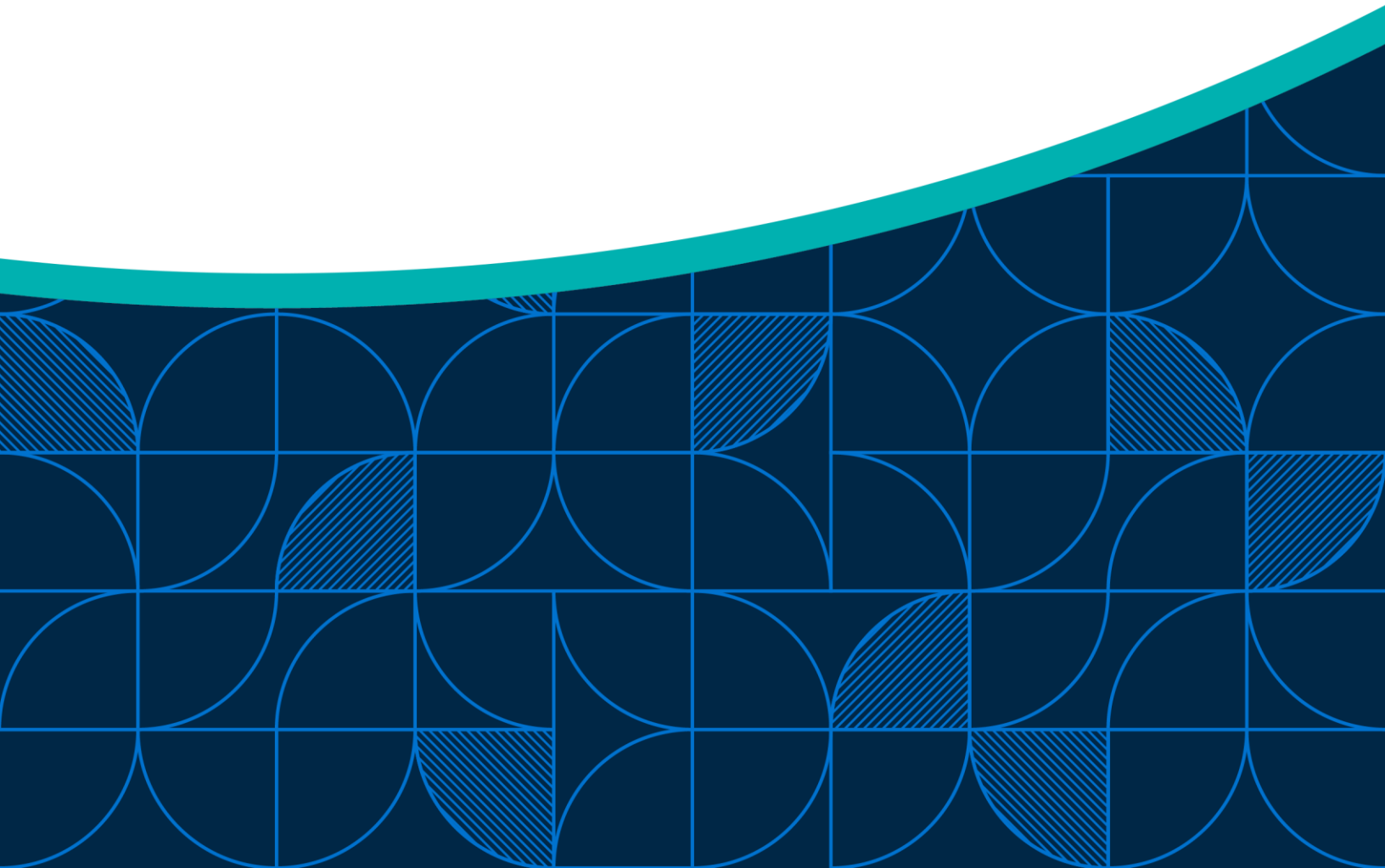




STRATEGIC ADVISORY SERVICES

Workforce Pell Grant Readiness Self-Diagnostic



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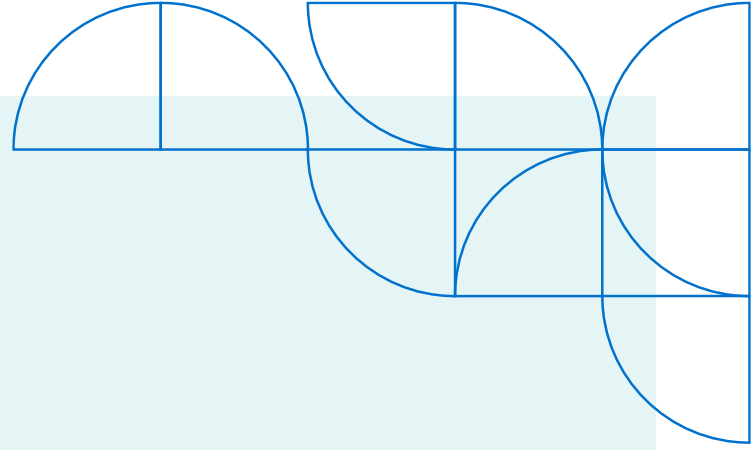


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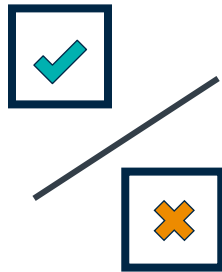
Introduction to the Workforce Pell Grant Readiness Self-Diagnostic

This Workforce Pell Grant Readiness Self-Diagnostic is designed to help institutional leaders assess their preparedness for emerging eligibility requirements and identify areas requiring additional attention. Organized around four core readiness factors, this diagnostic highlights the foundational considerations leaders should evaluate as they prepare for Workforce Pell implementation. These readiness factors are:

- Data and reporting capabilities,
- Program eligibility requirements,
- Workforce alignment and outcomes, and
- Student support capacity.

While recent legislation and proposed regulations provide important direction, many key details remain subject to state-level interpretation. As a result, leaders should view this diagnostic as a guide to current expectations rather than a definitive checklist and continue to monitor evolving guidance as Workforce Pell policies take shape.

How to Use the Diagnostic



- Review each readiness factor and requirements with appropriate stakeholders across campus:
 - Chief information officer
 - Program leadership
 - Workforce development experts
 - Student services leaders
- Evaluate each factor as a yes or no, or in the case of yet-to-be-determined factors, discuss likely statewide standards and anticipated performance against those emerging requirements

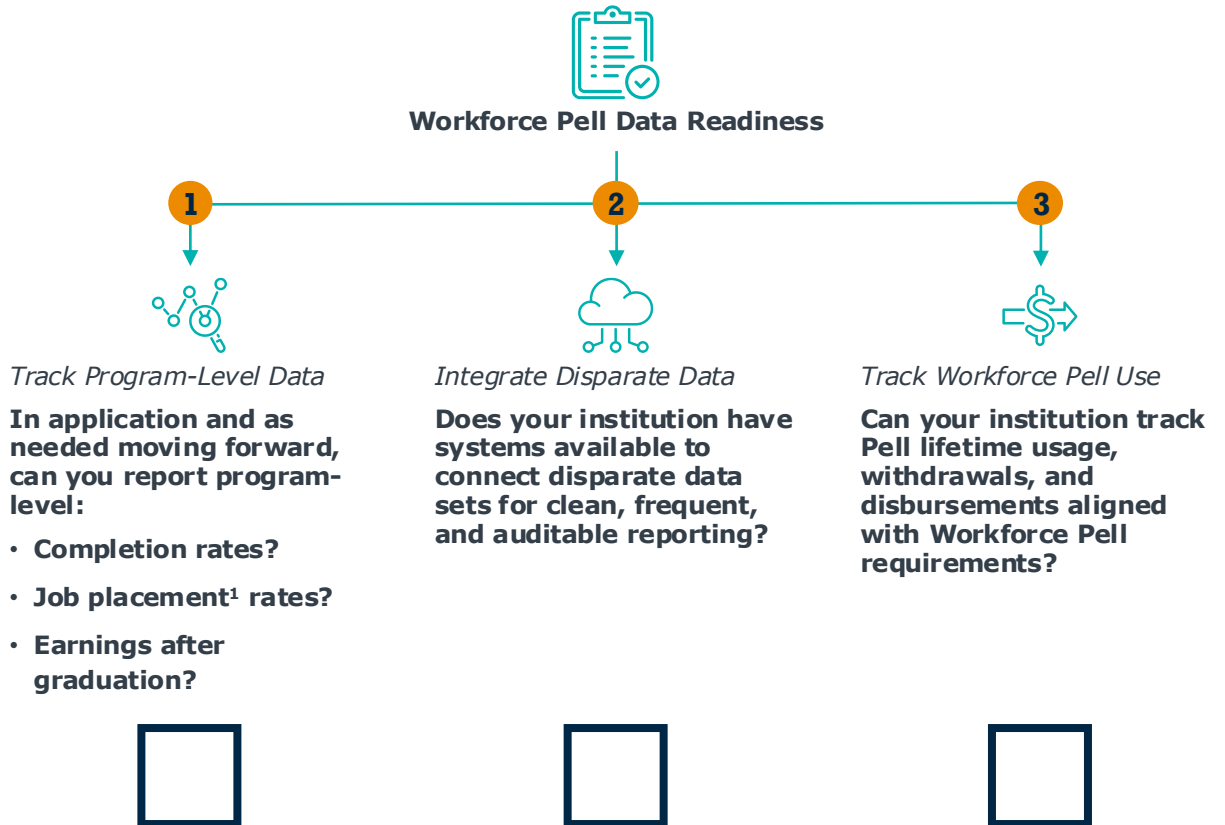
Are You Ready to Track and Report Required Metrics?

Workforce Pell Initiatives Cannot Progress Without Baseline Data Capabilities

To achieve Workforce Pell eligibility, institutions must track and report program-level data on completion rates, job placement rates, and earnings after graduation.

It is essential that institutions seeking Workforce Pell approval have a reliable, program-level system to track required data. This may mean building a single view from datasets like student information systems, advising records, career services databases, and graduate earnings, if that does not yet exist. Further, the short length of many Workforce Pell programs will require more frequent data updates than a traditional semester calendar.

Readiness Baseline Requirements



If you cannot track and report this required data, address those factors first before considering further eligibility factors. Ask your Strategic Leader how EAB is helping institutions with data management needs.

1) Early implementation requires only general job placement data, but in 2029, institutions will be required to begin measuring and reporting placement in jobs relevant to the completed program.

Sources: U.S. Congress, *One Big Beautiful Bill Act*, 2025. House Committee on Education and Workforce, *Workforce Pell Act Section-by-Section Summary*, 2025. Department of Education, *Discussion Paper and Proposed Regulatory Text: Eligible Workforce Programs*, 2025. EAB, "Six steps community colleges can take now to prepare for Workforce Pell," 2025.

Does Program Meet Basic Structural Requirements?

Length, Stackability/Portability, and History Determine Eligibility

The Bipartisan Workforce Pell Act established five non-negotiable, objective criteria for program eligibility.

Structural Program Requirements

1 Is your institution accredited and Title-IV eligible?

Eligible programs must be offered by a Title-IV eligible, accredited institution. However, institutions may enter into a written agreement permitting an ineligible provider to administer up to 25% of the program.

☐

2 Is your program administered within the required timeframe?

Eligible programs must be **at least 150 and less than 599 clock hours, and be offered over a minimum of 8, but fewer than 15 weeks**. This criteria may also be met by programs of 4 to 15 semester or trimester hours or 6 to 24 quarter hours. Workforce Pell legislation does not specify that the instructional weeks must be consecutive.

☐

3 Does your program lead to a recognized and portable credential?

Eligible programs must lead to a recognized postsecondary credential that is portable across more than one employer. Exemption may be granted to programs preparing students for an occupation with only one recognized credential (e.g., a commercial driver's license).

☐

4 Does your program meet credit articulation requirements as well as achieve stackability (as defined by your state)?

Program completers must receive academic credit applicable toward a further credential **and** accepted by one or more institutions. **Non-credit programs may meet this criteria** through processes like programmatic articulation or pre-articulated credit, which formally guarantee credit upon program completion. Credit for Prior Learning (CPL) may also qualify a program for eligibility so long as program completion automatically yields credit without requiring students to individually petition. Further, states will define stackability, which is likely to entail documented pathways to further credentials.

☐

5 Has your program existed for at least one year?

Eligible programs must have existed for at least one year, meeting all state certification metrics, before being approved for Workforce Pell.

☐

Sources: U.S. Congress, *One Big Beautiful Bill Act*, 2025. House Committee on Education and Workforce, *Workforce Pell Act Section-by-Section Summary*, 2025. U.S. Department of Education, *Discussion Paper and Proposed Regulatory Text: Eligible Workforce Programs*, 2025. Jobs for the Future, "JFF Offers Guidance on Workforce Pell Implementation," 2025. UPCEA, "A Primer and Update from Negotiated Rulemaking," 2025.

Is Program Performing Well and Workforce-Aligned?

Historic Completions and Outcomes Performance Enable Workforce Pell Approval

The Bipartisan Workforce Pell Act includes three further requirements about program performance and workforce alignment, which, while seemingly objective, introduce greater measurement and interpretation challenges.

Program Performance Requirements

Does your program achieve 70% completion within the required timeframe?

1

Eligible programs must meet a 70% completion rate within 150% of the expected completion time. The Bipartisan Workforce Pell Act clearly defines this threshold, but each state will need to establish its criteria for calculating completions. While this may delay Workforce Pell eligibility assessments, institutions can use existing resources like [WIOA performance indicators](#) to see potential methodologies.



Does your program achieve 70% job placement within two quarters?

2

Eligible programs must meet a 70% job placement rate no later than two quarters after exit¹. Like program completion requirements, states will need to establish definitions such as what type of employment counts as placement or what data source is used to record employment. It will be essential for institutions to stay up to date with state-defined placement metrics, but leaders can get a head start by using resources such as state workforce metrics initiatives to see how placement may be tracked. For example, Virginia's Workforce Development Agency provides public [workforce program metric calculations](#) that institutions can use to infer likely criteria for Workforce Pell eligibility.



Is your program's cost within the value-added earnings threshold?

3

An eligible program's tuition and fees must not exceed the value-added earnings of completers receiving federal student aid. Value-added earnings are calculated as the median earnings of relevant graduates (adjusted by regional price parities) minus 150% of the poverty line.



1) In 2029, this requirement will elevate to placement in jobs relevant to the program rather than job placement generally.

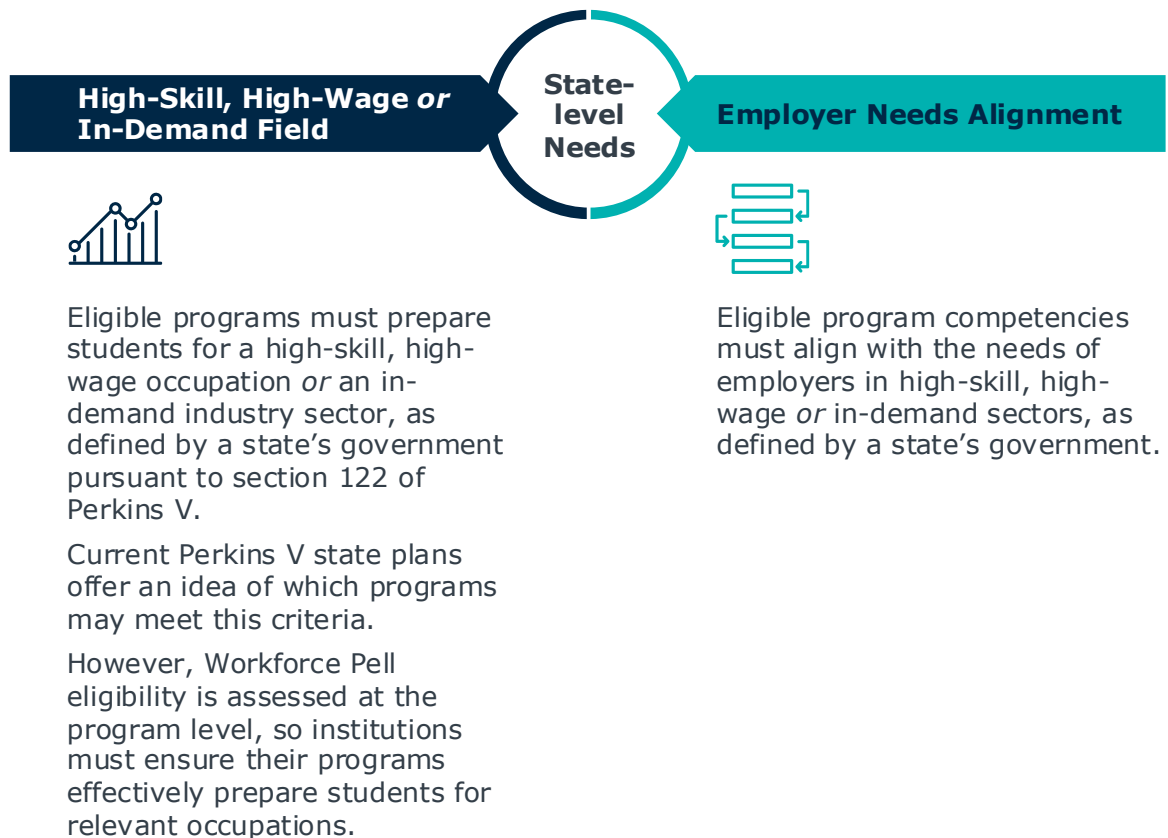
Sources: U.S. Congress, *One Big Beautiful Bill Act*, 2025. House Committee on Education and Workforce, *Workforce Pell Act Section-by-Section Summary*, 2025. U.S. Department of Education, *Discussion Paper and Proposed Regulatory Text: Eligible Workforce Programs*, 2025. Jobs for the Future, "JFF Offers Guidance on Workforce Pell Implementation," 2025. UPCEA, "A Primer and Update from Negotiated Rulemaking," 2025.

Is Program Workforce Aligned?

States Determine Further Workforce Needs Alignment Standards

The Bipartisan Workforce Pell Act adds two further components that will be defined at the state level. While the Bipartisan Workforce Pell Act does not explicitly define how states must determine employer need, we can anticipate potential requirements based on similar existing frameworks. However, it will be essential for institutions to review official criteria once published by their states' governments, and timelines will vary.

State-Level Workforce Alignment



Forecasting Employer Alignment

- WIOA Eligible Training Provider Lists (ETPL)
 - State-established ETPLs use metrics like in-demand occupations, program competencies, employer letters of support, or industry-recognized credential alignment to ensure job-driven training and labor market relevance. These lists may be incorporated into states' decisions on Workforce Pell employer needs alignment and can help inform potential program eligibility.
- Perkins V State Plans
 - When establishing their list of Career and Technical Education (CTE) programs, state governments are required to consult workforce development partners and industry representatives to guarantee the programs align with employer needs. This means an institution can refer to these lists for an idea of which programs its state may include for Workforce Pell eligibility.

Sources: U.S. Congress, *One Big Beautiful Bill Act*, 2025. House Committee on Education and Workforce, *Workforce Pell Act Section-by-Section Summary*, 2025. U.S. Department of Education, *Discussion Paper and Proposed Regulatory Text: Eligible Workforce Programs*, 2025. U.S. Department of Education, *Guide for Submission of State Plans*. U.S. Department of Labor, *Requirements for the Eligible Training Provider List in the WIOA*, 2020. Jobs for the Future, "JFF Offers Guidance on Workforce Pell Implementation," 2025. UPCEA, "A Primer and Update from Negotiated Rulemaking," 2025. U.S. Department of Labor, "WIOA Performance Assessments," 2025. Advance CTE, "Perkins V State Plans," 2025.

Are You Prepared to Serve Workforce Pell Students?

Factors Beyond Requirements Determine Success

Workforce Pell recipients will need student services aligned to adult learner and/or low-income/first-generation student needs, and campus infrastructure ready to support those needs. Many institutions, especially institutions familiar with administering workforce programs, will have developed these capabilities previously, but revisit these principles to ensure readiness ahead of expanded Pell student enrollment.

Readiness to Serve Workforce Pell Recipients



Student Audience **Adult and Workforce Learner Needs**

Workforce Pell programs likely attract adult, workforce-oriented, and low-income learners who require greater flexibility and more intensive student services.

Work with EAB to explore our resources on adult learners, such as on [Working Professional Student Segments' Needs and Motivations](#).



Administrative **Grant Administration**

Systems will need to differentiate and track Workforce Pell usage, and to award funding on short-term timelines detached from the academic semester.

Workforce Pell recipients may also face greater financial complexity if they continue into longer credential pathways. EAB can help [minimize financial attrition](#) and more.



Academic **Industry Alignment**

Institutional and program leaders must continuously evaluate and align to industry needs to ensure program completers are prepared for the workforce.

Partner with EAB to ensure productive employer relationships and program alignment with [employer needs](#).



Academic **Qualified Instructor Capacity**

Ideally, Workforce Pell opportunities expand enrollment in approved programs. Consider in advance what capacity limits exist and what trigger points signal need for expanded capacity.

[Understanding current capacity](#) and opportunities to expand establishes the potential for initial growth.

Are you confident your institution is ready to serve students eligible for Workforce Pell?



Data Management Designed for Higher Education

Trusted data is essential for all of higher education's most urgent decisions and priorities—from assessing Workforce Pell eligibility to meeting new reporting requirements, understanding institutional finances, and more. Edify is a higher education data management platform designed to speed access to reliable data, enabling fast and confident decisions across campus.

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Expand Your Capacity

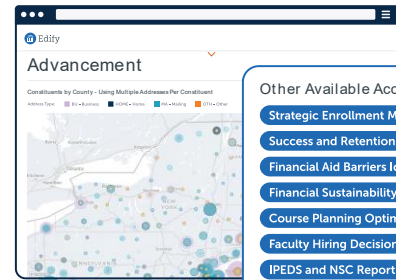
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Make Confident Decisions

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- Success and Retention Opportunities
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- LMS Utilization
- Course Planning Optimization
- Faculty Hiring Decisions
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Northampton Community College

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Reallocated to other priorities after sunseting unneeded Tableau licenses

Gateway Technical College

“

It feels like a weight off our shoulders. There's a shared understanding now— **no more chasing the data through one person's memory.**”

*-Brian Gardner, CIO,
Northampton Community College*



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of our partners**
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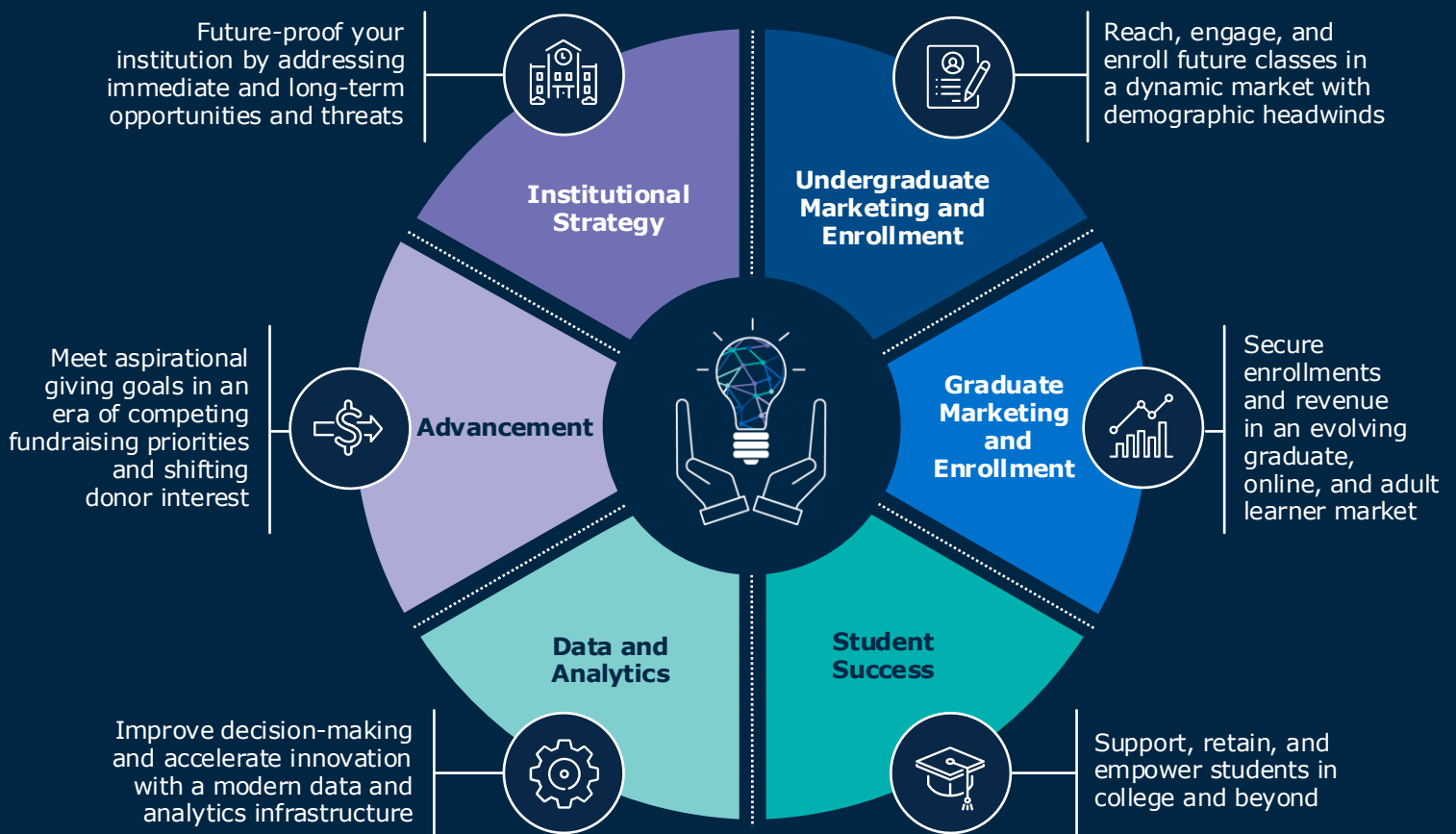
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