



Workforce Pell and Registered Apprenticeship:

**Practitioner Toolkit for
Implementation Readiness**

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Executive Summary

Workforce Pell represents the most significant expansion of federal student aid in decades. Beginning July 1, 2026, Pell Grant eligibility will extend to short-term workforce training programs — opening a new funding pathway for Registered Apprenticeship (RA) practitioners and the apprentices they serve. This toolkit is designed to help RA stakeholders understand how Workforce Pell intersects with the apprenticeship model and take practical steps to prepare.

Milestone
July 1, 2026

Pell eligibility extends to qualifying short-term workforce training programs.

Key RTI Providers' Program Requirements

-  Eligible programs must be between 150-599 clock hours delivered over 8-15 weeks
-  Lead to a recognized postsecondary credential or transferable academic credit
-  Maintain a 70% completion rate and job placement rate
-  Courses must have been offered for at least one year prior to eligibility
-  A uniform tuition structure that applies equally to all students regardless of Pell eligibility

clock hours
150-599

weeks
8-15

completion & placement rate
70%

Shared Responsibility Across the RA Ecosystem

No single stakeholder owns the full Workforce Pell implementation process; each stakeholder has a role.

- **RA Sponsors:** RTI inventory, cost documentation, On the Job Training (OJT) /RTI separation, credential coordination



- **Community Colleges and RTI Providers:** Title IV eligibility, clock-hour thresholds, credential outcomes, uniform tuition, one-year course history, 70% completion and job placement rate, and outcome tracking
- **Apprenticeship Intermediaries:** helping employers and program sponsors understand and integrate Workforce Pell with RTI mapping, documentation support, and funding stack education
- **Employer Partners:** maintaining wage/On the Job Training obligations, schedule alignment, and employment outcome documentation
- **State Agencies:** approval process alignment, in-demand occupation definitions, clarifying what apprenticeship registration does and does not confer, and coordinating timelines

The Time to Act Is Now

With a July 2026 launch date, the window to prepare is narrow. Practitioners who begin now — assessing RTI structure, confirming institutional partnerships, and building outcome tracking systems — will be best positioned to access this funding for apprentices who need it most. This toolkit provides the foundational knowledge and practical action steps to get there.



Introduction and Purpose

What This Toolkit Is and Who It Is For

This toolkit is designed for RA stakeholders including sponsors, employers, intermediaries, RTI providers, state apprenticeship agencies, state workforce and higher education partners. It provides a foundational overview of Workforce Pell, how it intersects with the RA model, and practical guidance to help you prepare for and benefit from this significant new program.

Workforce Pell represents one of the most consequential expansions of federal student aid in decades. For the RA community, it opens the door to meaningful new financial support for apprentices pursuing RTI through eligible training providers. While implementation guidance continues to evolve, now is the time for you to build knowledge, assess readiness, and cultivate the partnerships needed to take advantage of this opportunity.

Why Workforce Pell Matters for RA

RA is built on the earn-and-learn model: apprentices work and earn wages while simultaneously developing skills through structured OJT and RTI. Despite this model's proven effectiveness, financial barriers remain a persistent challenge. Workforce Pell has the potential to change this.



Persistent Barriers

- Apprentices often pay out-of-pocket for RTI.
- RA programs RTI may not provide college credit.
- RTI costs can limit program recruitment, retention, and growth.



What Workforce Pell Unlocks

- Meaningful financial relief for eligible apprentices.
- Expanded access to high-quality RTI that awards or maps to college credit.
- Potential to scale RA by providing new RTI funding stream.

How to Navigate This Toolkit

This toolkit is organized into six sections, moving from foundational knowledge to practical implementation guidance. You do not need to be a financial aid expert to use this guide. The goal is to assess your current RTI partnerships, have the right conversations, and support apprentices in accessing this aid.



Important notice: This toolkit reflects the state of Workforce Pell policy and implementation as of the date of publication. Because the regulatory landscape is actively evolving, practitioners are strongly encouraged to monitor updates from the U.S. Department of Education (ED) and relevant federal partners.



Section 1: What is Workforce Pell

Legislative Background

Workforce Pell expands the federal Pell Grant to include eligible short-term training programs that lead to employment in high-demand occupations. The federal Pell Grant Program has long been the cornerstone of need-based federal student aid, providing grants to low-and-moderate income students pursuing higher education. Until Workforce Pell, Pell Grant eligibility was limited to students enrolled in degree programs at accredited postsecondary institutions, effectively excluding short-term workforce training programs.

For the first time, through Workforce Pell, students enrolled in short-term workforce programs at eligible postsecondary institutions can access Pell Grant funding, provided those programs meet specific criteria related to length, quality, and labor market alignment.

Here are key features you need to know:

Table 1: Workforce Pell

Feature	What it Means for Apprentices
No Degree Required	Apprentices can access Pell funding toward RA program credentials and RTI cost/tuition even if the program's RTI does not result in a degree.
Shorter Programs Qualify	Required program length is between 150 and 599 clock hours over a period of 8-15 weeks, covering the length of many RTI sequences
Institution Type	Title IV eligible institutions (same as traditional Pell)
Need-Based	Eligibility is determined through FAFSA, so not every apprentice will qualify, and those who do qualify may be awarded differing amounts based on need
Award Amount	Prorated based on program length



Section 2: Workforce Pell and the RA Model

Where Workforce Pell Fits within the RA Structure

RA programs have two core components: OJT, in which apprentices develop skills under the supervision of a journey-level worker, and RTI, which provides classroom or online academic instruction that complements hands-on learning. Workforce Pell grants provide individuals with financial support toward enrollment in eligible short-term training programs at eligible institutions. This grant is directly applicable to the RTI component of RA.

RTI may be delivered by a variety of providers, including community colleges, technical schools, online providers, and other post-secondary institutions. The Workforce Pell eligibility of any given RTI program will depend on whether the specific provider delivering the RTI is a Title IV-eligible institution and whether the RTI program itself meets the relevant program eligibility criteria. The negotiated rulemaking process explicitly recognized RA as an eligible and high-quality Workforce Pell pathway.

Table 2: How Workforce Pell Aligns with RA

Workforce Pell Can Be Used For:	For RA Sponsors:
Short-term workforce training programs provided by a Title IV eligible institution	RTI must be provided by a Title IV eligible institution (typically a community college) for an apprentice to be able to use funds
Training for in-demand occupations	RA programs are considered in-demand
Training programs with demonstrated strong wage and employment outcomes	A sponsor's Title IV RTI provider must still demonstrate their instructional programs' wage and employment outcomes
<p>What Workforce Pell Does Not Do:</p> <ul style="list-style-type: none"> • Replace employer investment • Automatically fund all RTI • Override state approval • Pay apprentice wages or program OJT costs 	

RA aligns well with Workforce Pell because it:

- Is employment based by design
- Produces strong wage outcomes
- Includes direct employer validation



Key clarification: The RTI provider (college, training center, or partner institution) is the Workforce Pell-eligible entity, not the RA program itself.

Section 3: Understanding Eligibility

Workforce Pell eligibility operates at three interconnected levels: **the apprentice, the program, and the RTI provider institution**. All three must independently meet federal requirements for Workforce Pell to be awarded, meaning that individual student eligibility alone is not sufficient without an approved program provided by a Title IV-eligible institution.

Layer 1: Apprentice/Student Eligibility

Determined through Free Application for Federal Student Aid (FAFSA). The student must:

- 1 Demonstrate financial need (based on Student Aid Index from FAFSA)
- 2 Be a U.S. citizen or eligible non-citizen with a valid Social Security Number
- 3 Have no federal student aid default or prior federal grant refund owed
- 4 Be enrolled in a qualifying program at a Title IV-eligible institution

Layer 2: Program Eligibility

For RTI to qualify for Workforce Pell, the Title IV provider's program must meet criteria related to length, content, and labor market alignment. Requirements include:

- 1 RTI must be delivered (or substantially delivered) by a Title IV-eligible institution.
- 2 RTI program length must be between 150-599 clock hours of instructional time over 8-15 weeks; instruction does not have to be delivered in consecutive weeks.
- 3 Eligible RTI programs must lead to a recognized post-secondary credential.
- 4 The resulting RTI credential is stackable and portable across more than one employer.
- 5 Noncredit RTI is permitted but must articulate to academic credit with at least one credit-bearing certificate or degree program.
- 6 Programs must have a 70% completion rate and a 70% job placement rate. The completion rate applies to the Title IV institution's program, not the RA program. The job placement rate is calculated as the percentage of learners who are employed 180 days after exiting the Title IV institution's program.
- 7 Courses must have been offered for at least one year prior to applying for Workforce Pell program approval. RTI providers should document the history of course offerings as part of their eligibility application.



- 8 RTI programs must have uniform tuition for all students.

The proposed regulations include a “pass-go” provision for RA: if the RTI is part of an RA program, it automatically meets the high-skill, in-demand industry, and employer hiring needs requirements. However, Workforce Pell includes a value-added earnings requirement: RTI providers’ programs cannot exceed the amount of total tuition and fees when calculating the difference between median earnings of completers and 150% of the poverty line. Because the earnings test relies on historical earnings data, **implementation of this provision will not begin until the 2029–30 school year.** Sponsors and their RTI providers will need to be mindful of this test in setting progressive wage schedules.

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RTI must have documented instructional costs so that Workforce Pell funds can be allocated and audited. An institution seeking Workforce Pell eligibility for an RTI program will need to establish a single, uniform tuition structure that applies equally to all enrolled students, regardless of whether they receive a Workforce Pell Grant. Institutions may not charge Pell-eligible students different tuition or fees than non-eligible students. This requirement ensures that Workforce Pell supplements, rather than artificially inflates, the cost of training.

RA Advantage

RTI that is part of an RA program automatically meets Workforce Pell requirements related to high-skill occupations, in-demand industry alignment, and employer hiring needs.



Layer 3: Institutional Eligibility

The institution delivering RTI must be Title IV-eligible. This requires **all three of the following**:

- 1 Accreditation by an ED-recognized accrediting agency
- 2 State authorization to operate a post-secondary institution in all states where instruction is delivered
- 3 ED approval to participate in Title IV programs (demonstrating responsibility and administrative capability)

Workforce Pell requires that RTI be delivered by a Title IV-eligible institution — typically a community college or accredited technical school. However, under § 668.5, up to 25% of the program's instruction may be delivered by a non-Title IV-eligible entity, such as a union training center or employer facility, through a written arrangement with the eligible institution. This creates a viable partnership model for RA programs where some instruction is delivered by a non-eligible provider but the eligible institution must remain the primary provider and retain responsibility for the program's Title IV compliance.



Section 4: Roles Across the RA Ecosystem

Workforce Pell success requires coordination across the full RA ecosystem. The table below summarizes the primary responsibilities and priority actions for each practitioner type.

Table 3: Practitioner Roles and Priority Actions

Practitioner	Core Role	Priority Action Now
RA Sponsor	<ul style="list-style-type: none"> Ensure RTI aligns with Workforce Pell eligibility requirements Coordinate with RTI providers and employers Communicate expectations to apprentices 	<ul style="list-style-type: none"> Inventory RTI structure, hours, credential offerings, and delivery model to determine Workforce Pell eligibility Begin conversations with your RTI providers about documentation and outcomes
Community College/RTI Provider	<ul style="list-style-type: none"> Ensure RTI meets clock-hour, duration, and outcome thresholds Verify RTI leads to a recognized credential Guarantee academic credit toward certificates or degrees 	<ul style="list-style-type: none"> Review RTI curricula for credential and credit alignment Establish tuition structure for RTI Establish processes to track RTI completion, placement, and earnings
Apprenticeship Intermediaries	<ul style="list-style-type: none"> Coordinate across employers, colleges, and state agencies Translate Title IV and RA for sponsors Support compliance and reporting 	<ul style="list-style-type: none"> Map roles and responsibilities across partners Educate partners on RTI-specific Workforce Pell requirements Prepare to support state approval and data alignment
Employer Partner	<ul style="list-style-type: none"> Continue wage and OJT investments Support apprentice RTI participation, scheduling and monitoring performance Coordinate with sponsors on RTI timing 	<ul style="list-style-type: none"> Align RA policies with Workforce Pell implementation Educate state partners on how RA RTI works Flag areas where state approval processes may conflict with RA design
State Apprenticeship Agency	<ul style="list-style-type: none"> Register and oversee RA programs including RTI plan Coordinate with workforce and higher education agencies 	<ul style="list-style-type: none"> Align RA policies and design with Workforce Pell Educate state partners on RTI
State Governors and Workforce and Higher Education Agencies	<ul style="list-style-type: none"> Define in-demand occupations and quality thresholds Approve eligible Workforce Pell programs Oversee compliance and reporting 	<ul style="list-style-type: none"> Identify gaps between RA program data and Workforce Pell required data Establish RTI-specific outcome tracking Prepare documentation for audits and review



Section 5: Coordinating Workforce Pell with Other Funding

Workforce Pell does not operate in isolation. For most RA programs, it will be one layer in a broader funding stack that may include employer contributions, apprentice funding, local workforce dollars, and other federal, state or local streams. Understanding how these sources interact, and where the rules create hard limits, is essential before the program is designed around Workforce Pell as a funding source. Table 2 below maps the most common funding sources against Workforce Pell, with key coordination considerations for each.

Table 4: How Other Funding Sources Coordinate with Workforce Pell

Funding Source	How it Interacts with Workforce Pell	Key Consideration
Traditional Pell	Cannot be received simultaneously with Workforce Pell	Sponsors with RTI of 600+ hour or 15+ weeks may prefer traditional Pell
Employer-Paid RTI	Fully compatible; employer covers balance above Pell award as 'last dollar' payer	Uniform tuition rule requires all students be charged the same rate structure carefully
WIOA Title I Individual Training Account (ITAs)	Stackable; DOL guidance encourages Pell as the primary source when available	Coordinate with American Job Centers to avoid duplicative funding
State Scholarship/ Subsidies	Compatible; states can layer on top of Workforce Pell	Check state rules on coordination; some states prohibit double-dipping on state aid
Other Instructional Aid	If total non-federal aid \geq cost of attendance, student loses Pell eligibility	Monitor aid packages for students receiving employer tuition benefits

Section 6: Action Checklists and FAQs

Action Checklist

RA Sponsors

- Inventory all RTI components (hours, sequence, provider, delivery method)
- Confirm which RTI costs could be Workforce Pell-eligible (tuition, fees, books)
- Document RTI instructional costs, even if it is currently employer-funded
- Verify that RTI is separable from OJT for funding and reporting purposes
- Coordinate with RTI providers to confirm credential and credit alignment
- Prepare to explain Workforce Pell to employers (for Group Sponsored Programs) as a complement - not a replacement - of employer investment

Community Colleges/RTI Providers

- Confirm RTI meets clock-hour, weeks-of-instruction, and completion requirements
- Ensure RTI results in or maps to academic credit toward a certificate or a degree
- Align RTI outcome tracking with Workforce Pell accountability metrics (completion, placement, earnings)
- Prepare Title IV compliance processes (FAFSA, enrollment status, disbursement timing)
- Verify and document that each course seeking Workforce Pell approval has been offered for at least one year prior to application
- Confirm that completion and job placement rates meet the 70% threshold and establish data systems to track and report this metric
- Establish and document a uniform tuition structure that applies equally to all students regardless of Pell eligibility status
- Determine, in collaboration with relevant state agencies and RA stakeholders, how RTI tuition will be covered if RTI program costs exceed Workforce Pell awards

Apprenticeship Intermediaries

- Map RA programs to RTI providers and state approval pathways
- Support RTI providers through Workforce Pell eligibility and documentation processes
- Align RA program sponsors' data collection with Title IV reporting requirements
- Help employers understand funding stacks and compliance roles
- Develop shared tools, templates, and timelines for partners

Employers

- Understand what Workforce Pell can and cannot fund (RTI only)
- Coordinate training schedules with RTI providers to support Workforce Pell eligibility windows
- Prepare to document continued employment and wage outcomes
- Communicate clearly with apprentices about how to access Workforce Pell for their RTI

State Apprenticeship Agencies/Office of Apprenticeship Staff

- Coordinate with state higher education and workforce agencies on approval criteria
- Clarify how RA registration intersects with Workforce Pell eligibility
- Educate sponsors and intermediaries on what RA program registration does - and does not – confer related to Workforce Pell
- Support consistent interpretation of RTI quality and demand alignment
- Anticipate increased technical assistance needs related to RTI outline development and Title IV provider partnerships

State Governors and Workforce and Higher Education Agencies

- Define in-demand occupation criteria applicable to RA
- Take RA program RTI delivery models into account when determining approval for Title IV programs' eligibility for Workforce Pell
- Set clear expectations for credential, credit, and earnings validation
- Lead the coordination of data collection and reporting and establish appropriate processes
- Coordinate timelines with RA program stakeholders
- Communicate decisions early and often

FAQs

When should RA stakeholders start preparing for Workforce Pell?

Now. RA program sponsors and RTI providers should start preparing for Workforce Pell now to ensure RTI programs meet federal and state requirements, secure necessary approvals, and avoid delays in funding and credentialing when the July 2026 launch occurs.

Does Workforce Pell change how RA works?

No. Workforce Pell does not alter RA standards, structure, or employer responsibilities. **It only creates a new potential method for funding RTI.**

When will Workforce Pell be available?

Workforce Pell is expected to begin July 1, 2026, pending final federal regulations. The first year for funding would be the 2026-2027 school year. Remember, programs will need to have been offered for one year prior to being eligible, so for the 2026-2027 year, a Title IV institutions' educational program would need to have been in place during the 2025-2026 school year.

Do apprentices have to complete a FAFSA?

Yes. Apprentices receiving Workforce Pell funding to apply toward their RTI costs must meet standard Pell eligibility requirements.

I operate an RA program in multiple states. Will the program differ in each one?

For many RA program sponsors, RTI may be split across multiple providers or delivered through a combination of in-person and online instruction. Workforce Pell eligibility will be tied to the specific enrolled program at a specific institution, so the picture may differ for each provider. Sponsors with multiple RTI providers should assess each provider's eligibility separately.

How can a pre-apprenticeship program benefit from Workforce Pell?

Eligible individuals can use Workforce Pell funding toward qualified pre-apprenticeship programs. The benefits of using Workforce Pell for pre-apprenticeship may include:

- Enabling participants with limited income to access the training without requiring loans
- Strengthening pathways into RA programs

Pre-apprenticeship programs must still meet Workforce Pell eligibility requirements or partner with an eligible education provider.

Does the RTI have to be continuous to be eligible for Workforce Pell funds?

No, RTI delivery does not have to be continuous. While the program must be between 8 to 15 weeks in length, the RTI can be delivered intermittently thereby allowing for flexibility in how apprentices can complete the coursework and how RA programs can structure their OJT/RTI.

What types of institutions can offer Workforce Pell programs?

RTI programs eligible for Workforce Pell must be offered by institutions that participate in federal student aid (Title IV), including:

- Community colleges
- Technical colleges
- Public universities
- Private nonprofit institutions
- Some proprietary (for-profit) institutions, if eligible

RA sponsors typically participate through partnerships with eligible education providers.

How are hybrid or online RTI models treated?

Online and hybrid program delivery is permissible under Workforce Pell, as long as they comply with both Workforce Pell program criteria and ED's general distance education regulations. States need to establish bilateral agreements for online education programs if they are serving students across state lines, which is common in multi-state RA programs.

Submit Your Comments:

The Workforce Pell NPRM was published in the Federal Register on March 6, 2026, with a public comment deadline of **April 8, 2026**. Comments can be submitted and the full proposed rule accessed at: <https://www.federalregister.gov/public-inspection/2026-04520/accountability-in-higher-education-and-access-through-demand-driven-workforce-pell-pell-grant>.



To learn more about how Safal can support Workforce Pell implementation, please contact **Melissa Schroeder, Ph.D.** at Melissa.Schroeder@safalpartners.com

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