

WORKFORCE PELL AS A PATHWAY: THE STATE ROLE IN CREDIT ARTICULATION, STACKABILITY, AND TRANSFERABILITY

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INTRODUCTION

With the enactment of [H.R. 1](#), beginning July 1, 2026, students will be able to access Workforce Pell Grants for short-term, career-focused training programs that have been approved by the Governor of the state in which the school is approved to operate.¹ Among [other requirements](#) related to setting a bar for labor market outcomes and alignment with employer demand, the law requires that governors ensure that a student can “count” the learning obtained through a Workforce Pell-eligible program toward further education. Specifically, while eligible students can use their Workforce Pell dollars at qualifying noncredit programs, governors **must** produce written policies for institutions applying for program approval that include how they will:

- Ensure that written agreements demonstrate that a student will be awarded academic credit towards a certificate or degree program upon the student’s successful completion of a Workforce Pell program and enrollment in a subsequent certificate or degree program at one more institutions; and
- Determine if a credential is stackable (unless there is only one recognized postsecondary credential for the intended occupation), looking at documented connections to additional credentials and considering available data on whether students have obtained additional credentials through career pathways.

Institutions will need to implement campus-specific changes to meet these requirements, while governors can take a systems-wide approach (discussed below) to maximize future options for students.

CONVERTING NONCREDIT PROGRAMS TO CREDIT

Workforce Pell is intended to expand access to short-term programs that lead to employment in high-demand jobs. Many institutions offer such programs as noncredit, a term that refers to any course that institutions offer that does not provide students with academic credit (e.g.,

¹ The programs must be offered by an accredited institution approved by the U.S. Department of Education (ED). Programs must provide between 150 and 599 clock hours, over a time period lasting at least 8, but less than 15, weeks. See [Workforce Pell: An Overview for Governors](#) for more details on requirements.

developmental education, GED preparation, and other personal areas of interest, such as photography). Each year, an average of [5 million Americans](#) participate in noncredit programs. For purposes of Workforce Pell, noncredit programs are those that are designed to lead to a short-term, industry-recognized credential. These programs [tend to focus](#) on nimbly responding to skills needed for a specific occupation, and differ from credit programs that lead to a certificate or degree, which often include additional general education requirements.

Noncredit programs are often administered separately from credit programs, and typically do not have as stringent admissions requirements. These programs also do not generally run on the traditional academic calendar, but have a rolling cycle. Until H.R. 1, noncredit programs were not eligible for federal student aid. Because of these differences, many institutions do not utilize the same data systems for their noncredit programs as they do for credit programs. Institutions often do not track noncredit enrollees through their financial aid offices and typically cannot track key indicators, [such as](#) whether students later complete a credit program. Noncredit program data often do not exist in state longitudinal data systems.

DISPARATE PROGRAM APPROVAL PROCESSES

Typically, only tenure-eligible faculty teach credit courses. Those faculty have primary responsibility for curriculum and academic programs (though an institution's president and/or the institution's or state's governing boards may have final authority). A new credit-bearing academic program is typically developed by the faculty within the relevant academic department and then goes through approval by the institution's academic council/senate, the institution's governance board, the state, and the accrediting agency (which could also require approval by a special programmatic accreditor). This often takes at least a full academic year.

In contrast, [instructors for noncredit courses](#) are more likely to be industry experts with specialized experiences, and do not typically serve on academic committees or participate in entities like the faculty union. Noncredit programs do not typically go through the same approval processes as credit programs, and could take weeks instead of a year to set up.

TURNING NONCREDIT INTO CREDIT

To ensure short-term programs articulate to academic credit in related programs, institutions, systems, states can pursue three overlapping strategies: mapping learning outcomes, updating credit for prior learning policies, or building short-term programs as credit programs.

1. Mapping Learning Outcomes of Noncredit Programs to Academic Programs

Converting noncredit courses to credit has long been an institutional challenge. Faculty often question whether noncredit instructors are qualified or whether the coursework meets academic standards. When academic programs don't accept these courses, students may end up repeating material they've already learned. To clear those barriers, noncredit instructors and

academic faculty will need to work together to create a crosswalk of courses and ensure alignment of learning outcomes between the noncredit and credit programs. In pursuing that alignment, academic faculty may want to make changes to the learning outcomes and instruction for the noncredit programs to make credit articulation easier. Workforce partners will need to confirm that if changes are made, the program still teaches the required skills needed for employment.

Because the Workforce Pell law requires that programs stack to a related field, institutions should be able to articulate how the Classification of Instructional Programs (CIP) codes, a taxonomy for reporting academic programs and fields of study, are aligned.

2. Updating Credit for Prior Learning (CPL) Policies

CPL (also known as prior learning assessment) is academic credit that has been awarded after the skills [gained from outside](#) of a traditional academic program—including through employment, military service, or noncredit programs—have been validated through exam, credential receipt, or otherwise. Typically, CPL assessments are done by the academic program that is receiving the student; the student must proactively request the assessment and is often charged an extra fee. While the Department of Education has not provided guidance on this issue, because Workforce Pell requires the acceptance of credits, it is reasonable to assume that the receiving academic program cannot require the student to carry out additional steps. To ensure there are no barriers, 1) CPL could be administered through an assessment given by Workforce Pell instructors, or 2) the Workforce Pell credential itself could serve as evidence of the learning outcomes.

3. Begin Launching New Short-Term Programs as Credit Programs

Governors can encourage or require that new Workforce Pell programs be developed and approved as for-credit programs from inception, avoiding many of the challenges described above. Institutions can still incorporate characteristics of noncredit programs, including the partnership with employers, rolling enrollment, and expedited approval. States would need to reconcile the academic credit and the Workforce Pell approval processes.²

CREDIT ARTICULATION AND STACKABILITY

Many Workforce Pell recipients will want to pursue longer-term career goals. The separate requirement under Workforce Pell to ensure credentials are stackable in related programs will help workers expand their job possibilities and increase their lifetime earnings. Institutions can

² As an alternative to offering the program for credit, institutions could move Workforce Pell noncredit programs into the relevant academic departments at the institution. This construct would mean that academic faculty are involved in the creation of the program and serve as instructors.

be thoughtful about how they approach building noncredit-to-credit articulation as a part of the broader effort to create stackable credentials. To do so, states can encourage institutions to:

- **Ensure that students have a clear next step in their career, but also take a holistic approach** to determining the next academic program for credit articulation—understanding that for some, the next credential needed may be related to management and running a business, rather than the underlying technical skills.
- **Invest in advising.** Many noncredit learners [lack](#) access to advising, financial aid counseling, and structured career guidance. Yet advising and navigation are core to whether learners can successfully build careers through short-term training.

THE IMPORTANCE OF TRANSFERABILITY TO OTHER INSTITUTIONS

Many learners [move across](#) institutions for geographic, financial, or programmatic reasons. A short-term credential may provide entry into employment, but many careers require a degree to advance to higher-paying roles. The ability to transfer is particularly important for students enrolled [at institutions](#) that primarily offer certificates or that offer a narrow set of credentials—including many community colleges and proprietary institutions. Cross-institution transferability reduces the risk that students [become locked](#) into an institution to preserve the value of their earned credits, or face the cost of repeating coursework and navigating articulation processes. A Workforce Pell program could satisfy federal requirements by stacking only within the same college, but states can build on the federal requirement.

THE STATE'S ROLE IN FACILITATING TRANSFER

Unlike individual institutions, state entities operate from a system-wide vantage point. They can see where credentials originate, where students attempt to move, and where pathways break down. Particularly in states with a strong state data system, state leaders can track whether students who complete a short-term program subsequently enroll in a longer program, even if they transfer to another college; whether short-term programs that yield modest immediate wage gains serve as entry points to high-value, longer credentials; and how cross-institution transfer facilitates economic mobility. No single institution can replicate this systems-level view—institutions may lack the capacity, data access on outcomes, and visibility into enrollment at other institutions. Often, institutions will negotiate isolated bilateral transfer agreements.

States can lead by convening institutions to align expectations around learning outcomes across campuses, starting in high-priority occupational fields. Governors can support statewide collaboration to establish shared competency frameworks, clarify CIP alignment, and identify where meaningful stacking is possible. Where statewide articulation agreements or common course numbering systems already exist, Workforce Pell programs should be integrated into those frameworks. In states without such infrastructure, Workforce Pell implementation

presents an opportunity to build it. Governors have a direct lever to influence how programs connect and support a broader statewide talent development strategy that prioritizes mobility across institution types, geographic regions, and credential levels—ensuring that short-term training functions as a durable entry point into educational and economic opportunity.

APPENDIX A. GOVERNOR'S CHECKLIST

Governors have a significant role in ensuring that short-term, workforce programs are a part of a students' ongoing career pathway.

INSTITUTION CREDIT ARTICULATION - WORKFORCE PELL PROGRAM APPROVAL

- Require institutions to provide written proof that the Workforce Pell program **articulates** as credit into at least one related academic program. Proof can include:
 - Whether the Workforce Pell program is being offered for credit or is noncredit.
 - If the program is offered as credit, a copy of the approvals of the program by relevant parties (e.g., institution's academic council/senate, institution's governing board, accreditor).
 - A description of the **mechanism being used to grant credit**. For example:
 - If using CPL, attest to how the learning outcomes are being validated (e.g., end-of-credential exam given by the instructors, acceptance of the Workforce Pell credential). Institutions should provide written assurance that students will experience no additional barriers (e.g., having to request credit for prior learning, being charged fees, etc).
 - If using mapping of learning outcomes, provide a crosswalk of how the program articulates into the related academic program for credit.
 - Copies of all relevant agreements** (e.g., whether internal between noncredit instructors and academic faculty, or external with another institution) that codify the pathway. The agreements should include key information on the Workforce Pell program and the academic program, including clarity on how the credits are being applied to program requirements.
- [Optional]* Require that the academic program is associated with higher earnings than the Workforce Pell program and provide evidence that is the case.
- [Optional]* Require that the Workforce Pell program articulate to at least one other institution for academic credit. If this is not possible (e.g., a niche program not offered elsewhere in the state), that reason should be articulated.
- [Optional]* Encourage institutions to assemble an **internal working group** that develops the relevant policies/practices as noted in this checklist. Members should include

noncredit instructors, academic faculty, registrar, financial aid administrators, academic and career counselors, external workforce partners, and key institutional leadership.

STUDENT SUPPORT

- [Optional] Require institutions to create an easy-to-understand website for students that explains the credit articulation path.
- [Optional] Require institutions to track, disaggregate data, and report annually on:
 - Which students go into the academic pathway vs. directly to workforce;
 - How many students ultimately complete the next academic credential and how long it took them to do so; and
 - Earnings differentials between the students who pursue additional education versus those who only complete the Workforce Pell program.
- [Optional] Encourage institutions to **follow up with students** who have low earnings out of the Workforce Pell program to determine if they would like to stack additional credentials.
- [Optional] Encourage institutions to do **surveys of students** upon enrollment to determine their career goals, provide counseling, and assess whether goals were met.

STATEWIDE LEADERSHIP

- Take a leadership role** to support institutions and faculty in navigating complex articulation topics (e.g., faculty credentials, acceptance of credit for prior learning across the state, credit articulation within disciplines, identifying related academic programs).
- Determine if the state needs to **change its approval processes for academic programs** (i.e., if Workforce Pell is offered for credit) to avoid delays and duplication.
- Provide **resources as needed to institutions** for critical needs, such as faculty stipends or upgrades to data systems.
- Fully **leverage statewide longitudinal data systems** to standardize data-sharing agreements across institutions, ensure consistent reporting of both credit and noncredit enrollments, and incorporate occupational coding into wage records.
- Evaluate** whether Workforce Pell is producing durable pathways across the state's higher education system, helping both students and states meet their goals.