

Workforce Pell Implementation Checklist



May 2026

This checklist is designed to help institutions and state leaders prepare for and implement Workforce Pell by translating key statutory and proposed regulatory requirements into actionable readiness steps. It outlines the core criteria for eligible programs, the state approval and certification infrastructure, the data systems needed to verify completion and job placement outcomes, and the operational processes required for ongoing federal and student eligibility compliance.

Use this checklist to assess current capacity, identify gaps, assign task owners, and track progress ahead of program submission and launch. This resource summarizes key Workforce Pell requirements and implementation processes based on the final Workforce Pell regulations issued by the U.S. Department of Education in May 2026, which establish the program's requirements and implementation framework. This resource is intended for informational purposes only.

Program Design and Readiness (Institution)

- ☐ Program meets Workforce Pell length requirements (8–15 weeks; 150–599 clock hours or equivalent)
- ☐ Program has been offered for at least one year prior to seeking approval
- ☐ Program leads to a recognized postsecondary credential
- ☐ Credential is stackable and portable or prepares students for an occupation with a single recognized credential
- ☐ Program provides academic credit toward a certificate or degree at one or more eligible institutions
- ☐ Program is not offered as correspondence, study abroad, or direct assessment
- ☐ Tuition and fees are documented and monitored for future value-added earnings compliance

State Approval Infrastructure (Governor/State)

- ☐ Written Workforce Pell approval policies are established and publicly available
- ☐ Process includes consultation with the State Workforce Development Board

- ☐ Criteria for identifying high-skill, high-wage, or in-demand occupations are defined
- ☐ Employer input mechanisms are documented and incorporated
- ☐ Process for reviewing compliance with Title IV written arrangement limits is defined and transparent, including the 25% limit on delivery by ineligible entities, allowable exceptions up to 50% with accreditor approval, and considerations for Registered Apprenticeship programs.
- ☐ Appeal process for institutional determinations is defined and transparent
- ☐ Timelines for review, approval, and recertification are established
- ☐ Certification process to the U.S. Department of Education is in place

Job Placement and Completion Data Systems (State + Institution)

- ☐ State has access to administrative data sources, including wage records
- ☐ State has data-sharing agreements in place to support verification and auditing as needed
- ☐ State has a defined and documented methodology for calculating program completion and job placement rates
- ☐ State has a process in initial years to measure job placement using second-quarter-after-exit employment
- ☐ State has a planned process to transition to occupation-aligned placement measures by the 2029–2030 award year
- ☐ Institutions have a process to submit annual completer lists to the state

Federal Approval and Ongoing Eligibility (Institution + State)

- ☐ Governor certification includes all required program identifiers and attestations
- ☐ Institutions have a process to submit programs to ED only after state approval
- ☐ ED approval confirms program length, prior operation, and accountability thresholds
- ☐ State establishes annual reporting workflows for completion and placement outcomes
- ☐ Governor recertification aligns with the institution’s Program Participation Agreement
- ☐ States and institutions have processes in place to address loss of eligibility or required corrective action

Student Eligibility and Financial Aid Administration (Institution)

- ☐ Admissions and aid systems reflect Workforce Pell eligibility rules
- ☐ Processes prevent concurrent enrollment in Workforce Pell and other Pell-eligible programs
- ☐ Systems confirm students are not enrolled in or admitted to graduate programs
- ☐ Monitoring is in place to identify non-Federal aid that may exceed cost of attendance

Distance Education and Multistate Programs (If applicable, State + Institution)

- ☐ Institution clearly identifies whether program delivery method is online or in person
- ☐ States have a bilateral agreement in place between the institution's state and the student's state if necessary
- ☐ States verify that student pathway alignment to state workforce need is documented and approved
- ☐ States have data-sharing provisions in place that support cross-state placement and completion certification