

UNITED STATES DEPARTMENT OF EDUCATION

*Accountability in Higher Education and Access through
Demand-driven Workforce Pell (AHEAD) Committee*

2025 Negotiated Rulemaking - Meeting Summary
December 8–12, 2025
(First Session)

Welcome

Facilitator Kayla Mack opened the Session by welcoming the Department, Committee members, and public observers. She introduced the Department’s participants: David Musser, Acting Director of the Policy Coordination Group (OPE), serving as the Federal Negotiator; Jacob Lallo, Program Attorney (OGC); and Jeff Andrade, Deputy Assistant Secretary for OPE Policy, Planning, and Innovation (PPI). Then, Jeff Andrade introduced Under Secretary Nicholas Kent, who offered remarks and expressed appreciation to the Committee for its service.

Introductions

Kayla Mack introduced her co-facilitator, Mike Franczak. Committee members, both Primary and Alternate negotiators, introduced themselves. Jeff Andrade provided context on the *One Big Beautiful Bill Act* as relevant to the Committee’s forthcoming work, and David Musser outlined the agenda and Topics for Session One.

AHEAD Committee Membership

Community of Interest	Primary Negotiator	Alternate Negotiator
Students who are currently enrolled and receiving assistance from the Title IV, HEA programs.	Eric Atchinson, Arkansas State University System	Magnus Noble, University of Illinois Springfield
Students who are veterans, U.S. military service members, or groups representing them.	Matthew Feehan, Veterans Education Project	Julie Howell, Paralyzed Veterans of America
Employers and groups representing the business community, including small, medium, and large businesses.	David Kafafian, Clasp	Dennis Cariello, Hogan Marren Babbo & Rose
Legal assistance organizations that represent students, consumer advocates, and civil rights groups that represent students.	Tamar Hoffman, Community Legal Services of Philadelphia	Zoe Kemmerling, Legal Aid of the District of Columbia
Public institutions of higher education, including institutions eligible to receive Federal assistance under Title III and Title V of the HEA, Tribal Colleges and Universities, and Historically Black	Kristin Hultquist, HCM Strategies	Tonjua Williams, St. Petersburg College

Colleges and Universities.		
Private nonprofit institutions of higher education including institutions eligible to receive Federal assistance under Title III and Title V of the HEA, Tribal Colleges and Universities, and Historically Black Colleges and Universities.	Aaron Lacey, Thompson Coburn LLP	Joanna Roush, Liberty University
Proprietary institutions of higher education, as defined in 34 CFR 600.5.	Jeff Arthur, ECPI University	Ryan Claybaugh, Paul Mitchell Advanced Education
State workforce agencies and workforce development boards.	Rachael Stephens Parker, Maryland Governor’s Workforce Development Board	Andrea DeSantis, North Carolina Department of Commerce
State grant agencies, and other State and non-profit higher education financing organizations.	J. Ritchie Morrow, Nebraska Coordinating Commission for Higher Education	Elizabeth McCloud, Pennsylvania Higher Education Assistance Agency
State higher education executive officers, State authorizing agencies, and other State regulators.	Randy Stamper, Virginia Community College System	Heather DeLange, Colorado Department of Higher Education
Accrediting agencies recognized by the Secretary of Education.	Michale McComis, Accrediting Commission of Career Schools and Colleges	Gedalia (Gary) Litke, Association of Advanced Rabbinical and Talmudic Schools
Organizations representing taxpayers and the public interest.	Preston Cooper, American Enterprise Institute	Ethan Pollack, Jobs for the Future
United States Department of Education	Dave Musser, Department of Education	Jeff Andrade, Deputy Assistant Secretary for OPE (PPI) Jacob Lallo, Office of General Counsel (both non-voting)

** Alternate for “Students who are currently enrolled and receiving assistance from the Title IV, HEA programs,” Magnus Noble was added to the Committee at the start of the Session.*

Agenda

- Topic One:** Dealing with Ineligibility Due to Assistance from Non-Federal Grants
(Sections 690.5 and 690.80)
- Topic Two:** Workforce Pell Technical and Conforming Changes
(Sections 600.10, 668.5, 668.8, 668.20, 668.32, 690.2, 690.6, and 690.11)
- Topic Three:** Workforce Pell Definitions
(Sections 690.90, 690.91, and 690.92)
- Topic Four:** Governor Approval of Eligible Workforce
(Section 690.93)
- Topic Five:** Secretary of Education Approval of Eligible Workforce Programs
(Section 690.94)
- Topic Six:** Value-Added Earnings Calculation
(Section 690.95)
- Topic Seven:** Losing and Regaining Eligibility
(Sections 690.96 and 690.97)

Discussion of Issues

The Committee engaged in detailed discussion of each substantive Topic identified above. For every Topic, the Department walked through the associated Sections and responded to Committee questions regarding the proposed revisions. Throughout deliberations, Committee members suggested revisions; Department staff, Aaron Washington, Cody Christensen, and Cody Russell, provided informational presentations and answered inquiries; and representatives from the Department of Labor, Marek Laco, Luke Murren, and Kim Vitelli, offered additional context, information, and responses. In accordance with established protocols, pulse checks for tentative agreement were conducted for all seven Topics. Caucuses were held as needed to refine proposed text. A final, comprehensive Consensus Check was then taken on the revised text across all Topics and Sections. The Committee reached consensus on Workforce Pell.

Next Meeting

Session Two of the AHEAD Committee will be held January 5–9, 2026, at the U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 20202.

Next Steps

The facilitators will circulate a draft summary of Session One. The Department will provide an agenda and discussion paper in advance of Session Two. Committee members should forward any information, proposals, or requests intended for the Department and/or the Committee to the facilitators for appropriate coordination and distribution. Members are also encouraged to review updated discussion papers, proposed regulatory text, and related materials posted on the Department's webpage.

Attendance

All AHEAD Committee members were present for the first session. On day five, in the absence of two Primaries, representing the Public Institutions and Employers constituencies, their Alternates participated in the Consensus Decision-Making.