



Illinois Workforce Pell Implementation - Public Comment

June 2, 2026



Purpose

- Provide stakeholders with an overview of the proposed Workforce Pell policies, approval process, and implementation timeline
- Provide direction on how stakeholders may provide feedback during the public comment period
- Promote transparency, collaboration, and statewide alignment throughout Illinois' Workforce Pell implementation process



Illinois' Goal for Workforce Pell

To maximize student access to high quality short-term workforce programs and expanded financial aid, while maintaining consumer protections.





Workforce Pell: Background

Background: Workforce Pell

Authorized under **H.R. 1**, as the **Workforce Pell Act** expanding financial aid to short-term programs, effective July 1, 2026.



Program Requirements

- **Time:** 150-599 clock hours; 8-14 weeks
- Prepares learners for **high-skill, high wage, in-demand jobs**
- Meet **hiring requirements** for >1 employer
- Has been **offered by the institution for ≥ 1 year** prior to receiving eligibility
- Must meet **stackability, portability, articulation, and employer validation requirements**
- No more than 25% of teaching is outsourced



Outcome Requirements

- Have a verified **completion rate** of at least 70%
- Have a verified **job placement rate** of 70%
- Meet an **earnings requirement** that relies on program cost, median earnings, and the federal poverty level.

Background: Workforce Pell



Institutional Eligibility

- **Title IV Eligible** Institutions of Higher Education
- **Accredited** by a U.S. Department of Education Recognized Accreditor

223 Eligible Institutions in IL:
Community Colleges, 4-Year
Colleges and Universities (Public
and Private), Proprietary Institutions



Student Eligibility

- **Same** eligibility criteria as traditional Pell Grant
- Students with **bachelor's degrees ARE** eligible (unlike traditional Pell)
- Students must not have exhausted their lifetime Pell limit
- Students currently enrolled in or who have completed a **graduate program are NOT eligible**

Illinois Context Note: Workforce Pell & MAP for Short-Term Certificates

Federal Workforce Pell Grant

- Effective July 1, 2026
- In a program that is 8–14 weeks in length; 150–599 clock hours
- Need-based, with same student eligibility criteria as traditional Pell Grant
- Students with bachelor's degrees ARE eligible (unlike traditional Pell)
- Applied to any part of the total cost of attendance
- Eligibility at Title IV, accredited institutions only
- Must meet additional requirements related to completion rate, job placement, earnings, stackability, portability, etc.

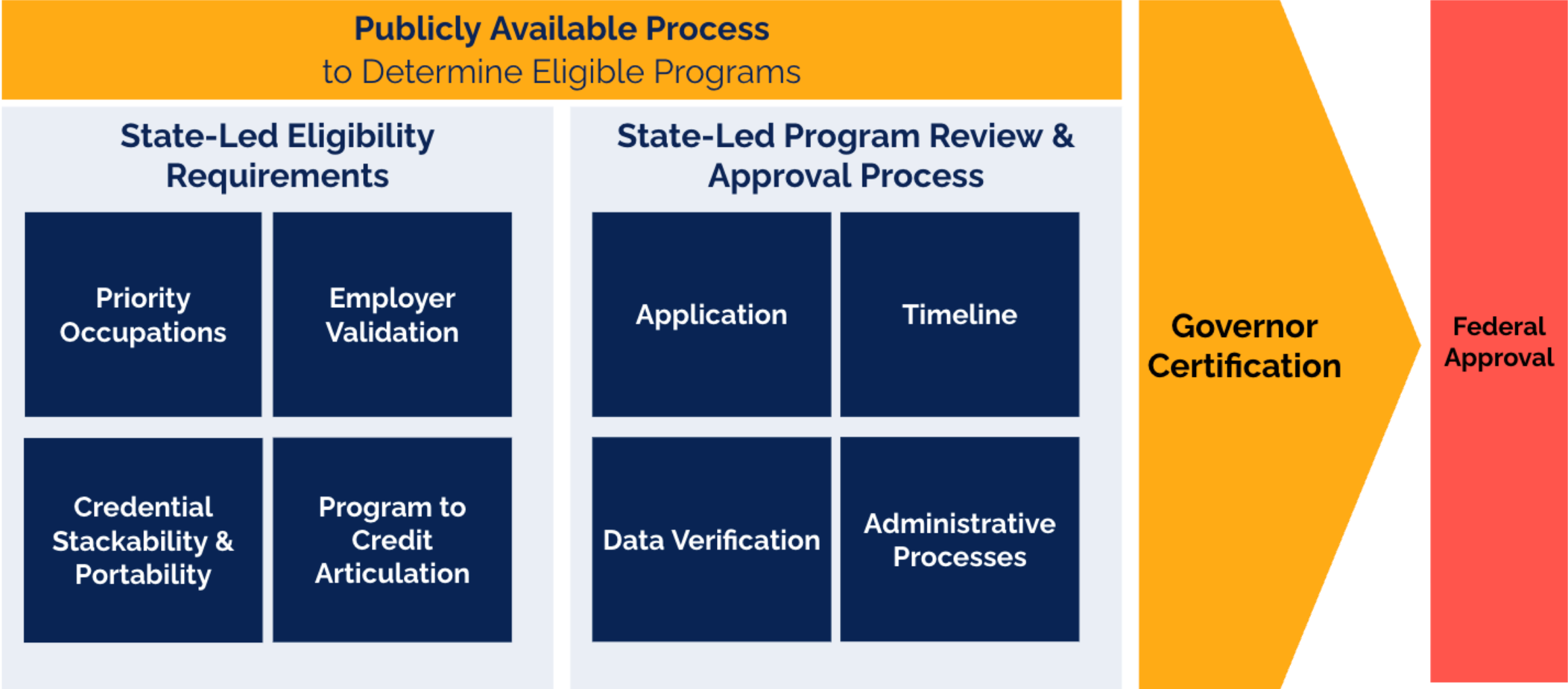


State MAP Grant for Short-Term Certificates

- Effective with the 2022-23 award year
- Enrolled in an Occupational or Career and Technical Certificate Program for at least 3 credit hours
- Need-based, with same student eligibility criteria as traditional MAP Grant,
- Restricted to undergraduate students who have not received a baccalaureate degree
- Applied to tuition and fees only
- Eligibility at Illinois public institutions only

There will be students in short-term workforce programs who are eligible for both a Pell Grant and a MAP Grant.

Background: Regulatory Overview





Illinois Implementation

Cross-Agency Planning and Implementation Structure



Illinois has established a two-tier governance model to coordinate policy alignment and operational execution across all relevant state agencies.

Cross-Agency Leadership Team

Sets strategic direction and formalizes policy decisions at the executive level, with representation from Agency Directors, the Governor's Office, and the IWIB.

Interagency Steering Committee

Drives day-to-day coordination and operational planning, led by ICCB and facilitated by the Education Strategy Group, with subject matter experts from each agency.

Executive Branch Roles and Responsibilities

Each agency under the Governor plays a distinct and critical role in Illinois' Workforce Pell implementation.

Governor's Office - Approval

Provides strategic leadership to the interagency teams. Accountable for implementation and approval in alignment with the statute. Consults with the IWIB on program approval.

IDES & DCEO — Labor Market & Workforce Alignment

Responsible for employer engagement, labor market data validation, and priority occupation methodology. Contributes to alignment between funded programs and existing workforce training funds.

ISAC — Financial Aid Alignment

Contributes to alignment between Workforce Pell and existing state aid programs. Provides technical assistance and support for students, families, counselors, and financial aid advisors.

ICCB & IBHE — Policy and Process Development

ICCB serves as the primary coordinating body. Higher education agencies are responsible for eligibility criteria development, institutional guidance, and overall infrastructure.

Key Deliverables

1 Create an Approval Process

Set up an approval process that is coordinated across the Governor's Office and relevant agencies. Process includes necessary validation.

2 Eligible Occupations Methodology

Leveraging existing State Plans, defined high-skill, high-wage, and in-demand. Identified priority occupations and related training programs.

3 Policy Framework

Policy Manual drafted for institutions, encompassing all written policy, application directions, and supporting guidance.

4 Stakeholder Engagement- On-Going

Illinois colleges, employers, and workforce partners have been engaged throughout the process to ensure the policy reflects on-the-ground realities and statewide labor market needs.

5 Campus-Level Training – In Development

Resources are being developed for institutions and key staff to aid program approval and overall student support.

Our Path Forward

Implementation Timeline

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- Spring 2026
Policy development; stakeholder engagement; public comment to federal rules
 - April – May 2026
Stakeholder engagement
 - ★ ● June 2, 2026
Policy Manual and Application posted for public comment; public webinar
 - July 15 – August 30, 2026
Application Portal Open
 - September 2026
Interagency Review
 - October/ November 2026
Consultation with IWIB; Governor Approval and Certification
 - Late 2026/Early 2027
Approved programs submitted to U.S. Department of Education for approval



Illinois' Workforce Pell Approval Process

The Approval Process



Step 1: Provider verifies that the program seeking eligibility prepares students for employment in an occupation on the Eligible Demand Occupation List.

Step 2: Institutions submit program approval through the Illinois Workforce Pell Application.

Step 3: Interagency team reviews and validates applications, prepare recommendations to the Governor's Office and IWIB.

Step 4: IWIB and Governor Approval. Governor certifies.

Step 5: Certifications are routed back to institutions by the cognizant agency for their submittal to the U.S. Department of Education.



Step 1: Confirm Program Eligibility

Priority Occupations List

*Federal law requires that the State **publish its methodology** to determine and periodically review which **occupations and industry sectors** are **high-skill, high-wage, or in-demand**, including the competencies needed in such industries and occupations, and where the **list of such occupations and sectors** will be made publicly available. Such review shall be done not less than every two years concurrent with development and modification of the WIOA State Plan.*

Guiding Definitions for Illinois

- **In-Demand:** (1) An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or (2) An occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate. (State WIOA and CTE Plan)
- **High-Skill:** Requires postsecondary and/or long-term training, such as an apprenticeship leading to a credential, certificate, diploma, or degree. (State CTE Plan)
- **High-Wage:** A median wage of 85% of the Living Wage for 1 adult & 1 child, as calculated by the [MIT Living Wage Calculator](#). (State WIOA Plan)

Priority Occupations List-Policy Recommendation

- Use the Demand Occupation Training List, managed by DCEO, as the foundation for the Eligible Program List.
- The DOTL is currently utilized for the WIOA Eligible Training provider program list.
- The DOTL is a framework guided by wage, education and skill, and occupational demand data.
- The DOTL allows for state and local petition for occupations to be added.



ADVANCED EDUCATION	999	Meet all criteria + minimum Bachelors
MIDDLE SKILLS	999	Meet all criteria, less than Bachelors
GROWTH	999	Meet education and openings criteria, less than minimum median wage
MODERATE DEMAND	999	Meet education and minimum median wage criteria, openings between 400 and statewide minimum (646)
STATEWIDE PRIORITY	999	Address a State, or Federal, priority related to emergency response, funding opportunities, innovative programs or identified initiatives and that may have a defined period of activity
LOCAL PRIORITY	999	Address an Approved Local Petition based on employer needs related to new or increased job openings or wages, or that meet priorities as outlined within Regional or Local Plans
LOW PRIORITY	999	Do not meet education and/or below 400 annual <u>openings</u> ; occupations with SOC Code ending in ##-###9 ("All Other") ² (<i>Not on DOTL</i>)

Examples of Eligible Occupations

The full list is located in Appendix B.

DOTL Tier	Examples of Occupations
High- Priority Meets all criteria, represents middle skills and advanced education	<ul style="list-style-type: none">• Paralegal• Firefighter• HVAC Mechanic• Truck Driver (CDL)• Network and Computer Systems Administrator
Growth/Moderate Meets skill and demand criteria, does not meet minimum median wage threshold	<ul style="list-style-type: none">• Automotive Service Technician• Certified Nursing Assistant• Dental Assistant• Emergency Medical Technician• Machinist• Welder
Added by Petition 1) Meets all criteria locally OR 2) does not meet all criteria but is a State priority	Local: <ul style="list-style-type: none">• CNC Operator• Pharmacy Technician• Surgical Technologist• Veterinarian Technician State: <ul style="list-style-type: none">• Early Childhood Educator• Community Health Worker• Solar Photovoltaic Installer



Step 2: Institution Submits an Application

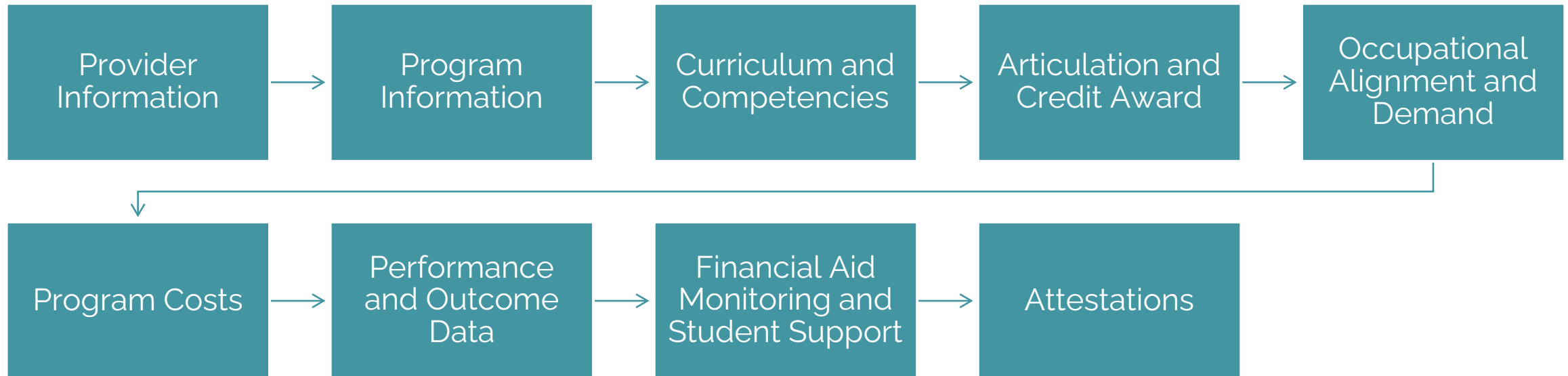
Application

Providers will be required to submit an application package for each program seeking Workforce Pell eligibility.

The Application Portal can be accessed on July 15, 2026 via Illinois' Workforce Pell landing page.



Application Components



A Note About Registered Apprenticeship Programs

Registered Apprenticeship (RA) Programs have different requirements and are noted as satisfying some of the eligibility requirements.

To be eligible, the related technical instruction **must** be delivered by an **eligible institution**. RAs **can** contract out through written agreements up to 49% of instruction.

RAs automatically satisfy the following requirements and therefore do not require evidence or documentation during the application process:

- 1) Priority Occupation Designation
- 2) Hiring Needs of Employers (Employer Validation)

Program Determination



Program is 8-14 weeks in length and 150-599 clock hours.



Program must ensure students are awarded academic credit toward at least one certificate or degree program at one or more eligible



Program must lead to a stackable, portable recognized postsecondary credential (unless it is the only recognized credential for that occupation).



Program meets the hiring requirements of potential employers in the related sectors or occupations.



Program must demonstrate that its program outcomes include $\geq 70\%$ completion (for 150% of time) and $\geq 70\%$ job placement.



Program complies with the value-added earnings requirements.



Program Length Requirement

Pursuant to Section 690.92, eligible programs must be:

- (1) A minimum of 8 weeks, but less than 15 weeks of instruction; and
- (2)
 - (a) Is at least 150 clock hours but less than 600 clock hours;
 - (b) At least 4 but less than 16 semester or trimester hours; or
 - (c) At least 6 but less than 24 quarter hours.

Programs must meet this length requirement for at least 12 months prior to seeking approval.



Articulation Requirement

*Federal law requires a written policy for institutions to establish that an eligible workforce program will **ensure the award of academic credit towards a certificate or degree program upon a student's successful completion of the eligible workforce program.***

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Articulation Policy – Inter-Institutional Agreements

Institutions shall maintain written agreements ensuring transferability of workforce program credit.

Agreements must:

- Identify covered workforce programs;
- Specify academic credit awarded;
- Detail how credit applies to certificate or degree programs; and
- Identify any conditions for acceptance (e.g., minimum grades).

Agreements should align with statewide transfer initiatives such as the Illinois Articulation Initiative (IAI) where applicable.

Articulation Policy – Awarding Credit

Institutions must ensure that students who complete an approved workforce program and subsequently enroll in a related certificate or degree program:

- Receive academic credit for the completed program; and
- Have that credit applied toward program requirements at one or more eligible institutions.

Institutions shall maintain a written academic credit policy that includes:

- A process for mapping workforce program competencies to academic courses or credit units;
- Assurance of credit acceptance through written agreements; and
- Public posting of credit procedures on institutional websites and catalogs.

Articulation Policy – Credit Application

Credit Application

- Credit must be applied toward certificate or degree requirements upon student enrollment.
- Competencies must be mapped to specific courses or credit allocations.

Public Documentation - Institutions must publish procedures for awarding credit and submit credit application policies to:

- Illinois Community College Board, or
- Illinois Board of Higher Education, respectively.



Credential Portability and Stackability Requirement

*Federal law requires a written policy for determining if a credential is **stackable and portable** that establishes **documented connections to additional credentials**, considers, if available, data showing whether students have obtained additional credentials through career pathways, real-time labor market information, and **includes a process for employer validation**.*

Stackable Credential Policy

A credential shall be considered stackable if it meets ALL of the following:

- The credential is part of a pathway with one or more subsequent credentials that recognize the attainment of additional knowledge and/or skills.
- Documented links exist showing how this credential serves as a building block toward higher or additional credentials (degrees, certificates, industry credentials, or apprenticeship milestones).
- The credential includes assessments recognized or accepted for credit accumulation toward subsequent credentials.

The stackability requirement does not apply if a credential is the only recognized credential (e.g. CDL).

Documentation/Evidence: curriculum maps, program catalogs, articulation agreements, job descriptions

Credential Portability Policy

A credential shall be considered portable if it meets the following:

- The credential is recognized by more than one employer beyond the awarding institution or region, or,
- It aligns with industry standards or external quality indicators (e.g., industry bodies, national standards) that prepare students for certification or licensure.

Documentation/ Evidence: employer verification, competency map, job postings, program accreditation



Employer Validation Requirement

*Federal law requires a written policy for determining whether a program **meets the hiring requirements of employers** in the high skill, high-wage, or in-demand sectors and occupations that the program prepares students for employment in, that—*

(A) Considers whether the expected competencies for the credential align with the competencies of the occupation(s).

*(B) Incorporates **direct input from employers**.*

Employer Validation Policy

Requirement Category	Acceptable Evidence Options	Specific Criteria for Success
Meeting Employer Hiring Needs	Job Postings Data	<ul style="list-style-type: none"> • Must use reputable sources (e.g., Illinois JobLink, Indeed, Lightcast). • Must be geographically relevant to the program location. • Postings must represent 10–20% of projected annual openings for the occupation. • Must explicitly require the skills/credentials taught in the program.
	<div style="text-align: center;">or</div> Employer Letters	<ul style="list-style-type: none"> • Letters from 3+ unique employers. • Must confirm hiring of graduates in the last 2 years OR commitment to hire in the next 2 years. • Must include employer contact info for verification.
Alignment of Competencies	Competency Mapping	<ul style="list-style-type: none"> • Documentation showing the curriculum aligns with job postings, industry-recognized standards, or O*NET requirements.
	<div style="text-align: center;">or</div> Meeting Agendas	<ul style="list-style-type: none"> • Official records (e.g., Perkins V Advisory Councils) that explicitly show employer review and endorsement of the curriculum.
	<div style="text-align: center;">and</div> Employer Letters	<ul style="list-style-type: none"> • Letters from one employer or an association confirming the curriculum successfully prepares students for the occupation.



Performance Benchmarks

Completion: At least 70 percent, within 150 percent of the normal time to completion.

Job Placement: A job placement rate of at least 70 percent, calculated as the percentage of students that are employed during the second quarter after exiting the program.

Value-Added Earnings (Interim): The total program cost should not exceed the median earnings minus 150 percent of the federal poverty line.

Published Tuition and Fees < Median Earnings – 150% of the federal poverty guidelines for a family of 1.

Completion

REQUIREMENT: At least 70 percent of enrollees must complete the program within 150 percent of the normal time to completion.

PROCESS

- Institutions must submit a student-level file containing the data elements required to calculate completion and placement.
- The student-level file must include all students enrolled in the program during the reporting period used for the Workforce Pell calculations, including both program completers and non-completers.
- All files must be submitted through secure data transmission processes.

Job Placement

REQUIREMENT: A job placement rate of at least 70 percent, calculated as the percentage of students that are employed during the second quarter after exiting the program.

Process

- Using the student-level file submitted by the institution, ICCB and IBHE will prepare and submit student records for data matching from their respective institutions with the Illinois Department of Employment Security (IDES) to determine the program's placement rate.
- ICCB and IBHE will work with IDES to conduct the necessary employment data match and calculate the percentage of program participants who were employed during the second quarter after program exit.
- The results of the employment data match will be used to determine whether the program meets the required 70 percent placement rate for Workforce Pell eligibility.

Other Requirements

- Already approved to operate in the State of Illinois
- Institutions cannot contract out more than 25% of instruction through a written agreement with a non-eligible entity.
- Institutions must not have been subject to any suspension, emergency action, or termination of programs during the five years preceding seeking Workforce Pell program approval.
- Institutions must submit **financial health** documentation as part of the program application. Specifically, institutions must submit their most recently completed GASB (for public institutions) or FASB Forms 2 and 3 (for private nonprofit institutions) financial statements documenting expenses and revenue, as reported through the Integrated Postsecondary Education Data System (IPEDS) financial health variables.



Steps 3-5, Levels of Approval

The Approval Process



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Step 5: Certifications are routed back to institutions by the cognizant agency for their submittal to the U.S. Department of Education.

Approval Timeline

Review and Approval Step	Estimated Timeline
Confirm Demand Occupation Eligibility	Beginning July 15, 2026
Submit Program Application	July 15- August 30, 2026
Interagency Review and Data Validation	September 1-30, 2026
IWIB and Governor Review, Approval, and Certification	October 1- November 30, 2026
U.S. Department of Education Approval	Winter 2026-27 <i>(estimated)</i>



Appeals and Renewal

Appealing Initial Eligibility

- If eligibility is not approved by the Governor, institutions may submit the appeal within **14 calendar days** of the denial notice and include any supporting evidence or documentation demonstrating that the program meets the applicable certification criteria established by the Governor.
- Appeals must be submitted through the Workforce Pell application system. Appeals will be evaluated and a determination will be issued within **30 calendar days** of receipt.

Renewal and Continuous Monitoring

Programs are eligible for two years before having to seek renewal.



Appealing Renewal Determination or Suspension

Institutions must submit a written appeal no later than **30 days** following the date of the suspension notice.

The interagency review team will acknowledge receipt of the appeal within 5 business days and complete its review within **45 days of receipt**.

Upon completion of review, the interagency team will transmit a recommendation to the Governor's Office. The Governor's Office will issue a final written determination within **15 days**.

Our Path Forward

Implementation Timeline

- 
- Spring 2026
Policy development; stakeholder engagement; public comment to federal rules
 - April – May 2026
Stakeholder engagement
 - ★ ● June 2, 2026
Policy Manual and Application posted for public comment; public webinar
 - July 15 – August 30, 2026
Application Portal Open
 - September 2026
Interagency Review
 - October/ November 2026
Consultation with IWIB; Governor Approval and Certification
 - Late 2026/Early 2027
Approved programs submitted to U.S. Department of Education for approval



**We want to
hear from you!**

Directed Question Topics



1. Eligible Occupations
2. Employer Validation Process
3. Stackability, Portability, and Articulation Policies
4. Application Process
5. Timeline
6. Consumer Protections
7. Data Collection

How to Provide Public Comment

The Illinois Workforce Pell Approval Manual is available for public comment June 2, 2026 – June 11, 2026.

Provide feedback using the form on the Illinois Workforce Pell Homepage.



Resources



- [Illinois Workforce Pell Implementation Landing Page](#)
 - Inquiry Form- ask a question, provide feedback
 - Frequently Asked Questions
 - Presentations and Recordings
 - Public Comment Form
- [Federal Student Aid Webinar: Workforce Pell: Program Eligibility, Awarding, and Accountability \(June 24\)](#)