

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Registered Apprenticeship
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TO: NATIONAL APPRENTICESHIP SYSTEM STAKEHOLDERS
OFFICE OF APPRENTICESHIP STAFF
STATE APPRENTICESHIP AGENCIES
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REGISTERED APPRENTICESHIP SPONSORS
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STATE WORKFORCE AGENCY HEADS
ALL EMPLOYMENT AND TRAINING ADMINISTRATION
GRANTEES

FROM: /s/ MEGAN BAIRD
Acting Administrator, Office of Apprenticeship

SUBJECT: Opportunities and Flexibilities for Registered Apprenticeship
Sponsors to Utilize Workforce Pell

1. Purpose.

To inform Registered Apprenticeship sponsors, State Apprenticeship Agencies (SAAs), and other National Apprenticeship System stakeholders of new opportunities for Registered Apprenticeship programs to utilize Workforce Pell Grant funding following the U.S. Department of Education’s (ED) publication of a Final Rule implementing Workforce Pell (hereinafter referred to as “ED Final Rule”). Workforce Pell, enacted as part of the Working Families Tax Cuts Act (WFTCA) (Public Law 119-21), extends Pell Grant eligibility to students enrolled in eligible short-term workforce training programs (“eligible workforce programs”) and took effect July 2026. This circular describes how the requirements for Workforce Pell eligibility interact with the Registered Apprenticeship model, highlights key flexibilities in the ED Final Rule that are specifically relevant to Registered Apprenticeship programs, summarizes changes to Pell Grant eligibility for all students, and discusses next steps for Workforce Pell implementation as it pertains to Registered Apprenticeships.

2. Action Requested.

The U.S. Department of Labor (Department), Office of Apprenticeship (OA)

requests that OA staff, Registered Apprenticeship sponsors, industry intermediary contractors, grantees, SAAs, institutions of higher education (IHEs), and other stakeholders familiarize themselves with this circular and the requirements of Workforce Pell as implemented by the ED Final Rule. OA encourages Registered Apprenticeship sponsors to consult with their respective Title IV-eligible IHEs and State partners to assess eligibility for Workforce Pell, to monitor State implementation of Governor's determination processes, and to consider how the flexibilities described in this circular may be applied to their programs. SAAs are encouraged to share this circular with sponsors registered in their states and entities interested in developing Registered Apprenticeship programs, as applicable.

3. Summary and Background.

Summary

Workforce Pell extends federal Pell Grant eligibility to students enrolled in qualifying short-term workforce training programs at Title IV-eligible postsecondary institutions (eligible institutions). While Registered Apprenticeship programs are not specifically referenced in the authorizing statute, a program offered at an eligible institution that serves as a related instruction (RI) component of a Registered Apprenticeship program may be eligible for Workforce Pell funding where it meets applicable statutory and regulatory requirements. The ED Final Rule provides several flexibilities that are specifically relevant to Registered Apprenticeship programs, including an increased threshold for the amount of the eligible workforce program that can be provided by non-Title IV-eligible organizations, the ability to split RI into multiple eligible workforce programs, non-sequential instruction weeks, and the option to include on-the-job learning (OJL) hours as part of an eligible workforce program.

Background

a. “Traditional” Pell Grants

The Pell Grant program provides grants (i.e., aid that does not have to be repaid) to undergraduates who display exceptional financial need and are intended to be the foundation for all need-based federal student aid awarded to undergraduates. Pell Grants are highly flexible and can be used for tuition, school fees (such as technology fees), textbooks, school supplies, transportation, or costs that occur surrounding childcare for a student's dependents. Pell Grant funds may also be applied to any other expenses (including basic living expenses) included in the cost of attendance.¹ The Pell Grant amount received by each student fluctuates based on their financial need and is prorated based on the number of credit or clock hours² a student is enrolled in each semester.³ Eligible institutions receive Pell

¹ See Federal Student Aid. (2026). *Cost of Attendance (Budget)* (2026–2027 Federal Student Aid Handbook, Vol. 3, Ch. 2). U.S. Department of Education, available at <https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2026-2027/vol3/ch2-cost-attendance-budget>.

² A clock hour is a unit of time representing 50–60 minutes of instruction in a program, typically used for non-term-based or workforce training programs. Unlike semester or quarter credit hours, which measure academic credit, clock hours measure the actual instructional time a student spends in class, lab, or supervised training.

³ For more information on how Pell Grant award amounts are determined, see Federal Student Aid. (2026). *Cost of Attendance (Budget)* (2026–2027 Federal Student Aid Handbook, Vol. 3, Ch. 2). U.S. Department of Education, available at <https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2026-2027/vol3/ch2-cost-attendance-budget>.

Grant funds first to pay tuition and other costs, with the remainder then provided to the student directly.

“Traditional” Pell Grants, are generally only available to undergraduate students enrolled in programs at eligible institutions that are at least 600 clock hours, or 16 semester hours offered during a minimum of 15 weeks...⁴

b. Workforce Pell, i.e. Eligible Workforce Programs

Workforce Pell was enacted as part of the WFTCA, signed into law by President Trump on July 4, 2025. The authorizing statute extends Pell Grant eligibility to students enrolled in eligible short-term training programs called “eligible workforce programs” that are between 150 and 599 clock hours in length, offered over a minimum of 8 and a maximum of 14 weeks of instruction. Programs must be offered by an eligible institution and must satisfy both Governor’s determination requirements and ED approval requirements. For purposes of Workforce Pell Grants, an “eligible institution” is a public, nonprofit, or qualifying proprietary postsecondary institution that is legally authorized, accredited, and approved by the Department of Education to participate in federal student aid programs...⁵ The basic student eligibility requirements and administration of Workforce Pell is the same as “Traditional” Pell Grants...⁶ The programmatic requirements for Workforce Pell and the interactions with Registered Apprenticeship, that are discussed in greater detail below, are summarized in Appendix A. The statutory effective date for Workforce Pell was July 1, 2026.

On May 19, 2026, ED issued the final rule “Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants,” that provides important clarifications and flexibilities that specifically address challenges faced by Registered Apprenticeship programs seeking to use this funding. OA is issuing this circular to ensure that Registered Apprenticeship stakeholders are aware of these flexibilities and are positioned to act on them as implementation proceeds at the state and institutional levels.

4. Guidance.

a. Opportunities and Flexibilities for Registered Apprenticeship Program Utilizing Workforce Pell

Workforce Pell provides an opportunity to support the expansion of the Registered Apprenticeship model to meet the workforce development needs of employers and propel American workers into high-paying jobs. Specifically, this funding stream may be used to help sponsors cover expenses for the related instruction component of Registered

⁴ There is a limited exception to this requirement. Programs can also qualify for Pell Grants without meeting eligible workforce program conditions if they are at least 10 weeks in length and 300 clock hours, 8 semester hours, or 12 quarter hours, and also require students to have the equivalent of an associate degree as a condition of admission.

⁵ These eligibility requirements can be found under Title IV of the Higher Education Act, as set forth in 20 U.S.C. §§ 1001–1002 and 34 C.F.R. Part 600.

⁶ See Federal Student Aid. (2026). See Federal Student Aid. (2026). *Calculating Pell Grants* (2026–2027 Federal Student Aid Handbook, Vol. 7, Ch. 2). U.S. Department of Education. <https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2026-2027/vol7/ch2-calculating-pell-grants>

Apprenticeship programs. It is important that Registered Apprenticeship stakeholders understand how the requirements for Workforce Pell interact with, complement, and pose challenges when using Workforce Pell to fund Registered Apprenticeship.

b. Eligibility of Registered Apprenticeship Programs for Workforce Pell

Although Registered Apprenticeship programs are not explicitly referenced in the Workforce Pell statute, a program offered at an eligible institution that serves as a RI component of a Registered Apprenticeship program—not the Registered Apprenticeship program as a whole—may be eligible for Workforce Pell funding.

The ED final rule clarifies that a program that serves as a related instruction component of a Registered Apprenticeship program automatically meets certain eligibility requirements for Workforce Pell:

- **High-Skill, High-Wage, or In-Demand Determination:** To be an eligible workforce program, the program must be determined by a State’s Governor to provide an education aligned with the requirements of high-skill, high-wage, or in-demand industry sections or occupations. A program that serves as a RI component of a Registered Apprenticeship program automatically meets this high-skill, high-wage, or in-demand determination.
- **Hiring Needs of Employers:** To be an eligible workforce program, a program must be determined by a State’s Governor to provide an education that meets the hiring needs of employers. Similar to above, a program serving as a RI component of a Registered Apprenticeship program is automatically determined to meet the hiring needs of employers requirement.

In addition to automatically meeting certain requirements, a program serving as a related instruction component of a Registered Apprenticeship program may meet several other requirements for Workforce Pell eligibility:

- **Credential Requirement:** An eligible workforce program must be determined by a State’s Governor to lead to a recognized postsecondary credential that is stackable and portable - or the program must prepare students for employment for which there is only one recognized postsecondary credential. Since the RI component of a Registered Apprenticeship program leads to a RA certificate of completion, which is included in the definition of a recognized postsecondary credential, it may meet this requirement. While the definition of “stackable” and “portable” will ultimately be defined by states as part of the Governor’s determination process (as discussed further later in this circular), the ED Final Rule references TEN 25-19, which defines these terms and specifies that a certificate of completion for a Registered Apprenticeship is a portable credential.
 - While a certificate of completion for a Registered Apprenticeship is portable, it may not always be stackable. Sponsors should determine if their program is stackable to additional credentials, such as an associate or bachelor's degree or other industry credentials.
 - Some Registered Apprenticeship programs issue interim credentials, which may also be considered recognized postsecondary credentials. An eligible workforce program that serves as a RI component of a Registered

Apprenticeship program and leads to an interim credential may choose to identify the interim credential as the recognized postsecondary credential that will be subject to the Governor's process for determining if the credential is stackable and portable. Since interim credentials lead to a Registered Apprenticeship certificate of completion, it is likely that interim credentials will meet a state's criteria as being stackable.

- **Outcome Requirements (ED Approval):** An eligible workforce program must be determined by ED's Secretary to have a completion rate and job placement rate equal to or above 70 percent and the program's total published tuition and fees must not exceed the published value-added earnings for that award year. The ED Final Rule clarifies how the completion rate, job placement rate, and value-added earnings metric are calculated. Notably, for each award year after the 2028-29 award year, the job placement rate is calculated as the percent of students who are employed in the occupation that the program prepares students for or a comparable high-skill, high-wage, or in-demand occupation during the second quarter after successfully completing the program. Since apprentices in Registered Apprenticeship programs are employed in a relevant field and the RI component of these programs often ends prior to the completion of the Registered Apprenticeship program, eligible workforce programs that operate as related instruction for a Registered Apprenticeship program are likely to meet these requirements.

Other criteria to qualify as an eligible workforce program include that the eligible workforce program must require a minimum of eight weeks, but less than 15 weeks of instruction, that the majority of an eligible workforce program component must be provided by an eligible institution, and that eligible workforce program component must ensure the award of academic credit towards at least one certificate or degree program at one or more eligible institutions.

Eligible workforce programs must operate for at least 12 months before they can be approved due to the need to accumulate data on completion and placement rates, as described above. During this one-year period, the program will not qualify for Workforce Pell, and must be funded using other sources.

c. Flexibilities for Registered Apprenticeship under the Final Workforce Pell Rule

- **Non-Sequential “Weeks of Instruction”:** The ED final rule clarifies that it is acceptable for an eligible workforce program to have non-sequential weeks of instructional time. A “week of instruction” is defined by 34 CFR 668.3(b) to mean any week in which at least one day of regularly scheduled instruction or examinations occurs or, for asynchronous coursework offered through distance education, any week where the institution makes available the instructional materials, other resources, and instructor support necessary for academic engagement and completion of course objectives and expects enrolled students to performance educational activities. This flexibility is particularly beneficial for Registered Apprenticeship programs, as a RI component of a Registered Apprenticeship that is segmented or provided intermittently over a period longer than 14 weeks may still qualify as an eligible workforce program.

- **Increased Outside Provider Threshold for Registered Apprenticeships (49% Flexibility):** Under the general regulatory framework, no more than 25 percent of an eligible workforce program may be provided by an institution or organization that is not an eligible institution. The ED Final Rule increases this threshold specifically for eligible workforce programs that are part of a Registered Apprenticeship program, permitting up to 49 percent of the eligible workforce program to be offered by an ineligible institution or organization. This flexibility acknowledges a common Registered Apprenticeship model in which employers, unions, joint apprenticeship training committees (JATCs), or other entities provide a portion of RI and allows greater participation by such providers without disqualifying the program from Workforce Pell eligibility. Registered Apprenticeship sponsors and RI providers interested in accessing Workforce Pell funding should carefully assess the composition of their RI delivery with eligible institution partners to ensure that provider arrangements are structured to comply with this threshold.
- **Related Instruction May Be Split into Multiple Eligible Workforce Programs:** The preamble to the ED Final Rule clarifies that RI may be delivered through multiple discrete, separately eligible workforce programs if each eligible workforce program is at least 150 clock hours or its equivalent in credit hours of instruction. For example, a four-year Registered Apprenticeship program with 600 clock hours of total RI could be structured as four separate eligible workforce programs, each qualifying independently for Workforce Pell. This flexibility is particularly relevant for Registered Apprenticeship programs where RI is delivered over a period exceeding the 14-week maximum required for a single eligible program. Sponsors are encouraged to consult with their eligible institution partners and State partners when structuring RI to take advantage of this flexibility.
- **On-the-Job Learning May Be Included in an Eligible Workforce Program:** The preamble to the ED Final Rule further clarifies that on-the-job learning (OJL) hours may be included as part of an eligible workforce program for purposes of Workforce Pell, provided that the OJL training hours are associated with either credit hours or clock hours that are required to complete the eligible workforce program. OJL included in an eligible workforce program will generally be provided through written arrangements with the employer(s) delivering the OJL component of the Registered Apprenticeship program, which cannot exceed 49 percent of the eligible workforce program. Including OJL hours in the eligible workforce program can increase the total program hours counted for Workforce Pell purposes, which may result in higher Pell award amounts for eligible students. However, as noted above, each eligible workforce program must be less than 600 clock hours in length, or the equivalent number of credit hours. As RI may be delivered through several eligible workforce programs, each of the eligible workforce programs could include OJL hours accounting for up to 49 percent of the delivered through a written arrangement. Registered Apprenticeship sponsors and RI providers should consult with their eligible institution partners to assess how OJL hours may be appropriately documented and incorporated into an eligible workforce program structure.
 - If a portion of OJL hours is included under the eligible workforce training program, then any weeks during which this portion of OJL occurs must be included in the total weeks of instruction in the program

These flexibilities may be combined by Registered Apprenticeship sponsors and eligible institution partners to assist components of a Registered Apprenticeship program to qualify as an eligible workforce program and maximize the impact of Workforce Pell funding for apprentices and Registered Apprenticeship programs. For example, the written arrangement flexibility and the ability to incorporate OJL may be combined to allow jobsite OJL hours provided by entities other than the eligible institution (e.g., employers, unions) to be included as up to 49 percent of an eligible workforce program. Since the recommended (but not required) minimum RI for a Registered Apprenticeship is 144 hours each year (which is below the 150 minimum total hours to qualify as an eligible workforce program), including OJL hours into a workforce program would allow the RI component of some Registered Apprenticeships that would otherwise not qualify to meet the program length requirements to be eligible for Workforce Pell. Additionally, since Pell Grant funding is prorated based on the length of the program, including OJL hours in an eligible workforce program can increase the total number of hours under a Pell eligible workforce program, allowing apprentices to receive higher Pell Grant award amounts.

This strategy of using the written arrangement flexibility and including OJL hours into an eligible workforce program can be further magnified by splitting the RI component of a Registered Apprenticeship program into several eligible workforce programs. This would allow multi-year Registered Apprenticeship programs that offer 144 hours of RI per year to develop an eligible workforce program that includes some OJL hours for each year of the Registered Apprenticeship program, allowing Pell-eligible apprentices to receive several Pell Grants over the course of the Registered Apprenticeship program.

d. Changes to Pell Grant Eligibility

In addition to specifying rules regarding Workforce Pell, the ED Final Rule also implements changes enacted by WFTCA regarding how Pell Grant eligibility and award amounts are determined. Effective May 19, 2026, a student is ineligible for any Pell Grant, including traditional or Workforce Pell, if the total non-federal grant or scholarship aid the student receives from any source equals or exceeds the student's cost of attendance (COA) for that award year. Non-federal grant aid includes, but is not limited to, state grants, institutional grants, and private scholarships. Note that the ED Final Rule clarified that WIOA is a Federal program; therefore, a student's receipt of aid from those programs would not affect a student's eligibility for a Pell Grant.

Previously, a student's Pell Grant was not reduced based on the amount of non-federal grant aid received, provided the student otherwise met eligibility requirements. Under the changes required by WFTCA and implemented through the ED Final Rule, where a student's non-federal aid covers the full COA, no Pell Grant award may be made. Where non-federal aid partially covers COA but does not equal or exceed it, the Pell Grant award will be limited to the difference between the COA and the non-federal aid received, rather than the full award amount for which the student would otherwise qualify.

e. Workforce Pell Implementation

While the effective date of Workforce Pell is July 1, 2026 and the ED Final Rule became effective on July 20, 2026, programs will not be eligible to apply for Workforce Pell eligibility until Governors—in consultation with the State Workforce Innovation and Opportunity Act (WIOA) workforce development board—develop and publish the criteria and procedures for making Workforce Pell eligibility determinations. Notably, for Registered Apprenticeship sponsors, this will include a written policy describing how a Governor will determine if a program leads to a recognized postsecondary credential that is stackable and portable. Additionally, it will include a written policy to describe how institutions must establish that an eligible workforce program will award academic credit towards another certificate or degree program upon a student’s successful completion of the eligible workforce program and enrollment in such certificate or degree program, and that such credit will be accepted at one or more eligible institutions (which may include the institution offering the eligible workforce program). Registered Apprenticeship sponsors and other National Apprenticeship System stakeholders are encouraged to monitor these state specific developments.

Finally, given the flexibilities and opportunities for Registered Apprenticeship sponsors and related instruction providers under the ED Final Rule, the Department encourages all Registered Apprenticeship stakeholders to consider strategies on how new Registered Apprenticeship programs can be developed and existing Registered Apprenticeship programs can be modified to be an eligible workforce program. These strategies may include, but are not limited to:

- **Partner with an Eligible Institution:** Sponsors of Registered Apprenticeship programs that are not currently working with eligible institutions as the RI provider should consider whether it would be helpful to partner with an eligible institution for apprentices to potentially be eligible to receive Pell Grant funding.
- **Segment and Group Related Instruction If Needed:** Registered Apprenticeship programs may want to break RI into smaller components and/or consolidate the delivery of RI into a shorter period to meet the 14-week maximum for an eligible workforce program. This could include front-loading RI so that component of the Registered Apprenticeship will be completed prior to apprentices beginning their OJL component or segmenting the RI to provide one week of instruction followed by three weeks of OJL, as each four-week period would only include one week of instruction in the eligible workforce program that would count towards the 14-week maximum. While reorganizing the delivery of RI may be an option, Registered Apprenticeship programs should always consider how RI interacts with OJL to ensure apprentices are applying the theoretical skills learned through RI to on-the-job experience as seamlessly as possible.
- **Utilize OJL and Written Arrangement Flexibility:** As described above, Registered Apprenticeship programs may wish to utilize the flexibility to offer up to 49 percent of an eligible workforce program through written arrangements to include OJL hours when developing an eligible workforce program to maximize Pell Grant funding available to apprentices.
- **Last-Dollar Braiding of Funds:** Registered Apprenticeship sponsors should consider leveraging external funding, including employer tuition assistance, grants

funding Registered Apprenticeship, and any other public or private funds to pay for the difference between Pell Grant award amounts and cost of attendance (COA) for RI. Sponsors will likely want to coordinate with their eligible institution partners' financial aid offices on how best to structure Pell Grants and any other tuition support.

5. Inquiries.

If you have any questions concerning the content of this Circular, please contact the Office of Apprenticeship at OA.Policy@dol.gov.

6. References.

- Working Families Tax Cut Act (WFTCA)(also referred to as the One Big Beautiful Bill (OBBA))
- Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants, Federal Register
- National Apprenticeship Act, 29 U.S.C. 50
- 29 CFR Part 29
- Training and Employment Notice (TEN) 25-19 (DOL Guidance on Recognized Postsecondary Credentials)
- Executive Order 14278 – Preparing Americans for High-Paying Skilled Trade Jobs of the Future

7. Attachments.

- Appendix A: Workforce Pell Eligibility Requirements and Interactions with Registered Apprenticeship Table
- Appendix B: Workforce Pell Eligibility Decision Flowchart for Registered Apprenticeship Sponsors.

Appendix A: Workforce Pell Eligibility Requirements and Interactions with Registered Apprenticeship Table

Workforce Pell Requirement	Connection to RA
Program Eligibility	
Program Length: Be between 150 and 599 clock hours and be offered over 8-14 weeks.	Longer related instruction (RI) components can be split into multiple eligible workforce programs that would then meet this requirement. OJL flexibility allows RA programs, including those that only offer 144 hours of RI, to potentially meet Pell eligibility requirements.
Course Type: Not be offered as a correspondence course. Distance education is allowable.	RI components currently offered as a correspondence course would not be eligible.
Provider Type: Program must be offered by a federal student aid eligible institution. Up to 25% of the program can be offered by an ineligible provider.	Sponsors with RI components not provided by an eligible institution will need to partner with an eligible institution to be eligible to receive funding.
Ineligible Provider Allowance. Up to 25% of a Pell eligible workforce program can be offered by an ineligible provider.	RI component of a Registered Apprenticeship may have less than 50% of the program be provided by an ineligible provider (e.g., employers, sponsors, unions). 50% flexibility can be complemented by OJL flexibility.
Governor's Determination	
High-Skill/Wage. Be aligned with the requirements of a high-skill, high-wage, or in-demand industry in the area the program is provided.	RI component of a Registered Apprenticeship program automatically meets per ED Final Rule provision 34 CFR § 690.93(g)
Hiring Requirements. Meets the hiring requirements of potential employers in the relevant sectors or occupations.	RI component of a Registered Apprenticeship program automatically meets per final rule provision 34 CFR § 690.93(g)
Credential. Either leads to a stackable recognized post-secondary credential portable across multiple employers OR provides a student the one relevant credential in an occupation where there is only one recognized post-secondary credential.	RA completion of certificate is portable but not always stackable. Determination of whether RI component of a RA program qualifies will depend on Governor's policies, procedures, and definition of "stackable" and "portable."
Academic Credit. Upon completion, provides a student with academic credit that can be used to pursue at least one certificate or degree program at one or more eligible institutions.	Determination of whether RI component of a RA program qualifies will depend on Governor's policies, procedures regarding this academic credit requirement.
Department of Education (ED) Determination	
Pre-existing. Program has been offered by the eligible institution for at least a year.	RI component may or may not be pre-existing, and modifying the RI component to meet Workforce Pell requirements may impact status. Existing finance structure will need to be maintained.
70% Completion Rate. For each award year, the program must have a completion rate of 70%	A Pell eligible workforce program is only part or all of the RI component of a RA program, which is

Workforce Pell Requirement	Connection to RA
measured at 150% of normal time.	generally shorter than the full RA program and may have a higher completion rate.. ⁷
70% Job Placement Rate. For each award year (AY), the program must have a job placement rate of 70%. Beginning in AY 2029-30 (July 2029), job placement must be in an occupation related to the training provided.	RI component should generally meet this requirement because apprentices are employed in the occupation they are being trained for throughout a Registered Apprenticeship program.
Positive ROI. Be expected to provide a positive return on investment (ROI) for students/taxpayers, defined as earnings gains minus tuition/fees costs exceeding 150% of the federal poverty line.	Since apprentices are employed and are pursuing high-wage occupations, a Pell eligible workforce programs serving as a RI component will likely meet this requirement

⁷ OA notes that, unlike the completion rate calculation for Registered Apprenticeship programs, the completion rate for Workforce Pell does not have a probationary period. Therefore, apprentices that leave a Registered Apprenticeship program during the probationary period will still be included in the completion rate calculation for Workforce Pell.

Appendix B Workforce Pell Eligibility Decision Tree

STAGE 1: PROGRAM STRUCTURE

Does your program fit the basic Workforce Pell mold?

Q1.1: Is the related instruction component of the Registered Apprenticeship provided by an eligible (i.e. federal student aid eligible) institution?

NO → Not eligible for Workforce Pell. Consider partnering with an eligible institution to provide the RI component.

RA TIP: Up to 49% of a Pell eligible Workforce program serving as a RI component of a Registered Apprenticeship program can be offered by an institution or entity other than an eligible institution, including the Registered Apprenticeship sponsor.

YES → Continue to Q1.2

Q1.2: Is the related instruction component of the Registered Apprenticeship at least 150 but less than 600 clock hours (or 4-15 semester / 6-23 quarter credit hours)?

NO → Not eligible for Workforce Pell. Consider restructuring as multiple stackable programs.

RA TIP: The related instruction component can be split into several different programs to qualify. Additionally On-the-Job Learning (OJL) may be included in an eligible workforce program to increase the number of clock hours if approved by the eligible institution.

YES → Continue to Q1.3

Q1.3: Does the program require at least 8 but less than 15 weeks of instructional time?

NO → Not eligible as currently structured.

Note: Non-sequential weeks are allowed. 14 weeks of instruction spread across a year is acceptable.

YES → Continue to Q1.4

Q1.4: Is the program offered using correspondence courses, study abroad, or direct assessment?

YES → Statutorily prohibited. Not eligible.

NO → Continue to Q1.5

Q1.5: Does the program lead to a recognized postsecondary credential (industry certificate, RA completion certificate, state/federal license, or degree)?

NO → Not eligible. Must lead to a credential.

YES → Continue to Stage 2

RA TIP: RA completion certificates automatically qualify as recognized postsecondary credentials.

STAGE 2: INSTITUTIONAL READINESS

Q2.1: Has your institution been subject to any suspension, emergency action, or termination by the Secretary in the past 5 years?

YES → Not eligible to offer this program.

NO → Continue to Q2.2

Q2.2: Will the eligible institution deliver more than 50% of the program directly?

YES → Qualifies under 34 CFR § 668.5(c)(3)(ii)(D) exception. Continue to Q2.3

NO → Exceeds written arrangement limits. Restructure program delivery.

Q2.3: Is the program included within your institution's scope of accreditation?

NO → Consult your accreditor BEFORE proceeding. Many accreditors don't currently include non-credit programs in their scope.

YES → Continue to Stage 3

STAGE 3: STUDENT ELIGIBILITY

(Apply per-student at point of enrollment)

Q3.1: Does the student meet standard Pell Grant eligibility (citizenship, Student Aid Index (SAI), enrollment status, etc.)?

NO → Not eligible for any Pell Grant.

YES → Continue to Q3.2

Q3.2: Does the student have a graduate credential OR is enrolled in a graduate program?

YES → Statutorily barred from Workforce Pell.

NO → Continue to Q3.3

Note: Bachelor's degree holders ARE eligible for Workforce Pell (new under WFTCA).

Q3.3: Will the student's non-Federal grant/scholarship aid equal or exceed their cost of attendance?

YES → Ineligible for Pell this award year. Per 34 CFR § 690.80(d), institution must either reduce non-Federal aid or return Pell.

NO → **STUDENT IS PELL-ELIGIBLE for this eligible workforce program.**

STAGE 5: OPERATIONAL READINESS

Before launching, confirm your financial assistance office can:

- ☐ Track completers and report annually to Governor
- ☐ Exclude remedial/noncredit coursework from Pell calculations
- ☐ Monitor non-Federal aid against COA in real time
- ☐ Report published tuition and fees annually to ED
- ☐ Use Pell Grant Formula 3 (term) or 4 (non-term) only
- ☐ Apply 50% disbursement cap rule per 34 CFR § 690.63(f)
- ☐ Maintain enrollment data for Pell LEU tracking
- ☐ Coordinate with state agency on job placement reporting

RA TIP: Many of these are simplified when partnering with an existing RA sponsor that already tracks completers and employer placements.

NEXT STEPS

1. Contact your State Apprenticeship Agency or DOL Office of Apprenticeship regional office (if RA-connected)
2. Submit program for Governor certification per 34 CFR § 690.93
3. After Governor approval, apply to ED via updated Form 1845-0012 for Secretary approval per 34 CFR § 690.94
4. Plan for value-added earnings compliance beginning 2030-31 award year per 34 CFR § 690.95

This decision tree is provided for informational purposes. Institutions should consult the full text of 34 CFR Parts 600, 668, and 690 and engage their state authorizing agencies and accreditors before launching new programs.