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Oregon Workforce Pell Policy

July 1, 2026

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Purpose

The federal Pell Grant program, authorized by Title IV of the Higher Education Act of 1965, is the single largest source of federal grant aid supporting postsecondary education students. Pell Grants have been awarded since 1973. Workforce Pell, established through Congress’s passage of H.R. 1 (2025) – the One Big Beautiful Bill Act (OBBBA) – expands Pell grant eligibility to learners enrolled in short-term, career-focused training programs that meet defined quality standards and lead to industry recognized credentials.

Federal Workforce Pell provisions (34 CFR Parts 600, 668, and 690) give some flexibility to Governors to determine the types of programs for which learners may use Workforce Pell grants in their states and places the responsibility of initial program approval on Governors/their designees. This document compiles Oregon’s policies, definitions, and requirements for Workforce Pell implementation.

Designation of Authority

The Oregon Higher Education Coordinating Commission (HECC) is designated to act on the Governor's behalf for all administrative functions related to Workforce Pell. This includes:

- Managing program intake, technical review, and validation processes.
- Coordinating consultations.
- Preparing the list of recommended Workforce Pell-eligible programs.
- Executing the Governor's certification through HECC authority delegated for this purpose.
- Maintaining the list of programs certified by the U.S. Department of Education.
- Publishing guidance, timelines, and public materials necessary for statewide implementation.

The HECC may issue additional guidance and policy as needed to ensure alignment with federal requirements and Oregon workforce priorities.

Consultation with the Workforce and Talent Development Board

Workforce Pell provisions authorize Governors to approve eligible short-term education and training programs after consultation with each state's Workforce Development Board. In Oregon, the Workforce and Talent Development Board (WTDB) serves as the Governor's official advisory body on workforce strategy, policy, and investment.

The HECC will conduct structured consultation with the WTDB at all appropriate stages of the Workforce Pell determination process. WTDB consultation will ensure alignment with Oregon's workforce needs, economic development strategies, and sector based employer input. WTDB consultation will address:

- Alignment of programs to high-skill, high-wage, or in-demand occupations and industries;
- Validation of employer skill and credential requirements;
- Consideration of Oregon's workforce priorities, strategic plans, and talent assessments;
- Transparency and public engagement in program review and approval.

The HECC will provide the WTDB annually in June each year:

1. A proposed methodology for identifying priority occupations and industries, and alignment criteria and all future revisions and updates.
2. Summaries of labor market and employer validation findings.
3. The compiled list of programs that meet Workforce Pell requirements.
4. A briefing memo describing the review process, findings, and any items requiring Board input.

The WTDB will review, consider, and make recommendations on the above items. Recommendations will be recorded in a public meeting. HECC will consider these recommendations regarding methodology, findings, and program approval in making final decisions on behalf of the Governor's Office.

Program Eligibility

The HECC requires institutions to verify that program submissions satisfy all Workforce Pell eligibility requirements as outlined by federal laws and regulations. Programs determined to meet the identified criteria

will be approved for inclusion on the Oregon Workforce Pell Approved Program List. HECC retains authority to request supplemental documentation or clarification necessary to verify compliance prior to issuing a final eligibility determination. The HECC will use the following criteria to evaluate the eligibility of submitted programs:

Program Length

The program must be at least 150 to 599 clock hours, 4 to 15 semester or trimester hours, or 6 to 23 quarter hours. The program must be delivered during at least 8 weeks of instruction, but less than 15 weeks of instruction.

Stackable

The credential program must either be stackable or result in the sole recognized postsecondary credential required for an occupation. An institution demonstrates this by providing evidence that:

1. **Stackable:** Credential awards are transcribed and the credential applies toward a higher-level certificate or degree program at the same institution or at another Title IV eligible institution of higher education with the same two-digit classification of instructional program (CIP) code, or toward the requirements of an approved Registered Apprenticeship program aligned to the same two-digit standard occupational code (SOC). This may be demonstrated by providing documentation and assurances that credit for prior learning will be awarded following state and institutional policies for any HECC approved Noncredit Training Certificates that are issued; or
2. **Sole Recognized Postsecondary Credential** required for an occupation: Credential awarded at the completion of the program is required by statute, regulation, licensing authority, or governing occupational standard and no alternate postsecondary credential is required to qualify an individual for entry into employment in the occupation.

Employer Validated and Portable

The credential must meet the hiring requirements of potential employers in the sectors or occupations that the program prepares students for employment in and be portable across more than one employer. The institution demonstrates this by:

1. Forming or identifying an Employer Advisory Committee that includes representatives from at least two employers that employ workers in the occupations that the program prepares students for employment in (may include industry consortia, local sector partnerships, joint apprenticeship and training committees, etc.), submitting a list of the members of the Employer Advisory Committee, and describing how the Employer Advisory Committee contributed to the creation of the program, including how the Employer Advisory Committee informed the alignment of competencies included in the program with the competencies needed in such high-skill, high-wage, or in-demand sectors and occupations; or
2. Providing evidence that the credential is a component of an approved Registered Apprenticeship program.

Credit Articulation

The credential program must either articulate to credit or result in the sole recognized postsecondary credential required for an occupation. An institution demonstrates this by providing evidence that:

1. The credential results in the award of academic credit towards a certificate or degree program upon a student's successful completion of the program and enrollment in such certificate or degree program at one or more Title IV eligible institutions. Institutions demonstrate this by providing a fully executed, written credit articulation agreement with one or more Title IV eligible postsecondary institutions and must specify the number of credits accepted and their applicability to the identified program.
2. **Sole Recognized Postsecondary Credential** required for an occupation: Credential awarded at the completion of the program is required by statute, regulation, licensing authority, or governing occupational standard and no alternate postsecondary credential is required to qualify an individual for entry into employment in the occupation.

Eligible Occupations

The credential must prepare students to meet the hiring requirements of occupations that are high-skill, high-wage, and in-demand, or occupations that fall under the exception for occupations that are critical to an in-demand industry. HECC will publish the list of eligible occupations annually. HECC will use the following definitions of high-skill, high-wage, and in-demand:

High-wage Occupation: A high-wage occupation is an occupation that:

1. Pays more than the all-occupation median wage statewide or for a particular area, and/or
2. Has a potential wage growth greater than the all-occupation median potential wage growth. Potential wage growth is the ratio of an occupation's 75th percentile wage to the same occupation's 25th percentile wage.

High-skill: A high-skill occupation is an occupation for which the typical entry-level education is:

1. Postsecondary training (non-degree) or higher; or
2. Apprenticeship; or
3. Related work experience or long-term on-the-job-training and where the competitive education requirement is postsecondary training (non-degree) or higher.

In-demand: An in-demand occupation is an occupation that has projected annual openings greater than the median across occupations statewide or for a particular area.

Exception: Credentials that prepare students for an occupation that does not meet one or more of the high-skill, high-wage, or in-demand definitions, but is critical to an in-demand industry sector (defined in next section) and the competitive education requirement is postsecondary training (non-degree) or higher are eligible occupations.

Industry Critical: An occupation that is critical to an in-demand industry sector is:

1. One that comprises at least one percent of an in-demand industry sector's employment and the industry sector employment in that occupation accounts for at least 30 percent of total employment in the occupation, or expert/industry input indicates the occupation's importance; and/or
2. One that is part of an in-demand industry sector's employment, demonstrates extraordinary recent hiring, receives expert/industry input indicating its future importance, and is approved by HECC as an emerging Industry priority occupation.

Program Offered for at Least One Year

Federal statute requires that, to be eligible for Workforce Pell grants, a program must have been offered by the eligible institution for not less than 1 year meeting all eligibility requirements. For the purposes of Workforce Pell program eligibility, a program that experiences a Significant Change will be considered a new program. A Significant Change means 30% or more cumulative curriculum change (including changes to program length, competencies and learning outcomes, courses offered, name changes, etc.)

- 1. Significant Change:** A program that has been in existence for at least one year that experiences a Significant Change may not be approved for Workforce Pell until at least one year from the date of the Significant Change.
- 2. Change to Program Length:** An existing program that does not currently meet the length requirements of Workforce Pell that is changed to meet the Workforce Pell program length requirements may not be approved for Workforce Pell until at least one year from the date of the length change, regardless of whether or not the length change was a Significant Change.

If a previously approved program for Workforce Pell experiences a Significant Change, it will be considered a new program, will be removed from the Oregon Workforce Pell Approved Program List, and may not be resubmitted for approval for at least one year.

Completion Rate

As required under federal statute and rule, the program must have a completion rate of at least 70 percent, meaning that at least 70 percent of enrollees complete the program within 150% of normal completion time.

Job Placement Rate

As required under federal state and rule, the program must have a job placement rate of at least 70 percent, meaning that at least 70 percent of program completers are employed 180 days following completion.

Continued Eligibility

Institutions must notify HECC via the Contact below with any issues impacting Program Eligibility.

All institution approved programs for Workforce Pell must apply biennially for continued eligibility and may do so beginning one calendar year after initial eligibility. Institutions will receive automated messaging from the partner portal system 45 days prior to expiration of the initial eligibility period, and are to complete the continued eligibility application process via the partner portal system.

All Workforce Pell programs that lose eligibility for any reason can teach out the remaining students – but no new students can be enrolled.

All Workforce Pell programs whose eligibility applications are denied may appeal via the Contact below. Appeals will be determined by the HECC Director.

Programs that become ineligible due to a failure to achieve completion, placement, value-added-earnings, and/or eligible occupations definitions must wait two years before they can reapply. These metrics will be reviewed annually by HECC.

Oregon Workforce Pell Approved Program List

All approved programs are posted online at [TBD]. The Oregon Workforce Pell Approved Program List is updated and may change.

In-demand Industry Sector Determination

A list of in-demand industry sectors for the purposes of Workforce Pell will be approved by the Governor, in consultation with the Workforce and Talent Development Board. Identification of in-demand industry sectors relies primarily on lists of priority sectors produced by state and regional economic and workforce development entities and, secondarily, on a review of the characteristics of industries not covered by the preliminary list. Secondary review includes analysis of an industry's total employment, total business establishments, state and regional location quotients, and payroll per employee.

Effective Date

July 1, 2026.

Contact

HECC.WorkforcePell@HECC.oregon.gov

Reference

[H.R. 1 \(2025\)](#)

[Workforce Pell Final Rule issued by U. S. Department of Education](#)