



Workforce Pell: Program Overview and Considerations for Implementation



About Trellis Strategies

Trellis Strategies is an experienced research partner dedicated to advancing education and workforce development.

With nearly 40 years of expertise, we specialize in qualitative and quantitative research services, including surveys, interviews, focus groups, and case studies.

Our proficiency in qualitative research and quantitative analyses enables us to extract insights from extensive datasets, guiding strategic decision-making in areas such as student success and outcomes.

Our research team has deep expertise in documenting the financial wellbeing and student success indicators of postsecondary students across the nation. Since 2018, we have surveyed 3.8 million students at 300 institutions in 37 states on their basic needs, mental health, and other critical drivers of student success.

For more information, visit our website: www.trellisstrategies.org/about-us/



EVALUATION



ANALYTICS



DATA COLLECTION



CUSTOM RESEARCH

515

REPORTS
IN 2024

5.3+

MILLION
STUDENTS SURVEYED
SINCE 2018

30+

THREE DECADES OF
ORGANIZATIONAL
RESEARCH EXPERIENCE

Why the Modern Learner?

- Learners, of all ages, are changing
- Our learner insight work helped us to understand all demographics of learners were shifting and the shift was broader than just “adult learners”
- Our conversations center around the need for the system to evolve to meet the needs of all learners



AGENDA ITEMS



1. Legislative Overview
2. Next Steps for Implementation
 - Student Eligibility
 - Program Approval
3. Considerations for Implementation
4. Campus Based Opportunities
5. Questions

One Big Beautiful Bill Act

- H.R. 1 or One Big Beautiful Bill Act
 - Reconciliation Bill
 - Wide ranging changes to higher education and higher education finance
- Included Workforce Pell Grants after a series of legislative discussions on the issue
- Provided guidance that balances Republican and Democrat perspectives on the issue
- Legislative text leaves many questions unanswered
- Creates one of the first true federal / state partnerships in postsecondary education

Key Bill Text Elements

- Timeline
 - Program is intended to go into effect on July 1st, 2026
 - Additional guidance will be available through the Neg Reg process which will run through December and January
 - Assume rules in the early part of 2026
- State Process
 - States will then need to run their own processes to provide recommended programs

Program Eligibility

- Programs must be between 150 and 599 clock hours
- Courses must be 8 to 15 weeks long
- Programs cannot be offered as a correspondence course
- Institution offering program must be otherwise Pell eligible
- Programs must be designed for student portability into credit-bearing pathways or prepares an individual for a career pathway with only one recognized credential.
- Program specific requirements
 - Must have been offered for at least one year prior to receiving eligibility
 - Have a verified completion rate of at least 70% within 150% of normal time for completion. Look at (20 U.S.C. § 1088(b)(2).)
 - Have a verified job placement rate of 70% at 180 days after of program completion (20 U.S.C. § 1088(b)(2).)
 - Meet value-added earnings requirement

Value Added Earnings Requirement

- The published tuition and fees are used to baseline the calculation
- The Department will then take the Median earnings of graduates minus 150% of the federal poverty line
- Earnings will be measured three years after completion
- The earnings will also be adjusted for regional differences

State Role

- The Governor of a State, after consultation with the State board, determines that the program—
 - “(I) provides an education aligned with the requirements of high-skill, high-wage (as identified by the State pursuant to section 122 of the Carl D. Perkins Career and Technical Education Act (20 U.S.C. 2342)), or in-demand industry sectors or occupations;”
 - (II) meets the hiring requirements of potential employers in the sectors or occupations described in subclause (I);”
 - (III) either
 - (aa) leads to a recognized postsecondary credential that is stackable and portable across more than one employer; or
 - (bb) with respect to students enrolled in the program—
 - (AA) prepares such students for employment in an occupation for which there is only one recognized postsecondary credential; and 139 STAT. 352
 - (BB) provides such students with such a credential upon completion of such program; and”
 - (IV) prepares students to pursue 1 or more certificate or degree programs at 1 or more institutions of higher education (which may include the eligible institution providing the program), including by ensuring—
 - (aa) that a student, upon completion of the program and enrollment in such a related certificate or degree program, will receive academic credit for the Workforce Pell program that will be accepted toward meeting such certificate or degree program requirements; and”
 - (bb) the acceptability of such credit toward meeting such certificate or degree program requirements;

State Role (Part 2)

- After the Governor of such State makes the determination that the program meets the requirements under clause (iii), the Secretary determines that —“
 - (I) the program has been offered by the eligible institution for not less than 1 year prior to the date on which the Secretary makes a determination under this clause;
 - (II) for each award year, the program has a verified completion rate of at least 70 percent, within 150 percent of the normal time for completion;
 - (III) for each award year, the program has a verified job placement rate of at least 70 percent, measured 180 days after completion; and
 - (IV) for each award year, the total amount of the published tuition and fees of the program for such year is an amount that does not exceed the value-added earnings of students who received Federal financial aid under this title and who completed the program 3 years prior to the award year, as such earnings are determined by calculating the difference between —
 - (aa) the median earnings of such students, as adjusted by the State and metropolitan area regional price parities of the Bureau of Economic Analysis based on the location of such program; and
 - (bb) 150 percent of the poverty line applicable to a single individual as determined under section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) for such year.

Provisional Eligibility

- “(B) In the case of a program that has not previously participated in programs under this title and is being determined eligible for the first time under this paragraph, the Secretary may consider such program to be an eligible program for purposes of the Workforce Pell Grants program under section 401(k) for a provisional eligibility period that may not exceed 3 years, if such program-- “
 - (i) subject to clause
 - (ii), meets the requirements of subparagraph (A); and “(ii) in lieu of the determination of median earnings under subclause (I) of subparagraph (A)(v), provides to the Secretary for purposes of meeting the requirements of subparagraph (A)(v), alternate earnings of students who complete the program, which are statistically rigorous, accurate, comparable, and representative of students who complete such program.

State and Federal Roles

• State Role:

- Governor must consult with state workforce board and determine that the program:
- Is aligned to high skill, high wage or in-demand industry sectors/occupations
- Meets hiring requirements of potential employers
- Leads to a recognized credential that is stackable, portable, or leads to a job for which there is only one recognized credential, and the program leads to that credential upon completion
- Ensures students get academic credit that is accepted for another certificate or degree program

• Federal Role:

- After state completes its checklist, Secretary determines:
- WFG program has been offered by the institution for at least a year
- 70 percent of participants complete the program within 150 percent of normal time to completion
- 70 percent of participants find employment within 180 days of program completion
- Published tuition and fees for the program do not exceed the “value-added earnings” of completing students
- Value-added earnings = median earnings [adjusted for geographic location] of cohort of students 3 years after completion MINUS 150 percent of the poverty line.

Student Eligibility

- Student can not receive a normal Pell Grant award and a Workforce Pell award at the same time
- Individuals must meet normal Pell eligibility requirements
- Cannot be enrolled in a graduate level program or have obtained a graduate level certificate
- Workforce Pell counts against recipient's lifetime Pell Grant
- Students with a bachelor degree can still potentially receive Workforce Pell Grant

Award Amount

- Pell amount will be prorated and prorated amount can fall below minimum award amount
- We assume that SAI will be used and that proration will follow clock hour proration
- NCAN has put forward this potential formula:
 - “Multiply the student’s Pell award by the lesser of:
 - The number of clock hours in the WFP program (150-599) ÷ the number of clock hours in the program’s academic year (900)
 - The number of weeks in the WFP program (eight to 15) ÷ the number of weeks in the program’s academic year (at least 30 for credit hour programs, at least 26 for clock-hour programs).
 - This means that a student with an SAI of 0 who is attending a WFP program that is eight weeks long and offers 160 clock hours would receive a WFP award of \$1,315 because the proration amount based on clock hours ($160/900=18\%$) is less than the proration amount based on weeks ($8/26=31\%$).”

Negotiated Rulemaking

- Process Overview
 - Process through which clarity is added to the legislation through developing a shared vision for an NPRM
 - Required for many elements of Title IV
 - Requires consensus to be “binding” without consensus ED can move forward with their own direction
- Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee
- Using emergency authority during the shutdown (and likely future shutdowns) due to timeline (November 1st) and legislation required deadlines
- Dates
 - December 8-12, 2025, 9:00 a.m. to 12:00 p.m. and 1:00 p.m. to 4:00 p.m., Eastern
 - January 5-9, 2026, 9:00 a.m. to 12:00 p.m. and 1:00 p.m. to 4:00 p.m., Eastern

Neg Reg (Continued)

- Groups represented:
 - Borrowers
 - Legal Assistance
 - Public / Private / Prop IHE's
 - State Workforce Agencies
 - State Education Finance
 - State Authorizing Agencies
 - Accrediting Agencies
 - Employers
 - Taxpayer / Public Interest
- Issues:
 - Program Eligibility for Workforce Pell
 - Financial Value Transparency and Gainful Employment
 - Pell Grant for Full Award

Considerations for Implementation

- Existing Programs
 - Identify existing programs in in-demand fields that align with the Perkins high-skill, high wage
 - Alignment of these programs with regional employer needs (job descriptions + conversations)
 - Assessment of how stackable or alignment with terminal credentialing
- Student Implications
 - Lifetime Pell eligibility requirements
 - Half life of skills
 - Learner journey mapping for additional education

Campus Implications

- Academic Affairs
- Enrollment Management
- Financial Aid
- Institutional Effectiveness / Research
- Student Services

Campus Based Opportunities

- Future and Provisional Programs
 - Opportunities in the labor market for new program development
 - Development of intentional enrollment strategies for programs + continued enrollment
 - Validation of skills / separate signaling process for quality
- Institutional Assessment
 - Impact of implementation
 - Student Success Metrics
 - Competition



QUESTIONS?

THANK YOU!

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