Illinois Workforce Pell Program Approval Manual

Revised November 10, 2026

For Eligible Illinois Institutions of Higher Education
Grounded in the U.S. Department of Education's Workforce Pell Regulations (34 CFR 600, 668, 690)

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Executive Summary

The *Illinois Workforce Pell Program Approval Manual* provides guidance to eligible Illinois institutions of higher education on implementing the Workforce Pell program beginning in Academic Year 2026–27. Aligned with federal regulations, the manual establishes the requirements for the development, approval, and oversight of short-term workforce programs eligible for Pell Grant funding.

Its purpose is to help institutions effectively navigate all phases of participation—from program design and application through approval, compliance, and ongoing performance accountability—while ensuring alignment with state workforce priorities and federal requirements.

Specifically, the manual:

- **Promotes alignment with workforce needs** by prioritizing programs tied to in-demand, high-skill, and/or high-wage occupations
- **Clarifies eligibility requirements** for providers, programs, and students under Workforce Pell
- **Outlines the state and federal application approval process**, including the roles of the Governor and key workforce and education partners
- **Defines performance expectations**, including benchmarks for completion, job placement, and value-added earnings
- **Establishes compliance and reporting standards** to ensure accountability and program integrity

Overall, the manual serves as both a compliance resource and a strategic guide to support high-quality program implementation, protect students, and expand access to workforce-aligned education across Illinois.

Section I. Background

Workforce Pell is an expansion of the federal Pell Grant program that allows eligible students to use Pell funding for high-quality, short-term workforce programs aligned with in-demand occupations. Effective July 1, 2026, programs must meet criteria and specific performance outcomes for Governor and Secretary of Education approval, as detailed in this manual.

Illinois' goal for Workforce Pell implementation is to maximize student access to high-quality short-term workforce programs and expanded financial aid, while maintaining consumer protections. Thus, Illinois added state-specific requirements for institutions and their programs to become eligible in order to fully realize this goal.

The development of this work was coordinated through an Interagency Steering Committee and Leadership Team with representatives from the following education and workforce agencies, under the leadership of the Governor's Office:

- **Board of Higher Education (IBHE)**
- **Community College Board (ICCB)**
- **Department of Commerce and Economic Opportunity (DCEO)**
- **Department of Employment Security (IDES)**
- **Illinois Student Assistance Commission (ISAC)**
- **Illinois Workforce Innovation Board (IWIB)**

The Steering Committee engaged many stakeholders in the development of this manual.

Section II. Eligibility

A. Provider Eligibility

Participating providers must **be approved** to operate in the State of Illinois, as determined by the Illinois Board of Higher Education, and must meet the requirements set forth in 34 CFR Part 600. Institutions must be **Title IV eligible** and **fully accredited**.

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 (690.92 (g)).

Financial Health: Lastly, to ensure consistent oversight and comparability across providers, all out-of-state institutions and for-profit providers serving Illinois students through Workforce Pell-funded programs shall be required to:

- Align financial reporting to National Center for Education Statistics GASB/FASB standards, regardless of their home state reporting requirements or internal accounting practices.
- Submit financial data in a format that enables direct comparability with Illinois-based institutions.
- Provide sufficient documentation to allow the State to assess financial stability, operating margins, and risk of closure.

Documentation Needed: Institutions must provide 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. This documentation will need to be specific to their operations in Illinois and is required to support the interagency review team's assessment of institutional financial stability and capacity to sustain program delivery. Finances should be able to appropriately support program delivery.

B. Program Eligibility

To qualify as an *eligible workforce program*, the program, credit or noncredit, must meet all the following federal criteria, as outlined in Section 690.92.

An eligible workforce program must meet the following criteria prior to seeking approval:

1. Program is 8–14 weeks in length (and has been offered at this length for at least 12 months).
2. Program is 150–599 clock hours or equivalent semester hours (4 to 15 semester hours/6 to 23 quarter hours). Programs must be offered within these set clock hours or semester hours for at least 12 months ahead of seeking approval.
3. Program is offered at the undergraduate level, approved by the ICCB and/or IBHE.

4. Program is covered in the institution's overall accreditation, and in good standing (prior to Secretary approval).
5. Program is recognized or accredited, and in good standing, by the applicable state authority or third-party, if required to offer the program in order for students to seek licensure or gain employment.
6. Program is not offered as correspondence, study abroad, or direct assessment coursework.
7. Program must deliver curriculum aligned to high-skill, high-wage, or in-demand occupations.
8. Program meets the hiring requirements of potential employers in the related sectors or occupations.
9. Program must lead to a stackable, portable recognized postsecondary credential (unless it is the only recognized credential for that occupation).
10. Program must ensure students are awarded academic credit toward at least one certificate or degree program at one or more eligible institutions.
11. Program must demonstrate that its program outcomes include ≥70% completion (for 150% of time) and ≥70% job placement, as defined in 34 CFR 690.93.
12. Program complies with the value-added earnings requirements.

C. Student Eligibility

An eligible student for the purposes of this program is:

1. a student who meets all the other eligibility criteria in Section 401 of the Higher Education Act (e.g., U.S. citizen or eligible noncitizen; demonstrate financial need);
2. has not earned a graduate degree, is not admitted to a graduate program, nor is enrolled in a graduate program; and
3. has not exhausted their lifetime Pell Grant eligibility of 12 semesters (or its equivalent) under Section 401 (d)(5).

In a change from prior law, a student who already holds a bachelor's degree may be considered for a Pell Grant if enrolled in an eligible workforce program.

Section III. Approval Process

This section details the program approval process and timeline. In contrast to traditional Pell processes, Workforce Pell approval requires a more active state role, as states are responsible for reviewing and endorsing specific short-term programs before those programs can be deemed eligible for federal Pell funding. Specifically, the Governor and the State Workforce Board have statutory approval roles.



Step 1: Demand Occupation Eligibility

Provider verifies that the program seeking Workforce Pell eligibility prepares students for employment in an occupation on the Eligible Demand Occupation List. This list was adapted from DCEO's Demand Occupation Training List, which considers wages, skill-level, and demand for occupations across the state. The Eligible Demand Occupation List also identifies associated Classification of Instructional Programs codes (CIPs) with each eligible Standard Occupational Classification code (SOC). Note: Not all occupations on this list will have training programs that will be eligible for Workforce Pell.

This list is noted in Appendix A. For more on this policy and methodology, see Section IV(B).

Step 2: Institutions Submit Program Application

Providers must complete and submit an application for each program using the Illinois Workforce Pell Application. Institutions should follow the instructions as described. A copy of the application elements can be found in Appendix B.

Institutions may access the application here: https://www.iccb.org/programs-and-initiatives/workforce-pell/

In addition to the application, institutions will submit student-level data through a supplemental submission for the purposes of validating completion and job placement outcomes. Instructions for this process are noted in detail in Section IV (G) of this manual.

An Institutional Readiness Checklist (Appendix C) is available to support institutions in assessing eligibility prior to applying.

NOTE: Applications may be submitted at any time, but the State will review programs in two cycles annually. Please see the estimated timelines under Step 5 below.

Step 3: Interagency Review

Once an application is submitted, it will undergo a review process facilitated by an interagency review team, made up of staff from the ICCB, IBHE, and DCEO. The review team will review

the applications for completeness and that the information and documentation provided sufficiently demonstrates that it meets the prescribed federal and state requirements. They will also validate the information and data provided with internal resources, including but not limited to previously submitted program data, outcomes resulting from data matches, etc. Agencies reserve the right to reach out to institutions to seek additional information or documentation. Final determination of eligibility will be made based on the totality of evidence.

Student-level data collected for the job placement measure will be matched with administrative wage data from the Illinois Department of Employment Security.

If an application meets all of the criteria and demonstrates that it sufficiently meets federal and state requirements, the interagency review team will recommend it for approval by the Governor, in consultation with the Illinois Workforce Innovation Board.

If a program does not demonstrate that it meets all the state and federal requirements, the institution will receive written notice indicating that the program was not recommended to the Governor for approval. The notice will include the reason(s) for the determination as well as information regarding the appeals process.

Step 4: IWIB and Governor Approval Requirements

Before a program can be reviewed by the U.S. Department of Education, the **Governor of Illinois** must determine and certify that the program meets all aspects of §690.93(a).

1. **State Workforce Board Consultation**: Upon the interagency team's recommendation, the Illinois Workforce Innovation Board will review the submitted applications and recommend programs for approval to the Governor.
2. **Governor Approval and Certification**: The Governor will review, make approval determinations, and certify eligible programs recommended by the IWIB.
3. **Notice of Approval Status to Institutions**
   a) If an application is approved, the cognizant agency (ICCB or IBHE) will issue the program certification(s) to the institution and provide formal notification of approval. Institutions may then submit the certified program(s) to the U.S. Department of Education through the *Application to Participate in the Federal Student Financial Aid Programs* (E-App) for final federal review and eligibility determination.
   b) If a program is not certified by the Governor, the cognizant agency will provide the submitting institution with written notice of non-approval, including the date of denial and the specific reason(s) the program did not meet certification requirements.

Step 5: U.S. Department of Education (Secretary) Approval Requirements

After gubernatorial approval, the institution submits the application certification(s) (690.93(d)) to the U.S. Department of Education. ED reviews the program under §690.94. The Secretary verifies:

- The program has existed for at least 12 months.

- Completion rate is ≥70%, within 150% of normal time.
- Job placement rate is ≥70%, measured in the second quarter after completion.
- Tuition/fees do not exceed the value-added earnings threshold.

Within the E-App, applications for eligible workforce programs can be added in Section G - Educational Programs. This is the central place to add, edit, verify, and track program information for each school. You can select "Workforce Programs" as a new Educational Programs type. The institution will also be required to upload a copy of the signed State Workforce Pell Program Certification to this system.

If the Department determines that the program(s) meets all requirements, the institution will be provided with an updated Eligibility and Certification Approval Report (ECAR) that includes each eligible workforce program that has been approved. Once the Department's approval is received, the institution may award and disburse Pell Grant funds to students enrolled in the approved eligible workforce programs. You may award Pell Grant funds to students who are already enrolled in the program retroactive to the beginning of the payment period in which the program becomes eligible (see the Federal Student Aid Handbook, Volume 3, Chapter 3).

Approval Process Timeline	
Review Step	**Timeline**
1) Confirm Demand Occupation Eligibility	Prior to submitting application
2) Submit Program Application	Open; see timelines below for review consideration
3) Interagency Review and Data Validation	April 1-May 15; October 1-November 15
4) IWIB and Governor Review, Approval, and Certification	June 1-July 31; December 1-January 31
5) U.S. Department of Education Approval	

Spring Review Cycle Submissions Between October 1-March 31	
Interagency Review and Data Validation	April 1-May 15
IWIB and Governor Review, Approval, and Certification	June 1-July 31
U.S. Department of Education Approval	TBD

Fall Review Cycle Submissions between April 1-September 30	
Interagency Review and Data Validation	October 1- November 15
IWIB and Governor Review, Approval, and Certification	December 1- January 31
U.S. Department of Education Approval	TBD

Applications submitted well ahead of the review deadlines (March 31 and September 30) will undergo a cursory review and will receive subsequent feedback on any areas where documentation is missing or additional revisions are needed. This applies only to the program application and does not apply to the student-level supplemental submission.

Section IV: Program Determination Policy

All program determination criteria will be incorporated into the application, and institutions will be required to provide supporting documentation and evidence demonstrating compliance with each requirement.

Programs may be credit or noncredit so long as they meet all of the program determination requirements.

A. Length of Program

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.

Additionally, institutions are limited to contracting out up to 25% of instruction through a written agreement. Registered Apprenticeship programs are allowed to contract out through written agreements up to 49% of instruction.

For programs that are offered in different lengths: For initial approval, an institution may seek Workforce Pell approval for the same program offered in different lengths that meet the federal requirements (e.g. a Basic Nursing Assistant Program offered 8 weeks in the summer but 12 weeks in the fall and spring). The application will require institutions to identify if they intend to seek approval for one or multiple lengths of the program and provide any applicable evidence that may differ between the program offerings.

While institutions can submit these programs in one application in the state process, the institution must report all versions of an eligible workforce program separately on the U.S. Department of Education's E App. According to the U.S. Department of Education FSA Workforce Pell FAQ (October 2026) "the reason for this unique treatment is that unlike all other Title IV-eligible programs, there is a maximum length restriction on eligible workforce programs as well as a minimum length. The Department must determine that all versions of an eligible workforce program meet the appropriate length requirements."

Documentation Needed: Institutions shall provide **one or more** of the following as evidence for program length for number of weeks: public-facing documents detailing number of instructional weeks; master program schedule. Institutions shall provide one more of the following as evidence for number of clock hours or credit hours: public-facing documents/webpages identifying the number of clock hours or credit hours, college catalog, course listing that makes up the program.

B. Alignment with High-Skill, High-Wage, or In-Demand Occupations

Requirement: (690.93(b)(1)(i)) The State's 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 State Plan under Section 102(c) of the Workforce Innovation and Opportunity Act.

Leveraging existing policy and data sources used in the state for similar workforce initiatives, Illinois will utilize the Demand Occupation Training List, managed by the Illinois Department of Commerce and Economic Opportunity, for the purposes of WIOA Title I implementation of the Eligible Training Provider List as its framework for the eligible occupations for the purposes of Workforce Pell. Built in the DOTL and from WIOA and Perkins V, Illinois has the following definitions for in-demand, high-wage, and high-skill.

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.

High-Skill: Requires postsecondary and/or long-term training, such as an apprenticeship leading to a credential, certificate, diploma, or degree.

High-Wage: A median wage of 85% of the Living Wage for 1 adult & 1 child, as calculated by the MIT Living Wage Calculator. (NOTE: this is the definition for methodology related to the DOTL. It is not a factor for the value-added earnings calculation.)

Demand Occupation Training List (DOTL)
The Demand Occupation Training List (DOTL) specifies occupations for which demand is projected based on annual average job openings, average median wages, education and training levels, and local state or national initiatives. Only those occupations considered "in demand" will be included in the DOTL. The criteria and current DOTL are outlined in WIOA Notice 20-NOT-08, Change 2 Demand Occupation Training List, an attachment to WIOA Policy 8.3

Illinois Eligible Training Provider List (ETPL)
Illinois' WIOA ETPL (Eligible Training Provider List) policy establishes the criteria and procedures for approving training providers and programs so they can receive WIOA-funded tuition through Individual Training Accounts, ensuring only qualified institutions and programs are included. It also requires ongoing eligibility and performance reporting to maintain

accountability and quality, with certain programs like registered apprenticeships automatically eligible for inclusion. WIOA Policy 7.3 Training Provider and Training Program Eligibility outlines the process for applying for eligibility.

- **State-approved list required for funding:** The ETPL is a statewide list of approved training providers and programs, and only those listed are eligible to receive WIOA Title I funding through Individual Training Accounts (ITAs).
- **Programs must be job-driven and credential-focused:** Training programs on the ETPL must lead to employment in demand occupations and provide measurable, industry-recognized skills or credentials aligned with employer needs.
- **Consumer information:** The ETPL helps participants compare training programs and make informed choices.

Any program approved for Workforce Pell eligibility can elect to automatically be an approved program on the State's Eligible Training Provider List.

SPECIAL NOTE: TECHNICAL INSTRUCTION IN A REGISTERED APPRENTICESHIP PROGRAM AUTOMATICALLY MEETS THIS REQUIREMENT.

C. Articulation

Pursuant to 34 CFR 690.93(a)(4), the program must:

(4) Prepare students to pursue one or more certificate or degree programs at one or more eligible institutions (which may include the eligible institution providing the program), including by ensuring—
(i) That a student, upon completion of the program and enrollment in such a related certificate or degree program, will receive academic credit for the program that will be accepted toward meeting such certificate or degree program requirements; and
(ii) The academic credit described in paragraph (i) will be acceptable toward meeting such certificate or degree program requirements.

This articulation requirement applies to every program, including those programs that award the only recognized credential for an occupation. (Note that those programs would not need to show that they are stackable or portable under 34 CFR 690.93(a)(3)(ii).)"

1. **Awarding Credit Requirements**
   a. 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 workforce program at one or more eligible institutions (including the home institution); and
      - the credit must be applied toward the total credit requirements of the student's enrolled academic program and;

- workforce program competencies and learning outcomes are mapped to specific academic courses or credit units in the certificate or degree program.

b. Institutions shall maintain a written academic credit policy that includes:

- A process for mapping workforce program competencies and hours to academic courses or credit units;
- Assurance of credit acceptance through written agreements; and
- Public posting of procedures for awarding and applying credit on institutional websites and in student handbooks/college catalogs consistent with requirements for publicly available policies in Illinois.

For community colleges and public universities, procedures for awarding credit for prior learning must be submitted to the Illinois Community College Board or the Board of Higher Education, respectively.

2. Prerequisite Programs

A program that is a prerequisite for a certificate or degree program meets the articulation requirement only if both of the following are true:

a. Students who complete the program earn academic credit for it; **and**
b. That credit is accepted towards the requirements for completing the certificate or degree for which it is a prerequisite.

3. Inter-Institutional Credit Agreements

To ensure the transferability and acceptance of Workforce Pell program credit beyond the originating institution, institutions shall maintain written agreements that demonstrate and guarantee such transferability. Agreements must:

a. Establish **written articulation agreements** with one or more eligible institutions that:
   - Identify specific workforce Pell programs and the academic credit that will be awarded upon successful completion.
   - Specify how that credit will be accepted and applied toward defined certificate or degree programs at the receiving institution.
   - Detail any conditions, such as minimum grades, sequencing of coursework, or pathways (e.g., general education, major requirements).
   - In cases where the partnership involves multiple geographic regions, institutions must document the rationale for the partnership and demonstrate labor market demand and career opportunities in each region served.
b. Align with statewide transfer initiatives such as the Illinois Articulation Initiative (IAI) where applicable.
c. Be signed by authorized institutional representatives and made available to students and advisors.

4. Student Notification and Counseling

Institutions must inform students, in writing, in eligible workforce programs about:

- The availability and process for earning academic credit.
- The existence of articulation agreements and receiving institutions.
- Academic/career advising services to plan the application of credit toward a certificate or degree.

D. Stackability and Portability Policy

Pursuant to 690.93(a)(3)(ii), States must have *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; OR, with respect to students enrolled in the program– (A) Prepares such students for employment in an occupation for which there is only one recognized postsecondary credential; and (B) Provides such students with such a credential upon completion of the program.*

1. Criteria for Stackability

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). This includes programs that serve as a pre-requisite for another program.
- The credential includes assessments recognized or accepted for credit accumulation toward subsequent credentials.

Documentation Needed: Institutions shall provide **one or more** of the following as evidence for stackability: curriculum maps, program catalogs, articulation agreements, job descriptions, ICCB-approved program of study application.

Exception: If a program awards the only recognized credential for a specific occupation and is offered as a standalone program, it is exempt from the stackability requirement under the regulations.

2. Criteria for Portability

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 Needed: Institutions shall provide **one or more** of the following as evidence for portability: employer verification, competency map, regional job postings, program accreditation

E. Employer Validation Policy

To qualify for Workforce Pell, every program must provide clear evidence of employer or industry validation. Eligible providers seeking eligibility determination for their programs must submit evidence to demonstrate that:

a) The program prepares participants for employment in a designated priority occupation, as defined by Illinois's current DOTL.
b) Employers are currently hiring or anticipate hiring for the associated occupation in the next year.
c) The skills, competencies, and credentials taught in the program seeking eligibility determination align with specific employer expectations and hiring standards.

Evidence of Employer Validation

Eligible providers seeking a Workforce Pell eligibility determination for their program can demonstrate employer validation by providing compelling evidence as detailed below.

A. Meeting Employer Hiring Needs - Acceptable Evidence

Eligible providers seeking a Workforce Pell eligibility determination for their program must provide evidence of <u>at least one</u> of the following to demonstrate hiring needs:

i. Jobs Postings Data: The most compelling source of documentation for employer validation is provided through an analysis of job postings that align with priority occupations identified by the state. These data can be obtained from reputable, commonly accepted labor market information sources such as state-based job posting aggregators (e.g. Illinois Job Link), national job posting aggregators (e.g. Indeed), or labor market analytics platforms (e.g. Jobs EQ, Lightcast, etc.).

   The jobs postings analysis must align to the geographic scope of the program (e.g. regional data must be utilized to demonstrate need for a local program). Additionally, the analysis must demonstrate that a meaningful share of employer job postings either:

   a) Demand the skills and competencies taught in the program seeking a determination as demonstrated by the job description, required or preferred qualifications, or other section of the job posting that indicates hiring need; or

b) Demand the culminating postsecondary credential of the program seeking a determination as demonstrated by the job description, required or preferred qualifications, or other section of the job posting that indicates hiring need.

A meaningful share of employer job postings is defined as:

a) Postings that represent 10 - 20% of the projected annual openings for the associated occupation(s), subject to state determination.
b) Postings that are unique and unduplicated, to the extent possible.
c) Postings that are clearly aligned to a designated priority occupation, as defined by the DOTL.

ii. Employer Letters: Letters from 3 or more unique employers describing their prior or future commitment to hiring graduates from the relevant programs. Each letter must include:

a) A clear statement that the employer <u>either</u> (1) has hired exiters or completers from the program seeking a determination in the last two years and is satisfied with program graduates <u>or</u> (2) has a significant interest in hiring them in the next two years.

b) Contact information of the employer to aid in state-level validation.

A sample employer letter template (Appendix D) has been provided to assist in the application process. It is not required to be used but serves as a resource. At a minimum, at least one employer letter must be submitted demonstrating alignment of competencies (B). However, if a program uses employer letters to demonstrate hiring need in lieu of job postings data, an application packet must include at least 3 unique employer letters demonstrating hiring need as described in A. If only 3 letters are submitted, at least one of these letters must also include language that meets the requirement described in B (alignment of competencies).

B. Alignment of Competencies and Direct Input from Employers - Acceptable Evidence

Eligible providers seeking a Workforce Pell eligibility determination for their program must provide:

i. at least one letter from an employer or an employer association describing that the program's curriculum successfully prepares individuals for the associated occupation(s); **AND**,

ii. evidence of <u>at least one</u> of the following demonstrating competency alignment between the program and the occupation(s):
- Competency Mapping: Competency mapping showing the program's curriculum aligns with published occupational qualification requirements in job postings, industry-recognized credential standards, O*NET or other identified resources.

- Meeting Agendas and/or Minutes: Official meeting evidence that explicitly reflects employer review and endorsement of the program curriculum, including, but not limited to, meetings of industry advisory councils convened for Perkins V compliance and reporting or other publicly convened meetings.

Employer Validation Documentation Requirements

Requirement Category	Acceptable Evidence Options	Specific Criteria for Success
Meeting Employer Hiring Needs	Job Postings Data	• 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.
	or	
	Employer Letters	• 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.
and		
Alignment of Competencies	Competency Mapping	• Documentation showing the curriculum aligns with job postings, industry-recognized standards, or O*NET requirements.
	or	
	Meeting Agendas	• Official records (e.g., Perkins V Advisory Councils) that explicitly show employer review and endorsement of the curriculum.
	and	
	Employer Letters	• Letters from **one employer** or an association confirming the curriculum successfully prepares students for the occupation.

Use of Employer Engagement

Eligible providers seeking an eligibility determination for their programs are encouraged to engage in direct employer engagement as a complementary strategy to:

1. Validate interpretation of labor market data
2. Provide qualitative insights on skill requirements
3. Support program design and continuous improvement

However, employer engagement alone is not sufficient to establish demand without supporting labor market evidence.

SPECIAL NOTE: TECHNICAL INSTRUCTION IN A REGISTERED APPRENTICESHIP PROGRAM AUTOMATICALLY MEETS THIS REQUIREMENT.

F. Other Requirements

Institutions may be required to provide evidence or attest that the program meets other federal and state requirements.

1. **Accreditation**
   Institutions must be accredited and in good standing. Additionally, the program must be within the scope of accreditation. The Department does not require the accrediting agency to approve each eligible workforce program, but an accrediting agency recognized by the Department may establish its own internal processes regarding the approval of eligible workforce programs,

which must follow its established review procedures for substantive changes set forth in § 602.22. If an accrediting agency decides to approve one or more eligible workforce programs separately or based on established policies that require eligible institutions to make a substantive change request to add an eligible workforce program, the accrediting agency approval may come before or after approval by the governor (but prior to Department approval).

Note: The Higher Learning Commission has a screening tool that institutions can use to determine if their program is within the scope of its accreditation and/or if any action is needed by the institution. Institutions should seek a letter from HLC ahead of submitting to the U.S. Department of Education.

2. **Third-Party Oversight**
   If applicable, the program is recognized or accredited, and in good standing, by the applicable state authority or third-party, if required to offer the program, licensure, or for employment. This is not in reference to ICCB/IBHE program approval. For example, EMT programs must be approved or recognized by the Illinois Department of Public Health as an EMS education/training program. Institutions could submit an approval letter, a screenshot of a list from IDPH listing the institution as an approved training provider, or another piece of evidence that demonstrates that the provider is operating with consent from IDPH. In cases where the authorizing body indicates a status of approval or performance (e.g. good standing, probation, watch list, suspended, etc.), the program must be in good standing status, or its equivalent, at the time of Workforce Pell application approval.

G. Performance Benchmarks

Workforce Pell–eligible programs are subject to specific performance benchmarks designed to ensure that participating programs deliver strong outcomes for students and align with workforce needs. These benchmarks focus on three primary areas: completion, placement, and value-added earnings. Institutions seeking to participate in Workforce Pell must understand these requirements and be prepared to demonstrate performance both at the time of program approval and on an ongoing basis.

A **Supplemental Student -Level Submission will be required as a part of the Workforce Pell application process.** This submission of student-level data will be used to validate that the program meets the required completion and job placement metrics. Instructions on the submission process for both ICCB and IBHE is provided through an additional document titled "Workforce Pell Student-Level Submission Instructions". This file will be submitted to the cognizant agency through the identified secure file transmittal process outlined in that document. **Individual student records cannot be submitted through JotForm or email and must follow the process outlined in this document.**

1. Completion

Eligible institutions must track and report the rate at which enrolled students successfully complete the program within the established timeframe. Because Workforce Pell programs are short-term by design, timely completion is a key indicator of program effectiveness.

Completion Benchmark	
All Academic Years	A completion rate of at least 70 percent, within 150 percent of the normal time to completion, as determined under 34 CFR 668.8 (f).

In order for a program to receive approval for Workforce Pell eligibility, it must demonstrate that it has a completion rate of at least 70 percent, within 150 percent of normal time to completion. Institutions will be required to submit evidence and attest to meet this requirement yearly.

2. Job Placement

Institutions must demonstrate that program completers obtain employment related to their field of study within a defined period after exiting the program as detailed below. Placement benchmarks are intended to ensure that Workforce Pell programs are aligned with in-demand occupations and lead directly to employment opportunities.

Institutions are expected to:

- Demonstrate that jobs obtained are relevant to the training provided
- Maintain or develop partnerships with employers and local workforce systems to support job placement

Strong career services and employer engagement strategies will be critical to meeting placement expectations.

Placement Benchmark	
Academic Years 2026-27, 2027-28, 2028-29	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.
Starting in Academic Year 2029-30	A job placement rate of at least 70 percent, calculated as the percentage of students who are employed in the **occupation(s)** for which the program prepares students (as identified through the process established under 34 C.F.R. 690.93 (b)) or a comparable high-skill, high-wage, or in-demand occupation during the second quarter after successfully completing the program, as determined through a certification from the Governor, based on the Governor's analysis using available administrative data, including wage records.

2a. Validating Program Eligibility for Community Colleges

To assist with the completion and placement calculations, colleges must submit a student-level submission following instructions provided in the "Workforce Pell Student-Level Submission Instructions". These instructions will contain the submission process, records to include and data elements necessary to calculate the 70% completion rate and 70% placement rate. The records submitted by the college must include all students enrolled in the eligible program cohort used for the Workforce Pell completion and placement calculations, including both completers and non-completers of the program. Instructions contained within this data template will specify the academic year that must be submitted to verify completion and placement rates for the submitted program.

Colleges should include all students who entered or enrolled in the program during the applicable fiscal year, consistent with federal Workforce Pell reporting guidance. All student-level data will be transferred to ICCB via long-standing secured ftp procedures.

The student-level file submitted by the college should include all students enrolled in the program for which the college is seeking Workforce Pell approval. Data to be included in the file includes all students enrolled in the program. The "Workforce Pell Student-Level Submission Instructions" will specify the academic year to include based on the Workforce Pell application due date and the availability of wage records for determining the program's placement rate. The student-level file will include a variable used to report allowable federally approved exceptions that remove students from the calculation of the completion and placement rates for the program. Federally approved exceptions include the following:

- A student is excluded from both the numerator and denominator of the completion and placement rate calculations if the student dies; experiences the onset of a medical condition that prevents employment; is ordered to active duty in 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.

ICCB will calculate the 70% completion rate based off the student files for each program submitted. ICCB, in collaboration with the Illinois Department of Employment Security (IDES), will match completion data from these programs to calculate the placement (or employment) rate of those completers to determine if the 70% placement rate was met for the program. Submitted student-level data may be validated against ICCB unit record submissions and curriculum information maintained in the ICCB Curriculum Master. For the completion rate and placement rate calculations, please note the following:

- When calculating the 70% completion rate, the student record submitted must indicate the student completed the program and that this occurred within 150% of time based on the student's start date and exit date in the program. Only those students reported with a valid exclusion reason will be removed from this calculation.
    - Note that the student record should indicate completion when the student has successfully satisfied all academic and program requirements for the eligible

Workforce Pell program. The student exit data should also reflect exit from the proposed Workforce Pell program. Colleges should report completion based on the student meeting the program requirements, even if the formal credential conferral occurs after the reporting period. Institutions should confer eligible credentials as soon as practicable in accordance with their institutional policies. Institutions must maintain documentation supporting the reported completion status and provide such documentation to ICCB upon request for monitoring, audit, or program review purposes.

- When calculating the 70% placement rate, ICCB will use the student's exit date to match their exit quarter to wage data from IDES. The placement rate will be determined based on employment data two quarters post-exit. There is a lag in when wage data is available for use. The availability of wage data to verify the placement rate calculation is one of the crucial factors in determining the specific academic year that must be submitted through the **supplemental submission** to evaluate the program's effectiveness in meeting the 70% placement threshold.

2b. Validating Program Eligibility for Public, Private, and Independent Institutions

For public, private, and independent degree granting institutions seeking approval for programs, IBHE will obtain enrollment counts for programs identified as potential Workforce Pell programs based on the credit hour requirements. Approved programs will be added to the Workforce Pell Program Inventory for Public, Private, and Independent Institutions. Enrollment counts will be based on students' declared program as reported through the annual student enrollment data submitted to IBHE, broken out by institution, fiscal year, and CIP code. Final completion and placement calculations will be based on the student-level submission provided by the institution that is then matched to Illinois Department of Employment Security (IDES) wage record. Those calculations will be used to determine final eligibility as part of the application process.

To assist with the completion and placement calculations, institutions must submit a complete student-level file, using the template provided, containing the data elements required to calculate the 70% completion rate and 70% placement rate, including student name and social security number. The **Student-Level Data Submission** submitted by the institution must include all students enrolled in the eligible program cohort used for the Workforce Pell completion and placement calculations, including both completers and non-completers, consistent with applicable federal Workforce Pell reporting guidance.

- All student-level data will be transferred to IBHE via established secure data submission procedure established by IBHE.

The student-level file submitted by the institution must include all students enrolled in the program during the most recent fiscal year where job placement data is available used to evaluate Workforce Pell eligibility, excluding the most recently completed fiscal year.

For example, for Workforce Pell applications, institutions must provide student-level data through the designated secure process for the academic years noted in the "Workforce Pell Student-Level Submission Instructions".

The student-level file will include a variable used to report allowable federally approved exceptions that remove students from the calculation of the completion and placement rates for the program. Federally approved exceptions include the following:

- A student is excluded from both the numerator and denominator of the completion and placement rate calculations if the student dies; experiences the onset of a medical condition that prevents employment; is ordered to active duty in 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.

IBHE will calculate the 70% completion rate based on the student files submitted for each program. IBHE, in collaboration with the Illinois Department of Employment Security (IDES) under a new data sharing agreement, will match completion data from these programs to calculate the placement (or employment) rate of those completers to determine if the 70% placement rate was met for the program.

2c. Validating Program Eligibility for Private Business and Vocational Schools

For private business and vocational schools (PBVS) seeking approval for programs, IBHE will obtain enrollment counts for programs identified as potential Workforce Pell programs based on the clock or credit hour requirements reflected in the IBHE-approved PBVS program inventory. Enrollment counts will be based on students' declared program as reported through the annual student enrollment data submitted to IBHE pursuant to the Private Business and Vocational Schools Act of 2012 (105 ILCS 426), broken out by institution, fiscal year, and CIP code. These enrollment counts are intended to assist institutions in identifying programs that may qualify for Workforce Pell eligibility. Final completion and placement calculations will be based on the student-level submission provided by the institution that is then matched to Illinois Department of Employment Security (IDES) wage records. Those calculations will be used to determine final eligibility as part of the application process.

To assist with the completion and placement calculations, institutions must submit a complete student-level file containing the data elements required to calculate the 70% completion rate and 70% placement rate, including student name and social security number. The student-level file submitted by the institution must include all students enrolled in the eligible program cohort used for the Workforce Pell completion and placement calculations, including both completers and non-completers, consistent with applicable federal Workforce Pell reporting guidance.

- All student-level data will be transferred to IBHE via established secure data submission procedures consistent with PBVS annual reporting requirements under the Private Business and Vocational Schools Act of 2012 (105 ILCS 426).

The **Supplemental Student-Level Data Template** submitted by the institution must include all students enrolled in the program during the three prior fiscal years used to evaluate Workforce Pell eligibility, excluding the most recently completed fiscal year.

For example, for Workforce Pell applications submitted in FY27, institutions must provide student-level data for FY25.

The student-level file will include a variable used to report allowable federally approved exceptions that remove students from the calculation of the completion and placement rates for the program. Federally approved exceptions include the following:

- A student is excluded from both the numerator and denominator of the completion and placement rate calculations if the student dies; experiences the onset of a medical condition that prevents employment; is ordered to active duty in 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.

IBHE will calculate the 70% completion rate based on the student files submitted for each program. IBHE, in collaboration with the Illinois Department of Employment Security (IDES) under a new data sharing agreement, will match completion data from these programs to calculate the placement (or employment) rate of those completers to determine if the 70% placement rate was met for the program. Submitted student-level data may be validated against annual enrollment data reported to IBHE under the Private Business and Vocational Schools Act of 2012 (105 ILCS 426) and program information maintained in the IBHE-approved PBVS program inventory.

3. Value Added Earnings

In addition to completion and placement, institutions must ensure that program participation results in measurable earnings gains for students. Value-added earnings benchmarks essentially assess whether students experience a return-on-investment. For each award year, the total amount of the published tuition and fees[1] of the program for such year is an amount that does not exceed the value-added earnings of students who received financial aid under Federal Title IV and who completed the program 3 years prior to the award year.

The institution must keep published tuition and fees at or below the value-added earnings calculated for the program for all students who first enroll in the eligible workforce program during the award year that begins following the annual release of the program's value-added earnings.

Institutions must submit the tuition and fees for the program as well as provide a link to the published tuition and fees. As an interim measure ahead of the U.S. Department of Education's validation in 2030, Illinois will consider the tuition and fees charged by the institution to the student when deciding whether to approve the program. These costs will be compared to the state median annual wage for the primary occupation, using data published by IDES. If there are

[1] The U.S. Department of Education defines tuition and fees as "the institutional charges for an eligible workforce program."

multiple occupations for which the program prepares students, the institution may elect up to three occupations by which the median earnings may be averaged.

To establish a reasonable benchmark, Illinois will apply the following standard: 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.

If a program's cost exceeds this benchmark, the program will not be approved.

VAE Calculation
The first year the calculation can be made is 2030. Programs that have a calculated value-added earnings of zero or negative value shall not be eligible for Federal Pell Grant funds. The institution must provide, upon request, evidence satisfactory to the U.S. Secretary of Education that its published tuition and fees does not exceed the published value-added earnings for that award year.

- Calculation is on Pell recipients only.
- The **cohort period** is the award year that ends three full award years prior to the beginning of the award year for which value-added earnings are being determined.
- **Earnings measurement period**: The first full tax year following the award year in which the student completed the eligible workforce program.
- **Note on Small Program**s:
    - If the final list of students who completed the program during the cohort period *includes at least 50 students*, the Secretary sends information about those individuals to the Federal agency with earnings data.
    - If it does not include at least 50 students, the Secretary adds students who completed the same program during the first award year prior to the cohort period. *If the combined number of completers from both award years includes at least 50 students,* the Secretary sends information about those individuals to the Federal agency with earnings data, and if it does not include at least 50 students, the Secretary adds students who completed the same program during the second award year prior to the cohort period. If the combined number of completers from all three award years includes at least 50 students, the Secretary sends information about those individuals to the Federal agency with earnings data, and if it does not include at least 50 students, the Secretary adds students who completed the same program during the third award year prior to the cohort period.
    - *If the combined number of completers from all four award years includes at least 30 students,* the Secretary sends information about those individuals to the Federal agency with earnings data and if it doesn't, the Secretary does not calculate value-added earnings for the program for that award year.

Institutions are responsible for collecting, maintaining, and reporting accurate data related to all performance benchmarks. Institutions should ensure that data systems are capable of tracking student outcomes from enrollment through completion.

Ongoing monitoring of performance is essential. Institutions are encouraged to use performance data not only for compliance purposes but also to inform continuous improvement efforts, strengthen program design, and enhance student outcomes.

Section V: Renewal, Loss of Eligibility, and Appeals

A. Renewal

Workforce Pell program approvals are valid for two years from the date of Department of Education approval. To maintain eligibility, institutions must complete a renewal process prior to the expiration of each approval period. Renewal ensures that programs continue to meet federal and state eligibility requirements, demonstrate strong student outcomes, and remain aligned with in-demand occupations and employer needs.

The renewal process is designed to be streamlined relative to initial approval, relying primarily on performance data and updated program documentation. However, programs that have undergone substantive changes or that fail to meet performance benchmarks will be subject to additional review or denial.

1. Renewal Timeline

Institutions are responsible for initiating the renewal process no later than 120 days prior to the program's approval anniversary date. The interagency team will communicate renewal deadlines to institutions no later than 180 days in advance of the anniversary date.

Milestone	Timeline Relative to Anniversary Date
Interagency notification to institution	180 days prior
Institution submits renewal application	120 days prior

Programs that fail to submit a renewal application by the prescribed deadline may be subject to a lapse in program eligibility. Programs for which a renewal determination has not been made by the anniversary date will be placed in a provisional status pending final determination.

2. Renewal Application Requirements

Instructions for the program renewal process will be communicated with eligible institutions at a later date. Generally, institutions will submit a renewal application that includes the following:

a) Performance Documentation: Institutions must provide two years of performance data demonstrating that the program continues to meet the benchmarks established in Section V, including:

- Completion rate of at least 70 percent, within 150 percent of normal time to completion;
- Job placement rate of at least 70 percent, calculated as the percentage of students employed during the second quarter after exiting the program; and
- Published tuition and fees do not exceed the value-added earnings threshold.

b) Program Updates**:** Institutions must attest to, or provide updated documentation for, any changes made to the program since initial approval or the prior renewal, including:

- Changes to curriculum, clock hours, credit hours, or program length;

- Changes to the credential awarded upon completion;
- Updates to articulation agreements or inter-institutional credit arrangements;
- Updates to stackability and portability documentation, including any revised employer validation; and
- Changes to the occupations for which the program prepares students, including verification that the program's target occupation(s) remain on the Eligible Demand Occupation List.

c) Institutions must also confirm that the program continues to meet all federal eligibility criteria under §690.92 and that no circumstances have arisen that would affect the institution's Title IV eligibility under the Higher Education Act.

3. Interagency Review

Upon receipt of a complete renewal application, the interagency team will conduct a review of the submitted materials. The review will assess whether:

- The program continues to meet all applicable federal and state eligibility requirements;
- Performance benchmarks have been met for both years of the approval period;
- Articulation, stackability, and portability requirements remain satisfied; and
- The program's target occupation(s) remain on the Eligible Demand Occupation List.

The interagency team may request additional information or clarification from the institution during the review period. Institutions will be notified of any such requests and will have 14 calendar days to respond. Failure to respond within this window may result in the renewal application being deemed incomplete.

Upon completion of review, the interagency team will transmit a recommendation to the IWIB and Governor's Office, along with a summary of findings.

4. Governor's Office Determination

The Governor's Office will review the interagency team's recommendation and, consistent with the requirements of §690.93(a), make a final determination as to whether the program's approval shall be renewed.

Programs for which the interagency team has identified performance or eligibility concerns will receive additional scrutiny prior to a Governor's Office determination. The Governor's Office may, at its discretion, request supplemental documentation or convene additional consultation with the institution or relevant state agencies before issuing a determination.

Institutions will be notified in writing of the Governor's determination by the cognizant agency. A renewed approval is effective as of the program's anniversary date and is valid for two years from that date.

5. Substantive Program Changes

Institutions that have made substantive changes to an approved program since initial approval or prior renewal must disclose those changes as part of the renewal application. The interagency team will determine whether any disclosed changes constitute a material modification that requires re-evaluation under the initial approval criteria in Section III.
Substantive changes include, but are not limited to:

- An increase or decrease in program length;
- A change in the credential awarded that affects the program's stackability or portability status;
- A change in the target occupation(s) that requires re-verification against the Eligible Demand Occupation List; or
- A change in the institution's accreditation status or Title IV eligibility.

Institutions are encouraged to consult with the interagency team prior to implementing substantive changes to assess whether re-approval may be required outside of the regular renewal cycle.

6. Failure to Meet Performance Benchmarks

Programs that fail to meet one or more performance benchmarks regarding completion, placement, and/or value-added earnings during the renewal period will be subject to immediate suspension of Workforce Pell eligibility, effective upon the issuance of a suspension notice by the Governor's Office or its designee.

Upon suspension:

- No new students may be funded through Workforce Pell for the suspended program;
- Students currently enrolled and receiving Workforce Pell funding at the time of suspension will not be affected for the remainder of their enrolled term; and
- The institution must notify currently enrolled students of the program's suspended status and provide information about available support services and alternative pathways.

B. Loss of Eligibility

If an eligible workforce program fails to meet the requirements -

1. Under 34 CFR 690.93, the program will become ineligible at the end of the payment period that begins following the date that-

    a) The Governor acts to withdraw approval for an eligible workforce program; or
    b) The Governor fails to reapprove the program.

2. Under 34 CFR 690.94, the program will become ineligible at the end of the payment period that begins after the date that the Secretary determines that the institution failed to meet the completion rate or job placement rate requirements, except that the Secretary will not make such a determination while a program’s eligibility, approval, or reported completion rate of job placement rate is in an appeal status or awaiting the Governor’s final approval determination.

3. Under 34 CFR 690.95,

a) The program will become ineligible at the beginning of the award year following the release of the value-added earnings; and

b) The Secretary will assess the liability for amounts of Pell Grants disbursed for students enrolled in the eligible workforce program during the award year for which the value-added earnings were calculated and shall collect any such liability from the institution.

C. Appeals Process

1. Appealing Initial Eligibility Determination

Pursuant to Section 690.93(b)(3), institutions may appeal the State's denial of program eligibility. Institutions must 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 may be submitted through the Workforce Pell application system. All agencies and parties involved in the review and approval process will evaluate the appeal and accompanying documentation and issue a determination within 30 calendar days of receipt.

2. Appealing Suspension or Renewal

Institutions that believe a suspension determination was issued in error, or that wish to contest the accuracy of the performance data underlying a suspension, may submit a formal appeal to the interagency team. The appeals process is not a substitute for the remediation process and does not delay the effective date of a suspension. An institution may pursue both an appeal and a remediation plan concurrently.

A) Grounds for Appeal

An appeal will be considered only on the following grounds:

- The performance data used to determine benchmark non-compliance contained a material error;
- The institution experienced extraordinary circumstances beyond its control, such as a natural disaster, public health emergency, or significant disruption to regional labor market conditions, that directly and demonstrably affected program outcomes during the review period; or
- A procedural error occurred during the renewal review process that materially affected the suspension determination.

Disagreement with the performance benchmark thresholds established under Section IV.F, or with the methodology used to calculate value-added earnings, does not constitute valid grounds for appeal.

B) Submission Requirements

Institutions must submit a written appeal to the interagency team no later than 30 days following the date of the suspension notice. Appeals submitted after this window will not be considered. The written appeal must include:

- A clear statement of the specific ground(s) on which the appeal is based;
- Supporting documentation sufficient to substantiate the claim, which may include corrected data, third-party verification, or contemporaneous records of extraordinary circumstances; and
- A brief description of the remedy sought.

C) Review and Determination

The interagency team will acknowledge receipt of the appeal within 5 business days and complete its review within 45 days of receipt. During the review period, the interagency team may request additional documentation from the institution. Institutions will have 14 business days to respond to any such requests; failure to respond within this window may result in the appeal being dismissed.

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 of receiving the interagency recommendation. The Governor's determination on appeal is final and not subject to further administrative review.

D) Outcomes

If an appeal is granted, the Governor's Office will issue one of the following remedies, as appropriate to the circumstances:

- Rescission of the suspension and restoration of Workforce Pell eligibility, where the appeal establishes that the program did in fact meet applicable benchmarks;
- Modification of the suspension determination, including adjustment of the remediation timeline or interim performance targets, where extraordinary circumstances are substantiated; or
- Substitution of corrected performance data and re-evaluation of benchmark compliance, where a material data error is established.

If an appeal is denied, the suspension remains in effect, and the institution must proceed through the remediation process to seek reinstatement. The denial will include a written explanation of the basis for the determination.

D. Regaining Eligibility after loss based on the Secretary of Education's Determination

1. If an eligible workforce program loses eligibility based on the Secretary's determination that the program's completion rate or job placement rate failed to meet the requirements

under 34 CFR 690.94(a)(2) or the institution voluntarily discontinues a failing eligible workforce program, the institution may not seek to reestablish the eligibility of the failing program, or to establish eligibility for a substantially similar program sharing both (i) the same four-digit CIP code, and (ii) identical SOC codes according to the CIP SOC Crosswalk that is provided by a Federal agency, until two years following the earlier of the date the program loses eligibility under 34 CFR 690.96(b) or the date the institution voluntarily discontinues the failing workforce program.

2. If an eligible workforce program loses eligibility due to a loss of Governor approval described in (a) of this section, the program may reestablish eligibility after the Secretary receives the Governor's certification that the program has been approved as provided under 34 CFR 690.93(c), and after the Secretary determines the program has met eligibility criteria under 34 CFR 690.94.
3. If an eligible workforce program loses eligibility because its published tuition is higher than its value-added earnings under 34 CFR 690.89(e), the institution may, through a process described by the Secretary, request that the program's eligibility be reinstated by-
    a) Providing to the Secretary a new certification of the Governor's approval of the program as provided under 34 CFR §690.93(c);
    b) Submitting to the Secretary documentation of the program's current published tuition and fees and an attestation that the tuition and fees have been reduced and will remain equal to or less than the program's recalculated value-added earnings; and
    c) Requesting a recalculation of the program's value-added earnings to determine whether the program's updated tuition and fees that will apply to the next award year exceed the program's value-added earnings.

Section VI: Bilateral Agreements between States

The Governors of two States may enter into a bilateral agreement, that is published publicly, regarding the enrollment of students located in one of those States into some or all the programs located in the other State.

For Academic Year 2026-27 and 2027-28, only Illinois-based providers will be approved for Workforce Pell eligibility, unless notified otherwise.

Section VII: Agency Contacts

For Community Colleges:

Dr. Whitney Thompson, Deputy Director for Workforce Education

Illinois Community College Board

Whitney.thompson@illinois.gov

For Public, Private Four- Year Institutions/ Proprietary Institutions:

Dr. Leslie Daugherty, Managing Director of Talent and Workforce Development

Illinois Board of Higher Education

Workforcepell@ibhe.org

Section VIII: Resources

Workforce Pell Statute and Regulations

U.S. Department of Education Federal Student Aid FAQ

Higher Learning Commission

Other Resources, including the State's FAQ

Appendices

Appendix A: Eligible Occupations (Demand Occupation Training List)

Appendix B: Application Elements

Appendix C: Institutional Readiness Checklist

Appendix D: Sample Employer Validation Letter Template