



# Workforce Pell: 2.5 months and counting (down)

Western Alliance of Community College Academic Leaders  
Cheyenne, Wyoming  
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# Workforce Pell – The basics

- ▶ Caveat emptor: Regulations are not final
- ▶ Proposed regulations released, comments closed...**much more to come**
- ▶ Provides Pell grants for programs between 150 & 599 clock hours of instruction (**or equivalent credit hours**) over 8-15 weeks **under certain conditions**
- ▶ **Federal** components of eligibility to launch by July 1\*
- ▶ Significant misinformation circulating

\*Does this mean students will have access July 1?

Unclear—will require significant state, institutional, and departmental effort

# Process from here

- ▶ Final regulations – Early Summer?
- ▶ State policies and processes
- ▶ Sub-regulatory guidance (many commitments)
- ▶ Processes established for state/federal communications
- ▶ Institutional applications to state
- ▶ Changes to Program Participation Agreements (PPAs)
- ▶ Implementation by July 1, 2026?!?

## Necessary (but not sufficient) institutional conditions

- ▶ Same as Pell/Title IV
- ▶ State authorization, accreditation, financial responsibility and administrative capability, signed PPA

Just b/c you meet these **DOES NOT**  
mean you can offer  
short-term credentials in a state

# Other criteria and conditions

- ▶ **Pass 70/70 test (70% completion, 70% placement)**
- ▶ **Value-added earnings metric**
- ▶ **Prepare students for high-skill/high-wage or in-demand sectors/occupations**
- ▶ **Stackable, portable, and articulated to further credentials**

# State requirements

## ▶ Governors will:

- Ensure alignment with requirements of “high-skill, high-wage jobs” (Perkins) OR in-demand industry sectors/occupations
- Establish a publicly available process for institutions to request a determination that a program meets requirements, including:
  - Criteria used
  - Methodology to review high-skill/high-wage and in-demand status
  - Two-year review process (concurrent with WIOA state plans)

**CONT'D**

# State requirements

## ▶ Governors will (cont'd):

- Develop written policy for determining whether a program meets employers' hiring requirements that:
  - Considers whether credential program aligns with high-skill, high-wage, in-demand
  - Incorporates direct input from employers (through state or local workforce boards, industry partnerships, etc.)
- Develop written policy for determining stackability, portability, and a process for employer validation
- Develop written policy for institutions to establish that program will ensure articulation of credit

**CONT'D**

# State requirements

## ▶ Governors will (cont'd):

- Make available the information institutions must submit including:
  - Job placement standards
  - Information necessary to make job placement calculations
- Make available process and timeline for the Governor's consultation with state board and determination that a program meets requirements
  - Apply procedures consistently and equitably to all institutions
- Provide appeal process

**CONT'D**

# State requirements

## ▶ Governors will (cont'd):

- Provide attestation that state board has been consulted
- Ensure program meets all requirements and provide certification to the Secretary
- Agree to:
  - Provide documentation to Secretary
  - Notify Secretary when withdrawing approval of programs
- Take into account wages and costs with respect to value-added earnings (prior to value-added test becoming effective)

**CONT'D**

# State requirements

## ▶ Governors will (cont'd):

- Enter bilateral agreements with other states if they want to allow institutions in other states to provide short-term programs under these provisions
- Measure completion and placement (eventually “in field”)

# Key questions for this group

- ▶ **What are current pain points?**
- ▶ **What is your institutional process?**
- ▶ **How has engagement with your state gone?**
- ▶ **What types of programs are you leaning towards?**

# Big questions and issues remaining

## ▶ **Sub-regulatory guidance**

- Determining “in-field” employment status
- Student disclosures
- Communication processes (state-ED, institution-ED)
- Appeals and reinstatement

# Big questions and issues remaining

## ▶ **“Directed Questions” (from the NPRM)**

- Partnerships with ineligible providers and apprenticeships
- Interstate approach
- Interim earnings metric
- Aggregating small programs
- Programs with many out-of-state students

**THANK YOU!**

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