

# Steps to Begin Evaluation for Workforce Pell Eligibility

Institutional Readiness & Compliance Guide – 2026 Implementation

- 1 Analyze Program Length**  
Confirm the program is between 150 and 599 clock hours (or 5-15 semester/trimester credit hours) and runs for 8-15 weeks.
- 2 Validate Credential Type**  
Ensure the program leads to a recognized postsecondary credential that is stackable and portable.
- 3 Audit Performance Metrics**  
Verify the program has at least a 70% completion rate and 70% job placement rate (measured 180 days after completion).
- 4 Evaluate Return on Investment (ROI)**  
Calculate if median value-added earnings of graduates exceed the total tuition and fees charged.
- 5 Check High-Demand Alignment**  
Confirm with state workforce boards that the program prepares students for high-skill, high-wage, or in-demand occupations.
- 6 Verify Institutional Status**  
The institution must be Title IIV-eligible and must not have faced recent suspensions or actions by the Department of Education.
- 7 Confirm “Stackability”**  
Ensure the program enables students to earn credits that can be applied toward a broader certificate or degree program.

## Key Considerations



### Noncredit Programs

May require structural changes to meet federal accreditation standards



### Timing

Implementation set for July 1, 2026 (rules not yet finalized)



### Data Collection

Track earnings and employment data 180 days post-completion immediately



### Full-Ride Rule

Students are ineligible for Pell if non-federal grants/scholarships cover full COA



### Pell-Only Aid

Workforce Pell students eligible for Pell only—NOT federal student loans

## Implementation Timeline & Budget Notes (March 2026)

### Value-Added Earnings Delay



Official earnings calculations begin in 2030-31 award year (programs enrolling in 2026-27 get 4-year grace period before earnings accountability fully enforced)

### Federal Budget Impact



CBO estimates \$2-7 billion cost over 10 years depending on take-up rates, state implementation, and ED enforcement of accountability measures

**Important:** This evaluation guide incorporates March 2026 proposed rules. For official guidance, consult the Department of Education and your state workforce development board.