

AHEAD Committee | Clarification Regarding Small Program & Cohort Sizes

Submitted by Employers / Business

Context & Statement of Support:

We appreciate and are supportive of Congress's and the Department's efforts to ensure that Workforce Pell is only made available to students attending programs that meet quantifiable outcomes standards. We also recognize that many in-demand programs in rural areas, military settings, and other parts of the labor market will never reach statistically significant cohort sizes to enable thoughtful evaluation of completion and placement rates in a way that drives signal as opposed to noise for students, taxpayers, and the Department.

Given this, we would propose either of the below textual revisions to provide Governors with the necessary discretion to address such instances, while still achieving the collective accountability goals shared by all.

Textual Revision Proposed

Add §690.94(a)(2)(iii) reading:

» **“For any award year, an institution may submit and a Governor may certify the completion rate and job placement rates, using the methodology published under §690.93(b), which may include the use of consolidated, rolling, multi-year cohorts when annual cohort sizes are insufficient for reliable measurement, based on the Governor’s determination and analysis using administrative data.”**

Note for Department

We are open to other ways to address this small cohort issue and would remain eager and open to discuss alternative revisions that achieve similar ends and are preferable to the Department.