IMPLEMENTING WORKFORCE PELL

Why Rulemaking Matters — and How Advocates Can Help

AUTHORS: NICKY LAURICELLA COOLBERTH, KATIE SPIKER, AND CAROLINE TRESCHITTA

For the first time, Pell Grants can now help workers afford short-term, career-focused programs that connect them to in-demand jobs. Workforce Pell expands eligibility to programs 150–600 clock hours and 8–15 weeks long — a major step toward making education and training accessible to working adults, parents, and people changing careers.

Passing Workforce Pell was a major win — and it's just the beginning. **The real test will be whether it's implemented in a way that delivers on its promise: expanding opportunity for working people and helping employers hire with confidence.**

CAREER FOCUSED PROGRAMS prepare workers for jobs like phlebotomy technicians, welders, medical billers and coders, HVAC technicians, electrical line workers, or IT support specialists.

FOR WORKERS:
Workforce Pell means more affordable, fast pathways to credentials that lead to higher earnings and good jobs.

FOR EMPLOYERS:
Workforce Pell means a stronger pipeline of skilled candidates for critical industries — from manufacturing and construction to health care and IT.

WHAT IS NEGOTIATED RULEMAKING, AND WHY DOES IT MATTER?

The U.S. Department of Education, in partnership with representatives of those affected by the regulations, must write the rules that determine how the law will actually work — like what programs qualify and how they'll decide whether students and employers truly benefit. This rulemaking process will shape how the program operates for years to come. That's why advocates' voices are essential right now: to make sure the final rules reflect the needs of working people, employers, and communities in every state — and to ensure that Workforce Pell is a springboard for complementary policies that strengthen local economies and expand shared prosperity.

NATIONAL SKILLS COALITION

WHO IS DOING THE IMPLEMENTING?

The U.S. Department of Education will:

- Set national, baseline definitions that will help states determine which programs can qualify.
- Spell out minimum standards and specify the data and evidence that states must use to demonstrate completion, employment, and earnings outcomes.
- Create the approval and oversight process so states can confirm programs meet minimum federal standards.

Governors will:

- Decide which programs meet state workforce needs and have employer involvement.
- Gather and submit the data that demonstrate strong results for workers.
- Work with colleges and training providers to ensure credentials stack and lead to good jobs.

WHO DECIDES WHAT?

Federal agencies will set basic standards in each of these six areas of implementation, and states will tailor them to local needs. Advocates can influence all of this to ensure Workforce Pell dollars flow only to programs that deliver real opportunity and economic mobility for workers and give local businesses a reliable talent pipeline.

	AREAS OF IMPLEMENTATION					
	Program Eligibility	**Credential Portability**	**Employer Engagement**	**Program Performance**	**Tuition vs Value Added Earnings**	**Articulation & Credit Transfer**
FEDERAL Responsibilities	Set the rules for converting hours to credits	Define what counts as "stackable" & "portable"	Provide an approval process for states to show employer demand	Specify which data states must report to show completion & job placement	Set the formula for calculating value-added earnings	Explain what proof is needed to show credit will count towards a next step
STATE Responsibilities	Apply state specific requirements	Refine state specific standards for stackability and portability	Decide which jobs are "in demand" and how employers help shape programs	Collect and report data from programs to meet federal standards	Ensure availability of wage record data that shows whether programs lead to strong earnings	Verify that credit is awarded and applies to a related certificate or degree

WHEN WILL THIS ALL HAPPEN?

Workforce Pell is on a fast timeline. The law says that students should be able to use Pell Grants for short-term programs starting in the 2026-27 school year. States will move on different timelines. Some states already fund short-term programs and can adapt faster. Others will need more time to build new systems.

TIMELINE FOR IMPLEMENTATION AND ADVOCACY

Shaping the Rules			Launching the System	Strengthening Implementation		
JULY 2025	FALL 2025	WINTER 2025	SPRING 2026	SUMMER 2026	FALL 2026	WINTER 2026 & BEYOND
» Law passes through Congress » U.S. Department of Education (DoE) begins implementation planning	» States submit initial priorities to DoE » States begin preparing systems and processes	» DoE conducts negotiated rulemaking » States continue groundwork	» DoE releases final rules » States apply rules	» Workforce Pell goes live » Colleges and training providers launch eligible programs	» Students enroll in newly eligible programs » States refine alignment with state financial aid systems	» States and DoE refine policies and processes based on early results » Eligible program list expands as more approvals are completed

◄ Advocating for complementary policies ►

WHEN & HOW CAN ADVOCATES INFLUENCE DECISIONS

Shaping the rules

- Submit written priorities during negotiated rulemaking.
- Comment on proposed rules in early 2026.
- Engage workforce, higher education, human services, and employer partners to ensure diverse voices influence the rules.

NSC has already urged the U.S. Department of Education to center quality and equity in Workforce Pell implementation – ensuring that eligible programs lead to good jobs, equitable outcomes, and stackable credentials. Our comments draw on lessons from states that have built strong data systems, quality frameworks, and holistic supports for learners.

Launching the system

- Work with governors, workforce boards, and higher education to align Workforce Pell with existing state financing systems.
- Capture early experiences from students and businesses with the purpose of making improvements.
- Protect and sustain state and federal investments in human services because basic needs are workforce needs.

Advocating for complementary policies

As Workforce Pell is implemented, it will likely shine a spotlight on the need for strong sector partnerships, support services, and reliable outcomes data. Advocates should advance state and federal policies that strengthen these critical elements of our workforce and education system.

Strengthening implementation

- Identify state policy challenges – such as issues with data sharing or difficulties integrating Workforce Pell with existing state and federal financial aid – and push for fixes.
- Ensure colleges and training providers have the resources to offer support services that help people complete their training programs.
- Help your state spot and address unintended consequences – from college capacity needs to program quality issues – and advocate for policy changes where Workforce Pell needs strengthening or new investments to ensure it's delivering for learners.