



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive
Public Works Resource

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April 8, 2026

Nicholas Kent
Under Secretary
U.S. Department of Education
400 Maryland Ave SW
Washington, D.C. 20202

Re: NPRM for Docket ID ED-2026-OPE-0133

Dear Under Secretary Kent:

The American Public Works Association (APWA) represents more than 32,000 public works professionals across North America who serve in both the public and private sectors providing expertise at the local, state and federal government levels. Working in the public interest, our members plan, design, build, operate, and maintain America's vast infrastructure network that is so fundamental to our economy, environment, public health, and safety. As our nation continues to face a significant workforce shortage, APWA appreciates the opportunity to provide comments on the U.S. Department of Education's proposed codification of two changes to the Higher Education Act of 1965 included in the One Big Beautiful Bill Act (OBBA) of 2025.

With the workforce shortages across all vocations, and the historic *Infrastructure Investment and Jobs Act* (IIJA) set to expire on September 30, 2026, it remains imperative that we continuously seek practical, commonsense solutions to make it both easier and appealing for individuals to consider non-traditional routes to fulfilling career opportunities. To that end, we believe that these proposed changes are steps in the right direction and have the potential to set the stage for future growth in our nation's workforce.

While APWA supports measures to get qualified candidates into the workforce immediately, we also take the position that those entering these job fields should have the ability to do so while enjoying the satisfaction that comes with career advancement. In that spirit, we believe that shortening the eligibility timeframe to as little as eight weeks (150 hours) for programs to qualify for a Workforce Pell grant offers a tangible improvement over the current system. It stands to reason that allowing more individuals to consider programs which are shorter than the traditional 15-week minimum for current Pell eligibility, while still culminating in an industry-recognized, portable certificate, degree, or credential, has the potential to appeal to more people. We believe that this added flexibility can only serve to enhance choice and therefore result in positive outcomes.

PRESIDENT
Vic Bienes, P.E.

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE



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Short-term, industry-recognized programs play a critical role in meeting these goals. APWA certificate programs provide comprehensive, employer-recognized skills and knowledge that address the essential competencies required of today's public works professionals. Because these programs focus on need-to-know, job-specific skills, they often demonstrate workforce readiness more clearly than broad degree programs and can be pursued by individuals with varied educational backgrounds. These certificates offer accessible, proven pathways for both new and experienced workers to validate their expertise, advance in their careers, and meet the evolving needs of communities across the country. APWA will be expanding our educational opportunities in the fall of 2027 by adding stackable credentials that fit together like building blocks. Each Micro-credential is a small, focused credential that can be earned individually or stacked toward a certification. This is designed to match real workforce needs.

The story of public works is the story of those who sometimes come to their profession in unexpected ways; to that end, it is encouraging that the Workforce Pell will be extended to those who *have* completed a bachelor's degree, thus meaning that a student may receive a degree in one area and then decide they want to pursue a vocation in another field and may qualify for the funding to help them do so. This would be, no doubt, a benefit to their community and certainly an example of a committed investment in our nation's workforce.

As the nation continues to experience a workforce shortage concentrated in technical trades vital to public works operations – like solid waste, transportation, and engineering – and the Trump administration considers and advances new approaches to mitigate these shortages, APWA supports added flexibility to the Pell program and believes it will create more opportunity to those seeking a career change. As a professional source of education and credentialing programs, APWA ardently believes in the power of continuing education, opportunities for growth, and career advancement. As DOE works to implement these regulations beginning July 1, 2026, APWA stands prepared to serve as a resource regarding the multifaceted expanse of careers within the public works field. Once again, we appreciate the opportunity to register our voice in this matter.

Sincerely,

A handwritten signature in black ink that reads "Scott D. Grayson". The signature is fluid and cursive, with a long horizontal line extending from the end.

Scott D. Grayson, CAE
Chief Executive Officer

PRESIDENT
Vic Bienes, P.E.

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE