

Workforce Pell Readiness Checklist

For Four-Year Colleges & Universities

1. Program Portfolio & Eligibility

- Review existing program offerings, particularly those offered by continuing education and extension units or professional schools and identify short-term programs (credit and noncredit) that can meet the general structural requirements of Workforce Pell (i.e. 150 - 600 clock hours, 8 - 15 weeks in duration, and in operation for at least 1 year).
- Evaluate certificate offerings in in-demand fields, as determined by the state the institution is located in
- Verify stackability or credential verification: programs must articulate into a recognized postsecondary credential that is stackable and portable across more than one employer or prepares students for employment in an occupation for which there is only one recognized postsecondary credential.
- Verify metrics: 70% completion rate, 70% job placement rate, program price does not exceed the value-added earnings of graduates

Note, an additional metric, based on Workforce Pell grant recipients, the median earnings compared to high school graduates in the state can only be determined after the Workforce Pell grants have been awarded.

2. Data Systems & Infrastructure

- Refine institutional data systems to take into account Workforce Pell-required metrics:
 - Program length and CIP codes
 - 70% completion rates (within 150% of normal completion timeline for program)
 - 70% job placement within 180 days
 - Credential attainment (licenses, certifications, certificates)
 - Post-completion earnings relative to tuition (“value-added income”)
- Connect with your government relations/workforce teams to establish contact with state longitudinal data systems entities or labor agencies for employment and wage tracking.
- Ensure financial aid management systems can differentiate Workforce Pell vs. traditional Pell awards while still tracking the combined award total for each student.
- Consider mapping programs to the [Noncredit Data Taxonomy 2.0](#) (purpose, outcomes, enrollment/demographics, finance/policy) to identify data gaps.

3. Governance & Policy Engagement

- Assign a Workforce Pell/OBBBA task force (registrar, IR, financial aid, workforce/career services, academic deans, continuing education, compliance/legal, etc.).
 - Establish contacts with the entity overseeing these efforts in your state (likely your governor's office or state workforce agency, which must verify program alignment with "high-skill, high-wage, in-demand" industries).
 - Avail yourself (and participate when possible) to the [U.S. Department of Education negotiated rulemaking](#) to shape implementation and track potential compliance standards.
 - Track beyond negotiated rulemaking to the final rule/outcomes of this work with the U.S. Department of Education and Federal Register
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4. Academic & Student Services

- Expand advising processes, systems, and information to serve eligible student populations (adult learners, career changers, bachelor's degree holders eligible for Workforce Pell).
 - Address credit for prior learning (CPL) and noncredit-to-credit pathways to ensure Workforce Pell programs support degree progress or towards a recognized occupational credential.
 - Develop career navigation supports (job placement, employer partnerships, stackable credential maps) to meet completion and placement guardrails.
 - Address equity concerns: Ensure aid expansion reaches underserved learners, not only incumbent professionals seeking short-term upskilling.
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5. Financial Aid & Compliance

- Train financial aid staff on differences in Pell programs (Workforce Pell vs. traditional Pell) and lifetime Pell usage rules.
- Audit cost of attendance and tuition structures for short-term programs to ensure compliance with the "value-added earnings" test.
- Consider the impact of other OBBBA provisions and how these might intersect with Workforce Pell awards

6. Institutional Strategy

- Consider your institution's strategic position as a regional provider of short-term, stackable credentials, especially in partnership with employers.
 - Leverage continuing ed, extension schools, and online programs as delivery arms for Workforce Pell offerings.
 - Explore regional, state, and federal funding opportunities to strengthen data systems and quality assurance.
 - Use Workforce Pell as an opportunity to rethink the role of four-year institutions in workforce development, bridging traditional degree pathways with applied learning.
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7. Continuous Evaluation

- Build dashboards to track Workforce Pell program performance against federal guardrails.
 - Share findings with state policymakers to shape future expansions of aid eligibility.
 - Regularly review program mix to align with changing labor market demand signals.
 - Work with your state workforce boards/governor to encourage them to re-evaluate the lists of eligible program types to meet a changing local workforce on a regular cadence.
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Bottom Line for Four-Year Institutions:

While Workforce Pell is often framed around community colleges, four-year universities stand to gain if they align continuing ed, certificate, and professional programs with the new aid eligibility. This new opportunity combined with OBBBA's other key higher education provisions, including the new Title IV program accountability framework means earnings outcomes and value for students will drive federal funding access. Institutions that strengthen short-term offerings, data systems, and workforce partnerships can expand access for modern learners and bolster their public value proposition.

Content for this resource was developed with the assistance of ChatGPT, an AI language model. All text has been thoroughly reviewed, edited, and approved by UPCEA staff with subject matter expertise. References and links have been verified for accuracy and reliability.