the one-year seasoning requirement be removed, and that the policy expressly permit institutions to satisfy the academic-credit standard through catalog and curricular documentation where the receiving program resides at the originating institution or within the same accredited system. 3. Regional equity and the Priority Occupations List The methodology's baseline criteria appear to rest on statewide thresholds—average annual openings exceeding twenty—while simultaneously requiring alignment "with at least one of the top three sectors in local workforce development areas," without specifying which local area governs for a program serving a particular region. The ambiguity matters, and it matters most where Maine's labor markets are thinnest. Occupations central to the economy of Aroostook County and northern Maine—forestry and logging occupations chief among them, alongside much of production agriculture—appear nowhere in Appendix B, precisely because a statewide numerical threshold will systematically overlook demand that is real, urgent, and concentrated in the counties least able to absorb its loss. The petition process offers a remedy in principle but not yet in practice: as drafted, it lacks both a decision timeline and an articulated evidentiary standard beyond the requirement that a proposal "sufficiently align" with the policy's criteria. I would ask the Board to consider a regional designation pathway, one permitting an occupation to qualify on the	considered aligned with regional workforce needs if supporting evidence is provided. Such evidence may include an attestation from the Local Workforce Development Board from the area in which the institution is located. The Petition section of the Workforce Pell Determination Policy has been updated to reflect the following: (e.g., in consultation with local workforce development board, evidence of alignment with demand via job openings, etc.) The policy has also been updated to include a link to the SWDB website that links to the websites of Maine's three local workforce development boards: the Coastal Counties Workforce Development Board, the Central Western Maine

	strength of documented demand within a local workforce development area, and to commit to a defined timeline and standard for petition review. None of this diminishes my gratitude for the care evident in the draft, or my confidence in the collaborative structure it proposes. Precisely because Workforce Pell will matter most to the learners who have historically had the fewest pathways open to them—rural adults, working parents, the underemployed of our northernmost counties—the details of this policy repay every hour of scrutiny we give them now. UMPI stands ready to assist the Board in refining the provisions above, and I welcome any opportunity to discuss these comments further. With gratitude for the Board's work and for the opportunity to comment, Raymond Rice, Ph.D. President, University of Maine at Presque Isle	Workforce Development Board, and the Northeastern Workforce Development Board.
Bradley Denholm, University of Maine System	Good afternoon, Reviewing the *Maine Workforce Pell Determination Policy,* I noticed that SOC codes associated with *Engineering Technologists and Technicians* (SOC: 17-3020) have not been included under either Criteria #1 or #2. Fully acknowledging that engineering programs are typically outside the scope of Workforce Pell, Technicians and Technologists (Automation Technicians, Mechatronics Technicians, etc.) make sense to include under Criteria #1. My basis for this comment is that the skillsets are aligned with those of *Millwrights*, *Maintenance Workers (Machinery)*, and *Industrial Machinery Mechanics* (all included) - especially as technology advancements and adoption in the state continue to transition to more automated, data-driven machinery.	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Engineering Technologists and Technicians (SOC: 17-3020) was not added to the Priority Workforce Pell Occupation list because it was not aligned with at least one of the top three sectors in local workforce development areas. There is a pathway for occupations that do not align with at least one of the top three priority industry sectors in one of Maine's three local workforce

	If the broader category is deemed ineligible, the inclusion of the sub-category, *Electro-Mechanical and Mechatronics Technologists and Technicians* (SOC: 17-3024), should be considered. Thank you in advance for your consideration. Best regards, Brad	development areas (path 1) or the essential occupations path (path 2) to qualify through a petition process, provided supporting evidence demonstrates that the occupation aligns with regional workforce needs.
Claire Sullivan, Ph.D., University of Maine System	Hello, In reviewing the document, I did not see information on learners who choose to continue their education when calculating employment outcomes. The final rules included two changes that will be of interest to our digital learning community: See https://wcet.wiche.edu/frontiers/2026/05/29/workforce-pell-final-rules-turning-policy-into-practice-for-the-digital-learning-community/ 2. The Department revised the treatment of students who continue their education when calculating employment outcomes. Under the final regulations, students who enroll in another educational program during the measurement period will be excluded from the 70% job placement rate metric calculation. This change recognizes that Workforce Pell programs are to be intentionally designed as stackable pathways leading to additional credentials or degree programs and avoids penalizing programs for students who continue their education rather than immediately entering employment. Thank you!	Thank you for your comment. We appreciate your participation in the public comment process and your feedback. Per federal rule, students who are enrolled in a subsequent postsecondary program following completion of a Workforce Pell program (and during the mandated time frame— second quarter after exit) are not excluded from the placement rate calculation. However, under the federal rule, they are excluded from the Value-Added Earnings calculation.

	Regards, Claire Sullivan, Ph.D. Assistant Vice Chancellor for Innovation in Digital Badges and Micro-Credentials University of Maine System	