Frequently Asked Questions

Workforce Pell

As of Oct 2026

These Frequently Asked Questions (FAQs) provide information on the new final regulations implementing Workforce Pell. These final regulations were published on May 19, 2026, and implemented changes from the *One Big Beautiful Bill Act*, also known as the *Working Families Tax Cuts Act* (Pub. L. 119-21, or the Act).

The Department of Education (the Department) reviewed the comments from the public on the Workforce Pell proposed regulations that were received during the public comment period and responded to them in the new final regulations. Since the time that the new regulations were published the Department has received additional questions regarding the application of these new regulations.

As background, the Act extended Federal Pell Grant eligibility to students enrolled in high-quality, short-term *eligible workforce programs*. *Eligible workforce programs* are defined in the statute as undergraduate programs offered by eligible institutions that:

- Last at least eight weeks but fewer than 15 weeks of instruction.
- Consist of 150–599 clock hours, 4–15 semester/trimester hours, or 6–23 quarter hours.
- Are certified by the governor of a state (or tribal government).
- Are approved by the Department.
- Meet both completion and job placement rate minimum requirements (at least 70%).
- Meet value-added earnings requirements (tuition and fees must not exceed the calculated earnings benefit).
- Do not include correspondence, remedial courses, English as a second language (ESL) courses, study abroad, or direct assessment coursework.
- Meet the program length requirements for 12 months preceding the date an institution begins the application for Department approval.

Pell Grants that are received for enrollment in eligible workforce programs are colloquially referred to as "Workforce Pell." Workforce Pell advances the Trump Administration's America's Talent Strategy by connecting Americans to high-skill, high-wage, and in-demand careers and providing them with access to short-term programs that are aligned to meet immediate employment opportunities.

These FAQs address how to establish and maintain eligibility for eligible workforce programs. They will be updated periodically as **new** questions are submitted and answered concerning the final regulations.

Other than existing statutory and regulatory requirements that are specifically stated in this document, the contents of this guidance don't have the force and effect of law and aren't meant to bind the public. This document is intended only to provide clarity to the public regarding the new regulations and the interaction with existing requirements under the law or agency policies.

Program and Student Eligibility

1. When are the new Workforce Pell regulations effective?

The new regulations implementing Workforce Pell are effective beginning with the 2026–27 award year.

2. When can institutions apply to participate in Workforce Pell?

The Department began accepting applications from institutions for eligible workforce programs on July 1, 2026. The first eligible workforce program was approved by the Department on August 4, 2026, and the Department continues to review applications and approve programs on a rolling basis.

3. What steps does an institution need to take to have eligible workforce program(s) approved for Workforce Pell?

Workforce Pell is a fundamental change in how the federal government funds workforce development programs. This change extends Pell eligibility to qualifying high-quality, performance-based, short-term programs. The emphasis is on alignment with employer needs and stackable credentials within a broader career pathway.

Eligible workforce programs must meet minimum completion rates and verified employment outcomes after students have completed the program. Therefore, it is essential to the success of every eligible workforce program that before applying for Workforce Pell, institutions consider the program design, the program's alignment with local labor market needs (as identified by state governors, workforce boards, and local employers) and defined career pathways, its current student outcomes, and the institution's readiness in tracking completion, placement, and earnings data.

Step 1: The institution reviews the requirements in the new regulations and ensures the proposed program(s) meets minimum and maximum program length and credit-hour or clock-hour requirements under 34 CFR 690.92(a)-(c), is included in the institution's grant of accreditation, and has met these program length requirements for 12 months preceding the date the institution begins the application process.

Step 2: Prior to applying for eligibility to the Department, the institution requests that the state governor, or their official designee, review each proposed eligible workforce program to determine whether the program(s) meet certain eligibility requirements set forth in 34 CFR

690.93 under the new federal regulations. After determining that each proposed eligible workforce program meets these requirements, the governor, or their official designee, completes and signs the Department's *State Workforce Pell Program Certification* form that includes every workforce program(s) for which the institution is seeking approval.

Step 3: After receiving the completed *State Workforce Pell Program Certification* form, the institution applies for Department approval by completing the Application to Participate in the Federal Student Aid Programs (E-App), which can be found at https://fsapartners.ed.gov/title-ivprogram-eligibility/title-iv-participation-application.

Within the E-App, applications for eligible workforce programs can be added in Section G - Educational Programs. This is the central place to add, edit, verify, and track program information for each school. You can select "Workforce Programs" as a new Educational Programs type.

The following information will be required:
- Program Name
- CIP Code
- SOC Code
- Date Program Met Eligibility Requirements
- Date Governor Certified
- Accreditation
- Number of Weeks
- Type of Hours
- Clock Hours
- Credit Hours
- Program Delivery Method
- State Licensure
- Prison Education Program Status
- Contractual Agreements with Ineligible Institutions or Organizations

The institution will also be required to upload a copy of the signed *State Workforce Pell Program Certification* to this system.

Step 4: If the Department determines that the program(s) meets all requirements, the institution will be provided with an updated Eligibility and Certification Approval Report (ECAR) that includes each eligible workforce program that has been approved. Once the Department's approval is received, the institution may award and disburse Pell Grant funds to students enrolled in the approved eligible workforce programs. You may award Pell Grant funds to students who are already enrolled in the program retroactive to the beginning of the payment period in which the program becomes eligible (see the *Federal Student Aid Handbook*, Volume 3, Chapter 3).

4. Our institution wishes to offer the same eligible workforce program in different calendar formats. For example, we would offer a full-time version that includes 400 clock hours

over 10 weeks, and a part-time version of the program that includes 400 clock hours over 14 weeks. Are we required to seek the Department's approval for each version of the program separately?

Yes. An institution must report **all** versions of an eligible workforce program separately on the E-App. For example, if an institution offers one version of a workforce program that is offered over 10 weeks of instruction and one that is offered over 14 weeks of instruction, it must add two separate programs in the E-App: one that is 10 weeks and one that is 14 weeks.

The reason for this unique treatment is that unlike all other *Title IV*-eligible programs, there is a maximum length restriction on eligible workforce programs as well as a minimum length. The Department must determine that all versions of an eligible workforce program meet the appropriate length requirements.

5. We offer eligible workforce programs at locations where we don't offer any other programs. When we submit these programs for approval, do we also need to add these new locations to the E-App?

Any location that offers 50% or more of a program, including an eligible workforce program, needs to be reported by the school to the Department on the E-App. If more than 50% of an eligible workforce program is offered at a location that has never been submitted to the Department, the institution would be required to report the program and the new additional location to the Department when it seeks approval for the eligible workforce program. As with all additional locations, the location will need to be authorized by your state and approved by your accrediting agency.

6. If a student previously received a bachelor's degree, can they enroll in an eligible workforce program and receive Workforce Pell? If so, how is the FAFSA® form used to calculate that student's Pell Scheduled Award?

Yes. Normally, a student's eligibility for Pell Grants ends after they receive a bachelor's degree or equivalent. However, the Act allows, and the regulations clarified, that students with bachelor's degrees are eligible to receive Pell Grants for eligible workforce programs **if** the students meet all the other Pell Grant eligibility requirements (for example, citizenship requirements).

Students enrolled in or accepted for enrollment in graduate programs or who have obtained graduate credentials can't qualify for Pell Grants for enrollment in eligible workforce programs.

The FAFSA Processing System (FPS) will not calculate a Pell Scheduled Award for a student with a bachelor's degree unless specific steps are taken by the institution as follows:

- Once the student has completed the FAFSA form and the institution has received the student's Institutional Student Information Record (ISIR), a financial aid administrator

(FAA) must set the "Enrolled in Eligible Workforce Program" field on the ISIR to "Yes." This can be done as a correction in the FAFSA Partner Portal (FPP) or via EDE batch correction.

After this correction is made, FPS will process a new ISIR transaction that includes the student's updated Pell Grant eligibility (despite having a bachelor's degree). Institutions must still confirm that students enrolled in eligible workforce programs meet all other eligibility criteria, including not having a graduate credential or currently being enrolled in a graduate program. At this stage, the institution can award and disburse a Pell Grant to the student.

More information on this process can be found in Electronic Announcement APP-26-02, published on April 23, 2026.

7. Can a student enrolled in an eligible workforce program receive Pell Grant funds concurrently if they are also enrolled in another program or are enrolled in another institution?

No. A student can't concurrently receive a Federal Pell Grant for enrollment in an eligible workforce program and any other educational program at the same or a different institution, including another eligible workforce program.

8. Are students eligible for Direct Loans, Federal Work-Study (FWS), or a Federal Supplemental Educational Opportunity Grant (FSEOG) when they enroll in an eligible workforce program?

No. As described under 34 CFR 690.90, a Pell Grant is the only type of *Title IV* aid for which a student can qualify on the basis of enrollment in an eligible workforce program. However, nothing prohibits the student from receiving other types of assistance, e.g. private loans or funding under the *Workforce Innovation and Opportunity Act* (WIOA).

9. If a student withdraws from an eligible workforce program, do we have to complete an R2T4 calculation?

Yes. Students enrolled in eligible workforce programs are subject to the same regulations and procedures that apply to all *Title IV* programs, including Return to *Title IV* (R2T4) regulations. There were no changes to the R2T4 regulations in the eligible workforce program final regulations.

10. Is my institution's accrediting agency required to approve each workforce program?

No. As described in the preamble to the final rule, an eligible institution must be able to demonstrate that each program, including eligible workforce programs—collectively or individually—is included within its grant of accreditation. The Department does not require the accrediting agency to approve each eligible workforce program, but an accrediting agency

recognized by the Department may establish its own internal processes regarding the approval of eligible workforce programs, which must follow its established review procedures for substantive changes set forth in § 602.22. If an accrediting agency decides to approve one or more eligible workforce programs separately or based on established policies that require eligible institutions to make a substantive change request to add an eligible workforce program, the accrediting agency approval may come before or after approval by the governor (but prior to Department approval).

11. Are there restrictions on remedial coursework in eligible workforce programs?

Yes. Unlike eligible *Title IV* programs, under 34 CFR 668.20(g), reduced credit or noncredit remedial coursework (including ESL) can't be included in the calculation of Pell Grant awards for students enrolled in any eligible workforce programs, including both programs offered using credit hours and clock hours.

12. Can an eligible workforce program be offered as a noncredit program as long as the coursework is not remedial?

Yes. Noncredit eligible workforce programs are considered as clock hour programs under the new regulations and must meet the usual clock hour program requirements that apply to other eligible *Title IV* programs. For example, the institution must monitor each student's attendance in a clock hour program and cannot make subsequent disbursements of Pell Grant funds until the student successfully completes a certain number of clock hours. Additionally, the eligible workforce program must lead to a recognized credential provided by the school.

While the program is not required to confer credits, governors are required to certify that completion results in credits toward certificates or degrees at either your institution or at another institution. Thus, you may need to have an articulation agreement.

13. Our institution has been offering a 16-week, 600 clock-hour program for five years. The program qualifies for Pell Grants and Direct Loans. Are we now required to reduce the program to less than 15 weeks and less than 600 clock hours and stop providing Direct Loans?

No. You are not required to make any changes to existing eligible programs that are already approved under *Title IV*, HEA program eligibility requirements, including the requirements under 34 CFR 668.8.

For example, if an otherwise-eligible program is at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours and at least 15 weeks of instruction, it continues to qualify for Pell Grant and Direct Loan funds and none of the other eligible workforce program requirements apply.

14. Our school offers a program in several different lengths. For example, in the fall and spring semesters, the program is offered in 8 weeks and is 320 credit hours. During the summer term the program is shortened to 6 weeks but still 320 credit hours. Can this program qualify as an eligible workforce program if we have offered both versions for at least one year?

If an institution offers multiple versions of the same program, and at least one version of the program meets the length requirements—in both clock or credit hours and weeks of instruction—for at least one year prior to the institution's application to make that program an eligible workforce program, the Department considers the program to have met the length requirement for at least one year.

However, a program that is less than eight weeks of instruction, more than 14 weeks of instruction, or does not consist of 150–599 clock hours, 4–15 semester/trimester hours, or 6–23 quarter hours, does not meet the requirements for an eligible workforce program and can't qualify for Pell Grant funds. In the situation described, the 8-week version of the program could become an eligible workforce program if that version of the program has been offered for at least one year. When the governor certifies the program, they would only evaluate completion and placement for the students who enrolled in the 8-week version of the program. The governor would not be permitted to consider completions or placements of students who enrolled in the 6-week version of the program.

The same concept applies when one version of a program consists of the required number of clock hours, but other versions do not.

To ensure that an institution does not inadvertently disburse Pell Grant funds to an ineligible version of a program, an institution must always submit each version of the program that has a different length when seeking approval from the Department. Please see *APP-Q3* above for more information.

15. Does a "recognized postsecondary credential" have to be awarded upon completion of the eligible workforce program?

No. As defined under 34 CFR 690.91, the recognized postsecondary credential is the credential consisting of an industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship defined under 29 CFR Part 29, a license recognized by the state involved or federal government, or an associate or baccalaureate degree.

For example, if a student is enrolled in a Registered Apprenticeship lasting two years, the recognized postsecondary credential may be granted at the end of the two-year Registered Apprenticeship rather than when the student completes the eligible workforce program, which only constitutes the related training component of the Registered Apprenticeship. However, for *Title IV* purposes the student must *also* receive a degree, certificate, or other nondegree

recognized credential from the institution, which is generally conferred upon completion of the eligible workforce program.

16. The program must meet conditions for Department of Education approval 12 months preceding the date of operation. What if a school creates a program but no students enroll in the program due to the program's Pell Grant ineligibility during those 12 months?

The program must have been in existence for at least one year before the Department can approve it. The Department considers an educational program to have been in existence for at least one year only if an institution has been legally authorized to provide, and has continuously provided, the program during the 12 months (except for normal vacation periods and, at the discretion of the Secretary, periods when the institution closes due to a natural disaster that directly affects the institution or the institution's students) preceding the date on which the institution applied for eligibility for that program. At least one student must have been enrolled in the program throughout all periods when the program was normally being offered during the year (i.e., not including regular vacation or non-instructional periods).

State Review and Certification

17. Is there a specific form that governors must use to certify a program?

Yes. A state governor, or their official designee, must complete the *State Workforce Pell Program Certification* that includes certifications for every workforce program(s) for which the institution is seeking approval. Note that the form can include more than one workforce program and the Department does not need a separate form for each eligible workforce program being submitted. The form can be found at https://fsapartners.ed.gov/knowledgecenter/library/electronic-announcements/2026-07-01/eligible-workforce-programs-stateworkforce-pell-certification-form-available.

18. Should my state governor provide the certification form directly to the Department, or should the institution provide the certification form?

The institution must upload the state certification form during its application for approval of the program in the E-App. The Department cannot accept a *State Workforce Pell Program Certification* from any entity except the institution seeking approval.

19. The regulations require the governor to consult with a state board before approving an eligible workforce program. Is the governor required to take the advice of the State board? What if the governor disagrees with the state board's recommendations?

The law and regulations (34 CFR 690.93(a)) only require the governor to consult with the state board. A governor is not required to follow the counsel of the state board.

20. Our state already participates in a state authorization reciprocity agreement. Does this agreement cover our eligible workforce programs? Is there anything else that is needed for an institution to offer a program online to students in other states?

A state authorization reciprocity agreement allows an institution to obtain authorization to operate in another state through reciprocity. However, a reciprocity agreement is not sufficient for an institution to offer an eligible workforce program in another state.

States are only permitted to enter into bilateral agreements prescribed under 34 CFR 668.93(h) to offer eligible workforce programs online to students located in other states. Governors of two states may enter into a publicly published bilateral agreement regarding the enrollment of students located in one state in some or all of the workforce programs located in the other state as long as: (1) the governor in the state in which the student is located includes the occupations/sectors on their approved workforce programs list; (2) the governor of the state in which the institution is located has determined that the program(s) are eligible workforce programs; and (3) the bilateral agreement includes provisions for data-sharing among the states for purposes of completion and placement rate calculations.

21. Are there any benefits to an eligible workforce program being part of a Registered Apprenticeship program?

Yes, eligible workforce programs that serve as the related instruction component of a Registered Apprenticeship:

1. Can have written arrangements with outside entities for those entities to offer up to 49.9% of the program; and
2. Are treated as automatically meeting state requirements to provide an education aligned with high-need, high-wage, or in-demand sectors or occupations, and meeting the hiring requirements for such sectors.

22. My institution offers a program that trains students to prepare students to take the Commercial Driver's License (CDL) skills exam required to obtain that CDL. After obtaining their CDL students can qualify for an endorsement on the CDL (for example, to haul hazardous materials). Is this sufficient to meet the requirement under 34 CFR 690.93(a)(4) that the program prepares students to pursue one or more certificate or degree programs at one or more eligible institutions?

No. An endorsement of a license is provided by a state, not by an institution.

Upon completion of an eligible workforce program, the student must be able to receive academic credit for the program that will be accepted toward meeting certificate or degree program requirements at the same institution or another institution. The possibility of additional endorsements does not meet the stackability requirements of the new regulations.

As an example, consider an institution that offers a 300-hour truck driving program that qualifies a student to take the CDL exam. The institution could meet the requirement for stackability and academic credit by establishing an articulation agreement with another institution that would allow a student who has completed the truck driving program to receive eight semester hours of transfer credit toward an associate's degree program in logistics.

Completion and Placement Rates

23. How is the program completion rate calculated?

Under 34 CFR 690.94(a)(2), the completion rate for an eligible workforce program is calculated as the percentage of students who complete the program within 150% of the normal time to completion. A program's completion rate must be at least 70% for Pell Grant eligibility.

For the 2026–27, 2027–28, and 2028–29 award years, a state governor, or their designee, will evaluate whether a program meets completion rate requirements and will include a certification on the state certification form if the program meets those requirements. The governor will determine how to perform this calculation using enrollment and completion data from the institution.

For award year 2029–30 and thereafter, the institution will perform the calculation of the completion rate using the procedures described in 34 CFR 668.8(f).

24. How is the job placement rate calculated?

Under 34 CFR 690.94(a)(2), the job placement rate for an eligible workforce program measures the extent to which students are obtaining employment following completion of the eligible workforce program. A program's job placement rate must be at least 70% for Pell Grant eligibility.

The governor calculates the job placement rate as the percentage of program completers who are employed, in any profession, during the second quarter (i.e., 3-6 months) after exiting the program. The Department has not prescribed a formula; however, Governors may use the placement rate under 34 CFR 668.8(g) as an example. For the 2026–27, 2027–28, and 2028–29 award years, a student can be employed in any occupation. After the 2028–29 award year, students are only considered "placed" if they are working in occupations for which the workforce program prepared the students or in comparable high-skill, high-wage, or in-demand occupations.

25. What happens if a program fails to meet completion or job placement requirements for one year?

Programs that fail either the completion rate or the placement rate requirements will lose eligibility for Pell Grants. In this situation, the program would become ineligible at the end of the

payment period that begins after the date that the Department determines that the institution failed to meet the completion rate or job placement rate requirements. The Department won't make such a determination while a program's eligibility, approval, or reported completion rate of job placement rate is in an appeal status or awaiting the governor's final approval determination.

Pell Grant eligibility may be regained by following the steps under 34 CFR 690.97. The Department will provide additional information on this process in the future.

26. Are students who are enrolled in eligible programs excluded from the job placement rate calculation?

No. The regulations under 34 CFR 690.94(e) exclude several types of students from the numerator and denominator of the placement and completion rate calculations, but not students who are currently enrolled in eligible programs.

A student is exempt if the student

- dies;
- experiences the onset of a medical condition that prevents employment;
- is ordered to service in the uniformed services, including service performed under Title 10 or Title 32 of the United States Code, for a period of more than 30 days; or
- becomes incarcerated.

Minimum Value-Added Earnings Test

27. What is the value-added earnings test?

Described in the regulations under 34 CFR 690.95, the value-added earnings test compares the median earnings of program completers of eligible workforce programs (adjusted for regional price differences) to 150% of the Federal poverty line applicable to a single individual. The amount of the adjusted median earnings exceeding 150% of the Federal poverty line is the "value-added earnings" for the program.

Once the value-added earnings have been calculated for each eligible workforce program in an award year, in order to maintain Pell Grant eligibility, the tuition and fees for those programs may not exceed the value-added earnings. In addition, programs with zero or negative value-added earnings also lose eligibility for Pell Grants.

The Department will calculate the value-added earnings for an eligible workforce program annually beginning in 2030-31. Prior to that calculation and all subsequent value-added earnings calculations, institutions will receive completers' lists and are required to review those lists and ensure their accuracy within 60 days of receipt.

28. When will value-added earnings metrics be calculated? Will the Department review students who enrolled in the program prior to the program qualifying for *Title IV* funds?

Based on the cohort period outlined in statute (and further defined in 34 CFR 690.91), the earliest time that the Department can calculate official value-added earnings for workforce programs that become eligible during the 2026–27 award year (the first year of eligibility) will be for the 2030–31 award year. The calculation will only include the earnings of students who received Pell Grant funds. Students who enroll in the program prior to the program becoming *Title IV*-eligible are not considered in the value-added earnings calculation.

29. If my program's published tuition and fees exceed the calculated value-added earnings when it is calculated, can my institution lower its tuition and fees for the program to retain Pell Grant eligibility for the program?

Yes. The Department will calculate the value-added earnings for your program at least three months prior to the award year when the requirement for limiting your tuition and fees takes effect on July 1. If your program's tuition and fees exceed the value-added earnings, your institution must lower the tuition and fees charged for the program so that the tuition is equal to or less than the value-added earnings calculated for the program for the program to retain Pell Grant eligibility.

In this situation, for the program to remain eligible for Pell Grant funds, any new student that enrolls in the program on or after July 1 of that award year must be charged the lower tuition. You aren't required to alter the tuition charged to students who begin enrollment in the eligible workforce program for the first time prior to July 1 of the award year to which the value-added earnings applies.

30. What if my school does not want to reduce tuition and fees if the value-added earnings calculation is lower than the tuition and fees?

The Department's regulations do not require a school to reduce tuition and fees for the program. However, if the institution does not reduce the tuition and fees to the value-added earnings, the program will lose Pell Grant eligibility effective July 1 of the award year to which the value-added earnings metric applies.