

**IN-PERSON – 500 Mero Street, Frankfort, KY: 4th Floor Conference Room
Or Via Zoom**

Attendees: Leslie McKinney, Wesley Whistle, David Potter, Matt Berry, Kendrah Pearson, Alicia Crouch, Mason Dyer, Beth Hargis, Rob Collins, Becky Gilpatrick, Brittany Cox, Sarah Ehresman, Leslie Sizemore, Rajeev Darolia, Miles Feroli, Aveana Jackson, Myra Wilson, Laura Smart, Mike Yoder

KWIB Staff: Alisher Burikhanov, Debbie Dennison, LaChrista Ellis, Elishah Taylor, and Sara Jagers

10:00 am Welcome and Introductions

Alisher Burikhanov, Executive Director, Kentucky Workforce Innovation Board (KWIB), welcomed attendees and guest speakers. The purpose and importance of the discussion on Workforce Pell were highlighted, and the group moved directly to the agenda.

Workforce Pell National Update

Wesley Whistle, Project Director, Student Success & Affordability, New America, provided a national Workforce Pell update noting that [proposed rules were released March 9](#) with a public comment deadline of April 8. The regulatory language remains largely unchanged, but any questions may lead to targeted revisions. Key discussion areas include limitations on outsourcing through written arrangements, the potential use of multi-state agreements for distance education, development of interim earnings measures for new programs, considerations related to cohort size and data privacy, and how to account for students who continue their education rather than immediately enter the workforce.

Emphasis was placed on establishing clear processes, definitions, and approval structures at the state level, including documentation of roles and decision-making authority. States were encouraged to implement foundational systems quickly and refine them over time, recognizing that most states are not yet fully equipped to meet all requirements at launch.

Kentucky was identified as a national leader due to strong cross-agency collaboration and data infrastructure, positioning the state to influence broader implementation efforts. Recommendations included considering a phased or pilot approach to program rollout, aligning new approval processes with existing systems, and ensuring effective communication channels between state agencies, institutions, and federal partners.

The importance of submitting [public comments](#) was emphasized, with opportunities for individual organizations or a collective state response to help shape final regulations. Potential areas for comment include clarification of definitions, flexibility in program eligibility criteria, and expansion of allowable program types, such as summer bridge initiatives.

Rajeev Darolia, Ph.D., Wendell H. Ford Professor of Public Policy & Economics, University Research Professor, University of Kentucky, shared a resource highlighting key areas for public comment relevant to researchers and other stakeholders, which can be accessed the [PEER Center website](#).

Definitions: High-Skill, High-Wage, & In-Demand

David Potter, Ph.D., Senior Coordinator, Education Transition Strategist, Kentucky Adult Education, led the discussion focused on defining high-skill, high-wage, and in-demand occupations, including alignment with existing frameworks and the need to balance statewide consistency with regional labor market variation. The group highlighted capturing both high-growth occupations and those with substantial job openings and noted the need for additional federal guidance on state flexibility in applying these definitions.

- In-Demand Occupation (Tentative Definition): An occupation is considered in-demand if it meets at least one of the following criteria:
 - Projected statewide or local employment growth exceeds the overall statewide occupational growth rate, or
 - The occupation has more job openings than the statewide average number of openings per occupation.

- High-Wage Occupation (Tentative Definition): An occupation is considered high-wage if its statewide or local median wage exceeds the overall statewide median wage across all occupations.

Participants supported the use of multiple criteria connected by “OR” within definitions. Additional, not yet finalized, language was discussed to allow designation of in-demand occupations through state leadership. There was also general agreement with a statewide eligibility approach for programs that qualify in any locality, with no objections raised.

KYSTATS Data Review

Matt Berry, Ph.D., Executive Director, Kentucky Center for Statistics (KYSTATS), emphasized the role of data in determining program eligibility and measuring outcomes.

Key points included:

- Use of statewide wage data to determine high-wage thresholds
- Importance of incorporating both growth rates and total job openings
- Limitations of data for small cohorts and non-credit programs
- Need for data systems capable of supporting value-added earnings analysis and accountability metrics

Group Discussion

Discussion centered on implementation strategy and next steps, with a strong emphasis on establishing clear, documented processes for program approval, including defined roles, decision-making authority, and cross-agency coordination. A phased or pilot approach to implementation was considered to allow systems and processes to develop before scaling statewide. Maintaining high standards for program eligibility while building capacity over time was identified as a priority. Alignment with existing state approval processes and ensuring effective communication with federal partners and institutions were also highlighted as critical components.

The importance of submitting public comments, either individually or collectively, was underlined as an opportunity to influence final regulations. Kentucky’s strong cross-agency collaboration and data infrastructure were noted as positioning the state as a national leader, creating an opportunity to help shape broader implementation efforts.

11:27 am – Closing Comments and Adjournment

The meeting concluded with acknowledgment of progress and emphasis on maintaining momentum, continued coordination, and engagement in the federal rulemaking process. The next meeting will be on Thursday, April 2, 2026.



Workforce Pell Workgroup

Meeting Briefing Book

March 19, 2026

10:00 am – 11:30 am EST

Location: Education and Labor Cabinet

4th Floor Main Conference Room

500 Mero Street

Frankfort, KY 40601

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KWIB Workforce Pell Meeting Briefing Book
March 19, 2026, 10:00-11:30 pm EST

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KWIB Workforce Pell Workgroup Meeting

AGENDA
March 19, 2026
10:00 am – 11:30 am EST

Education and Labor Cabinet
4th Floor Main Conference Room
500 Mero Street
Frankfort, KY 40601

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|-----------------|---|---|
| 10:00 am | Welcome..... | <i>Alisher Burikhanov</i>
<i>Executive Director</i>
<i>Kentucky Workforce Innovation Board (KWIB)</i>

<i>David Potter, Ph.D.</i>
<i>Senior Coordinator, Education Transition Strategist</i>
<i>Kentucky Adult Education</i> |
| 10:10 am | Workforce Pell National Update..... | <i>Wesley Whistle</i>
<i>Project Director, Student Success & Affordability</i>
<i>New America</i>

<i>Rajeev Darolia, Ph.D.</i>
<i>Wendell H. Ford Professor of Public Policy & Economics</i>
<i>University Research Professor</i>
<i>University of Kentucky</i> |
| 10:30 am | Definitions: High-Skill, High-Wage, & In-Demand..... | <i>David Potter, PhD.</i> |
| 10:45 am | KYSTATS Data Review..... | <i>Matt Berry, Ph.D.</i>
<i>Executive Director</i>
<i>Kentucky Center for Statistics (KYSTATS)</i>

<i>Sam Keathley</i>
<i>Senior Workforce Analyst</i>
<i>Kentucky Center for Statistics (KYSTATS)</i> |
| 11:00 am | Group Discussion..... | <i>Workgroup Members</i> |
| 11:30 am | Adjournment..... | <i>Alisher Burikhanov</i> |

**Workforce Pell: An
Overview for Governors
(March 2026)**

WORKFORCE PELL: AN OVERVIEW FOR GOVERNORS

MARCH 2026

INTRODUCTION

Congress enacted [H.R. 1](#), the One Big Beautiful Bill Act (OBBBA), in the summer of 2025. Among its many provisions, the law expands Pell Grant eligibility to students enrolled in short-term, career-focused training programs that meet defined quality requirements and lead to industry-recognized credentials. This expansion is commonly referred to as “Short-Term Pell” or “Workforce Pell.” The [Congressional Budget Office](#) estimates that over the next ten years, the federal government will invest approximately \$1.5 billion in Workforce Pell Grants of about \$2,200 per recipient, although awards will vary as they are prorated based on program length and student need.¹ However, [research](#) on such short-term programs demonstrates that while some programs deliver strong labor market returns, many do not. This new funding stream represents an opportunity for Governors to drive resources to the strongest programs to address critical workforce development needs and better align postsecondary training to high-skill, high-wage, and in-demand jobs through their implementation decisions.

Workforce Pell goes into effect this summer, on July 1, 2026. The U.S. Department of Education (ED) released [proposed regulations](#) in March 2026, and is expected to finalize regulations later this spring. The draft regulations leave Governors with considerable leeway in the details of implementation, giving them an opportunity to ensure that workforce programs work for their residents and drive economic growth. This memo provides background on the opportunity and key decision points facing Governors related to quality standards around workforce programs; analysis of the critical data infrastructure that states will need to address in implementation; a roadmap for states and territories to tackle these questions; opportunities for leveraging support from both the philanthropic and research community; and a sample timeline to accomplish all of this.

Workforce Pell implementation also provides an opportunity for Governors to look beyond compliance for a single program and instead build the systems needed for a nimble, outcomes-driven, coordinated postsecondary and workforce system that sets and measures clear goals for economic mobility, accelerates growth in priority industries, strengthens regional competitiveness, and aligns education programs more directly with labor market strategy. This

¹ \$1.5 billion is based on the [CBO](#) score of mandatory Pell dollars – which was estimated at \$298 million over the 2025-2034 period. However, mandatory dollars are only about 20% of all Pell spending, with the rest being discretionary funding (subject to annual appropriations).

is of particular importance as these strategies must respond to potential changes due to the impact of AI—such as shifting economic priorities, evolving skill demands, new patterns of workforce displacement, and new roles and career pathways.

SEIZING THE OPPORTUNITY

Governors have significant authority over how Workforce Pell is implemented in their state or territory: the statute tasks Governors and their state workforce boards with setting standards and developing processes for institutions of higher education to demonstrate that their programs deliver results for workers and employers. Workforce Pell (like the Pell Grant program writ large) is available to any qualifying student enrolling in a qualifying program. In other words, it is not a fixed pool of funds that runs out every year, allowing Governors to respond adequately to demand from individuals looking for good jobs and better opportunities.

Governors looking to seize this opportunity can set strong expectations that their short-term programs deliver outcomes, and simultaneously build workforce infrastructure by setting goals, better leveraging data, and raising standards across workforce funding, including through the Workforce Innovation and Opportunity Act implementation (WIOA), Carl D Perkins Career and Technical Education Act (Perkins V), state financial aid programs targeted at workforce programs, or other state funding sources. The same outcomes standards and data systems that ensure Workforce Pell delivers quality results today will be the foundation for an effective response to help workers and jobseekers navigate technological change tomorrow, including any impacts of AI.

To do so, Governors do not have to rush programs over the finish line to prepare for the July 1, 2026 date. Some programs may be ready, and clearly demonstrate the value they are providing to students and the economy. Others may need time to capture the necessary outcomes data, build articulation plans and partnerships, and demonstrate alignment with workforce needs. Governors looking to ensure Workforce Pell dollars drive outcomes in the state can take the reins and build systems for the long-run.

KEY DECISION POINTS FOR GOVERNORS

Governors, in consultation with state workforce boards, are responsible for setting quality standards and ensuring all programs submitted to the U.S. Secretary of Education for approval meet performance [requirements](#) in the law. Ahead of the July 1, 2026, implementation date, state and territory leaders will need to evaluate their current operations and develop new approaches that establish definitions, metrics, new data collection methods, and approval processes to meet the requirements of Workforce Pell.

To qualify, programs must first meet the basic standards under the federal statute:

- Be 8-15 weeks in length (at least 150, but less than 600, clock hours);
- Have been in existence for at least one year (which means the eligible workforce program has met the required conditions for at least one year prior to approval);
- Provide recognized postsecondary credentials; and
- Not be a correspondence course or part of a study abroad program.

Student eligibility will be similar to the existing Pell Grant program, however, Bachelor's degree holders will be eligible for Workforce Pell, so long as they have not already exceeded their lifetime benefit limit, or the equivalent of 12 full-time semesters.

ED has proposed regulations that require Governors to set and publish measurable standards and processes for review, and then ultimately to determine, whether programs are:

- **Aligned to high-skill, high-wage, or in-demand sectors or occupations.**
 - *How to have impact:* Historically, these terms have not always been defined by states and territories, and their utility and relevance have not always led to an impact on program outcomes. The definitions that Governors set for these terms under Workforce Pell will have a significant impact on program eligibility. Governors may want to consider defining these terms in ways that, when taken together, ensure programs move residents into good-paying jobs with opportunity for upward mobility, and that connect to real, measurable, labor market needs by regularly updating analysis of real-time, regional job postings, projected changes (including any AI impacts), and gaps in talent supply.
- **Stackable (with documented connections to additional credentials) and portable across more than one employer.**
 - *How to have impact:* Documenting how a program transfers to required courses in degree or certificate programs, counts toward Registered Apprenticeship, or is part of a formalized sequence of credentials may mean institutions will have to launch new agreements and data reporting. Governors can further strengthen these efforts and the meaning of stackable by tracking whether students *actually* move to additional, related programs upon completion. Similarly, Governors have an opportunity to make determinations of portability meaningful by analyzing and using administrative data to determine whether participants get jobs in related occupations across employers. Governors can also prioritize providing clear career maps and advising and navigation. This is not ancillary to stackable pathways—rather, these supports are core to whether learners can successfully enter, persist in, and build careers through short-term training.

- **Aligned to employer hiring needs.**
 - *How to have impact:* The federal government gives states significant leeway to implement this requirement. Workforce Pell leaves some gaps in its definitions of quality measures—and states and territories may be interested in safeguarding against riskier programs, particularly those connected to new and emerging fields with more limited ability to demonstrate a historical connection to labor market needs. They could do this, for example, by requiring those programs to produce employer commitments to interview or hire participants, demonstrating they are truly connected to employers.

- **Resulting in an “industry-recognized credential.”**
 - *How to have impact:* Governors will need to bring clarity as to what an “industry-recognized” certificate or certification means, and can set a high and meaningful bar as to what counts as recognition (such as inclusion of as a hiring requirement in job postings) and by whom (industry associations, etc). Governors can include a focus on credentials that are not just industry-recognized, but also actually meaningfully sought out by employers and used in making hiring and promotion decisions.

- **Counting toward credit in certificate or degree programs.**
 - *How to have impact:* Governors will need a written process to assess whether a program is connected to longer certificate or degree programs, to allow participants to efficiently continue pursuing their education. However, to ensure that non-credit programs actually count toward credit in a *related* program, states and territories may also clarify for institutions how to demonstrate this and ensure students don’t lose the time spent in the shorter workforce program, and can consider making more Workforce Pell programs credit-bearing at the outset. Governors have the opportunity to convene institutions to align learning outcomes across programs and facilitate broader articulation.²

Some of these terms may already be defined by the state under Perkins, WIOA, or other state/territory programs or agencies. States and territories may consider performing an internal audit of existing definitions or uses of the terms to understand if/how they are already operationalizing these terms. And while these terms and standards are outlined and defined in

² Note: Every Workforce Pell program must articulate into at least one other related academic certificate or degree program, even if it is at the same institution. At the same time, the Workforce Pell program does not *have* to award academic credit, but, if the student completes the Workforce Pell program and enrolls in the identified related certificate or degree program, the receiving academic program *must* accept the Workforce Pell program. See Data Infrastructure Needs section for more details on “non-credit.”

the Workforce Pell program, they also present an opportunity for Governors to look at their whole system of education and workforce programs, not just Workforce Pell, and to improve cohesion and uniformity. A key way this can be done is by aligning definitions and standardizing the ways they measure key indicators of performance. They can also ensure learners receive support as they move beyond short-term programs, as these are often just one step in a career pathway that may include connected, longer-term programs that lead to higher wages, as well as career advising, employer commitments, and more.

By auditing standards across the workforce ecosystem and building a more comprehensive workforce framework that sets goals, uses data to measure demand and outcomes, aligns funding streams to outcomes, systematically connects jobseekers to opportunities, and provides clear authority and accountability for success, states can think bigger while tackling the implementation task at hand. For example, the [Good Jobs Economy framework](#) released last year helps put workers in good jobs, transform state systems, and build a workforce that powers a state's economy into the future.

Governors also play an important role in the U.S. Secretary of Education's determination of whether programs meet certain quality and outcome standards, such as:

- **Whether a program has a 70 percent completion rate.**
 - *Role for Governors:* The federal regulations require Governors to establish a process for calculating completion rates before the 2029-2030 award year.
- **Whether a program has a 70 percent job placement rate.** In the early years, reporting will align with the parallel WIOA performance requirement. Starting in the 2029-2030 award year, job placement is measured by looking at completers employed within a related field.
 - *Role for Governors:* Governors will need to establish a process for calculating job placement rates and ultimately align the methodology with federal standards that change starting in the 2029-2030 award year. Governors will also need to establish a process to collect administrative data to determine whether that placement is in a related field.
- **Whether a program meets a threshold return on investment (ROI), or median value-added earnings,** defined by whether program graduates receiving Workforce Pell funds earn more than the cost of the program (for all students) plus 150 percent of the poverty line, regionally adjusted, 3 years after completion.
 - *Role for Governors:* While ED will eventually make this calculation, Governors will need to assess ROI until data are available for the federal calculation, and may want to hew as closely as possible to the federal definition.

DATA INFRASTRUCTURE NEEDS

Without the data infrastructure to track participants from enrollment through employment, measure wages, and follow career advancement, Governors cannot know whether Workforce Pell is building pathways to good jobs. Implementing Workforce Pell requires states and territories to evolve their data systems into integrated longitudinal systems that link education to real-time labor market outcomes. States and territories will be required to report specific data about participants and programs. New data capabilities generated as a result of implementing these requirements will also give Governors the opportunity to set, measure, and track labor market outcome goals beyond what is required in Workforce Pell. Each state and territory will be starting from a different place, but may want to consider key updates such as:

- **Linking noncredit programs to labor market data:** Noncredit typically refers to any courses that institutions offer that do not provide students with academic credit (e.g., courses focused on specific workforce skills for a particular occupation, but also developmental education, GED preparation, or personal areas of interest such as photography). As it relates to Workforce Pell, noncredit programs are those that are designed to lead to a short-term, industry-recognized credential. Many states and territories do not collect data on noncredit programs, which prevents them from systematically linking workforce program participation to individuals' real-world labor market outcomes such as wages, job placement, and the range of employers hiring graduates (portability).
 - *How to have impact:* The ability to link these records will be critical for states to track real-world outcomes of program participants, even as ED takes on some of the wage outcome analysis using federal data. Specifically, this capability will be useful for Governors as they certify the ROI of programs before ED ultimately analyzes the median value added earnings of the program in later years, and may also be used by states to determine whether a program is high-wage. Having an early understanding of participants' labor market outcomes will also allow states to identify programs to prioritize with state-level investment and understand which programs may create risk.
- **Collecting enhanced wage records:** Over the next few years, state and territory labor departments will need to begin integrating Standard Occupational Classification (SOC) codes into Unemployment Insurance (UI) wage reports to verify that graduates are employed in fields specifically aligned with their training.
 - *How to have impact:* While the requirement to measure whether program participants find jobs related to their field of study does not take effect for several years, updating wage collections as early as possible will limit the

likelihood that a state approves programs that later lose eligibility. In the long run, building even more precise capabilities to understand the occupations that program participants land in will help guide investments and better measure success.

- **Formalizing credit articulation:** Governors will need to collect information on transfer or articulation agreements as part of the approval process to ensure non-credit completions provide a clear "on-ramp" to related certificate or degree programs.
 - *How to have impact:* Leverage statewide longitudinal data systems (SLDS) to better understand the long-term trajectories of workforce program participants, including whether and where individuals pursue further education.
- **Confirming basic program eligibility requirements:** Program length, participant completion, tuition and fees, and credit articulation may all be elements a state or territory will want to add to existing data collections to confirm programs meet other eligibility requirements. Many states and territories do not collect this data for noncredit programs.
 - *How to have impact:* Building an understanding of existing data collection capabilities and updating those capabilities not just for Workforce Pell, but for workforce programs and investments in the state writ large, will help ensure consistency and alignment across funding streams.
- **Analyzing demand:** States and territories will likely need to formalize regular (at least annual) analyses of labor market information such as scale of demand for particular occupations and industries, the supply of learners and jobseekers for those roles, and the gaps between demand and supply.
 - *How to have impact:* Analysis of labor market information typically sits scattered across state and territory agencies, is usually not done regularly, and may not provide the occupation-level information that would inform demand for particular programs. Streamlining and upgrading this capability could pay dividends across workforce investments.

TAKING ACTION

The effectiveness of Workforce Pell hinges on the ability of states and territories to track participants from enrollment through earnings and employment in particular occupations; assess the connections between workforce programs, job opportunities across multiple employers, and articulation to related education and workforce programs; and provide clear processes for determining program eligibility and program removal. At the same time,

Governors have an opportunity to leverage the work done to implement this program to further break down education and workforce silos and align their systems. To develop a clear process and timeline, define goals for good jobs and economic mobility, set high-quality standards, develop needed data infrastructure, and provide clear information to institutions and students, Governors can take action now to:

- **Designate a formal cross-agency working group**, including the Governor’s office, state workforce board, and higher education agencies, with a mandate to:
 - Set goals for residents attaining good jobs and economic mobility, and key performance indicators for the success of Workforce Pell in the state;
 - Identify and operationalize needed updates to state and territory data collection and analysis; audit existing standards and definitions across major investments like WIOA, Perkins V, and state financial systems; and
 - Set definitions and standards for Workforce Pell eligible programs; and facilitate credit articulation agreements.

The group can also produce recommendations on:

- The role these programs can play as a part of a state strategic response to the ongoing impact of AI; and
 - Updating standards, braiding funding, and developing shared goals with other relevant workforce investments.
- **Create a centralized online hub** to serve as a transparent guide for institutions seeking approval and a user-friendly catalog for students to view costs, job placement results, and how their program may earn them credit in other programs.
 - **Update policies, dependent on working group recommendations**, to leverage administrative data to the maximum extent possible across institutions of higher education, wage outcomes, and, where necessary, state tax records.
 - **Formally define the processes for Workforce Pell program approval and decertification** and include interim warning systems or flags for programs that may be in danger of losing eligibility, and adjust statewide academic approval processes as needed.
 - **Adopt a multi-year plan** to review and update policies and processes as state leaders learn what works for students and employers when more programs participate in the Workforce Pell program.
 - **Launch relevant updates standards and processes** around parallel workforce investments based on the working group’s recommendations.

OPPORTUNITIES FOR PHILANTHROPIC ENGAGEMENT

Existing state workforce funding streams and Workforce Pell Grants will still leave gaps in needed workforce resourcing. Having a plan to catalyze private resources through a coordinated [Good Jobs Fund](#)³ or similar investment vehicle to complement state efforts could build on the renewed focus on workforce and quality, and set states and territories up for philanthropic partners prioritizing high-quality programs. Governors can work with philanthropy to fill a number of gaps not filled by federal and state funding streams by supporting:

- Career pathway architecture:** Fund the connective tissue that Workforce Pell cannot—the design and coordination work required to build coherent, multi-credential pathways across programs, employers, and roles over time. Workforce Pell funds individuals in short-term programs. Philanthropy can fund the architecture that turns a sequence of programs into a genuine career launch—including earn-and-learn models, stackable credential sequences, and navigation infrastructure that connects training to good jobs and wages needed for economic independence.
- Independent evaluations:** Prepare promising new and existing programs for appropriate independent evaluations—including randomized control trials where feasible—to rigorously assess results and apply lessons to strengthen and modernize training programs and talent systems.
- Seed funding for new high-quality programs and infrastructure:** Support high-quality education and training programs that don't yet qualify for Workforce Pell Grant funds—for example, a program with initial high-wage outcomes, but which has not been in existence for the full year required by the federal program. Philanthropy could also help leaders produce the often AI-enabled labor market intelligence needed to understand real-time demand and to design new programs that meet high-quality benchmarks — or to re-design existing programs — while targeting state priorities, supporting programs to build a track record, and addressing emerging challenges like near- and medium-term impacts of AI.
- Support plus-up funding:** Work with Governors to design state-level performance incentives that reward programs exceeding the federal Workforce Pell quality thresholds—including programs that demonstrably lead to wages needed for economic

³ A Good Jobs Fund is used to identify and fund the development, and growth of evidence-based, scalable models that connect employers, job seekers, and education and training providers in local regions.

independence. Philanthropy can seed these incentive structures to demonstrate proof of concept.

- **Capital investments for seat expansion:** Modernize existing programs to meet the state’s Workforce Pell requirements, supporting programs that show significant impact on wages and job placement into jobs that allow for economic independence, but that need capital to expand seats or pay for equipment.
- **Fill the gaps on complementary programs or costs:** Identify, co-fund, and scale proven and promising programs that meet certain metrics to place people in good jobs, but do not qualify for Workforce Pell Grants, or that support students in Workforce Pell or other programs, but are uncovered costs, such as tuition that exceeds the Pell Grant maximum or non-tuition costs. For example, philanthropy could focus on programs providing a next step in the career ladder beyond a short-term program.
- **Intermediaries:** Expand the base of effective workforce intermediaries, with a focus on programs that have a track record of success and on key occupations identified by the state’s renewed focus on outcomes or through strategic initiatives that identify priority sectors.

OPPORTUNITIES TO BOLSTER RESEARCH ON OUTCOMES

Due to the nature of the Workforce Pell program design, opportunity for variation in its implementation by state or territory, and the associated requirements related to both historical (e.g., past performance) and future data (e.g., outcomes), researchers will have a wealth of opportunities to examine policy-important questions regarding program design, implementation, and the workforce impacts of a wide range of program models and policies. The research should be designed to leverage the existing evidence base and inform state policy and practice across the workforce development field going forward. Determining whether activities funded under Workforce Pell can produce meaningful gains in workforce outcomes—and, if so, which approaches are most impactful—will be critical, particularly given the muted impact that the short-term training programs that have been evaluated thus far have shown on such outcomes. Rigorous research and evaluation can explore questions including:

- **Workforce sector and program design:** What type of short-term programs (and what design characteristics, such as added career coaching, in-depth industry partnerships, etc.) produce the best outcomes for learners with respect to wages, wage growth, and employment.

- **Labor market outcomes and economic impact:** If and how Workforce Pell programs have an effect on local economies, in-demand industries, and economic priorities.
- **Student access:** Whether Workforce Pell is increasing enrollment in short-term programs for those who otherwise could not afford training. Researchers can analyze how access differs by region, the type of institution, the industry or sector, student financial need, and more.
- **The impact of implementation policies:** How the definitions Governors choose, in particular for high-skill, high-wage, and in-demand occupations, impact the types of programs approved— and what impact those programs have on participants, employers, and the larger economy.
- **The impact of Workforce Pell on workers displaced by AI:** Whether short-term credential programs effectively serve workers in AI-vulnerable occupations, and what program design characteristics—including sequencing across multiple credentials and career stages over time—produce the strongest and most durable outcomes.

CONCLUSION

Workforce Pell presents an opportunity to better align education and workforce strategies by expanding access to high-quality career pathways that prepare learners and workers for in-demand, high-wage jobs essential to meeting the nation’s urgent and evolving workforce needs. It provides Governors a chance to partner closely with their workforce boards, to set clear goals and shape regional talent pipelines, modernize data systems and the capacity to understand real labor market demand, and set forward-looking education and workforce strategies that reward outcomes.

It is not a turnkey federal program; it offers states and territories meaningful flexibility to design implementation approaches that reflect their unique priorities, partnerships, and workforce needs, as well as an opportunity to rigorously evaluate programs to identify those most successful at helping people move up the economic ladder.

The law establishes federal quality standards, but its real-world impact will depend on how state and territory leaders define quality standards and seize this moment to drive broader systems change. Governors who engage early, set strong standards, coordinate across agencies, and invest in data infrastructure will be well-positioned to deploy this new funding to move residents to good jobs and best serve the people of their state, while using this opportunity to develop the architecture needed for an effective workforce system beyond this single funding source.

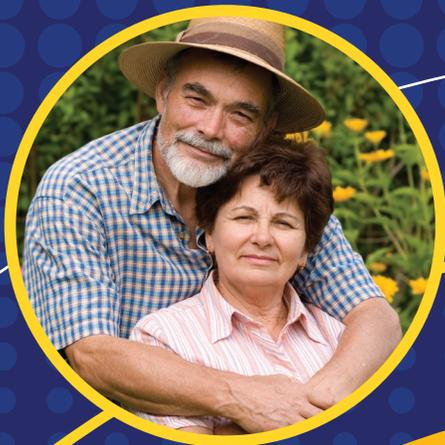
Appendix 1. PROJECTED TIMELINE

December 2025	ED released a consensus draft that served as the basis for draft regulations.
February - July 2026	Governors can begin creating the standards and definitions they will need for the key terms aligned above. Once those draft standards are set, they can begin to compile potential programs that may qualify.
March 2026	ED published a Notice of Proposed Rulemaking (NPRM) in the Federal Register. This opens a public comment period, after which it reviews feedback and prepares the final regulations. Governors may want to submit comments to help shape the rules, raise concerns, and make sure the policies will work in practice for their state.
April 2026	NPRM comment period closes.
April 30, 2026	States have until this extended deadline to incorporate changes for Workforce Pell into their Workforce Innovation and Opportunity Act (WIOA) state plan modifications.
Spring - Early Summer 2026	The final regulations will (likely) be published. The standards and definition guide (mentioned above) will need to be updated to reflect any changes. Governors can begin certifying programs/credentials that are eligible for Workforce Pell dollars.
July 1, 2026	Workforce Pell law goes into effect.
Fall 2026	First Workforce Pell awards are likely to be disbursed. States are likely to continue certifying programs as implementation ramps up.
2026-2028 Award Year	To be eligible, programs must maintain a 70% completion rate (within 150% of time) and a 70% job placement rate (without tracking occupational status).
April 2028	States will submit updated WIOA state plans. The draft regulations require states to create a process for determining whether a program meets various requirements (such as high-skill, high-wage, or in-demand standard; meet employer hiring needs, and others). The process for reviewing whether occupations meet these requirements will need to be done at least every two years, concurrent with WIOA state plans and modifications.
2029-2030 Award Year	To meet the 70% job placement requirement, states will now be required to start tracking whether students are employed in the occupation for which the program intends or a similar high-skill, high-wage or in-demand occupation.

Alice in Kentucky Study Excerpt

ALICE IN KENTUCKY:

» A STUDY OF FINANCIAL HARDSHIP



**ALICE: Asset Limited, Income
Constrained, Employed**
2025 Report | UnitedForALICE.org



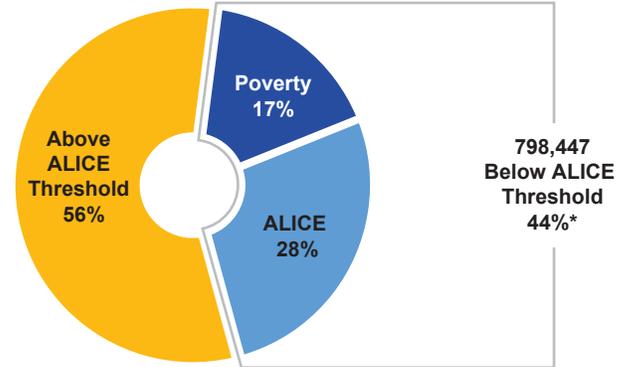
ALICE IN KENTUCKY: EXECUTIVE SUMMARY

The number of households in financial hardship in Kentucky is undercounted by official measures. According to the Federal Poverty Level (FPL), 17% of households in Kentucky (299,959) were in poverty in 2023. Yet United For ALICE data shows that another 28% (498,488 households) were **ALICE (Asset Limited, Income Constrained, Employed)**. ALICE households have income above the FPL, but not enough to afford the basics in the communities where they live.

The reality is that out of the 1,808,144 households in Kentucky, 798,447 – 44%* – had income below the ALICE Threshold of Financial Survival in 2023. These included both households in poverty and ALICE households.

The crux of the problem is a mismatch between earnings and the cost of basics. The **ALICE Household Survival Budget** for a Kentucky family of four in 2023 was \$75,300, well above the FPL of \$30,000 and full-time earnings for most low-wage jobs in the state. For example, retail salespersons (one of the most common occupations in Kentucky) earned a median hourly wage of \$14.12 – just enough to cover the ALICE Household Survival Budget for one worker employed full time (\$13.51 per

Total Households in Kentucky = 1,808,144



* In 2023, out of Kentucky households, there were 299,959 (16.6%) in poverty, plus 498,488 (27.6%) that were ALICE, which totals 798,447 (44.2%) below the ALICE Threshold and rounds to 44% in this Report.

hour), but not enough to cover the budget for a family with children, even with two adults working (combined wage of \$37.65 per hour).

ALICE Household Survival Budget, Kentucky, 2023

	Single Adult (Age 18–64)	Single Adult (Age 65+)	2 Adults, 1 Infant, 1 Preschooler
Monthly Costs			
Housing	\$664	\$664	\$912
Child Care	–	–	\$1,380
Food	\$423	\$389	\$1,147
Transportation	\$422	\$352	\$950
Health Care	\$175	\$531	\$668
Technology	\$86	\$86	\$116
Miscellaneous	\$177	\$202	\$517
Taxes	\$305	\$369	\$585
Monthly Total	\$2,252	\$2,593	\$6,275
ANNUAL TOTAL	\$27,024	\$31,116	\$75,300
Full-Time Hourly Wage	\$13.51	\$15.56	\$37.65

Note: Tax Credits include the Child Tax Credit (CTC) and the Child and Dependent Care Tax Credit (CDCTC). Full-time hourly wage represents the wage needed at 40 hours per week to support the annual total, with credits. For a family of four, this represents the combined wage needed for two workers. The Household Survival Budget is a bare-minimum budget. Many households incur higher costs, especially for housing.

Sources: AAA, 2023; American Community Survey, 2023; Bureau of Labor Statistics, 2023–Consumer Expenditure Surveys; Bureau of Labor Statistics, 2023–Occupational Employment Statistics; Centers for Medicare & Medicaid Services, 2023–Medicare - Chronic Conditions; Centers for Medicare & Medicaid Services, 2020–Medicare Current Beneficiary Survey; Centers for Medicare & Medicaid Services, 2023; Child Care Aware of Kentucky/Human Development Institute, University of Kentucky, 2024; Consumer Reports, 2022; Federal Reserve Bank of Atlanta–Policy Rules Database, 2023; Federal Highway Administration, 2022; Feeding America, 2023; Internal Revenue Service, 2023; National Association of Insurance Commissioners, 2024; Tax Foundation, 2023; U.S. Department of Agriculture, 2023–Official USDA Food Plans; U.S. Department of Housing and Urban Development, 2023–Fair Market Rents and Small Area FMR; USTelecom, 2022.

To see the Household Survival Budget for all counties in Kentucky, go to UnitedForALICE.org/The-Cost-of-Basics/Kentucky

Figure 1. The Cost of Basic Needs is Well Above the Federal Poverty Level

ALICE Household Budgets and FPL, Kentucky, 2023

	Federal Poverty Level <i>Census poverty thresholds by number of people in a household but not by age or geography</i>	ALICE Household Survival Budget <i>The cost of the essentials needed to live and work in the current economy, by household type and location</i>	ALICE Household Stability Budget <i>The cost of supporting and sustaining an economically viable household over time, including a contingency for savings</i>
Single Adult			
Monthly Total	\$1,215	\$2,252	\$3,831
Annual Total	\$14,580	\$27,024	\$45,972
Family of Four			
Monthly Total	\$2,500	\$6,275	\$9,791
Annual Total	\$30,000	\$75,300	\$117,492

Note: Family of four includes two adults and two children in child care (one infant, one four-year-old).

Sources: ALICE Household Survival Budget, 2023; Assistant Secretary for Planning and Evaluation (ASPE), HHS poverty guidelines for 2023, U.S. Department of Health and Human Services, 2023

Not Enough Income to Cover Basic Costs

When wages cannot cover basic household costs, families struggle to make ends meet. ALICE workers perform jobs that keep Kentucky’s economy running smoothly, such as cashiers, nursing assistants, office clerks, servers, laborers, and security guards. Despite wage increases through the pandemic and into 2023, many ALICE workers still could not cover the increased cost of household basics, and their families continued to struggle to make ends meet.

Figure 2 compares the Household Survival Budget costs for a family of four with two adults, an infant, and a preschooler to the full-time wages of two common Kentucky occupations, a home health and personal care aide (earning \$14.60 per hour) and a stock worker/order filler (earning \$17.08 per hour). In 2023, this household’s annual income fell short of basic costs by \$9,410, or 14% of their income. (For more data on how costs are increasing, see the [ALICE Essentials Index](#).)

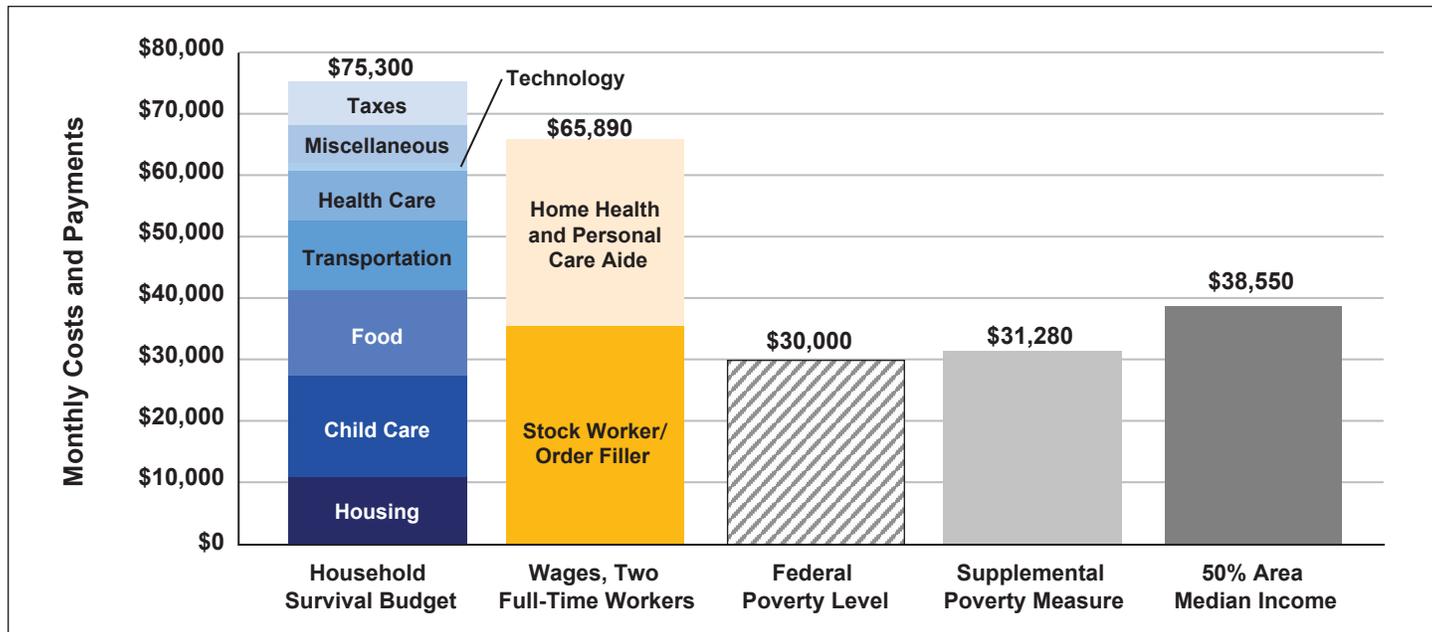
Figure 2 also shows that **government measures underestimate the cost of basics and the number of households facing financial hardship:**

- **The Federal Poverty Level** (FPL): The FPL relies on an [outdated methodology](#) for household costs; it does not account for cost-of-living differences within and across the continental U.S.; and it is adjusted by the Consumer Price Index, which underestimates inflation in essential

costs. **In 2023, Household Survival Budget costs in every Kentucky county were well above the FPL of \$14,580 for a single adult and \$30,000 for a family of four.**

- **The Supplemental Poverty Measure** (SPM): First published by the U.S. Census Bureau in 2011, the SPM is based on the costs of food, clothing, shelter, and utilities. In 2023, the SPM threshold for a renter household with two adults and two children in Kentucky was \$31,280.
- **Area Median Income** (AMI): The AMI is the midpoint of income distribution within a geographic area (half of households earn more, half earn less). Percentages of AMI are used for federal housing assistance; very low-income households earn less than 50% of AMI, the typical threshold for Section 8 eligibility. AMI is based on income, not costs, so it does not capture whether households can afford basic expenses. In Kentucky in 2023, for a four-person household, 50% of AMI was \$38,550 – more than the FPL and the SPM, but still well below the Household Survival Budget.

Figure 2. Basic Costs Exceed Wages of Common Jobs and Official Measures of Hardship
Annual Budget, Wages, and Official Measures of Financial Hardship, Family of Four, Kentucky, 2023



Note: *Home health and personal care aides* monitor the condition of people with disabilities or chronic illnesses and help them with daily living activities. *Stock workers/order fillers* receive, store, and issue merchandise, materials, equipment, and other items from stockrooms, warehouses, or storage yards, and may operate power equipment to fill orders.

Sources: ALICE Household Survival Budget, 2023; Bureau of Labor Statistics—Occupational Employment Statistics, 2023; U.S. Census Bureau, Supplemental Poverty Measure, 2023; U.S. Department of Housing and Urban Development, *Area Median Income* (Kentucky Income Limits), 2023.

See page 2 for Household Survival Budget sources and visit UnitedForALICE.org/The-Cost-of-Basics/Kentucky to see the Household Survival Budget for all counties and for numerous household compositions.

Increasing Costs: The ALICE Essentials Index

When prices increase faster than wages, people’s purchasing power decreases, and the economy struggles. Inflation is especially challenging for families on a tight budget or a fixed income, like ALICE households.

The increase in the cost of basics is what affects ALICE households the most. Yet that increase is often concealed in the standard measure of inflation, the Bureau of Labor Statistics’ **Consumer Price Index** (CPI), which tracks the changes in the retail price of a broad basket of goods and services purchased by consumers in [75 urban areas](#). The CPI is composed of [more than 200 categories](#), including food and beverages, housing, apparel, transportation, medical care, recreation, education, and communication services.

By contrast, the **ALICE Essentials Index** focuses specifically on the budgetary realities that ALICE families face. The Index tracks the cost of only six basic goods and services essential to living and working in the current economy: housing, child care, food, transportation, health care, and basic smartphone and home broadband internet plans. And it shows that the rise in the cost of household basics far outpaces increases in the cost of the CPI’s larger basket of goods and services.

ALICE households have long been disproportionately impacted by inflation. During the economic recovery in the wake of the pandemic, inflation surged, and many consumers had to cut or tighten spending to stay within their budgets. But ALICE households had already been struggling with higher rates of inflation in essential household goods for years. And since they only purchased necessities, they had little to no leeway to cut spending.

In Kentucky and across the country, the ALICE Essentials Index has increased faster than the CPI for more than a decade (Figure 3). From 2007 to 2023, the average annual rate of increase for the ALICE Essentials Index was 3.0% in Kentucky, on par with the South Census Region and the national rate (both 3.1%). While the CPI does not report by state, [CPI increased](#) by 2.5% both in the [South Census Region](#) (which includes Kentucky) and nationally during the same period.

Demographic Trends

Population change: The population in the U.S.—including Kentucky—is aging. At the same time, the costs of raising a child have contributed to declining birth rates, further [narrowing the gap between births and deaths](#). When the COVID-19 pandemic hit, death rates surpassed birth rates in Kentucky. Although [death rates have since declined, they continued to outpace births in 2023](#). As a result, population growth is now more reliant on migration. [International migration](#) in urban areas such as Louisville, Lexington, and Bowling Green has contributed most to Kentucky’s population growth.

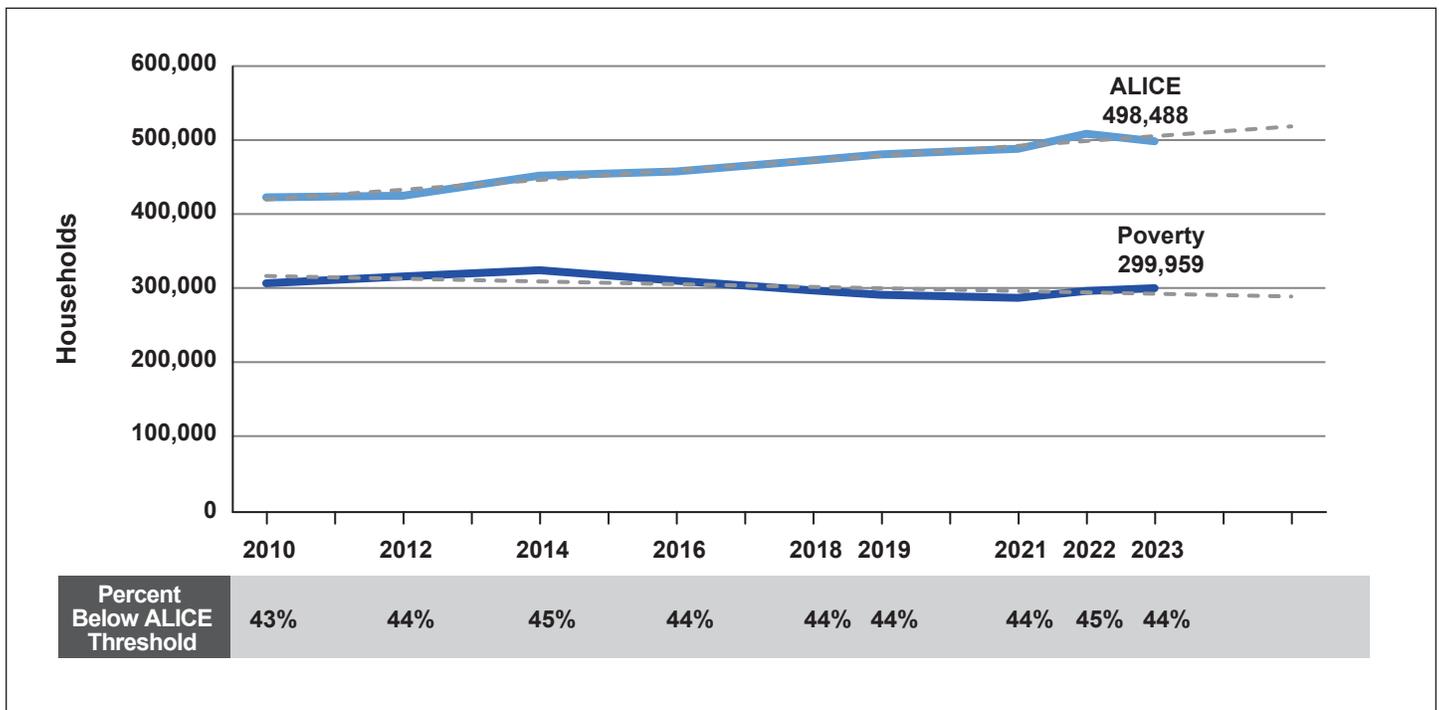
Household income status: Rates of financial hardship in Kentucky have shifted over time (Figure 6). During the last major economic disruption – the Great Recession – the percentage of Kentucky households below the ALICE Threshold increased

from 33% in 2007 to 43% in 2010, and it never returned to pre-Recession levels in the decade that followed.

Since 2010, despite some ups and downs in rates of financial hardship, the trend has been clear: **The number of ALICE households in Kentucky has continued to rise.** From 2010 to 2023, the total number of households in the state increased by 7% (compared to a 14% increase nationally), the number of households in poverty decreased by 2% (up 3% nationally), and the number of ALICE households increased by 18% (up 24% nationally). And while the total number of households below the ALICE Threshold increased by 10%, the share of total households below the ALICE Threshold during this period has remained relatively stable, fluctuating between 43% and 45% (Figure 6).

Figure 6. ALICE Households are Trending Upward, While Households in Poverty Remain Largely Flat

Number of Households by Income, Kentucky, 2010–2023



Note: The gray dashed trend lines in this figure highlight the general direction of the point-in-time data for the years shown. These lines indicate whether the numbers of ALICE and poverty-level households have been generally increasing, decreasing, or remaining flat. The ALICE trend line is statistically significant at $p < 0.0001$; and the Poverty trend line is statistically significant at $p < 0.0385$.

Sources: ALICE Threshold, 2010–2023; U.S. Census Bureau, American Community Survey, 2010–2023

Wages for the Most Common Occupations

Over the last few years, low-wage workers saw the biggest [increase in wages](#) in more than a decade. This was in part due to a [tighter labor market](#) where employers had to offer more competitive wages to attract and retain workers. Minimum wage increases in some states also contributed to this effect. However, the minimum wage in Kentucky is aligned with the federal minimum wage ([\\$7.25 per hour](#)) and [has not been updated since 2009](#).

Wage increases alone have not been enough to make up for years of falling behind. As documented in the ALICE Essentials Index, wages have not kept pace with the cost of essential

goods for more than a decade, stretching ALICE workers' household income even further. In 2023, of the 20 most common occupations in Kentucky as reported by the Bureau of Labor Statistics (BLS), 15 paid less than \$20 per hour. The wage necessary to cover the ALICE Household Survival Budget for a single adult in Kentucky was \$13.51 per hour working full time, or for a family with two adults and two children, a combined wage of \$37.65 per hour.

Of the workers in the 20 most common occupations in Kentucky, 31% were below the ALICE Threshold in 2023. Among laborers and material movers, the most common occupation, 36% were struggling. Occupations with the largest share of ALICE workers included waiters and waitresses, cooks, cashiers, home health and personal care aides, and fast food and counter workers (Figure 9).

Figure 9. A Large Share of Workers in the 20 Most Common Occupations are Below the ALICE Threshold

Labor Characteristics, Most Common Occupations, Kentucky, 2023

Most Common Occupations	Total Employment (BLS)	Percent of Workers Below ALICE Threshold (ACS PUMS)	Median Hourly Wage (BLS)
Laborers and Freight, Stock, Material Movers, Hand	61,050	36%	\$18.85
Driver/Sales Workers and Truck Drivers	54,260	23%	\$19.56
Stockers and Order Fillers	52,180	38%	\$17.08
Cooks	51,780	52%	\$13.41
General and Operations Managers	50,500	9%	\$37.93
Registered Nurses	48,710	9%	\$37.42
Cashiers	44,940	50%	\$14.54
Retail Salespersons	44,870	27%	\$14.12
Customer Service Representatives	43,940	31%	\$17.47
Fast Food and Counter Workers	43,150	43%	\$11.30
Janitors and Building Cleaners	37,310	42%	\$13.93
Waiters and Waitresses	27,160	56%	\$10.27
Office Clerks, General	27,140	30%	\$16.72
Elementary and Middle School Teachers	26,720	10%	\$28.54
Home Health and Personal Care Aides	25,700	46%	\$14.60
Other Healthcare Support Workers	23,500	17%	\$17.84
Bookkeeping, Accounting, and Auditing Clerks	22,790	14%	\$20.87
Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	21,920	14%	\$18.62
Orderlies and Psychiatric Aides	21,100	31%	\$17.06
Maintenance and Repair Workers	20,790	14%	\$21.73

Note: BLS = Bureau of Labor Statistics; ACS PUMS = American Community Survey Public Use Microdata Sample. This figure includes all workers in Kentucky (residents and nonresidents coming into the state for work). The median hourly wage is based on the annual wage for the occupation, divided by 52 weeks and estimated at 40 hours per week. [ALICE Threshold status](#) is determined by comparing workers' total household income to the ALICE Household Survival Budget for their household composition and location.

Sources: ALICE Threshold, 2023; Bureau of Labor Statistics—Occupational Employment Statistics, 2023; U.S. Census Bureau, American Community Survey, PUMS, 2023.

Summary of State Definitions

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Summaries of state definitions of “in-demand” and “high-wage” occupations used under the Carl D. Perkins Career and Technical Education Act

*This table and the full article is available on [New America’s website](#).

State	In-Demand Definition or Criteria	High-Wage Definition or Criteria
AK	None found.	None found.
AL	<p>Rubric with five criteria:</p> <ol style="list-style-type: none"> 1. At least 70% of median regional wage; 2. Annual positive growth for 10-year period; 3. Projected to have a minimum of 15 openings per year; 4. Median wage exceeds 70% of the Lower Living Standard Income Level; and 5. Requires a postsecondary degree, certificate, or credential for initial employment. <p>To be considered in-demand for a region, occupations must match 1 through 3 and either 4 or 5. Occupations must be in-demand in three regions to be considered in-demand statewide.</p>	None found, but see the wage thresholds for in-demand occupations.
AR	<ul style="list-style-type: none"> • A pathway must have a 10-Year Forecast Total Demand of aligned occupations greater than or equal to 5,548, which is 0.4% of the total employment in Arkansas. • This percentage can be applied regionally to account for local variations in workforce needs. • Additionally, only high-wage occupations are considered for labor market alignment. 	<ul style="list-style-type: none"> • Median annual wage at or above \$39,728, determined using the Massachusetts Institute of Technology (MIT) Living Wage Calculator. • The high-wage definition will be reviewed annually by referencing the MIT Living Wage Calculator.

AZ	No definition found in the Perkins state plan or related documents, but the 2024 WIOA plan notes the Workforce Arizona Council approved a list of six existing industries and one emerging industry as the state's in-demand industries "because they express healthy employment levels (including historic and projected levels) and average weekly wages."	None found.
CA	<ul style="list-style-type: none"> • Secondary: "Identified in the Occupation in Demand index (produced by the Employment Development Department) and/or through the comprehensive local needs assessment." • Postsecondary: Any occupation in the region that: <ol style="list-style-type: none"> 1. Has new job growth projected for the period 2024 through 2029 within the region; and 2. Meets or exceeds the median annual job openings for the region. 	<ul style="list-style-type: none"> • Secondary: Above the median wage for all occupations. • Postsecondary: At or above the median wage for all occupations in the region.
CO	Identified by local recipients through regional comprehensive local needs assessments using labor market information provided by the state.	Identified by local recipients through regional comprehensive local needs assessments using labor market information provided by the state.
CT	Top half of occupations within each career cluster based on number of projected openings.	Above the state median wage for all occupations.
DC	More than the median number of total (growth plus replacement) annual openings in the DC metropolitan statistical area over the preceding 5-year period.	Has a 25th percentile wage equal to or greater than the most recent MIT Living Wage Index for one adult in DC, and/or leads to a position that pays at least the median hourly or annual wage for the DC

		metropolitan statistical area.
DE	Projected to create at least four annual job openings per year due to growth in the state.	Offers compensation that is greater than the state median wage.
FL	<p>State in-demand occupations have:</p> <ul style="list-style-type: none"> • 500 annual openings and average growth rate of 0.71% or 1,200 annual openings with any positive growth; • A mean wage of \$19.00/hour and entry wage of \$15.44/hour. <p>Regional in-demand occupations must have 30 openings and positive growth, along with mean and entry wages that are adjusted to reflect the regional cost-of-living.</p>	<ul style="list-style-type: none"> • State “High Skill/High Wage Occupations” are in-demand occupations with a mean wage of \$29.76/hour and entry wage of \$19.00/hour. • The state mean and entry wage levels are also adjusted for each region’s cost of living to create a list of regional “High Skill/High Wage Occupations.”
GA	<p>High Demand Careers are occupations that have:</p> <ul style="list-style-type: none"> • A positive projected growth rate over a 10-year period; • Annual job openings equal to or greater than the median job openings, based on a 10-year projected period; and • Wages equal to or greater than 75% of the state median wage. <p>Occupations determined to be a public service or public good may be added to the list if they do not meet these criteria.</p>	None found, but see the wage threshold for High Demand Careers.
HI	Occupations that have a higher number of annual openings than the state average, and/or higher annual growth rate than the state average.	Average annual salary that meets or exceeds the MIT Living Wage statewide or for a county.
IA	Identified by local recipients through	None found.

	comprehensive local needs assessments using labor market information provided by the state.	
ID	Occupations are considered high-demand if they have at least 100 openings annually.	Meets or exceeds the county average wage.
IL	<p>None found in the Perkins state plan or related documents, but the Demand Occupation Training List used for WIOA individual training accounts has three criteria:</p> <ul style="list-style-type: none"> • Projected annual openings equal to at least 0.01% of statewide employment; • Entry-level education requiring at least a high school diploma with moderate on-the-job training (OJT) and not more than a bachelor’s degree with long-term OJT; and • Median wage that is at least 85% of the living wage for one adult and one child, as determined by the MIT Living Wage calculator. 	<p>An occupation that meets at least one of the following wage criteria:</p> <ol style="list-style-type: none"> 1. Using data from DOL and the MIT Living Wage Calculator, an occupation whose median salary is at least 85% of the statewide living wage for one adult and one child; or 2. If the occupation does not pay a family-supporting wage, it is a springboard occupation that is a necessary position for advancing to an occupation with more responsibility and that pays a family-sustaining wage.
IN	<p>Indiana’s Top Jobs system ranks occupations from one to five stars by weighting four factors:</p> <ul style="list-style-type: none"> • Current and anticipated demand using short- and long-term job openings and real-time job postings (weighted 35%); • Projected growth using long-term change in employment and short- and long-term change in the number of projected new jobs (25%); • Average earnings, earnings growth, and ratio of earnings to 75% of state’s average wage (12%); and • Retention, measured by 	None found, but see the wage thresholds used in the Top Jobs system.

	<p>job separations divided by average total employment, "in order to suppress high-churn occupations" (28%). An occupation must pay 100% of the state average wage to earn four or more stars.</p>	
KS	<p>None found in Perkins state plan or related documents, but the state labor agency reports on its website that its "Occupational Employment Demand" methodology considers:</p> <ul style="list-style-type: none"> • Occupations in highest demand relative to all other occupations based on projected total job openings over the next 10 years and current online job postings; and • Occupations expected to experience the most growth over the next 10 years, based on the projected number of job openings due to growth and the projected average annual growth rate. 	<ul style="list-style-type: none"> • The "Occupational Employment Demand" methodology includes an indicator for occupations with high wages. • An occupation is considered high wage if the occupation has a median or mean wage greater than the median or mean wage for all occupations in the region.
KY	<ul style="list-style-type: none"> • None found in the Perkins state plan or related documents, but the Kentucky Workforce Innovation Board website reports it has identified five in-demand sectors considering "quantitative factors (entry annual wages or median wages, occupational demand, and growth rate) and qualitative factors." • A list of example occupations in these sectors is provided. 	None found.
LA	<ul style="list-style-type: none"> • Uses a weighted rating system that classifies occupations based on demand and wage levels. • Jobs are rated on a scale 	Pays average hourly rate equal to or greater than the average hourly rate of all occupations within the region.

	<p>from one to five, with five being the highest rating for occupations with the greatest demand and highest wages in the state.</p> <ul style="list-style-type: none"> • This methodology is also applied at the regional level. • An in-demand industry is defined as an occupation in which state, local or regional market data shows that demand exceeds projected employment supply to such a level that the occupation is rated with 3, 4, or 5 stars. 	
<p>MA</p>	<ul style="list-style-type: none"> • MassHire Boards identify critical industries and occupations in each region from among “opportunity star” occupations identified by the state using a system that classifies occupations based on demand and wage levels. • Jobs are rated on a scale from one to three, with three as the highest rating for occupations with the greatest demand and highest wages. • An occupation is “high demand” if it is one of the top 10 percent of occupations by annual openings or top 25 percent of occupations by projected job growth rate. An occupation is “in-demand” if it is one of the top 25 percent of occupations by annual openings or top 50 percent of occupations by projected job growth rate. • An occupation is “high-wage” if its median earnings are greater than median earnings for all occupations. • An occupation has an “education wage” if its 	<ul style="list-style-type: none"> • An occupation is “high-wage” if its median earnings are greater than median earnings for all occupations. • An occupation has an “education wage” if its median earnings are greater than the median earnings for all occupations that require a similar level of education. • An occupation is “top wage” if it is categorized as both “education wage” and “high wage.”

	<p>median earnings are greater than the median earnings for all occupations that require a similar level of education.</p> <ul style="list-style-type: none"> • An occupation is “top wage” if it is categorized as both “education wage” and “high wage.” 	
MD	Careers with a growth rate over 10 years of at least 7% or a 2-year occupational projected growth of 2.5%.	Exceeds the state average annual wage.
ME	High Demand means the occupation is expected to have at least 20 openings per year between 2022 and 2032.	Above the hourly or annual median wage of all state occupations.
MI	An occupation for which state, local, or regional labor market data show that demand exceeds projected employment supply.	Average hourly rate equal to or greater than the average hourly rate of all occupations.
MN	<p>Occupations In Demand methodology ranks occupations on the basis of these variables:</p> <ul style="list-style-type: none"> • Job vacancies by region; • Number of existing jobs in the region; • Unemployment insurance weeks claimed (a high number of claims reduces the demand score); and • Vacancies reported as temporary or seasonal (a high share of vacancies reported as temporary reduces the demand score). 	Above the median wage for all occupations.
MO	<ul style="list-style-type: none"> • The Perkins state plan indicates that the Missouri Economic and Research Information Center (MERIC) helps to identify these occupations. • MERIC produces Career Grades, which assigns a letter grade from A+ to F to an occupation based on a 	None found, but average wage is a factor in Career Grades.

	<p>combination of projected total job openings, projected percent growth, and current average wages.</p> <ul style="list-style-type: none"> • Occupations with a grade of A or A+ have above average results in at least two of the three variables, while occupations with a grade of B or B+ have above average results in at least one of the three variables. 	
MS	Identified by local recipients through comprehensive local needs assessments using labor market information provided by the state.	None found.
MT	All industries and careers are currently in demand in Montana.	60% and above the median income per county, city, region, and state.
NC	Occupations identified through labor market data as currently or forecasted to experience worker shortages.	Paying wages at or above the median income for the relevant region or state.
ND	<ul style="list-style-type: none"> • Identified by local recipients using local data and state labor market information, including the State High Need and Emerging Occupations List used to determine eligibility for the Career Builders Scholarship and Loan Repayment programs. • Factors used to identify these occupations include total employment, 10-year numeric job growth, annualized job growth rate, 10-year annual job openings, average annual wages, and essential and emerging occupations. 	None found, but wages are a factor in identifying occupations for the State High Need and Emerging Occupations List.
NE	High Demand ratings use 10-year occupational projections and are based on three weighted factors:	<ul style="list-style-type: none"> • Eight wage categories are used to determine high wage: 1. Average hourly wage;

	<ul style="list-style-type: none"> • The number of annual openings (highest weight); • The net change in employment (second highest); and • The growth rate (lowest weight). <p>Occupations are ranked against all other occupations within a region to determine their final rating. Because each area is ranked individually, occupations may have a higher rating in one region than in another.</p>	<ol style="list-style-type: none"> 2. Entry wage; 3. Experienced wage; 4. 10th percentile wage; 5. 25th percentile wage; 6. 50th percentile wage; 7. 75th percentile wage; and 8. 90th percentile wage. <ul style="list-style-type: none"> • When an occupation pays wages at or above the region’s all-occupations, all-industries wage in any of these categories, it receives a point for that wage category. • If an occupation gets a point in four or more of the categories, it is considered High Wage.
NH	<p>None found in Perkins state plan or related documents, but the state labor agency publishes a list with five types of High Demand Occupations:</p> <ul style="list-style-type: none"> • Type A: With more than 106 annual total openings and more than \$15 average hourly wage; • Type B: With more than 5% projected employment percent change and more than 20 annual total openings; • Type C: Listed as a national apprenticeship in a WIOA targeted sector (information technology, hospitality, healthcare, and manufacturing) with more than 20 annual total openings; • Type D: Listed as a national apprenticeship with more than 20 annual total openings; • Type E: In a WIOA targeted industry with more than 20 annual total openings. 	<p>None found, but wages are a factor in identifying one of the types of High Demand Occupations (Type A).</p>

NJ	In-demand occupations have more than the median number of total (growth plus replacement) openings statewide or in a particular region.	Pays at or above the state median hourly wage or the mean annual wage.
NM	Careers are considered in-demand when demand for particular careers exceeds supply.	Median salary must meet or exceed 185% of the federal poverty guideline for a family of three, the federal guideline for reduced-price lunch eligibility.
NV	<ul style="list-style-type: none"> • Occupations identified as high need by the Governor’s Office of Economic Development and the Department of Employability, Training, and Rehabilitation. • The 2024 WIOA state plan reports that the identification process “includes examining real-time job postings, DETR Occupational Employment Projections, Brookings Institution STEM Scores, job openings, wages, automation, and needs of targeted industry sectors.” 	Pays at least the living wage as identified by the MIT Living Wage Calculator for a family of three with one child.
NY	<ul style="list-style-type: none"> • None found in Perkins state plan, but the state’s CLNA template asks local recipients to identify the top five industries in their region using state labor market information. • The 2024 WIOA state plan reports the state has identified 10 existing and 25 emerging demand occupations, without identifying them or the criteria used to identify them. 	None found.
OH	Greater than average projected job openings or growth, along with median wages equal to or greater	None found, but wages are a factor in identifying in-demand occupations.

	than 80% of the state median wage.	
OK	Identified by local recipients using labor market information provided by the state and other data.	Pays more than the median wage compared to the regional occupational wage. Any amount over \$19.94 per hour is considered high wage.
OR	Occupations having more than the median number of total (growth plus replacement) openings for statewide or a particular region.	Pays more than the all-industry, all-ownership median wage for statewide or a particular region.
PA	<ul style="list-style-type: none"> • High Priority Jobs are initially identified using employment projections, screening out occupations that pay less than 200% of the federal poverty level for one adult and one child and those with “indications of labor market slack,” such as unemployment rates of 10 percent or higher. • The list is refined based on local input. • Occupations paying below the wage threshold may be included only if: <ol style="list-style-type: none"> 1. Substantial opportunities exist for advancement into higher-level jobs; or 2. Opportunities exist to invest workforce dollars in ways that improve job quality and/or strengthen career advancement. 	None found, but see the wage threshold for High Priority Jobs.
RI	Identified by local recipients using labor market information provided by the state.	None found.
SC	Occupations with a projected employment growth rate of at least 11% over the next 10 years and have an increase of at least 900 job openings.	Pays at least 25% more than the state median household income.

SD	<p>Identifies occupations as Hot Careers based on these criteria:</p> <ul style="list-style-type: none"> • Positive projected percent change in employment 2022-2032; • Projected annual openings greater than the average across all occupations (82) for 2022-2032; and • Pays average wage greater than the median wage across all occupations. 	None found, but see the wage threshold for Hot Careers.
TN	<p>Occupations with the following characteristics:</p> <ul style="list-style-type: none"> • Growth rate for the industry sector in the region is positive and the individual occupations have positive growth rates; • For all occupations in the industry sector, the ratio of program completers (supply) to the number of annual average openings for the occupations (demand) is no more than 1.5, except that if placement rates are 95% or higher the occupations in the industry sector are considered “in demand;” • Average annual number of openings in the industry sector is equal to or greater than the average number of openings for all regional employment. 	Wages 20% greater than the median regional wage.
TX	<ul style="list-style-type: none"> • Secondary: Greater than 17% annual growth (2022 Texas median growth). • Postsecondary: Identified by local recipients based on state, regional, or local labor market information and consultations with employers and industry groups. 	<ul style="list-style-type: none"> • Secondary: Pays equal to or greater than the state annual median salary. • Postsecondary: Identified by local recipients using labor market information and other data.

UT	<ul style="list-style-type: none"> • None found in the Perkins or WIOA state plans, but the Department of Workforce Services assigns a star rating (one to five) to occupations based on employment outlook, job stability, and wages. • Occupations rated five stars have the strongest employment outlook, high employment stability, and high wages, while occupations rated one star have relatively low wages and limited employment outlook and stability. 	None found, but wages are a factor in the state's star rating system for occupations.
VA	<p>None found in Perkins state plan or related documents, or the 2024 WIOA state plan, but the state produces a High Demand Occupation list using these criteria:</p> <ul style="list-style-type: none"> • 5-year job change greater than -0.5%; • 5-year average annual openings equal or greater than 100; and • Median annual earnings at or above 200% of poverty level. <p>An occupation is also considered High Demand Occupation if at least 10 Registered Apprentices were initiated between 2020 and 2025.</p>	None found, but see the wage threshold for High Demand Occupation.
VT	Occupations having more than the median number of total openings (growth plus replacement) statewide or for a particular region.	Pays more than the all-industry, all ownership median wage statewide for a particular region.
WA	<p>None found in Perkins state plan or related documents, but the Employment Security Department identifies Occupations In Demand through a multi-step process:</p> <ul style="list-style-type: none"> • Provisionally identifies as 	None found.

	<p>“in-demand” occupations with average annual growth rates of at least 90% of their respective geographic area’s total average annual growth rate in any of three projection periods (5 years, 10 years, and 2/10 years) and a share of total openings of at least 0.08%;</p> <ul style="list-style-type: none"> • Designates as “in-demand” those occupations with a provisional identification as “in-demand” in all three projection periods; • Adjusts designations if current supply/demand data (e.g., online job announcements) significantly contradict them; and • Further adjusts designations based on input from local workforce development boards. 	
WI	<p>One of top 50 occupations that are identified in statewide long-term occupational projections and/or local needs.</p>	<p>Pays hourly wages above the state average.</p>
WV	<ul style="list-style-type: none"> • Secondary: None found. • Postsecondary: One of the top 10 occupations identified in the West Virginia Department of Commerce’s statewide long-term occupational projections and local needs. 	<ul style="list-style-type: none"> • Secondary: None found. • Postsecondary: Pays hourly wage above the state median wage.
WY	<p>None found in Perkins state plan or related documents or 2024 WIOA state plan, but the state labor agency website identifies In-Demand Occupations that meet two criteria:</p> <ul style="list-style-type: none"> • At least 50 total projected annual openings, based on Wyoming Long-Term Occupational Projections, 2022-2032; and 	<p>None found in Perkins state plan or related documents, but see the wage threshold for In-Demand Occupations.</p>

	<ul style="list-style-type: none">• Median hourly wage of at least \$25.	
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Workforce Pell

What to know about implementation

| Wesley Whistle

Project Director, Student Success & Affordability



Timeline

- Workforce Pell is authorized to begin July 1, 2026 (for the 2026–27 academic year)
- NPRM released March 9
- Comments Due April 8th
- ED will do early implementation



Timeline

July 2025

Bill Passed

Congress Passed Workforce Pell legislation as part of the budget bill

December 2025

Negotiated Rulemaking

The U.S. Department of Education convenes negotiated rulemaking to develop proposed regulations governing Workforce Pell eligibility, program requirements, and oversight.

March 2026

Notice of Proposed Rulemaking

ED will publish the NPRM outlining proposed Workforce Pell regulations, followed by a public comment period.

Late Spring 2026

Final Rule

After reviewing public comments, ED issues the Final Rule establishing requirements for Workforce Pell implementation.

Early Implementation

When ED finalizes some rules, it can early implement them before they go into effect if it is optional.

Directed Questions

- Written arrangements (25%)
- Bilateral agreements
- Interim earnings metrics
- Cohort definitions
- Aggregation methods



Overview



Student Eligibility

- FAFSA-based Pell-eligibility (your financial aid office will be needed)
- Prorated award:
 - 15 weeks: Max award: \$4,310, Min award: \$430
 - 8 weeks: Max award: \$1,260, Min award: \$125
- Excludes graduate degree holders
- Counts toward Pell lifetime limit



Program Eligibility

- 150–599 clock hours **and** run 8–15 weeks in duration
- Be in operation for at least a year prior to approval by the Secretary of Education
- Offered by an accredited institution
- Cannot be a “correspondence” program, but distance programs are allowed



Program Eligibility

Approved (in a TBD process) by the governor, in consultation with the state's workforce board, to meet the criteria:

- Aligned with high-skill, high-wage (def. Perkins), or in-demand industry sectors (def. WIOA).
- Meets employer hiring requirements.
- Leads to a recognized, stackable, & portable credential across employers or is a unique recognized credential essential for a specific occupation.
- Must count for academic credit toward a certificate or degree program at at least one institution.



Accountability Metrics

The program must meet these outcomes yearly to the Secretary of Education:

- Completion: Greater than 70% completion rate (within 150% of program time).
- Placement: Greater than 70% “verified” job placement rate (180 days post-completion).
- Value-added Earnings: Tuition and fees must be less than a new metric called “value-added earnings” of completers after three years. Value-added earnings equals median earnings adjusted by region and inflation compared to 150% of the poverty line.



Accountability Metrics

States provide the data to ED:

- Completion: Greater than 70% completion rate (within 150% of program time).
- Placement: Greater than 70% “verified” job placement rate in occupation (180 days post-completion).



Accountability Metrics

US Department of Education will provide data:

- Value-added Earnings: Tuition and fees must be less than a new metric called “value-added earnings” of completers after three years. Value-added earnings equals median earnings adjusted by region and inflation compared to 150% of the poverty line.



Clarifying Initial Eligibility: Outcomes Upfront

- ED's intent: 70% completion and job placement rates are required for initial approval.
- Regulatory language wasn't explicit, but we anticipate final rules will clarify this.
- States should be prepared to ensure programs demonstrate readiness to meet these outcomes



Distance Education

- Bilateral agreements allow cross-state enrollment, but institutions must not enroll out-of-state students without approval.
- States should safeguard this.
 - Consider requiring attestations from institutions that they will not enroll out-of-state students unless a bilateral agreement is in place.
- This prevents inadvertent liabilities for institutions and ensures compliance.



Tuition v. Earnings

- Current NPRM suggests governors consider tuition vs. expected returns as guidance.
- This may become more stringent: an expectation to evaluate if programs will likely pass value-added earnings.
- States should proactively review tuition and anticipated earnings to avoid approving non-viable programs.



Questions?

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Sharing Work on Workforce Pell: How Scholars Can Submit Comments on Newly Proposed Regulations

BY | MARCH 2026

To read the proposed regulations this post discusses or to submit comments to the U.S. Department of Education by April 8, 2026, [click here](#).



important new changes to the higher education system, including [lower graduate loan limits](#) and [accountability for programs with low earnings](#). Among those changes: extending Pell Grant eligibility to short-term (8- to 15-week) programs. The policy change has long been a priority for [community colleges](#) and [other institutions](#), and is designed to support workforce-aligned higher education programs, though others have raised concern that [insufficient guardrails](#) could lead to a proliferation of [programs with low wages](#).

Last week, the U.S. Department of Education released [proposed regulations](#) detailing the design of the Workforce Pell program.[1] Higher education researchers can play an important role in determining the details of Workforce Pell, particularly because the Notice of Proposed Rulemaking (NPRM) includes a number of specific requests for feedback (“[directed questions](#)”) that suggest the Department is especially in need of – and open to considering – external feedback. In this post, we provide an overview of key provisions of the proposed rule, along with notes on some of the areas where researchers and scholars can provide especially useful comments.

Workforce Pell

OBBBA [extended Pell Grant eligibility](#) to students attending short-term (8- to 15-week, 150- to 600-clock-hour) programs for the first time. The statute outlines a two-step process for institutions seeking to have their programs approved: first, approval from the governor of the institution’s state after confirming the program meets certain criteria, and second, approval from the Secretary of the U.S. Department of Education. Governors will determine whether programs are approved on a few criteria:

- Whether programs meet the state’s [definitions](#) of high-skill, high-wage, or in-demand occupations (as those terms apply to federal funds under the Perkins Career and Technical Education [CTE] and Workforce Innovation and Opportunity Act [WIOA] programs);
- Whether programs meet the hiring requirements of employers in those occupations; and
- Whether students will be able to earn credit for their programs upon subsequent enrollment in a related higher education program.



Once approved by the state, the law says that the Secretary commits the program has been in operation for at least a year, that the completion and job placement rates were certified by the governor as hitting at least 70 percent, and that the program meets a tuition-to-discretionary-earnings test (termed “value-added earnings” in the proposed rule). Under that measure, the tuition and fees of the program must not exceed the median earnings of the program minus 150 percent of the federal poverty level (\$23,940 in 2026), adjusted for the school’s location using the Bureau of Economic Analysis’s [regional price parity](#).

These guardrails will be important to ensure that students do not end up in programs that lead to very low earnings levels. But they are also important because the Pell Grant program itself is facing a [funding shortfall](#) of more than \$100 billion over the next decade, starting this year – [even after a](#) \$10.5 billion infusion also provided by the OBBBA. Funds spent on short-term programs could accelerate that shortfall, forcing Congress to make up the difference with more funds or even cuts to other, higher-value investments.

Even though negotiators reached unanimous agreement on the proposed regulatory language, the Department indicated a long list of areas in which it is explicitly seeking feedback from commenters; and some of the debates during negotiations suggest other areas of importance. These are some of the key areas for public comments on the new Workforce Pell initiative:

- **Consideration of Earnings During Initial Approval:** The Education Department’s NPRM does not include any requirement that data on programs’ earnings be used in the eligibility determination process until at least until after three years have passed since the first set of Pell Grant recipients graduates. Since the law requires that programs pass this tuition-to-discretionary-earnings test in order to be eligible for Workforce Pell, some negotiators sought a way to enforce the test upon programs’ initial approval for Pell funds. In response, the Department agreed to seek comment on the approach as a condition of reaching agreement on the proposal. One idea the Department asked about is whether to require the production of an “interim” earnings measure, at least for transparency purposes, and whether to require programs to meet that interim test before receiving Pell funds.

That interim measure would presumably need to come from state data if it were calculated prior to granting Pell Grant eligibility, since the Department of Education is [not permitted](#) to



renewal processes; and how the Department should collect such information from the states to inform its own approval processes and to provide transparency to students. [Proposed 34 CFR § 690.95\(a\)](#)

- **Technical Details of Measuring Program Earnings:** Another area that sparked plenty of discussion among negotiators was in the particulars of measuring the earnings of Workforce Pell programs.

When to Measure Earnings: The OBBBA states that for Workforce Pell programs, the Secretary will measure the “earnings of students who received Federal financial aid under [Title IV of the Higher Education Act] and who completed the program 3 years prior to the award year.” (See Sec. 83002(b)(2)(iv)(IV) of [OBBBA](#).) While we and others interpreted that as suggesting a measure of earnings three years after graduation, the Department’s proposed rule instead specifies that those earnings will be measured in the first full tax year after completion, but for a cohort from three full years prior to the year in which the Department is calculating the measure – so, for instance, in 2031, the Department will look back to the 2028 tax-year earnings of those who graduated from the program in the 2027 award year. Elsewhere in OBBBA, an earnings-based accountability standard is similarly described as measuring the earnings of students who “completed such program during the academic year that is 4 years before the year of the determination” (see Sec. 84001(c)(2) of [OBBBA](#)), yet the Department’s [proposal](#) would operationalize that as a four-year earnings measurement period, not a one-year measurement. Researchers familiar with measuring earnings outcomes for short-term programs could provide comments on the best ways to balance timeliness of accountability with appropriate expectations for assessing the returns to a short-term program. [Proposed 34 CFR § 690.91](#)

Which Graduates to Exclude from the Measure: Under OBBBA and in the proposed rules, earnings will be measured only for graduates who are working (*excluding* those who are unemployed or otherwise not working). But the Department proposes to operationalize this as including even those who are enrolled in an institution of higher education during the year earnings are measured, as long as they are also working. Several negotiators had pushed the



that might also be excluded could include, for example, those who are totally and permanently disabled, deceased, or in prison education programs or comprehensive transition and postsecondary programs. Researchers who have worked with earnings data will have useful insights for the Department. [Proposed 34 CFR 690.95\(a\)](#)

Applying a Regional Price Parity Adjustment to Earnings: As outlined in the OBBBA, the Department will adjust the earnings of a program using the Bureau of Economic Analysis [regional price parities](#) for the program's metropolitan area, if available (or for its state, if metropolitan area is not available). However, the Department proposed *not* to apply an adjustment if more than half of the students enrolled in the program are not located in the state where the program is offered during the earnings year (like some programs that are offered online), instead using the unadjusted, national median earnings of the program. The Department is looking for comments on this approach – and especially on how it should identify the student's location. Under the proposed rule, the student's location would be based on the student's FAFSA at the time they enroll in the program; some negotiators suggested instead using the student's address during the year when earnings are measured. [Proposed 34 CFR § 690.95\(b\)\(1\) and § 690.95\(k\)](#)

Aggregating Cohorts in Small Programs to Protect Privacy and Enable the Calculation of Earnings: An anticipated challenge for many Workforce Pell programs is that small cohort sizes make it impossible to produce earnings data while protecting students' privacy – and thus impossible to enforce the tuition-to-discretionary-earnings measure. The Department proposes to accommodate by requiring a minimum n-size of at least 50 graduates (higher than needed, because some graduates may not be working and won't make the final cut for inclusion); then adding students from one year prior, then two, stopping when the cumulative cohort hits 50 graduates. If it doesn't, the Department adds a third prior year's worth of graduates (for a total of four years); if it reaches at least 30 graduates, the Department attempts to calculate the earnings, and if not, the Department doesn't make the attempt. This approach doesn't match the version the Department separately [developed](#) for an earnings-based accountability measure, creating additional complexity in calculating the two. In addition, the accumulating



online eligible programs – but the Department proposed requiring bilateral agreements be in place for any state from which the school is enrolling students about the occupations in which programs can be offered. (In-person programs would not have the same requirement.) The reasons for requiring agreements are two-fold: first, to ensure the workforce development program approved by the state where the college is located is relevant for the students enrolling from other states, too; and second, to ensure data-sharing agreements are in place to facilitate the calculation of completion rates and job placement rates. Those are both important rationales – but it begs the question of why similar data-sharing agreements would not be needed even for in-person training programs if a significant share of students in the program are from out-of-state. Researchers experienced in using state administrative data may have feedback about how important those data-sharing agreements might be (e.g., in light of data on how many students might find employment out-of-state), and how best to facilitate the production of completion, employment, and/or earnings data when student enrollment is split across state lines. [Proposed 34 CFR § 690.93\(h\)\(1\)-\(3\)](#)

- **Restarting an Adjacent Program After Losing Eligibility:** If a program fails and either loses eligibility or is voluntarily discontinued, the proposed regulations would allow institutions to launch new programs in the same field of study (i.e., in the same [four-digit Classification of Instructional Programs](#) [CIP] code) as the failing program, as long as it leads to a different occupation – measured by the [Standard Occupational Classification \(SOC\) code](#). That sets up a gaping loophole; an [official CIP-code-to-SOC-code crosswalk](#) reveals plenty of cases where programs would need only tweaking to be able to restart. Truck and bus driving programs, for instance, can lead to jobs as heavy/tractor-trailer truck drivers, light truck drivers, school bus drivers, transit and intercity bus drivers, and shuttle drivers. It's also different from a similar policy the Department is pursuing in the [accountability regulations](#), which would prohibit colleges from restarting programs within the same four-digit CIP code if it shares *any* of the same SOC codes as the failing six-digit CIP code program. The Department would benefit from comments from researchers familiar with using this crosswalk, those who have studied institutional improvement strategies and can weigh in as to whether a renaming of the SOC code is likely to indicate a lower likelihood of failing, and scholars who can propose

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How to Submit a Comment

The Department of Education is required to consider all substantive comments it receives during this public comment process, but comments from researchers and scholars are especially important because of the agency's obligation to consider evidence and engage in reasoned decision-making. We encourage scholars who are interested in submitting comments to develop clear, well-explained, research-backed proposals. For more on submitting a comment, check out our [tips for writing effective public comments](#), shared in a recent virtual event. Commenters can submit their feedback to the Department [here](#) by April 8. Reach out to the PEER Center for advice and questions at peercenter@american.edu.

[1] The proposed rule includes one other provision, preventing students from receiving Pell Grants if their full costs of attendance are otherwise covered by non-federal grant/scholarship aid. We don't discuss that provision in detail, but interested readers can find it at [34 CFR § 690.5\(a\) and \(b\)](#) in the proposed rules.

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