

Workforce Pell Determination Policy: Proposed Changes and Informational Updates for State Workforce Development Board Review on June 29, 2026

Question	Response	Proposed Change to Policy
Question #1: Would an individual need to provide rationale for not accessing a Maine institution before Maine would enter into a bilateral agreement with another State?	As we further develop the process for bilateral agreements, applicants will be required to provide justification as to why a bilateral agreement is necessary and why comparable training opportunities available within the State of Maine are insufficient to meet their educational and workforce needs.	None
Question #2: Can Workforce Pell financial aid be used to cover non-tuition expenses, such as housing and childcare?	Our current understanding is that Workforce Pell can be used to cover anything in the school's cost of attendance. Cost of attendance typically includes tuition, fees, books, supplies, housing, food, travel, and miscellaneous expenses. Childcare is typically not automatically included in the cost of attendance, but students can request a budget appeal to ask if those costs can be included. However, by their nature Workforce Pell programs are short term and therefore both the Pell Grant amounts and expenses will be prorated and much smaller when compared to traditional Pell.	None: Governors and State Workforce Development Boards do not have discretion to define how Workforce Pell is calculated. We will communicate applicable financial aid regulations and guidelines in coordination with our financial aid partners.
Question #3: Does the Value-Added Earnings calculation rely on U.S. Federal Poverty Guidelines applicable to a single individual?	Yes, the Value- Added Earnings calculation are determined by calculating the difference between the adjusted median earnings of student completers during the earnings measurement period and 150 percent of the U.S. Federal Poverty Guidelines applicable to a single individual for such tax year (§ 690.95(b)). The median earnings is adjusted by State and metropolitan area regional price parities. EXAMPLE: Published Tuition & Fees: \$3,000 Median Completer Earnings: \$25,000 150% of the federal poverty guidelines for a household of 1: \$21,870 Program 1: Located in Owensboro, Kentucky (RPP=90) Earnings Adjusted for Regional Price Parities: $\\$25,000 / (90/100) = \\$27,778$ Value-Added Earnings: $\\$27,778 - \\$21,870 = \\$5,908$= program passes	Clarified Value-Added Earnings language on page 8 of policy to state: Per federal rule, this is determined by calculating the difference between the adjusted median earnings of student completers, measured three years after exit, and 150 percent of the U.S. Federal Poverty Guidelines applicable to a single individual.

Question #4: Does the Value-Added Earnings calculation take benefits into consideration as well as salary?	Value-Added Earnings (VAE) will be calculated by the U.S. Department of Education. The Workforce Pell final rule calculates VAE using adjusted median earnings. Adjusted median earnings are defined as "The median earnings of Pell Grant recipients measured three years after program exit, adjusted using regional price parity based on where the institution is located." The Final Rule states that "The Department will calculate and publish the value-added earnings in conjunction with a federal agency with earnings data." The U.S. Department of Education further stated in the Workforce Pell Final Rule that "Value-added earnings will not be calculated until 2030. This provides the Department with ample time to work with stakeholders and release guidance on the value-added earnings framework. We will release sub-regulatory guidance and implement systems' changes as necessary to effectuate the value-added earnings metric."	Added definition of Adjusted Median Earnings to Appendix A: Adjusted Median Earnings: The median earnings of Pell Grant recipients measured three years after program exit, adjusted using regional price parity based on where the institution is located.
Question #5: What do Title IV institutions need to evidence to partner with a non-Title IV training provider?	A Title IV institution is required to enter into a written arrangement with a non-Title IV training provider in order for the non-title IV training provider to provide instruction for an eligible Workforce Pell Program. No more than 25% of an eligible Workforce Pell program can be offered by an entity that is not a Title IV institution unless it is a Registered Apprenticeship program. If the program qualifies as the related instruction component for a Registered Apprenticeship Program, no more than 49% of the instruction can be provided by an entity that is not a Title IV institution. The Institution shall calculate the percentage of an eligible workforce program offered by an ineligible institution or organization by dividing the number of semester, trimester, or quarter credit hours, clock hours, or the equivalent provided by the ineligible institution or organization by the total number of semester, trimester, or quarter credit hours, clock hours, or the equivalent required for completion of the program. For purposes of this calculation, a course is considered provided by an ineligible institution or organization if the organization with which the Institution has a written arrangement has authority over the design, administration, or instruction in the course, including, but not limited to: 1. Establishing the requirements for successful completion of the course; 2. Delivering instruction in the course; or 3. Assessing student learning. The Final Rule encourages Institutions to reference the most recent version of the Federal Student Aid Handbook that discusses written arrangements	Updated language on page 7 of policy to state: Title IV institutions must have a written agreement with any non-Title IV training provider for that provider to deliver the portion of the program permitted under federal regulations. Updated language on page 16 of policy to include as evidence: Copy of the written agreement, if partnering with a non-Title IV provider

Question #6: Do elevator operators, ironworkers and construction laborers meet the criteria to be added to the Workforce Pell Priority Occupation List?	The list reflects current and projected labor-market demand and wage opportunities, using data from MDOL's Center for Workforce Research and Information (CWRI), including the High-Wage, In-Demand Occupations and Occupational Employment and Wage Estimates, 2024. •Riggers (49-9096) meet the in-demand, high-wage, and high-skills requirements to be added to the Workforce Pell Priority Occupation List. •Elevator Installers and Repairers (SOC Code 47-4021), Structural Iron and Steel Workers (SOC Code 47-221) and Reinforcing Iron and Rebar Workers (SOC Code 47-2171) do not meet the criteria to be added to the Workforce Pell Priority Occupation List. The occupations do not meet the minimum "In-Demand" threshold of 20 annual openings. According to the CWRI dataset from the US Bureau of Labor Statistic, Elevator Installers and Repairers have 11 annual openings, and Structural Iron and Steel Workers have 15 annual openings, and Reinforcing Iron and Rebar Workers have 2 annual openings which falls below the required threshold. •Construction Laborers (SOC Code 47-2601) do not meet the criteria for inclusion on the Workforce Pell Priority Occupations List as the U.S. Bureau of Labor Statistics reflects that there is no formal educational credential required for the occupation (https://www.bls.gov/emp/tables/education-and-training-by-occupation.htm). NOTE: The related instruction component of a Registered Apprenticeship Program, when delivered by an eligible Workforce Pell provider and meeting Workforce Pell program length requirements, automatically satisfies the federal Workforce Pell requirements for being high-skill, high-wage, and in-demand. As a result, it is not evaluated under the state's Priority Occupations methodology, and occupations not included on the Priority Occupations List (e.g., Construction Craft Laborer) may still be eligible for Workforce Pell when offered through an eligible Registered Apprenticeship Program.	Riggers (49-9096) Added to the Workforce Pell Priority Occupation list, Path 1. Added language to clarify education requirements for Essential Occupations on page 10: The typical education required for entry into the occupation must be at least a high school diploma or equivalent. Added example to page 10: The related instruction component of a Registered Apprenticeship Program, when delivered by an eligible Workforce Pell provider and meeting Workforce Pell program length requirements, automatically satisfies the federal Workforce Pell requirements for being high-skill, high-wage, and in-demand. As a result, it is not evaluated under the state's Priority Occupations methodology, and occupations not included on the Priority Occupations List (e.g., Construction Craft Laborer) may still be eligible for Workforce Pell when offered through an eligible Registered Apprenticeship Program.
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Question #7: What is the process for adding occupations to the Workforce Pell Priority Occupation List?	To request that a new occupation be added to the Workforce Pell Priority Occupation List, an individual may submit a petition letter to the State Workforce Development Board Director. The petition must demonstrate that the proposed occupation sufficiently aligns with the criteria outlined in the Workforce Pell Determination Policy. After submission, the State Workforce Development Board will review the petition. The State Workforce Development Board will evaluate and determine whether the supporting evidence submitted for the occupation sufficiently aligns with the criteria in the Workforce Pell Priority Occupation Methodology and List Section of the Maine Workforce Pell Program Determination Policy.	Inserted Petition language on page 11 of policy to state: To request that a new occupation be added to the Workforce Pell Priority Occupation List, an individual may submit a petition letter to the State Workforce Development Board Director. The petition must demonstrate that the proposed occupation sufficiently aligns with the criteria outlined in the Workforce Pell Determination Policy. After submission, the State Workforce Development Board will review the petition. The State Workforce Development Board will evaluate and determine whether the supporting evidence submitted for the occupation sufficiently aligns with the criteria in the Workforce Pell Priority Occupation Methodology and List Section of the Maine Workforce Pell Program Determination Policy.
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