

# Quality Principles for Workforce Pell Programs

## Labor-Market Alignment

Workforce Pell programs should be aligned with clearly documented labor-market demand and lead to occupations that provide meaningful economic opportunity. Programs should demonstrate evidence of alignment to jobs with current and future openings, wage outcomes that exceed a threshold anchored in the cost of living in a given region, and relevance to current and anticipated workforce needs. Workforce Pell should expand opportunity without steering learners into low-wage or dead-end jobs without pathways to economic mobility.

## Relevance to Employer Needs

As part of program design, engagement with employers is not only critical but also required under the law. Employer engagement should be substantive and ongoing. Quality programs reflect employer involvement in program design, curriculum alignment, and validation of skills, with safeguards to prevent conflicts of interest or employer-driven dilution of quality. But a quality program goes beyond this and has evidence that employers actually hire from it. The law requires the credentials resulting from these programs to be portable across employers, meaning the programs must be generalizable enough to be recognized across an industry or by employers, rather than customized training for a single company.

## Stackability and Pathway Integration

Workforce Pell programs should be designed as part of broader education and career pathways. At a minimum, programs must be stackable; however, colleges and systems should also move toward true integration, creating pathways through and across non-credit and credit programs. Programs must articulate to longer-term credentials or degrees related to the occupations and/or industries for which Workforce Pell programs train students, allowing students to build toward additional education and advancement over time. Program pathways should be mapped and communicated to students considering Workforce Pell programs, and to states to ensure compliance. This is particularly important to meet the requirement that non-credit programs articulate to credit-bearing certificates or degrees. To support this, institutions should invest in integrated student information systems that connect non-credit and credit programs. States should invest in integrated cross-agency data systems that connect program-level data to outcomes, enabling accurate tracking of student progress and success.

# Student-Centered Design, Equity, and Access

Quality Workforce Pell programs are intentionally designed to support student success from enrollment through employment. Because these programs are short and intensive, they must include appropriate academic, career, and navigation supports. Recognizing that Workforce Pell is need-based aid, program design should reflect evidence-based practices and ensure that instruction, advising, and wraparound supports, like navigating food, transportation, child care, or housing insecurity, are structured to promote completion and labor market success. Programs should prioritize transparency, including clear communication about costs and the impact on a student's lifetime Pell eligibility, as well as eligibility for other forms of financial aid. They should also incorporate student feedback to better align programs with students' goals and career outcomes. One clear way to provide students with value is to embed work-based learning opportunities in Workforce Pell-eligible programs. Work-based learning helps students build skills and their professional networks, leading to better employment outcomes.

## Affordability

A quality Workforce Pell program is affordable for students and will not leave students with unmanageable debt. Since the Pell Grant is prorated based on length and student financial need, the amounts students receive can be small, and program costs are likely to exceed them. However, students in Workforce Pell programs are not eligible for Federal student loans, and many will need additional resources to cover the difference. Colleges should ensure that student costs are entirely or mostly covered by other sources of financial aid, preferably grant aid. For instance, states should be designing programs that allow eligible students to access state financial aid and WIOA training funds. If those sources include private or institutional debt, colleges should ensure that the terms of those financial products provide that the repayment of those obligations is also affordable.

## Consumer Protection, Market Oversight, and Third-Party Risk

Workforce Pell programs should be designed and overseen with strong consumer protections to prevent deceptive recruitment practices, conflicts of interest, and the erosion of program quality. Schools should not enter into agreements that steer students to risky lending products. States and institutions should apply heightened scrutiny to the roles of for-profit providers, online program managers (OPMs), and private lenders to ensure that recruitment, pricing, program delivery, and financing arrangements prioritize student outcomes over revenue generation.

---

These principles were developed in consultation with a national **Advisory Committee** supporting New America's project, *Short-Term Pell Implementation: Ensuring Quality and Impact*:

- **Carolyn Fast**, Director of Higher Education Policy and Senior Fellow, The Century Foundation
- **Steve Jurch**, Associate Vice President, Center for Policy and Practice, Association of Community College Trustees
- **Amanda Olmstead**, Director of Workforce Alignment, Achieving the Dream
- **Emily Passias**, Deputy Executive Director, Advance CTE
- **Annie Phillips**, Director, Education Strategy Group
- **Portia Pratt**, Senior Policy Analyst, Postsecondary Education, National Governors Association
- **Lindsey Reichlin Cruse**, Director of Research, National Skills Coalition
- **Kate Tromble**, Vice President, Federal Policy, Data Quality Campaign