

THE WORKFORCE PELL PLACEMENT PROBLEM

What Many Community College Leaders Are Discussing Privately, and What the Numbers Will Show Soon

A White Paper for Community College Executives and Operations Leaders

Brandon Tigges | Co-founder and CEO, Job Machine | May 2026

EXECUTIVE SUMMARY

Workforce Pell takes effect on July 1, 2026¹. For the first time in the history of federal financial aid, community colleges and other Title IV institutions will be funded for short-term workforce programs against a placement standard verified by state agencies using state wage records. The standard is binary. A program either clears 70 percent placement within 180 days of completion, or it does not². The consequence of missing is immediate: a program that fails to meet the completion or job placement requirements loses Pell eligibility, the institution faces a two-year waiting period before it can reapply, and during that window the institution cannot establish a substantially similar program, meaning one with the same four-digit Classification of Instructional Programs code or overlapping Standard Occupational Classification codes³.

In private conversations across community college systems, senior leaders are saying the same thing. They have no strategic plan for the placement piece. The challenge is not being talked about openly because no institution wants to be the one that admits it does not know how to hit 70 percent. But the freaking out is real, and it is warranted.

This paper makes three arguments. First, the placement requirement under Workforce Pell is not a reporting change. It is a production change, and the gap between today's career development posture at most community colleges and what production at 70 percent requires is enormous. Second, the institutions that solve this first will set the standard for the sector, and the ones that do not will face program closures, restricted funding, and reputational exposure that will make national news. Third, there is a known framework for producing systematic placement at scale, drawn from the performance-accountable corner of postsecondary education where this work has been done for over a decade. The four components of that framework, the maturity curve it implies, and the operational moves required to climb it are the substance of this document.

Most community colleges sit at Level 1 or early Level 2 on the placement maturity curve today. That is not a failure of career development teams. It is a structural reality of how community colleges have been resourced and incentivized for the last several decades. Workforce Pell changes the incentive structure. The institutions that recognize that early and rebuild their placement infrastructure to match the new requirement will be in a different position twelve months from now than the ones that wait to see how the verification numbers come back.

FIGURE 1

The eligibility-loss mechanic

What prep guidance covers **vs.** what the final rule also says

WHAT MOST READINESS GUIDANCE COVERS



WHAT THE RULE ALSO SAYS HAPPENS WHEN A PROGRAM MISSES



During the two-year lockout, the institution cannot establish a substantially similar program.

The final rule defines **substantially similar** as one with the same 4-digit Classification of Instructional Programs (CIP) code or any overlapping Standard Occupational Classification (SOC) codes. A rebrand is not a remedy.

Source: U.S. Department of Education, Workforce Pell Grant Final Rule Fact Sheet, May 2026.

THE REFRAME: WORKFORCE PELL IS A PRODUCTION REQUIREMENT, NOT A REPORTING REQUIREMENT

Most of the public conversation about Workforce Pell has focused on the data and reporting layer. State systems are racing to build IPEDS-aligned tracking infrastructure. The Department of Labor recently opened the sixth round of its Strengthening Community Colleges Training Grants, awarding \$65 million for state community college consortia to build the data infrastructure, employer partnerships, and state-level eligibility pipelines that Workforce Pell will require¹¹. Achieving the Dream and other policy organizations have been writing for nearly a year about the gap between non-credit program tracking today and what verification will require¹². The North Carolina community college system has been engaging colleges through Community of Practice meetings, including a September 2025 meeting and an October 2025 meeting, explicitly to align curriculum and continuing education departments around new data requirements¹³.

All of this work is necessary. None of it is sufficient. The data infrastructure being funded helps an institution measure placement. It does not produce placement.

This is the part of the conversation that has not entered the public discourse with the same volume. The 70 percent placement rate is not a number an institution reports. It is a number a state agency calculates, using state wage records, 180 days after each student completes their program. There is no soft landing. A program that misses the threshold loses Pell eligibility for that program. The institution must wait two award years before it can reapply, and during that lockout it cannot establish the same program under a new name. The federal final

rule explicitly defines a substantially similar program by Classification of Instructional Programs code and overlapping occupational codes, so a rebrand is not available as a remedy.

To clear that threshold, an institution does not need better tracking. It needs a different operational posture. It needs the ability to take a graduating cohort and systematically move 70 percent of those students into employment that shows up in state wage records within 180 days. That is a production problem, not a measurement problem. And almost no community college in the country is currently organized to solve it.

THE STRUCTURAL OBSERVATION

This is the part of the argument that is most important to name clearly, and to name without judgment. Community college career development teams have not historically been organized as placement engines. They have been organized as resource-and-referral functions. A career center that runs a Handshake or College Central Network instance, offers resume workshops, holds two career fairs a year, and provides one-on-one advising for students who walk in the door is doing the job it was designed to do. It is doing that job well, in many cases. It just is not the job that Workforce Pell requires.

This is a structural observation, not a critique. Community colleges have not had a financial or accreditation incentive to produce verified placement at scale. The career development function has not been resourced to actively place individual students into named jobs. With a student body of 100,000 or more across a large urban system, or even 8,000 at a smaller institution, the math has never supported the kind of high-touch outreach, employer engagement, and individual coordination that systematic placement requires. The function was built for a different mission. That mission was correct for the funding environment it operated in.

Workforce Pell changes the funding environment. It introduces, for the first time at scale, a federal financial incentive tied to verified individual placement outcomes. The career development function is now being asked to deliver something it was never built to deliver, at a scale it was never resourced for, against a verification standard it has never operated under.

What follows is not a story about career development teams failing. It is a story about institutions needing to rebuild a function around a new requirement, with different processes, different metrics, different accountability structures, and different technology. **The institutions that do this well will be the ones that recognized the structural shift early and acted on it.**

THE RISK

Many community colleges today publish placement rates well above 80 percent. Those numbers come from alumni surveys with what one community college planning analyst has publicly described as abysmal response rates, biased toward the graduates most likely to respond, which are the graduates who got good jobs⁵. The Hechinger Report documented this dynamic in detail several years ago. Montgomery College in Maryland, an outlier in the sector, hires an outside firm to cross-check 22,000 graduates against state licensing records, LinkedIn, CareerBuilder, and other sources to produce an honest placement number⁴. The reporting noted at the time that most institutions do not make anywhere near that level of effort. It is worth adding that there is no nationally standardized community college placement rate today. Each institution discloses its own number using its own methodology, which is one of the reasons published rates and verified rates are likely to diverge sharply once verification becomes mandatory.

Under Workforce Pell, the survey-based placement number stops being the number that matters. The number that matters is the one the state calculates using state wage records. State wage records do not depend on survey response rates. They do not flatter the institution. They do not exclude graduates the school could not reach. They count every student in the program, and they count only the students who show up in employment data within 180 days.

The timeline is more compressed than most institutions are operating against. To receive Workforce Pell approval, a program must already have a verified 70 percent placement rate from a prior cohort. Programs that wish to participate in the first award year will need to demonstrate that rate using data from students who completed in the prior period. For the first two years of the program, state agencies calculate the placement rate using state wage records. After that, institutions calculate the rate themselves and have it attested by their non-federal auditor⁶. And the standard itself tightens over time, as Figure 2 shows.

FIGURE 2

The standard tightens in stages

The placement bar shifts from any-employment to in-field employment in the 2029–2030 award year.

JULY 1, 2026

**Workforce Pell
takes effect**

2029–2030 AWARD YEAR

**Standard
tightens**



WINDOW 1 — Any-employment placement

70% of completers must be employed within 180 days of completion. Any employer. Any occupation. Verified against state wage records.

WINDOW 2 — In-field placement

70% must be employed in the specific occupation the program trained them for, identified by SOC code or a comparable high-demand occupation.

Institutions building for Window 1 need to build for Window 2 at the same time. The four-component framework that produces verified any-employment placement is the same framework that produces verified in-field placement. Designing only for the lower bar means rebuilding three years later.

Source: U.S. Department of Education, Workforce Pell Grant Final Rule, May 2026; 34 CFR §690.94.

The in-field SOC-code requirement that activates in the 2029 to 2030 award year is published in §690.94 of the final rule⁷. And the back-end consequence shown in Figure 1 applies in either window: a program that misses the threshold loses eligibility immediately, the institution faces a two-year lockout, and it cannot bring the program back under a new name during that window³. Most readiness guidance in the sector does not surface that consequence.

As state agencies begin running the calculations and the first verified placement numbers become public, the gap between self-reported placement and verified placement at many institutions is likely to be substantial. The Hechinger Report's reporting on Montgomery College's verified-placement work documented that institutions making the effort to cross-check graduates against state licensing records, employment databases, and wage records produced numbers significantly lower than the alumni-survey-based figures the same institutions had been publishing for years⁴. The same pattern is widely expected to play out under Workforce Pell verification. The senior leaders who are talking about this privately are not predicting that verified numbers will land near the 70 percent threshold. They are preparing for the possibility that many programs will land well below it.

This is going to make national news. The first wave of stories will profile specific institutions and specific programs. The institutions that get profiled negatively will spend years trying to recover the reputational ground. Funding for the affected programs will be restricted. Some programs will close. Students enrolled in those programs at the time of closure will face teach-out arrangements and incomplete credentials. State legislatures will respond. Federal scrutiny will increase.

The institutions that get out in front of this and build the placement infrastructure that produces real verified numbers will be in the other group. They will set the operational standard for the sector. They will become the references that policy organizations cite, that state systems benchmark against, and that funders want to work with. The difference between the two groups will not be the size of the institution, the quality of its programs, or the dedication of its career development staff. The difference will be whether the institution recognized the production problem early and rebuilt the function around it.

THE OPPORTUNITY

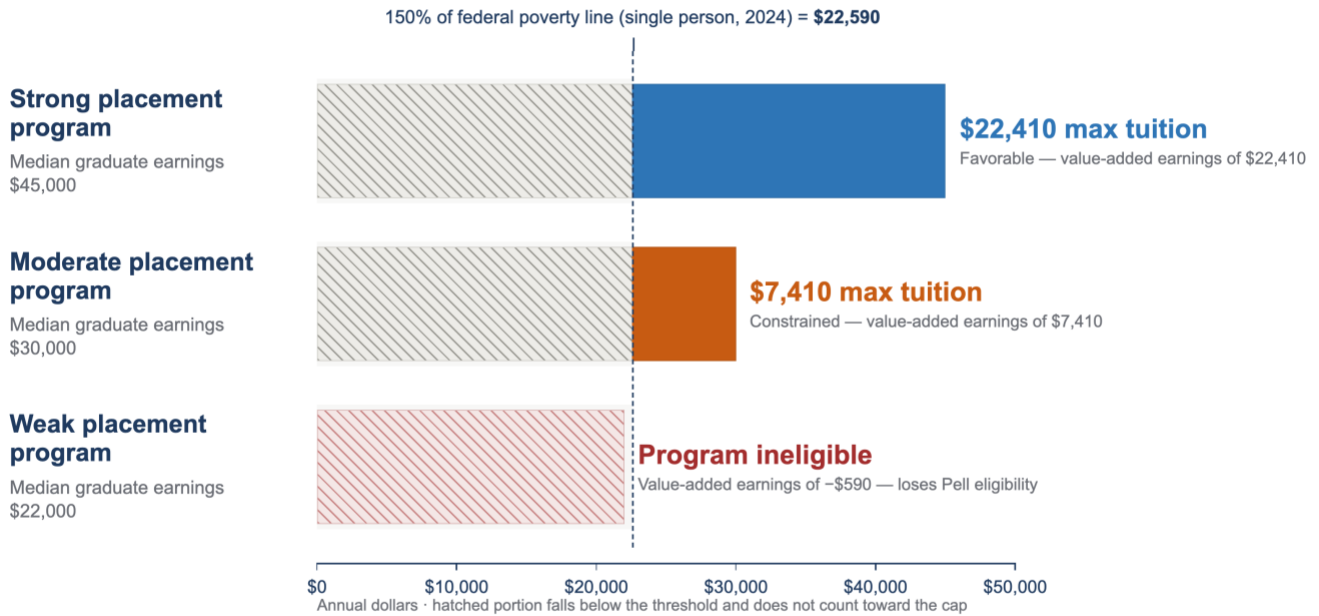
Workforce Pell is also a substantial opportunity, and it is important to name that clearly. The program unlocks need-based federal financial aid for short-term workforce training for the first time in the history of the Pell Grant. The Education Department's regulatory analysis estimates an average of 187,000 Workforce Pell recipients per year between fiscal years 2026 and 2035, with an average award of approximately \$1,710⁸, supporting programs of 150 to 599 clock hours in high-demand industries designated by state workforce boards¹⁰. The Department projects roughly \$3.2 billion of federal funding flowing into eligible workforce programs over the decade⁸. For community colleges, this represents a new and meaningful pool of federal funding tied to programs the sector has long wanted to support but has historically had to fund through grants, state appropriations, or out-of-pocket tuition.

There is a second dimension to the opportunity that is less discussed but more strategically significant. The final rule ties an institution's maximum allowable tuition to its own graduates' earnings. A program's published tuition and fees may not exceed its value-added earnings, defined as the difference between the median earnings of program graduates and 150 percent of the federal poverty line for a single person, which was \$22,590 in 2024⁹. Figure 3 shows what this looks like across three program scenarios.

FIGURE 3

Placement outcomes set the tuition ceiling

How the value-added earnings rule converts graduate earnings into maximum allowable tuition



Value-added earnings = median graduate earnings minus 150% of the federal poverty line for a single person. Programs may not charge tuition exceeding this figure. Programs with zero or negative value-added earnings lose Pell eligibility entirely.

Source: U.S. Department of Education, Workforce Pell Grant Final Rule, May 2026; 34 CFR §668.402.

This is a structural change that has not yet entered the operational vocabulary of most career development conversations. Workforce Pell does not just gate eligibility on placement. It gates revenue ceiling on earnings. An institution that builds the placement infrastructure to drive graduates into higher-wage, in-field employment raises its own tuition cap by doing so. An institution that places graduates at low wages caps its own revenue. The same operational moves that protect Pell eligibility against the 70 percent threshold also raise the institution's maximum federal-funded revenue per student. The infrastructure work is not a defensive expense. It is a revenue lever.

This is the moment to do this work. The institutions that wait for the first round of verified placement numbers to come back before investing in the infrastructure will be eighteen to twenty-four months behind by the time they start. The institutions that build now have a window.

THE FRAMEWORK: FOUR COMPONENTS OF SYSTEMATIC PLACEMENT

Systematic placement at scale is not a single program or a single tool. It is a framework with four components that work together. Each component addresses a different failure mode in the manual model. None of them is optional. The institutions that have figured this out, in the corners of postsecondary education where verified placement at 70 percent has been a regulatory requirement for over a decade, have all converged on these four components in some form.

1. Structured Outreach

The manual model relies on individual career development staff members building relationships with individual students and individual employers. Outcomes vary widely based on which staff member a student is assigned to, how long that staff member has been in role, and how many students they are responsible for. With six to twelve career development staff per campus and significant turnover, the variance compounds. No standardization means no predictability.

Structured outreach replaces this with sequenced, multi-touch communication applied uniformly to every graduate. Every student in a program receives the same outreach cadence, beginning at a defined point in their program and continuing through the 180-day post-completion window. The handoff from instruction to career development happens on a defined schedule, not on student initiative. The outreach to employers follows a documented sequence rather than depending on the individual staff member's network.

The submetrics for this component are concrete: number of outreach touches per assigned graduate per week, percent of graduates with at least one coaching interaction per week through the placement window, percent of graduates with a documented job-targeting plan within two weeks of program completion. These are the kinds of numbers career development teams should be operating against and being held accountable to. Most are not today.

2. Real-Time Pipeline Visibility

Most community colleges learn their placement numbers at the end of the reporting cycle. Under Workforce Pell, that lag becomes catastrophic. By the time the verified state wage record placement number comes back, the cohort that produced it has long since dispersed. The action plan required when a program misses the threshold has to be built on stale information, against a verification cycle that has already moved on to the next cohort.

Real-time pipeline visibility means leadership can see placement pacing for every program, for every campus, for every Workforce Pell-eligible cohort, refreshed continuously. How many graduates in this cohort have been placed? How many have active interviews? How many are unresponsive? How many days do we have left in the verification window? Which programs are pacing toward the threshold and which are not?

This is not about having a dashboard. It is about having a placement system that produces the underlying data as a byproduct of doing the work, rather than requiring separate reporting effort. The institutions that solve this stop discovering placement problems at the end of the cycle and start managing them while there is still time to act.

3. Defined Handoffs

Most community college career development functions operate on tribal knowledge. When a student should be handed off from instruction to career development, when career development should escalate to additional support, when a non-responsive graduate should be deprioritized — these decisions vary by staff member, by program, by campus. The placement function becomes dependent on the tenure of the staff who happen to be in role at the time.

Defined handoffs replace this with documented trigger points. A student is handed off from instruction to career development on a specific schedule, typically two to four weeks before completion for an eight-to-fifteen week program. A graduate moves to active placement support on day one of the post-completion window. A graduate

who is non-responsive after a defined number of contact attempts triggers a specific escalation. A graduate with an interview scheduled triggers a specific coaching protocol. None of this depends on staff tenure or relationships. All of it is documented and enforced systemically.

This is also where the role of career development changes. In the manual model, career development staff are doing the work of resume optimization, job identification, application submission, and interview scheduling alongside coaching. In a properly structured model, the production work runs on automation, and the career development team focuses on the high-leverage human work that automation cannot do: building empathy and accountability with students, ensuring they actually show up for interviews, coaching them on what to do when they get there, and helping them navigate the offer stage.

4. Outcome Tracking Tied to the Verification Metric

The fourth component is the one most institutions are talking about, because it overlaps with the data infrastructure conversation. But there is an important distinction. The outcome tracking that matters under Workforce Pell is not generic employment tracking. It is tracking tied directly to the specific verification metric the state will use: employment status 180 days after completion, certified against state wage records, by program.

This means the tracking system has to capture the numerator and denominator the way the verification will count them. It has to flag the specific gaps between self-reported placement and wage-record-verified placement before the cycle closes. It has to produce employer verification of employment as a structured workflow, not an ad hoc effort at the end of the year. And it has to align with the program-by-program eligibility structure, so that an institution can see at a glance which programs are pacing toward eligibility risk and which are clear.

This is the component that closes the loop. Without it, the other three components produce activity without proof. With it, the institution can defend its placement numbers to the verifying authority, year after year, with evidence.

THE PLACEMENT MATURITY CURVE

The four components together describe what a Level 4 placement function looks like. The maturity curve in Figure 4 is a tool for executives and operations leaders to honestly assess where their institution sits today, before the verified numbers force the assessment for them.

FIGURE 4

The placement maturity curve

Four stages of institutional capability under verified-placement accountability



“In a properly built system, placement is not something the institution tries to make happen. It is what happens by default.”

— Senior Vice President of Career Services, one of the largest postsecondary career college networks in the United States

The pull-quote in Figure 4 is the test for Level 4. **Her team does not measure placement rate as an aspirational target. They run a system in which placement happens because the system is built to produce it.** That is the operational posture community colleges are about to need.

WHAT THE WORK ACTUALLY LOOKS LIKE

Climbing the maturity curve is not abstract. It is a specific set of operational moves, sequenced in a specific order. The institutions that have built this function describe it in roughly the same way.

A career development team structured around production, not referral

The function shifts from passive resource provision to active placement production. Staff are organized around graduate cohorts, not student walk-ins. Caseloads are defined and tracked. Each career development staff member knows which graduates they are accountable for, where each graduate stands in the placement pipeline, and what the next action is. Submetrics include coaching touches per assigned graduate per week, percent of graduates with documented interview preparation within thirty days of completion, percent of graduates with employer-verified employment within the verification window, and time from program completion to first interview. These numbers are reviewed weekly, not annually.

Defined handoff points and cadences

Students transition from instruction to career development on a defined schedule, typically two to four weeks before completion for an eight-to-fifteen-week program. Career development engagement begins before the student graduates, not after. The cadence of touchpoints through the post-completion window is documented and enforced. Graduates who are non-responsive trigger a defined escalation rather than disappearing from the system. Graduates who receive interviews trigger a defined coaching protocol. None of this depends on which staff member happens to be assigned.

Automation that handles the work no human team can do at scale

Resume optimization for thousands of graduates per year is not a job a career development team can do by hand. Neither is the work of identifying the right jobs for each graduate, applying to those jobs at the volume the current hiring environment requires, and scheduling interviews with employers. Today's job market expects candidates to apply to five to ten times as many jobs as a decade ago, in large part because employers screen with their own automated systems. An institution that does not have technology handling the production layer of this work cannot operate at Level 3 or Level 4. The math does not work.

This is also where the human work becomes high-leverage. When automation handles resume optimization, opportunity generation, application submission, and interview scheduling, the career development team can focus on what only humans can do: building empathy and accountability with graduates, ensuring they show up for interviews, coaching them through the hardest interview questions, and helping them navigate offer negotiation. The team becomes a force multiplier rather than a bottleneck.

Verification of employment as a structured workflow

Under Workforce Pell, the verification of employment is no longer optional and is no longer something that can be assembled from alumni surveys at the end of the year. It has to be produced as part of the placement workflow, in real time, with employer-side documentation that can withstand state wage record cross-checks.

Institutions that treat verification as an end-of-cycle reporting exercise will find themselves with placement numbers that look good on paper and fail at certification. Institutions that build verification into the placement workflow from the moment a graduate receives an offer will have evidence on hand when the state asks for it.

Accountability that runs both directions

Career development staff are held accountable to specific weekly and monthly submetrics. Their managers are held accountable to program-level placement pacing. Program directors are held accountable to verification-window outcomes. Executive leadership has real-time visibility into all three layers. The accountability structure runs both directions, with the institution being clear about what it expects from the function and what it provides to the function in return.

THE NEXT TWELVE MONTHS

Workforce Pell takes effect July 1, 2026. To be approved for the program, a workforce program must already be demonstrating 70 percent placement from a prior cohort. State agencies will begin running placement calculations against state wage records in the first two years of the program. By the 2029 to 2030 award year, the standard tightens further to in-field placement matching SOC codes. The window to build the placement infrastructure that produces verifiable numbers is measured in months, not years. The institutions that wait until the first verified numbers are public will be eighteen to twenty-four months behind their peers by the time they begin building.

The work required in the next twelve months has a defined sequence:

- **Audit current posture honestly.** Where does each program sit on the maturity curve today? Not where do leaders want it to sit, but where is it actually sitting? Which programs are likely to clear 70 percent under wage-record verification, and which are not? This is the baseline.
- **Quantify the risk of the first verification cycle.** What does it cost the institution to have one program fail verification? Restricted enrollment, accountability review, action plan compliance, redeployment of staff to damage control, reputational exposure, and program closure are all real and quantifiable. Stack those costs against the cost of building the infrastructure proactively. The math is rarely close.
- **Pick a starting point.** Build the framework in one program family or on one campus first, where the conditions are most favorable. Prove that the four components work together in your institution's specific operational context, with your specific student populations, your specific employer market, and your specific accountability structures. Use that proof to expand.
- **Build the technology layer alongside the operational layer.** Neither works without the other. A career development team without production-grade technology cannot reach 70 percent at scale. Technology without a properly structured team produces activity without placement. Both have to be built together, with the team adapting to what the technology unlocks and the technology configured to what the team needs.
- **Set the institutional bar.** Make verified placement, not self-reported placement, the institution's internal standard, even before the verification cycle requires it. The institutions that internalize the higher bar early will be the ones that the sector benchmarks against later.

CLOSING

The institutions that solve this first will be the ones that recognized early that Workforce Pell is not a reporting change. It is a production change. They will be the ones that rebuilt the career development function around the new requirement rather than asking the existing function to deliver something it was never built to deliver. They will be the institutions the next decade of policy organizations cite, that state systems benchmark against, and that funders prioritize.

The opportunity is to do this the right way, build the processes and infrastructure that match what the law now requires, and serve more students more effectively in the programs Workforce Pell is designed to unlock. The risk is to discover the gap between self-reported and verified placement only when the first state wage record certification returns, when the institutions that moved earlier have already set the standard.

The freaking out is happening privately. The work to address it can start now.

ABOUT THE AUTHOR

Brandon Tigges is the co-founder and CEO of Job Machine, an AI-powered employment automation platform that works with community colleges, workforce development organizations, and accredited career colleges to systematize placement at scale. Brandon speaks regularly at industry conferences on systematic placement and operational topics including Workforce Pell readiness, placement infrastructure at performance-accountable career colleges, and the use of automation to drive placement outcomes in WIOA, TANF, SNAP, dislocated worker, and veterans programs. He has presented at the National Association of Workforce Development Professionals annual summit and the California Workforce Association annual conference, and is presenting in 2026 at the CECU and CSPEN annual conferences and the Florida Workforce Development Association annual conference, among others. He is based in Austin, Texas.

brandon@jobmachine.com | jobmachine.com | 540-550-3682

ENDNOTES AND SOURCES

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