

Rhode Island Workforce Pell Application Guidelines 2026-2027

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Table of Contents

I. Introduction	3
II. Authority and Purpose	3
III. Eligibility	4
A. Institutional Eligibility	4
B. Program Eligibility	4
C. Student Eligibility	5
IV. Occupational Eligibility Methodology	5
V. Program Determination	9
VI. Application Process	9
VII. Required Evidence and Attestations	11
VIII. Program Eligibility Appeals Process	14
IX. Timeline	16
X. Ongoing Compliance and Maintenance	17
XI. Family Educational Rights and Privacy Act (FERPA)	18

Appendices

Appendix A: Workforce Pell Grant Occupation Eligibility Methodology	19
Appendix B: Required Program Data Elements	20
Appendix C: Required Student Data Elements	24
Appendix D: Workforce Pell Program Frequently Asked Questions	26
Appendix E: Definitions	28
Appendix F: Workforce Pell Employer Validation & Industry Support Form	31

I. Introduction

The Working Families Tax Cuts Act (WFTCA), enacted as [Public Law 119–21](#) in July 2025, expanded federal Pell Grant eligibility to students enrolled in eligible workforce training programs. Through this legislation, the Workforce Pell Grant (WPG) Program extends Pell Grant funding to short-term training programs that lead to industry-recognized credentials and prepare students for employment in high-skill, high-wage, or in-demand occupations. The program is intended to increase access to postsecondary education and workforce development opportunities by providing financial assistance for tuition and fees associated with eligible short-term workforce training programs.

Workforce Pell emphasizes accountability and outcomes-based evaluation, requiring participating institutions to demonstrate program effectiveness through measures such as completion rates, employment outcomes, and value-added earnings. To ensure program quality and compliance with federal and state requirements, eligible postsecondary institutions must submit program- and student-level data that verify alignment with approved occupational demand and workforce standards. Eligible institutions are those that are authorized to operate in the state of Rhode Island, accredited by a recognized accrediting agency, and eligible to receive Title IV federal student aid funding. Participation in Workforce Pell is voluntary.

Members of the Governor’s Office, the Rhode Island Office of the Postsecondary Commissioner (RIOPC), the Department of Labor and Training (DLT), and the Rhode Island Longitudinal Data System Center (RILDS) provided advice on the state’s implementation of Workforce Pell.

The State is launching its Workforce Pell Grant Program eligibility verification through a pilot process for the 2026-2027 academic year. The pilot process is designed to protect students’ limited Pell lifetime funding, prioritize programs that lead to quality jobs and long-term economic mobility, and give the state time to build the data systems for effective oversight. In this first year, the State plans to examine the effectiveness of the process it establishes to support improved outcomes for students, employers, and institutions. The state has identified 20 priority occupations that programs must align to in order to be Workforce Pell eligible (see Table 1 for list).

II. Authority and Purpose

The 119th U.S. Congress through H.R. 1 (2025) established the Workforce Pell Grant Program under Title IV of the Higher Education Act (HEA), which covers federal student financial aid. Workforce Pell expands the federal Pell Grant to short-term workforce training programs.

The US Department of Education issued [Federal regulations](#), 34 CFR Parts 600, 668, and 690, outlining requirements for implementation of Workforce Pell program on May 20, 2026 that went into effect July 20, 2026. The Statute and regulations give authority to the Governor to approve programs before they are then submitted to the Secretary of Education at the U.S. Department of Education. The Governor can delegate their approval authority to another state agency. Governor Daniel J. McKee has authorized the Rhode Island Commissioner of Postsecondary

Education at the Rhode Island Office of the Postsecondary Commissioner (RIOPC) to act as the designee.

This document establishes the policies, guidelines, procedures, and requirements for implementing and administering the Workforce Pell Grant (WPG) Program in Rhode Island as established in 34 CFR 690.93(a),(b). It includes the provider and program eligibility criteria, application and approval processes, ongoing compliance and reporting requirements, and procedures for appeals and corrective actions.

III. Eligibility

A. Institutional Eligibility

To offer a Workforce Pell program once approved, an institution must be authorized to operate in Rhode Island, be accredited by an agency or entity that is recognized by the U.S. Department of Education, and eligible to participate in Title IV federal student aid programs under the Higher Education Act (HEA). The institution must maintain an active Program Participation Agreement (PPA) with the U.S. Department of Education. In addition, the institution must be in good standing and have not been subject to any Title IV program suspension, emergency action, or termination by the U.S. Department of Education during the five years immediately preceding the date of eligibility determination.

B. Program Eligibility

Participation by eligible institutions is voluntary. To qualify for the Rhode Island Governor's approval, programs must satisfy all federal Workforce Pell eligibility requirements including:

1. Align with the state's list of high-skill, high-wage, or in-demand occupations or serve as related technical instruction for a registered apprenticeship program.
2. Ensure that no more than 25 percent of instruction is provided by an ineligible institution or organization, or less than 50 percent if the instruction is a related instruction component for a Registered Apprenticeship.
3. The occupation(s) to which the program is aligned meets the hiring needs of employers.
4. For the 12 months preceding the date on which the institution applied for eligibility the program must have been implemented as currently designed, and:
 - a. Had a minimum of 8 weeks but less than 15 weeks of instruction;
 - b. Had a duration of between 150-599 clock hours; 4-15 semester or trimester hours; or 6-23 quarter hours;
 - c. Was not offered using correspondence courses, study abroad, and credit or clock hour equivalencies that are part of a direct assessment;
 - d. Led to a recognized postsecondary credential that is stackable and portable across more than one employer OR prepared students for employment in an

- occupation for which there is only one recognized postsecondary credential and provides such credential upon program completion;
- e. Provided students with academic credit for at least one certificate or degree program at one or more eligible institutions;
 - f. Met a 70% completion rate within 150% of normal time;
 - g. Met a 70% placement rate calculated as the percentage of students employed during the second quarter after exiting the program.

Value-Added Earnings

Starting in award year 2029-30, the Secretary of the U.S. Department of Education will calculate the value-added earnings 690.95(a). For award years 2026-27 through 2028-29, the Governor, or designee, will certify that programs meet this requirement through the application process.

Bilateral Agreement

The Governor may enter into a bilateral agreement with a Governor from another state that allows residents in Rhode Island to enroll in a distance-education program offered in another state outside of Rhode Island. Before entering into a bilateral agreement, the Governor, or their designee, must confirm that the out-of-state program prepares students for a job in an occupation that meets the federal and state requirements for eligibility. The program must also be officially recognized as an eligible Workforce Pell program in the state where it is offered. The bilateral agreement between the two states must be published publicly.

C. Student Eligibility

Institutions with an approved Workforce Pell eligible program will be responsible for disbursing Workforce Pell grants to eligible students enrolled in those programs and notifying students of any federal restrictions of Workforce Pell grants.

While students with a graduate degree are not eligible, students whose highest credential is a bachelor's degree may be eligible. Students must meet the standard Pell Grant need-based eligibility requirements (completion of the FAFSA is required). Workforce Pell awards are prorated based on program length relative to a full academic year and are determined at the Federal level. Pell Grant funds used in an eligible workforce program are included in the calculation of a student's Lifetime Eligibility Used (LEU). Students can only receive one type of Pell grant at a time. This means that students enrolled concurrently in more than one eligible Pell Grant program cannot receive grants for both programs.

IV. Occupation Eligibility Methodology

To ensure a thoughtful and high-quality use of Workforce Pell, Rhode Island will implement an initial pilot process with clear eligibility guardrails for the 2026 application window. These guardrails are designed to protect students' limited Pell lifetime funding and support workforce pathways that lead to long-term economic mobility. This process will also allow the state to be

thoughtful as the data system is set up, and make procedural adjustments based on lessons learned from the pilot process.

For the purposes of the 2026-2027 Workforce Pell eligibility year, the State of Rhode Island will define the terms High-Skill, High-Wage, and In-Demand as follows:

A. High-Skill: For the purposes of Workforce Pell, programs must align to occupations that meet the WIOA framework for middle-skill or high-skill jobs, defined as follows:

1. Middle-skill jobs are careers that require more education and training than a high school diploma but less than a four-year degree, and that.
 - Address critical workforce needs and are persistently hard to fill as defined by the State's definition of In-Demand;
 - Provide an adequate initial wage or demonstrate a clear and documented pathway to meeting the State's High-Wage definition within a reasonable period following employment; and
 - Are attainable through targeted education, training, and supportive services.
2. High-skill jobs are careers that require entry-level employees to possess a bachelor's degree, associate degree, registered apprenticeship credential, or significant (typically 12 months or more) on-the-job training.

(Source: [RIDLT Workforce Innovation and Opportunity Act- Rhode Island Combined State Plan 2024-2028](#))

B. High-Wage: For the purpose of Workforce Pell, High-Wage is defined as the occupation or industry in which a full-time employee earns an amount that is equal to or greater than the annual median wage across all industries for Rhode Island estimated by Bureau of Labor statistics in the U.S. Department of Labor for the most recent year for which data is available.

- Median wage in Rhode Island is \$54,040 (or based on full-time employment, hourly rate of above \$26.00). (Source: [RIDLT Labor Market Information 2022-2032 Occupational Projections.](#))

C. In-Demand: For the purposes of Workforce Pell, Rhode Island will define In-Demand occupations using the State's High-Demand labor market information (LMI) designation.

- High-Demand occupations are defined as those with 750 or greater projected openings over a 10-year period due to any combination of new job creation, worker transfers, and exits. (Source: [RIDLT Labor Market Information 2022-2032 Occupational Projections.](#))
- Per federal regulations, the list of occupations that meet in-demand will be assessed and updated at least every two years, if not before, to ensure programing continues to align to the State's economic needs.

For the 2026-2027 pilot review process, the state will prioritize programs that demonstrate occupational alignment with all three criteria. The list of occupations that meet these criteria set up in the statute and regulations are outlined in Table 1.

Table 1: Priority Occupations for the Pilot Approval Process (2026-2027)

SOC Code	Occupation	In-Demand (10-Year Projected Openings)	High-Wage (2024 Median Wage)	High-Skill (WIOA Definition)	CIP Code
47-2031	Carpenters	4,673	\$29.09	Middle-Skill	46.0201
53-3032	Heavy and Tractor-Trailer Truck Drivers	4,352	\$28.71	Middle-Skill	49.0205
47-2111	Electricians	2,849	\$33.73	Middle-Skill	46.0302
47-2152	Plumbers, Pipefitters, and Steamfitters	2,576	\$31.07	Middle-Skill	46.0502, 46.0503, 46.0599
51-4121	Welders, Cutters, Solderers, and Brazers	2,460	\$27.40	Middle-Skill	15.0614, 48.0508
15-1232	Computer User Support Specialists	1,482	\$28.57	Middle-Skill	01.0106, 11.1006, 51.0709
33-3051	Police and Sheriff's Patrol Officers	1,476	\$37.15	Middle-Skill	03.0208, 43.0100, 43.0107, 43.0114, 43.0115, 43.0119, 43.0120, 43.0122, 43.0402
29-2061	Licensed Practical and Licensed Vocational Nurses	1,457	\$37.47	Middle-Skill	51.3901, 51.3999
23-2011	Paralegals and Legal Assistants	1,432	\$26.22	High-Skill	22.0000, 22.0302
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	1,431	\$30.57	Middle-Skill	15.0501, 47.0201
33-2011	Firefighters	1,340	\$33.41	Middle-Skill	03.0208, 43.0201, 43.0203, 43.0206, 43.0299
51-4041	Machinists	1,195	\$28.60	Middle-Skill	48.0501, 48.0503
43-5061	Production, Planning, and Expediting Clerks	977	\$30.37	Middle-Skill	52.0409
49-9041	Industrial Machinery Mechanics	936	\$30.71	Middle-Skill	47.0303, 47.0701, 47.0705, 47.0706
43-4031	Court, Municipal, and License Clerks	933	\$28.16	Middle-Skill	99.9999
35-1011	Chefs and Head Cooks	909	\$38.06	Middle-Skill	12.0500, 12.0501, 12.0503, 12.0504, 12.0509
49-3021	Automotive Body and Related Repairers	872	\$28.65	Middle-Skill	47.0603
31-2011	Occupational Therapy Assistants	781	\$30.57	High-Skill	51.0803
49-3051	Motorboat Mechanics and Service Technicians	781	\$26.69	Middle-Skill	15.0806, 47.0606, 47.0616
15-1231	Computer Network Support Specialists	762	\$38.57	High-Skill	11.0201, 11.0501, 11.0701, 11.0901, 11.0902, 11.1001, 11.1002, 11.1003, 11.1006
	ANY Related Technical Instruction for a Registered Apprenticeship	***	***	***	

Source: [RIDLT Labor Market Information 2022-2032 Occupational Projections](#)

Registered Apprenticeship

For purposes of Rhode Island's Workforce Pell programmatic eligibility review, programs that serve as Related Technical Instruction (RTI) within a Registered Apprenticeship Program (RAP) will be treated as meeting the State's High-Wage, High-Skill, or In-Demand criteria for purposes of initial eligibility review, consistent with federal regulations under Workforce Pell. RTI programs will also be considered as meeting the requirement of leading to a recognized postsecondary credential. Notwithstanding these provisions, RTI programs must meet all other applicable Workforce Pell eligibility requirements, including, but not limited to, minimum and maximum clock-hour thresholds and program duration parameters.

As part of the state's Workforce Pell pilot program approval process, applying institutions must explicitly identify whether a proposed program constitutes RTI connected to RAP. Institutions bear the burden of proof and must submit documentation demonstrating:

1. Formal connection to a Registered Apprenticeship Program registered with the Rhode Island Department of Labor and Training (DLT), in its capacity as the State Apprenticeship Agency; and
2. That the RTI component meets all other applicable requirements. Failure to substantiate RAP alignment and RTI structure will result in the program being evaluated under standard Workforce Pell eligibility criteria.

V. Program Determination

The Governor (or the Governor's designee) is responsible for making the initial determination that a program meets the statutory criteria for Workforce Pell eligibility, including consulting with the Governor's Workforce Board. Institutions whose program(s) are approved by the Governor (or designee) will receive a certification from the state. Institutions must include this certification to applications for federal approval submitted to the U.S. Department of Education. Institutions are responsible for notifying the state once their programs have been approved by the U.S. Department of Education.

For purposes of program approval, renewal, and evaluation, the Rhode Island Postsecondary Commissioner has been authorized to serve as the Governor of Rhode Island's designee.

VI. Application Process

Institutions seeking a determination of state eligibility for Workforce Pell for any short-term workforce training program must submit a separate, completed application for each program.

All applications, supporting artifacts, and institutional data submissions must be processed electronically. Instructions to submit application materials can be found at <http://riopc.edu/WorkforcePell>. Programs will go through a two-step application process to check initial baseline compliance of the program meeting requirements and then a data check to confirm that programs meet the federal performance baselines. Below outlines each of these steps in greater detail.

Applications for programs seeking approval through the pilot approval process will be accepted from August 14, 2026, through September 16, 2026.

Step One: Baseline Compliance Review

- a. Eligible institutions are required to complete a program data worksheet to demonstrate that the proposed program complies with all state and federal Workforce Pell requirements. (See Appendix B for a list of required program data elements.)
- b. Upon submission, the Governor or the Governor's designee will conduct a baseline compliance screening to verify:
 - Institutional eligibility
 - Program format requirements
 - Operating history
 - Alignment with high-wage, high-skill, and in-demand occupations or serve as related technical instruction for a registered apprenticeship program.
 - Demonstrated employer alignment
 - Evidence of stackable and portable credentials
- c. Upon completion of the baseline compliance review, the institution will be notified of one of the following outcomes:
 - Approved to move to Step Two: The institution will now need to submit student-level data once a data sharing agreement has been fully executed. (See Appendix C for a list of required student data elements.)
 - Not Approved: The program does not meet statutory requirements. The institution will receive a notice of ineligibility and guidance for corrective action.

Step Two: Program Data Verification and Workforce Board Consultation

- a. Programs that pass Step One will submit student-level data (see Appendix C) to verify that the program meets federal performance baselines of 1) a program completion rate of at least 70% within 150% of the normal time to completion, and 2) a job placement rate of at least 70% within the second quarter after completion.
- b. Programs seeking approval will be presented by the Governor or the Governor's designee to the Governor's Workforce Board (GWB) during the approval process.
- c. Upon completion of the Program Data Verification and presentation to the GWB, institutions will be notified of one of the following outcomes:
 - Approved to move to Step Three: Institutions that are approved will automatically move to Step Three.
 - Not Approved: The program does not meet statutory requirements. The institution will receive a notice of ineligibility and guidance for corrective action.

Step Three: Final Approval

- a. The Governor will award State Workforce Pell Program Certification to programs that meet all requirements.
- b. Institution must submit the State Workforce Pell Program Certification and all other required documents to the U.S. Department of Education for the Secretary's review and approval in accordance with federal Workforce Pell requirements.

VII. Required Evidence and Attestations

Below outlines how the Rhode Island Governor is defining key terms and the required evidence expected from programs to show that they meet each requirement. The Governor (or the Governor's designee) will review all applications to determine that adequate evidence is provided to meet each requirement.

A. Credential Stackability

Stackable Credential: A credential that is part of a sequence of credentials that articulate toward a higher-level certificate or degree which may be earned at one or more postsecondary institutions.

Evidence: A credential may be determined to be stackable if one or more of the following are documented:

- A written agreement establishing that academic credit is awarded upon successful completion of the workforce program and that it can be applied toward a certificate or degree program;
- An articulation or transfer-of-credit agreement specifying the number and type of credits awarded for the eligible workforce program;
- A pre-evaluated credit designation has been awarded for the program through credit for prior learning policies;
- Published pathway maps showing automatic progression from the eligible program to at least one credit-bearing certificates or degrees with increasing labor market value;
- Evidence that the pathway has been established and in use for at least one year;
- Documentation demonstrating no administrative or institutional barriers to advancement between credentials.

A sole recognized credential will meet the credential stackability requirement.

- Sole Recognized Credential Exception: A program that prepares students for an occupation for which there is only one recognized postsecondary credential is exempt from demonstrating the credential is stackable and portable. An institution must submit written evidence that a program qualifies for this exception, which may include statutes, regulations, state or national licensing standards, licensing board rules or guidance, statutory or regulatory excerpts, official agency letters or webpages, or governing occupational standards.

B. Credential Portability/Employer Aligned Competencies

Portable Credential: A credential that verifies an individual's qualifications, aligned with real labor market opportunities. It is accepted across multiple employers, settings, and geographic areas.

Employer Aligned Competencies: To demonstrate that an eligible program prepares students for employment aligned with employer hiring needs, delivers the expected competencies for which the recognized postsecondary credential intends, and is aligned with the competencies needed in the occupation, the institution must submit evidence demonstrating that the credential awarded by the program is recognized by employers within the occupation and that the program delivers the competencies required for employment in the occupation.

Evidence:

- Three letters of support from employers, or one letter of support from an industry association representing a group of employers, verifying that: 1) the specific skills and competencies the program provides meet their current hiring requirements; and 2) the employers are currently or are planning to hire for the occupation.
- The Rhode Island Workforce Pell Employer Validation & Industry Support Form can be found as a Word document in Appendix F or at <http://riopc.edu/WorkforcePell> as a fillable PDF.

C. Program Participation Agreement (PPA)

The Program Participation Agreement (PPA) is a mandatory agreement between the institution and the U.S. Department of Education required to participate in Title IV. Individual programs offered at the institution must meet the federal eligibility requirements for Title IV to be included in the PPA. Under WF Pell, the Governor must review program eligibility/renewal prior to the expiration of the PPA.

Evidence: Institution submits a copy of its PPA.

D. Related Technical Instruction Validation

Programs that serve as Related Technical Instruction (RTI) within a Registered Apprenticeship Program (RAP) will be treated as meeting the State's High-Wage, High-Skill, or In-Demand criteria for purposes of initial eligibility review, consistent with federal regulations under Workforce Pell. RTI programs will also be considered as meeting the requirement of leading to a recognized postsecondary credential. Institutions must explicitly identify whether a proposed program constitutes RTI connected to RAP.

Evidence: Institutions bear the burden of proof and must submit documentation including:

1. Standards of Apprenticeship registered with the Rhode Island Department of Labor and Training (DLT), in its capacity as the State Apprenticeship Agency, that demonstrates the program provided by the institution is the related technical instruction (RTI) for the Registered Apprenticeship; and
2. The RTI component meets all other applicable Workforce Pell requirements (e.g., hours, etc.).

Failure to substantiate RAP alignment and RTI structure will result in the program being evaluated under standard Workforce Pell eligibility criteria.

E. Credit Articulation

Credit Articulation: A program must ensure that, upon successful completion, students receive academic credit that applies toward a subsequent certificate or degree at one or more postsecondary institutions through a documented pathway to a credit-bearing program.

Evidence: A Workforce Pell-eligible program may be determined to meet program-to-credit articulation requirements if one or more of the following conditions are documented:

- A written agreement establishing that academic credit is awarded upon successful completion of the workforce program and that it can be applied toward a certificate or degree program;
- An articulation or transfer-of-credit agreement specifying the number and type of credits awarded for the eligible workforce program;
- A pre-evaluated credit designation has been awarded for the program through credit for prior learning policies;
- A consortium, partnership, or system-level agreement confirming credit acceptance or transferability across participating institutions; and
- Other formal documentation demonstrating guaranteed or standardized credit recognition upon enrollment in a certificate or degree program.

VIII. Program Eligibility Appeals Process

An institution of higher education applying to participate in the Workforce Pell initiative may appeal a denial of program eligibility, determination of noncompliance, suspension, or termination issued by the Rhode Island Postsecondary Commissioner as the Governor's designee to the Governor.

The appeal process is intended to provide institutions with a fair and timely opportunity for review while maintaining efficient and consistent program administration.

A. Filing an Appeal

An institution seeking to appeal a determination must submit a written appeal to the Rhode Island Postsecondary Commissioner as the Governor's designee within thirty (30) calendar days of receipt of the determination.

The written appeal must include:

1. The name, title, address, phone number, and email address of the institutional representative filing the appeal;
2. The institution's name;
3. A copy of the original determination being appealed;
4. A detailed description of the basis for the appeal, including any supporting facts or documentation;
5. Identification of the specific program eligibility criteria, policy provision, or determination being challenged; and
6. The signature of the authorized institutional representative.

Appeals must be submitted electronically via Workforcepell@riopc.edu

B. Acknowledgement and Informal Resolution

Within five (5) business days of receipt of the appeal, the Rhode Island Postsecondary Commissioner as the Governor's designee shall provide written electronic acknowledgement to the institution confirming receipt of the appeal.

Prior to a formal hearing or final review, the Rhode Island Postsecondary Commissioner as the Governor's designee may offer the institution an opportunity for informal resolution, clarification, or corrective action where appropriate. Informal resolution efforts may include requests for supplemental documentation, technical clarification, or corrective action plans.

Informal resolution efforts shall not extend beyond thirty (30) calendar days from the date the appeal was received unless mutually agreed upon by both parties.

C. Review Process

If the matter is not resolved informally, the Rhode Island Postsecondary Commissioner as the Governor's designee shall conduct an administrative review of the appeal.

As part of the review process:

- The institution may submit written documentation and supporting evidence;
- The Commissioner may request additional information reasonably necessary to evaluate the appeal;
- The Commissioner may conduct an administrative hearing or meeting if determined necessary;
- The institution may be represented by counsel or another authorized representative during the process.

The review shall generally be limited to information available at the time of the original determination, unless the Commissioner determines additional information is necessary to ensure a fair and complete review.

D. Final Determination

The Rhode Island Postsecondary Commissioner shall issue a written Notice of Final Action within sixty (60) calendar days of receipt of the appeal unless extended for good cause.

The Notice of Final Action shall include:

1. A summary of the issues under review;
2. The final determination;
3. The rationale supporting the determination; and
4. Any required corrective actions or conditions for future eligibility, if applicable.

The decision of the Rhode Island Postsecondary Commissioner shall constitute the final administrative determination for purposes of the state Workforce Pell eligibility process. The program will be provided with appropriate documentation to submit to the U.S. Department of Education.

E. Corrective Action and Re-Application

Nothing in this process shall prohibit an institution from reapplying for Workforce Pell eligibility during a future application cycle or from submitting corrective documentation identified during the review process. Where appropriate, the Commissioner may permit institutions to remedy technical or administrative deficiencies without requiring full reapplication.

F. Record Retention

The Rhode Island Postsecondary Commissioner as the Governor's designee shall maintain records related to appeals and determinations consistent with applicable state record retention requirements and Workforce Pell program administration requirements.

Institutions participating in the appeal process shall maintain all relevant supporting documentation for a minimum of three (3) years following final resolution of the appeal.

IX. Timeline

Milestone	Action	Date
Application Period	The application portal activates for award year 2026 – 2027. Submissions received after this period will be deferred to award year 2027 – 2028.	August 14, 2026 - September 16, 2026
Internal Multi-Tiered Review	Workforce Pell Workgroup conducts completeness checks, program screening and data verification.	August – November 2026
Governor's Workforce Board (GWB) Review	Programs are presented to the GWB for consultation.	September – October 2026
Determination Notice	RI Postsecondary Commissioner as the Governor's designee issues State Workforce Pell Program Certification or Notice of Application Denial to the applying institutions.	November 2026
Notification and Approval from U.S. Department of Education	Institution shares State Workforce Pell Program Certification with U.S. Department of Education for approval.	As soon as certification is received
Appeals Filing Window	Institutions whose programs were denied may submit their formal written appeal and all supporting evidence.	Mid November- Mid December 2026
Final Appeal Decision	RI Postsecondary Commissioner as the Governor's designee reviews the appeal, and a final, non-appealable administrative decision is issued.	Within sixty (60) calendar days of receipt of the appeal

X. Ongoing Compliance and Maintenance

- A. Each subsequent year after the Workforce Pell-eligible program is approved, institutions must:
1. Submit program-level data to ensure program continues to meet baseline eligibility requirements. Reference Appendix B for required data elements.
 2. Submit student-level data for all students who enrolled in an eligible Workforce Pell program during the recently ended award year. Data will be used to verify that the program continues to meet the federally required completion and placement rates and to support any applicable state reporting or evaluation requirements. Reference Appendix C for required data elements.
 3. Report the published tuition and fees for the eligible program through a process determined by the U.S. Secretary of Education.

In addition, institutions with eligible programs approved by the State of Rhode Island must notify the Rhode Island Postsecondary Commissioner as the Governor's designee within five (5) business days when:

1. The state-approved Workforce Pell grant program application for a program is submitted to the U.S. Department of Education;
2. The institution receives a decision from the U.S. Department of Education on eligible programs and the nature of that decision; and
3. The institution voluntarily stops offering a program. If an institution voluntarily discontinues a failing eligible program, the institution may not reestablish a program with both the same four-digit CIP and identical SOC codes until two years after the date of losing eligibility.

Institutions are not required to seek reapproval for routine updates that do not alter the program's core competencies, objectives, or structures. However, more substantive changes, such as those that modify program length, credential level, or the competencies that form the basis of eligibility, must be submitted to the Governor, or designee. These changes may require resubmission to both the state and U.S. Department of Education to ensure that the changes do not impact the program meeting statutory and regulatory requirements. If you are unsure of if changes are substantive, please contact WorkforcePell@riopc.edu

B. Program Ineligibility & Removal

Consistent with federal law, the Governor (or designee) retains full discretion to determine that a program is not eligible for certification and may withdraw or decline certification at any time. A program's state certification also expires upon the expiration of the eligible institution's Program Participation Agreement (PPA). Similarly, the U.S.

Department of Education may remove a program from federal Workforce Pell eligibility if it does not meet verification requirements, outcome metrics, or other federal standards. The Rhode Island Postsecondary Commissioner, as the Governor's designee, will update the public posting within 30 days of any program being removed from eligibility due to state or federal action. If a program is removed, consistent with 34 CFR 690.97(a), a provider may not seek to reestablish the eligibility of that program, or substantially similar programs, for two years post the initial ineligibility.

The same criteria used for initial approval must also be met for a program to remain eligible in the following award year. The Governor (or designee) must review program renewal prior to the expiration of the institution's Program Participation Agreement.

XI. Family Educational Rights and Privacy Act (FERPA)

Student education records are official and confidential documents protected under the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g) and its accompanying regulations ("FERPA"). FERPA defines education records as records maintained by educational institutions or agencies that are directly related to a student, regardless of whether the records are maintained in paper or electronic format. In addition to FERPA, other federal and state privacy laws and regulations ensure that student information collected by educational institutions and government agencies is disclosed only for authorized and legally defined purposes.

Under the FERPA regulations, 34 C.F.R. Sec. 99.35 educational institutions may release personally identifiable student information to the Rhode Island Office of Postsecondary Commissioner for the purposes of auditing and evaluating education programs and complying with federal and state regulations. Consent to release personally identifiable student information to the RILDS may also be obtained through a data sharing agreement signed during the application process, to the extent allowable under FERPA and /or other applicable federal and state privacy laws and regulations.

Appendix A

Workforce Pell Grant Occupation Eligibility Methodology

For the 2026-2027 approval year, Rhode Island is implementing a pilot process for determining eligible occupations. This process will be reviewed and updated for outgoing approval years.

The initial list of all High-Skill, High-Wage, and In-Demand occupations were determined with the following criteria:

- High-Wage: Occupation has a median wage higher than the RI median wage for all occupations in the most recently available year of data from Rhode Island Labor Market Information.
- High-Demand: Occupation has at least 750 projected total openings in the most recent 10-year occupational projection from Rhode Island Labor Market Information. An average of 75 job openings per year generally represents a need that cannot be fulfilled by one single cohort/source of training, ensuring client choice.
- High-Skill: Occupation that requires more education and training than a high school diploma but less than a four-year degree.
- Non-managerial: The occupation must not be a "First-Line Supervisor" nor be a Management Occupation (SOC Major Group 11).

The Workforce Pell Eligible Occupations List will be reviewed and updated at least every two (2) years in alignment with the WIOA State Plan modification process. The Governor or designee may conduct additional reviews and updates as needed in response to significant labor market shifts or changes in federal guidance.

Appendix B
Required Program Data Elements

Data Element	Definition
Submission Date	Date institution submits application for program eligibility determination to the RI Office of the Postsecondary Commissioner.
Institution Name	Official name of the institution.
Institution OPEID	The OPEID (Office of Postsecondary Education Identification) is an eight-digit number used by the U.S. Department of Education to identify schools eligible for Title IV federal student financial assistance programs.
Institution PPA Expiration Date	Date the institution's Program Participation Agreement (PPA) expires.
Accrediting Body	The name of the institution's institutional accreditor recognized by the U.S. Department of Education.
Institution Sector	One of nine institutional categories resulting from dividing the universe according to control and level. Control categories are public, private not-for-profit, and private for-profit. Level categories are 4-year and higher (4 year), 2-but-less-than 4-year (2 year), and less than 2-year.
Institution EIN	Employer Identification Number (EIN) is a unique nine-digit number assigned by the IRS.
Award Year	Identifies the financial aid year for which the institution is seeking program eligibility.
Program Name	The official program name.
Institutional Program Code	The institution specific course catalog code.
Program Implementation Date	The date on which the program was first offered in its current configuration. For eligibility purposes, the program must have been offered in its current form for the 12 months immediately preceding the institution's application for eligibility.
Program Approval Date	The date the program was initially certified by the Governor (or designee) as an eligible Workforce Pell Program.
Disciplinary Standing	Institution has not been subject to any suspension, emergency action, or program termination by the U.S. Secretary of Education during the five years immediately preceding the date of eligibility determination.

Data Element	Definition
Program Length (Weeks)	The number of weeks the program takes to complete. For federal student aid purposes, a week of instructional time is defined as any consecutive 7-day period in which at least one day of regularly scheduled instruction, examination, or authorized academic activity occurs. Eligible programs must contain at least 8 but less than 15 weeks of instructional time, but can be scheduled to include breaks when no instruction occurs.
Program Hour Type	Identifies whether the program operates in a contact hour or credit hour format.
Program Length (Hours)	The number of hours of training the program provides to students.
Delivery Mode	The mode of program delivery. In-person: instruction is face-to-face Hybrid: instruction is both online and face-to-face Online: instruction is completely online
Delivery Format	Program is not offered using correspondence courses, study abroad, and credit or clock hour equivalencies that are part of a direct assessment.
Program Webpage	URL for program webpage.
Program Description	Description of the program as listed in course catalog, program offerings, and/or marketing materials.
Common Conditions	Description of any eligibility requirements, prerequisites, or entry conditions for program participation.
Program Accreditation or Recognition	Name of organization from which <u>program</u> received accreditation or recognition by an industry association.
CIP Code	The U.S. Department of Education's Classification of Instructional Programs (CIP) six-digit identifier aligned to the program.
SOC Code(s)	The Standard Occupational Classification (SOC) code(s) for the occupation(s) for which the program prepares individuals for employment.
Credential Name	The official name of the recognized postsecondary credential awarded upon successful completion of the program.

Data Element	Definition
Credential Type	The type of credential awarded upon successful completion of the program. Certificate: A credential awarded by an educational institution upon completion of a course or program of study. Certification: A credential awarded by an independent organization that verifies an individual's knowledge or competency against established industry or professional standards, typically requiring ongoing renewal.
Credential Competencies	The competencies or skills validated by the resulting credential.
Program Stackability	Describes how the program leads to a stackable credential or results in the only postsecondary credential required for employment in a specific occupation. A stackable credential is one that is part of a sequence of credentials that articulate toward a higher-level certificate or degree which may be earned at one or more postsecondary institutions.
Program Portability	Describes how the program leads to a portable credential. A portable credential is one that verifies an individual's qualifications, aligned with real labor market opportunities. It is accepted across multiple employers, settings, and geographic areas.
Articulation Institution	The name of the institution(s) offering certificate or degree programs that accept the program's resulting workforce credential for academic credit.
Related Certificate or Degree Program(s) Name(s)	Specifies the name(s) of the certificate or degree program(s) into which academic credit from the program is accepted.
Articulation Method	Describes the formal mechanism through which a student earns academic credit toward a certificate or degree program upon successful completion of the program.
Credit Earned	The number of credit hours or units a student receives for successfully completing the program. Credit may be awarded through transcribed credit at the institution offering the program or through an executed articulation agreement with an external institution that recognizes the learning for academic credit.

Data Element	Definition
Related Technical Instruction	Program serves as Related Technical Instruction (RTI) within a Registered Apprenticeship Program (RAP).
Outsource Proportion	The proportion of the program that is provided by an ineligible institution or organization through a written arrangement. An ineligible institution/organization may provide no more than 25% of an eligible workforce program through a written arrangement. For programs offered as part of a Registered Apprenticeship, an ineligible institution/organization may provide up to 49% of the program under the written arrangement.
Outsource Provider	The name of the ineligible institution or organization that is providing a portion of the eligible program.
Tuition and Fees	The officially published instructional charges and mandatory fees assessed by the institution.
Books and Supplies	The average cost of books and supplies for a typical student enrolled in the program.
WIOA ETPL Program ID	Workforce Innovation Opportunity Act (WIOA) Eligible Training Providers List (ETPL) Program ID.
Work-based Learning Opportunities	Program offers experiences that connect classroom instruction with workplace experience, such as internships, apprenticeships, cooperative education, and practicum/clinical hours.
Student Services Availability	Type of services available to students, such as career advising, academic advising, childcare, disability services, or other support services.
Digital Credential	Program provides a digital credential to verify skills and accomplishments, such as completing a course or degree program.
Bilateral State Approval	Program operates under a bilateral agreement allowing cross-state enrollment.
Credential ID	Unique credential transparency ID to support linkage to information about credential in the Credential Registry.

Appendix C
Required Student Data Elements

Data Element	Definition
Institution Name	Official name of the institution.
Program Name	The official program name.
CIP Code	The U.S. Department of Education's Classification of Instructional Programs (CIP) six-digit identifier aligned to the program.
Award Year	The financial aid year for which student data are being reported.
Social Security Number	Student's Social Security Number.
First Name	Student's legal first name.
Last Name	Student's legal last name.
Middle Name	The student's legal middle name.
Date of Birth	Student's date of birth.
Student ID	A unique provider-issued student identifier assigned by the institution.
Sex	Indicates the student's sex.
Race/Ethnicity	Indicates the student's race and ethnicity as reported by the student or institution.
Military or Veteran Status	Student is a current or former member of the U.S. Armed Forces.
First Generation Status	Indicates whether the student is a first-generation college student, defined as a student whose parent(s), or sole supporting parent, did not complete a baccalaureate degree.
Highest Education at Enrollment	Student's highest level of education upon enrollment in program.
State of Residence	State in which student permanently resides.
Zip Code of Residence	The five-digit zip code of the student's permanent address.
Program Start Date	The date the program officially began.
Program End Date	The date the program officially ended.
Delivery Mode for Enrollment	The modality used by the student if the program is offered in more than one modality (e.g., both in-person and online).
Workforce Pell Recipient	Indicates whether the student received a Workforce Pell Grant while enrolled in the program.
Paid Pell Amount	The amount of Workforce Pell Grant funds paid to the student while enrolled in the program.
Withdrawal Status	Indicates whether the student withdrew from the program after the official add/drop date.

Data Element	Definition
Student Completion Date	The date the student actually completed the program.
Cohort Exclusion	Indicates whether the student met one or more of the following allowable exclusion criterion: the student dies; experiences the onset of a medical condition that prevents employment; is ordered to the uniformed services, including service performed under Title 10 or Title 32 of the United States Code, for a period of more than 30 days; or becomes incarcerated.
Postsecondary Credential Attained	Indicates whether the student earned the recognized postsecondary credential associated with the program upon completion.
Date Credential Attained	Date on which credential was attained.

Appendix D
Workforce Pell Program Frequently Asked Questions

Question	Answer
Is participation in the Workforce Pell Program mandatory?	Participation in the Workforce Pell Program is voluntary. Institutions that are interested in participating must complete the RI Workforce Pell Program Application found at http://riopc.edu/WorkforcePell to confirm program eligibility.
Does a program need to meet BOTH the 150 to 599 clock hours AND the duration of 8 to 14 weeks to fulfill the requirement?	Yes. The program must be at least 8 weeks and less than 15 weeks (8-14 weeks) in length AND consist of at least 150 but less than 600 clock hours of instruction (150-599).
If an existing program does not meet one or more of the required criteria and modifications are made to achieve compliance, will the period during which the program operated before those modifications be counted toward the one-year runtime requirement?	If modifications are made to a program to meet eligibility requirements, the program must operate in its revised format for at least one year before it can become an eligible Workforce Pell Grant program.
What is meant by a pilot process?	To ensure a thoughtful and high-quality rollout of Workforce Pell, Rhode Island will implement a pilot process with clear eligibility guardrails. These guardrails are designed to protect students' limited Pell lifetime funding and support workforce pathways that lead to long-term economic mobility. The requirements are subject to revision at the end of the pilot period.
How will the 70% completion rate be measured? Will it apply to all students in the program, or only to those who receive a Workforce Pell Grant?	The 70% completion rate is measured by the percentage of students who finish the program within 150% of the normal completion time. This requirement applies to all students enrolled in the program, not only those receiving a Workforce Pell Grant. Exclusions apply for the following reasons: death, medical condition that prevents the student from working, incarceration, and active military service.
Must programs be credit-bearing to qualify for participation in the Workforce Pell Grant program, or are non-credit programs also eligible?	Both credit and non-credit programs are eligible for Workforce Pell provided that they meet all required criteria. Reference the Workforce Pell Program Eligibility Checklist found at http://riopc.edu/WorkforcePell

Are individuals with a bachelor's degree eligible to receive a Workforce Pell grant?	Yes, individuals with a bachelor's degree who are enrolled in an approved Workforce Pell program may be eligible to receive a Workforce Pell Grant. Individuals with a graduate degree are not eligible to receive a Workforce Pell Grant.
Are individuals with a master's degree eligible to receive a Workforce Pell grant?	No, individuals who already have earned a master's degree are not eligible to receive Pell funding for a Workforce Pell approved program.
How do students apply for a Workforce Pell Grant?	Students enrolled in a Workforce Pell eligible program will need to complete a FAFSA (Free Application for Federal Student Aid). Once the FAFSA is processed, the institution at which the student is enrolled will confirm Workforce Pell Grant eligibility. Note: students may not receive a regular Pell Grant and a Workforce Pell Grant concurrently.
Does a Workforce Pell Grant award apply to a student's Pell Lifetime Eligibility?	Yes. Any Workforce Pell Grant funds a student receives will count toward their Lifetime Eligibility Used (LEU), which is the lifetime limit on Federal Pell Grant eligibility.

Appendix E Definitions

Accreditor: Private educational associations recognized by the Department of Education that develop evaluation criteria and conduct peer evaluations to assess whether or not those criteria are met. Institutions and/or programs that request an accreditor's evaluation and that meet an accreditor's criteria are then "accredited."

CIP Code: A taxonomy of instructional program classifications and descriptions developed by the U.S. Department of Education's National Center for Education Statistics (NCES). Specific programs offered by institutions are classified using a six-digit CIP code.

CIP-SOC Crosswalk: CIP-SOC Crosswalk matches 6-digit CIP codes with 6-digit SOC codes based on their occupational and programmatic descriptions. Matching CIP and SOC codes means an academic program provides the skills and knowledge required to perform a given occupation.

Eligible Institution: An institution is a Title IV-eligible, accredited postsecondary institution authorized to operate in Rhode Island or serving learners located in Rhode Island and offers one or more programs meeting federal requirements.

Eligible Workforce Pell Program: An undergraduate program that meets strict statutory and regulatory criteria regarding its length, delivery, outcomes, and alignment with workforce needs for Workforce Pell eligibility.

High-Skill: For the purposes of Workforce Pell, programs must align to occupations that meet the WIOA framework for middle-skill or high-skill jobs, defined as follows:

- Middle-skill jobs are careers that require more education and training than a high school diploma but less than a four-year degree, and that:
 - Address critical workforce needs and are persistently hard to fill as defined by the State's definition of In-Demand;
 - Provide an adequate initial wage or demonstrate a clear and documented pathway to meeting the State's High-Wage definition within a reasonable period following employment; and
 - Are attainable through targeted education, training, and supportive services.
- High-skill jobs are careers that require entry-level employees to possess a bachelor's degree, associate degree, registered apprenticeship credential, or significant (typically 12 months or more) on-the-job training.

High-Wage: For the purpose of Workforce Pell, high-wage is defined as the occupation or industry in which a full-time employee earns an amount that is equal to or greater than the annual median wage across all industries for Rhode Island estimated by Bureau of Labor statistics in the U.S. Department of Labor for the most recent year for which data is available.

- Median wage in Rhode Island is \$54,040 (or based on full-time employment, hourly rate of above \$26.00)

In-Demand: For the purposes of Workforce Pell, Rhode Island will define in-demand occupations using the Rhode Island Department of Labor and Training's High-Demand labor market information (LMI) designation.

- High-Demand occupations are defined as those with 750 or greater projected openings over a 10-year period due to any combination of new job creation, worker transfers, and exits.

Instructional Time: For federal student aid purposes, a week of instructional time is defined as any consecutive 7-day period in which at least one day of regularly scheduled instruction, examination, or authorized academic activity occurs. Eligible Workforce Pell Grant programs must contain at least 8 but fewer than 15 weeks of instructional time but can be scheduled to include breaks when no instruction occurs.

Non-Title IV-Eligible Provider: Unaccredited entities or organizations that do not meet Title IV eligibility requirements to independently receive and disburse federal financial aid; an ineligible institution or organization may provide no more than 25 percent of the instruction for an eligible workforce program;

Participating Institution: An eligible training provider that meets the standards for participation in Title IV, HEA programs in subpart B and has a current program participation agreement with the U.S. Secretary of Education.

Portable credential: A credential that verifies an individual's qualifications, aligned with real labor market opportunities. It is accepted across multiple employers, settings, and geographic areas.

Postsecondary Institution: An institution that qualifies as: An institution of higher education, as defined in 34 CFR § 600.4; A proprietary institution of higher education, as defined in 34 CFR § 600.5; or A postsecondary vocational institution, as defined in 34 CFR § 600.6.

Program Participation Agreement (PPA): A formal agreement that an institution of higher education must enter into with the U.S. Department of Education to be eligible to participate in and disburse Title IV federal financial aid.

Program-to-Credit Articulation: Formal articulation agreements, pre-evaluated credit for prior learning, or other policies written by institutions that apply industry-recognized certificates or certifications, occupational licenses, or registered apprenticeships towards academic credit for specific courses within a certificate or degree program.

Recognized Postsecondary Credential: Includes an industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship (defined under 29 CFR part 29,) a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.

Registered Apprenticeship Program: An industry-driven, high-quality career pathway where employers can develop and prepare their future workforce, and individuals can obtain paid work experience with a mentor, receive progressive wage increases, classroom instruction, and a portable, nationally-recognized credential. Registered Apprenticeships are industry-vetted and approved and validated by the U.S. Department of Labor or a State Apprenticeship Agency. In Rhode Island, Registered Apprenticeship Programs must be approved and validated by the Department of Labor and Training, which is the State Apprenticeship Agency.

Short-Term Program: A program of study that is at least 150 clock hours but less than 600 instructional clock hours, (or the credit hours equivalent) offered by an eligible training provider at least 8 but less than 15 weeks.

SOC Code: Standard Occupational Classification (SOC) Code is used by federal agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data.

Stackable Credential: A credential that is part of a sequence of credentials that articulate toward a higher-level certificate or degree which may be earned at one or more postsecondary institutions.

State Workforce Development Board: A state workforce development board established under Section 101 of the Workforce Innovation and Opportunity Act and 20 CFR 679 Subpart A. In Rhode Island, this is the Governor's Workforce Board (GWB).

Value-added earnings (VAE): Adjusted median earnings three years after completion minus 150% of the Federal Poverty Guideline; published tuition/fees must be less than VAE (beginning 2029-30 award year).

Appendix F

Rhode Island Workforce Pell Employer Validation & Industry Support Form

Program Information:

To be filled out by institution prior to sending for industry validation

Name of Workforce-Pell eligible provider:

Name of Program submitted for Workforce Pell approval:

Credential awarded through program:

Brief description of competencies aligned with the credential:

• Competency 1:

• Competency 2:

• Competency 3:

Employer Information:

To be filled out by employer/Industry association (IA)

is a .

Employer/IA Name

Brief company/IA description – Industry, location(s), size, and primary operations

As an employer or IA within this sector, we have seen sustained demand for individuals with the technical skills, workplace competencies, and industry-aligned training needed for the roles described below:

- Occupation/Role 1:
- Occupation/Role 2:
- Occupation/Role 3:

To be filled out by IA if applicable

If this is being submitted by an industry association, please list at least 3 key employers that demonstrate the hiring needs articulated above:

- Employer 1:
- Employer 2:
- Employer 3:

Employer/Industry Association Attestation

This program aligns with workforce needs within our industry and reflects relevant technical and occupational competencies, and awards a credential recognized by this industry.

This letter is intended to demonstrate workforce demand within the sector and the alignment of the training with the skills needed to address that need. It does not

Program Name

constitute a guarantee of employment, placement, or future hiring levels.

Name:

Signature:

Title:

Employer/IA Name:

Address:

Phone:

Email:

Date: