Workforce Pell

What Is Workforce Pell?

§ 690.90 Scope & Purpose

Extends Federal Pell Grant eligibility to short-term programs (150–599 clock hours / 8–14 weeks) that lead to high-value workforce credentials.

Pell Grant Only

Students in eligible workforce programs receive Pell — no other Title IV aid.

No Concurrent Aid

Cannot receive Pell for a workforce program and another program at the same time.

Tuition Cap

Published tuition & fees may not exceed the program's value-added earnings.

Program Eligibility Requirements

§ 690.92 — What Makes a Program Eligible?

Duration & Size

- 8–14 weeks of instruction
- **150–599 clock hours**
- OR 4–15 semester/trimester hours
- OR 6–23 quarter hours
- Must be an undergraduate program
- Must meet 668.8 requirements

Exclusions & Conditions

- No correspondence courses
- No study abroad coursework
- No direct assessment credit equivalencies
- No suspensions/terminations in prior 5 years
- **Governor approval required**
- **Secretary approval required**

The Governor's Approval

§ 690.93 — State-Level Approval Process

1 **Industry Alignment**

Program aligns with high-skill, high-wage, or in-demand sectors (per Carl D. Perkins Act & WIOA).

2 **Employer Validation**

Program meets hiring requirements of employers in the target sector, with direct employer input.

3 **Stackable Credential**

Credential must be stackable & portable across more than one employer, or sole credential in the field.

4 **Academic Credit Path**

Completers must receive transferable academic credit toward a certificate or degree program.

Bilateral agreements between two Governors can allow cross-state enrollment (§690.93(h))

Governor Certification

§ 690.93(d) — What the Governor Must Submit

✅ Program name

✅ 6-digit CIP code

✅ SOC code(s) for target occupations

✅ Signed approval statement

✅ Date of approval

✅ Alt completion/placement certification (if applicable)

✅ Agreement to provide documentation on request

✅ 15-day notice on withdrawal

✅ Attestation re: cost vs. anticipated wages

✅ Approval expires at PPA expiration

Registered Apprenticeship programs automatically meet alignment & employer requirements (§690.93(g))

Federal Performance Standards

§ 690.94 — Federal Evaluation Requirements

70%
Completion Rate

Within 150% of normal time to completion

70%
Job Placement Rate

Employed in target occupation, Q2 after completion

📅 Phase-In Timeline

2026–27 through 2028–29: Governor certifies completion & placement using admin data (wage records). General employment measure.

2029–30 onward: Placement measured by employment in the specific occupation the program prepares students for, or a comparable high-skill/high-wage/in-demand occupation.

Value-Added Earnings

§ 690.95 — The Tuition Cap Mechanism

| Median Earnings of Completers (RPP-adjusted) | — | 150% of Poverty Line (single individual) | = | **Value-Added Earnings** |

Cohort Period: Pell recipients who completed the program during the award year ending 3 full award years prior.

Minimum N: 50 students preferred; Secretary rolls back up to 3 prior years. 30 minimum with 4 years of data. If <30, no calculation.

CIP Aggregation: All programs with the same 6-digit CIP code at the institution are combined.

Earnings Window: First full tax year after the award year of completion.

Match Threshold: Federal earnings agency must match at least 16 students. If <16, no VAE calculated for that year.

Zero/Negative VAE: Program becomes ineligible for Pell — no exceptions.

Student Eligibility

§ 668.32 & § 690.6 / § 690.11

Who Qualifies?

- Must be otherwise Pell-eligible

- Not enrolled in (or accepted to) a graduate program

- Has not attained a graduate credential

- **May have a bachelor's degree — this is a key difference from standard Pell**

- If confined/incarcerated, must be in an eligible prison education program

⚠ Key Restrictions

- **No concurrent Pell for workforce program + any other program**

  - This applies at the same or a different institution

  - Includes enrollment in another workforce program

- Duration of eligibility rules in §690.6(f) apply

- No remedial coursework counted for credit-hour workforce programs (§668.20(g))

Loss & Regaining Eligibility

§ 690.96 & § 690.97

Governor Withdraws Approval

Timing: End of payment period after withdrawal or failure to reapprove

Regaining: Reestablish after Governor re-certifies and Secretary confirms eligibility

Completion/Placement Failure

Timing: End of payment period after Secretary determines rates not met

Regaining: 2-year lockout for same program or substantially similar (same 4-digit CIP + identical SOC codes)

Tuition Exceeds Value-Added Earnings

Timing: Beginning of award year after VAE release

Regaining: Reduce tuition, get new Governor certification, request VAE recalculation

Other Regulatory Changes

§ 668.5, § 668.8, § 668.20, § 600.10

Written Arrangements (§668.5)

Ineligible institutions providing >25% of a program cannot do so for eligible workforce programs. Workforce Pell programs are explicitly excluded from the 25–50% arrangement exception.

Eligible Program Definition (§668.8(n))

Eligible workforce programs are now included in the definition of 'eligible program' for Title IV purposes — but only for the Federal Pell Grant Program.

Remedial Coursework (§668.20(g))

Institutions may not count noncredit or reduced credit remedial courses (including ESL) for students enrolled in credit-hour workforce programs.

Program Approval (§600.10(c))

Institutions must obtain Secretary approval to establish eligibility for each eligible workforce program, added alongside direct assessment and prison education programs.

What Programs Could Qualify (Maybe)?

Illustrative Examples Across High-Demand Sectors

❤️ Healthcare

Phlebotomy technician, Medical coding, EKG technician

150–500 clock hours typical

💻 Information Technology

CompTIA A+/Network+/Security+, AWS Cloud Practitioner, Cisco CCNA prep

200–550 clock hours typical

⛑️ Skilled Trades

HVAC fundamentals, Welding certification, Electrical apprenticeship prep

250–599 clock hours typical

🚚 Transportation & Logistics

Commercial Driver's License (CDL), Forklift/warehouse operations, Diesel tech intro

160–400 clock hours typical

? Strategic Questions for Your Institution

1 **Do we currently offer programs in the 150–599 clock hour range?**

Inventory existing workforce, CE, and non-credit programs that could be candidates.

2 **Are our workforce programs currently non-credit?**

If so, can they be restructured as clock-hour programs eligible under §668.8? What's the accreditation pathway?

3 **Can we track completion and employment outcomes at 70%?**

Do we have data infrastructure to report completers and support Governor-certified placement rates?

4 **Do programs lead to recognized postsecondary credentials?**

Industry-recognized certs, licenses, or registered apprenticeship completions — are they stackable and portable?

5 **Is our Governor's office ready?**

Has the State established the process under §690.93(b)? What is the timeline for institutional submissions?

6 **Can we sustain tuition below value-added earnings?**

Model your program costs against likely completer earnings. Programs with zero or negative VAE are immediately ineligible.

Key Takeaways

- ✓ Workforce Pell creates a new, tightly regulated pathway for short-term credentials to access federal grant aid — Pell only, no loans, no other Title IV.

- ✓ The dual-gate model (Governor + Secretary) adds significant compliance layers institutions must navigate before a single dollar flows.

- ✓ The 70/70 completion and placement benchmarks are aggressive — programs must be high-performing from day one.

- ✓ Value-added earnings function as a hard tuition cap, with institutional liability for programs that exceed it.

- ✓ Cross-state bilateral agreements and Registered Apprenticeship carve-outs create flexibility, but the details matter.

- ✓ Institutions with any suspension, emergency action, or termination in the prior 5 years are locked out entirely.

Questions & Discussion

34 CFR Part 690, Subpart H
Proposed Regulations — Workforce Pell