WORKFORCE PELL

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UTAH SYSTEM OF HIGHER EDUCATION

BACKGROUND

The federal, statutory, and Board policy foundation is substantially in place.

HOW UTAH GOT HERE - 2025

- July 4, 2025: Federal legislation enacted
- July 25, 2025: Federal negotiated rulemaking announced; Accountability in Higher Education Access through Demand (AHEAD) committee created:
- December 5, 2025: USHE Workforce Pell Committee convened
- December 8-12, 2025: AHEAD Committee meets; Negotiated rulemaking consensus reached on regulatory language for Workforce Pell

HOW UTAH GOT HERE - 2026

- February-March: Committee considers statute; communication of eligibility requirements with institutions; projection of existing eligible programs
- March 10-April 8: Notice of Proposed Rulemaking (NPRM); public comment
- May 6: Utah Code 53H-11-417 establishes delegated Board responsibilities
- May 19: Final federal rule published
- June: USHE implementation planning and policy development
- July 1: Federal application process opens
- July 9: Workforce Pell policy approved by the Board

OVERVIEW

Workforce Pell expands eligibility for the Federal Pell Grant for certain short-term workforce programs, improving access and employability.

WHAT MAKES WORKFORCE PELL DIFFERENT

- **Shorter programs:** Programs that meet specific federal length requirements.
- **Workforce-aligned:** Programs must prepare students for high-skill, high-wage, or in-demand occupations.
- **Performance-based:** Programs must demonstrate completion, employment, and earnings outcomes.
- **Stackable or occupationally required credentials:** Programs must lead to a recognized credential that can support further education or employment, unless the occupation has a single required credential.
- **State + federal approval:** Utah must certify the program before the institution seeks final approval from the U.S. Department of Education.

FEDERAL PROGRAM REQUIREMENTS

A Workforce Pell program must:

- **Meet federal length requirements:** 8-15 weeks of instruction, and either 150-599 clock hours or 4- 16 semester hours.
- **Be offered by an eligible institution:** The institution must be eligible to participate in federal Title IV financial aid.
- **Align with the workforce:** Prepare students for a high-skill, high-wage, or in-demand occupation and meet employer hiring needs.
- **Lead to a recognized credential:** Students must be able to receive academic credit toward a certificate or degree, and these programs must be approved by an accrediting body. The credential must be stackable for educational progression unless the program leads to licensure.

FEDERAL PROGRAM REQUIREMENTS (CONT.)

A Workforce Pell program must:

- **Meet performance standards:** At least 70% completion and 70% employment. Beginning in later award years, the employment measure must relate to the program's training.
- **Meet the earnings/value requirement:** Tuition and fees cannot exceed the program's federally calculated value-added earnings.
- **Have sufficient operating history:** The program must have met applicable requirements for the 12 months preceding the federal approval process.
- **Certification:** The Utah Board of Higher Education must determine that the program meets the applicable federal and Utah requirements before being submitted to the U.S. Department of Education for approval.

VALUE-ADDED EARNINGS (VAE)

A federal value test ties allowable tuition and fees to graduate earnings.

THE FEDERAL CALCULATION

Median earnings of qualifying completers

–

150% of the federal poverty guideline

= VALUE-ADDED EARNINGS (VAE)

PROGRAM COST TEST

Published tuition and fees must be no greater than the program's VAE.

The VAE calculation is a program-level federal accountability test, not a prediction of an individual student's earnings.

ILLUSTRATIVE EXAMPLE

$40,000

median earnings

– $24,000

illustrative 150% poverty guideline

= $16,000 VAE

Maximum published tuition and fees: $16,000

IMPORTANT TIMING

- Official VAE is based on federal earnings data for qualifying completers.
- Students enrolled in another educational program during the earnings measurement period are excluded from the VAE cohort.
- For programs first eligible in 2026–27, the first official VAE calculation is not until the 2030–31 award year.

WHAT IS COMPLETE

Federal Framework

Final Workforce Pell regulations

Utah Law

Section 53H-11-417 establishes the state framework and Board responsibilities.

Board of Higher Ed. Policy

R132 establishes certification, consultation, reporting, monitoring, appeals, withdrawal, and disclosure requirements.

Federal Pathway

Institutions can submit programs to the U.S. Department of Education after state certification.

Early Program Work

USHE Technical Education analyzed program lengths and potential candidates. ORDS performing analysis on wages and other guidelines.

Implementation Planning

Data, workforce alignment, accreditation, financial aid, and institutional plans established.

The policy foundation is substantially complete. The operating infrastructure is up next.

ROLES & RESPONSIBILITIES

Entity/Role	Primary Responsibilities
Utah Governor	Formally delegate Workforce Pell approval authority to the Utah Board of Higher Education. Confirm the state's designated authority for purposes of the federal State Workforce Pell Certification Form.
Utah Board of Higher Education	Holds the statutory responsibility for Workforce Pell. Adopts policies and rules; determines whether programs meet federal and state requirements; certifies programs for federal submission; monitors, reapproves, and withdraws certification; establishes limits or cohorts as appropriate; takes formal Board action where required.
Commissioner of Higher Education	Leads the Office of the Commissioner in carrying out the Board's responsibilities. Serves as the Board's statutory designee to execute federal certifications, agreements, and other required documents. Provides executive coordination and resolves matters within delegated authority. Talent Ready Utah will provide coordination on behalf of the Commissioner.
State Workforce Development Board	Provides the consultation required by federal and Utah requirements regarding whether programs align with high-skill, high-wage, or in-demand occupations; participates in development/review of the occupational methodology and list; provides a workforce and employer perspective. It does not certify programs.

Entity/Role	Primary Responsibilities
Institutions of Higher Education	Identify candidate programs; confirm institutional and accreditation requirements; gather and submit required program and student data; apply to the Board for certification; respond to questions during review; submit the state certification with the federal application; administer Pell only after federal approval; meet ongoing reporting and disclosure requirements.
Institutional Financial Aid / Data / Academic Staff	Within each institution, coordinate the local application, data submission, financial-aid, academic, accreditation, and reporting responsibilities needed to support certification and federal approval.
ORDS	Leads the analytical and data work needed for Workforce Pell. Develops methodology and analysis for qualifying occupations with DWS; establishes completion, placement, and earnings calculation procedures; develops data specifications; analyzes and validates institutional data; supports annual monitoring and reporting.
Department of Workforce Services (DWS)	Provides labor-market information, wage and employment data, occupational analysis, and other workforce data needed for occupational alignment and program outcome verification; works with ORDS on data-sharing and data-use processes.

Entity/Role	Primary Responsibilities
Institutions of Higher Education	Identify candidate programs; confirm institutional and accreditation requirements; gather and submit required program and student data; apply to the Board for certification; respond to questions during review; submit the state certification with the federal application; administer Pell only after federal approval; meet ongoing reporting and disclosure requirements.
Institutional Financial Aid / Data / Academic Staff	Within each institution, coordinate the local application, data submission, financial-aid, academic, accreditation, and reporting responsibilities needed to support certification and federal approval.

ORDS + DWS: Workforce Data for Workforce Pell

Different expertise. A shared goal. Actionable information for program certification.

ORDS

Office of Research and Data Strategy

ANALYSIS & DATA LEAD

- Develop methodology for qualifying occupations
- Establish outcome calculation methods
- Analyze and validate institutional data

DWS

Department of Workforce Services

LABOR MARKET EXPERTISE

- Provide labor-market data and occupational information
- Support occupational analysis and demand trends
- Share workforce data and insights

TOGETHER

INFORMATION FOR WORKFORCE PELL

- Qualifying occupation methodology and list
- Completion, placement, and earnings calculations
- Reliable data to support program certification and oversight

IMPLEMENTATION

Authority & Governance | Workforce Alignment | Data & Outcomes | Application & Certification | Institutional Support | Ongoing Oversight

WORKFORCE ALIGNMENT

Responsible: ORDS and DWS, with State Workforce Development Board consultation and coordination by the OCHE implementation lead

- Finalize written methodology for identifying high-skill, high-wage, or in-demand occupations*
- Publish qualifying occupation list*
- Establish State Workforce Development Board consultation process*
- Establish update cycle and employer-input process

** Required before the Board can certify the first programs*

DATA & OUTCOMES

Responsible: ORDS, with DWS and Legal

- Execute OCHE/DWS data-sharing agreement*
- Finalize completion and placement calculation procedures*
- Establish data specifications and secure transfer process*
- Establish non-USHE data-sharing/MOU process*
- Build annual outcome and monitoring process

** Required before the Board can certify the first programs*

APPLICATION & CERTIFICATION

Responsible: OCHE implementation lead, with program/technical education, financial aid, ORDS, and Legal

- Resolve clock-hour/credit-hour interpretation
- Develop program self-screening tool*
- Develop application and evidence checklist*
- Establish staff review and Board certification workflow*
- Establish Commissioner execution of federal certification form and institutional handoff*
- Establish application calendar/first cohort

** Required before the Board can certify the first programs*

INSTITUTIONAL SUPPORT

Responsible: OCHE implementation lead, with Communications and functional experts

- Develop Workforce Pell website and resource center
- Publish FAQs and institutional guidance
- Provide application instructions and templates
- Conduct institutional training/technical assistance
- Develop standardized student disclosures

ONGOING OVERSIGHT

Responsible: OCHE implementation lead, with ORDS, Legal, and other functional experts

- Establish annual reporting and monitoring
- Operationalize appeal process
- Establish reapproval and withdrawal procedures
- Maintain public certified and federally approved-program list
- Develop interstate agreement process as needed

First Glance

Provided by Carrie Mayne, Chief Economist / ORDS

UTAH SYSTEM OF HIGHER EDUCATION

Workforce Pell Pilot Approach

Start from what is already known by USHE/DWS

DWS's labor market information

USHE institutions' programs of study

Existing programs have met other, similar standards

Accreditation

Performance Funding

Strategic Realignment

Criteria for Identifying Potential Programs

- **Technical education certificate between 5 and 20 credit hours**
- **No distance education**
- **Stackable**
  - USHE analysis using award level and field of study codes
- **Aligns to workforce**
  - Occupations identified by DWS as 3, 4, or 5 star
  - Required education closely aligns with certificates

Preliminary Workforce Pell Pilot Occupations

- Automobile Technician
- Diesel Mechanic
- Machinist
- Welder
- Cabinetmaking and Millwork
- Heavy Equipment Operator
- Administrative Assistant
- Criminal Justice
- Fire Fighter
- General Construction Laborer
- Carpenter
- Electrician
- Plumber
- HVAC Technician
- Heavy Equipment Technician
- Industrial Maintenance Tech

INSTITUTIONAL PROCESS

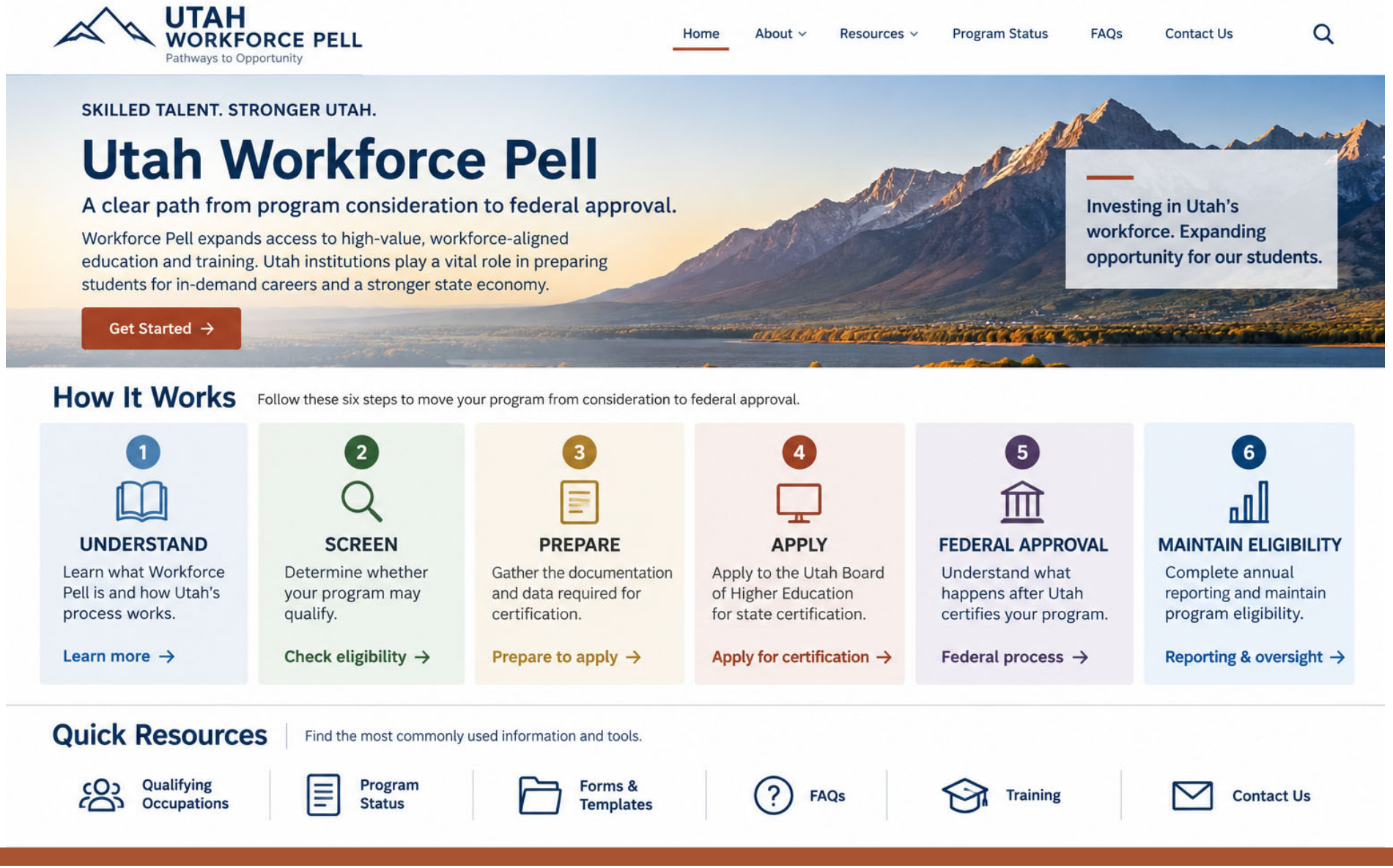
INSTITUTIONAL PROCESS

From Program Identification to Federal Approval

Utah Board certification does not authorize Workforce Pell.
The U.S. Department of Education must approve the program before the institution can award Pell.

UTAH WORKFORCE PELL

Website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SKILLED TALENT. STRONGER UTAH.
Utah Workforce Pell
A clear path from program consideration to federal approval.
Workforce Pell expands access to high-value, workforce-aligned education and training. Utah institutions play a vital role in preparing students for in-demand careers and a stronger state economy.
Get Started →
Investing in Utah's workforce. Expanding opportunity for our students.
How It Works
Follow these six steps to move your program from consideration to federal approval.
1
UNDERSTAND
Learn what Workforce Pell is and how Utah's process works.
Learn more →
2
SCREEN
Determine whether your program may qualify.
Check eligibility →
3
PREPARE
Gather the documentation and data required for certification.
Prepare to apply →
4
APPLY
Apply to the Utah Board of Higher Education for state certification.
Apply for certification →
5
FEDERAL APPROVAL
Understand what happens after Utah certifies your program.
Federal process →
6
MAINTAIN ELIGIBILITY
Complete annual reporting and maintain program eligibility.
Reporting & oversight →
Quick Resources
Find the most commonly used information and tools.
Qualifying Occupations
Program Status
Forms & Templates
FAQs
Training
Contact Us

NEXT STEPS

WHAT HAPPENS NEXT?

From Foundation to Implementation

1 NOW

ESTABLISH THE FOUNDATION

- Formalize authority and assign ownership
- Confirm federal/R132 alignment
- Advance occupation methodology and data infrastructure

2 NEXT

BUILD AND PREPARE

- Finalize application and review process
- Build website, guidance, and training
- Resolve priority federal questions

3 THEN

IMPLEMENT AND LAUNCH

- Open first application cycle
- Review and certify programs
- Commissioner executes federal certification
- Institutions submit to the U.S. Department of Education