

Arizona's Workforce Pell Program Policy

Policy Number: WAC Policy XX-XX

Effective Date: TBD

Authority: WIOA, as amended; 34 CFR Parts 600, 668, 690; 34 CFR 690.90–690.97, as amended.

1. PURPOSE & OVERVIEW

[H.R. 1](#), signed into law on July 4, 2025, expanded federal Pell Grant eligibility to include short-term workforce training programs. Beginning July 1, 2026, students may use Pell funds for accredited programs of 150-599 clock hours, offered over 8 to less than 15 weeks, that lead to recognized postsecondary credentials in high-skill, high-wage, or in-demand occupations. Federal law gives the Governor of the state authority to determine program eligibility, with the goal of aligning the use of funds towards programs that lead to high-skill, high-wage or in-demand careers. The Governor has designated the Workforce Arizona Council (WAC) as the entity that certifies eligibility for Workforce Pell for the State of Arizona, subject to approval by the U.S. Department of Education.

2. POLICY STATEMENT

It is the policy of the State of Arizona to direct federal Workforce Pell resources to high-performing short-term programs that address critical workforce needs and align postsecondary training to high-skill, high-wage, or in-demand jobs. This document establishes how Arizona identifies, reviews, certifies, and monitors Workforce Pell programs, in consultation with the WAC and consistent with federal eligibility criteria. Workforce Pell programs must comply with applicable federal Workforce Pell requirements.

3. DEFINITIONS (listed alphabetically)

Each definition is expanded upon in its related sections.

- **Completion rate:** The share of students who complete the program within 150% of normal time; the federal minimum is 70%.
- **Credit articulation:** A demonstration that completion of a Workforce Pell program yields academic credit toward a related certificate or degree program that a student could reasonably pursue.
- **Eligible institution:** A Title IV eligible institution that is accredited by a U.S. Department of Education–recognized accreditor, in good standing and with an active Program Participation Agreement.
- **Eligible occupation:** An occupation that meets Arizona's in-demand criteria and appears on the State's qualifying-occupations list
- **Employer validation:** Documented employer input confirming that a program meets hiring requirements in the relevant sector or occupation.
- **In-Demand Industries and Occupations** In-demand industry sectors and occupations are industries and occupations in Arizona and its Local Workforce Development Areas (LWDAs) identified by the Office of Economic Opportunity's formal labor market ranking methodology. In-demand industry sectors are ranked to prioritize those with strong economic performance (growth, wages, and competitiveness). In-demand occupations are rated to identify

occupations at each education level, based on high-skill and high-wage criteria, strong labor market demand, favorable wages, and strong knowledge, skills, and abilities. This methodology ensures that high-wage, high-skill, and high-employment opportunities are prioritized.

- **Job placement rate:** The share of a program's completers who are employed in the second calendar quarter after completing the program (about 180 days later); Workforce Pell requires at least 70%, verified through administrative wage records.
- **Portable credential:** Evidence that the credential a program awards meets the hiring requirements of more than one employer.
- **Stackable credential:** A credential is stackable if it articulates to academic credit toward a greater certificate or degree within a career pathway.
- **Recognized postsecondary credential:** An industry-recognized certificate or certification; a certificate of completion of a Registered Apprenticeship under 29 C.F.R. Part 29; a license recognized by the State or federal government, Associate's degree or Baccalaureate degree.
- **Registered Apprenticeship (RA):** An apprenticeship program registered under 29 C.F.R. Part 29.
- **Value-Added Earnings (VAE):** The median earnings of program graduates one year after completion, minus 150 percent of the federal poverty line, compared to total tuition and fees; calculated by the Secretary and regionally price-adjusted (\$ 690.95).

4. LEAD AGENCY & GOVERNANCE STRUCTURE

The Governor has designated the Office of Economic Opportunity as the lead state agency, with the Workforce Arizona Council designated as providing certifications for state eligibility approval for Workforce Pell. The Workforce Arizona Council includes multiple state agencies and business representatives, including the Arizona Department of Economic Security, Governor's Office, Arizona Department of Education, Arizona Commerce Authority, and State Apprenticeship Council.

Final state program eligibility determinations are issued by the Workforce Arizona Council on behalf of the Governor, and must also be approved by the US Department of Education, consistent with federal requirements under H.R. 1 § 83002.

Roles of Key Entities

- **Arizona's Office of Economic Opportunity (OEO):** Leads policy development and administration, in coordination with the Governor's Office.
- **Workforce Arizona Council (WAC):** As the State Workforce Development Board, the WAC advises the Governor on Workforce Pell policy, approves the qualifying occupations list, consistent with its authority under WIOA. Additionally, the Governor designated the WAC as the Statewide public official responsible for certifying Workforce Pell programs.
- **Arizona Department of Economic Security:** Manages the Eligible Training Provider List (ETPL) and operates the Arizona Apprenticeship Office as the State Apprenticeship Agency.
- **Higher education entities:** Support alignment with postsecondary requirements, including accreditation, maintaining Title IV eligibility, portability and stackability, credit articulation, and credential quality.

5. ELIGIBILITY

This section establishes the minimum institutional and program eligibility requirements that must be satisfied before an eligible program may be considered for state Workforce Pell Designation. All programs, institutions and students must meet the existing and any future eligibility requirements included in HR1 and in federal guidance from the US Department of Education.

A. Eligible Institutions

1. An institution seeking state Workforce Pell designation for an eligible program must:
 - a. Be an eligible institution participating in Title IV Federal Student Aid programs.
 - b. Maintain a current Program Participation Agreement with the U.S. Department of Education.
 - c. Be authorized to operate within the State of Arizona or otherwise authorized under applicable federal and state law or national reciprocity agreement.
 - d. Maintain accreditation by an accreditor approved by the US Department of Education.
 - e. Be in good standing with applicable federal and state oversight agencies.
 - f. Not have been subject to suspension, emergency action, or termination of Title IV participation by the U.S Department of Education during the five years preceding the Workforce Pell eligibility determination, unless otherwise permitted by federal regulation.
 - g. Commitment to data sharing with OEO through the Integrated Data System.

B. Eligible Students

1. Any program seeking a state Workforce Pell designation shall account for the limited exceptions to the standard federal Pell Grant requirements:
 - a. A student who holds a bachelor's degree remains eligible for Workforce Pell (§ 690.6).
 - b. A student who is enrolled in, admitted to, or holds a graduate credential is not eligible (§ 668.32).
 - c. A student may not receive Pell for two or more eligible programs at the same time (§ 690.11), and may not receive Pell for any period in which non-federal grant or scholarship aid already covers the full cost of attendance.
 - d. Suggestion: Federal Workforce Pell payments cannot be subject to annual funding or award caps; however, they remain subject to the standard 600% Pell Grant lifetime eligibility usage limit.

C. Eligible Programs

1. To be considered for Workforce Pell designation a program must:
 - a. Be an undergraduate program (it must not lead to a graduate credential).
 - b. Lead to a recognized postsecondary credential.

- c. Satisfy all applicable federal Workforce Pell requirements as provided under § 690.92.
 - d. Be offered by an eligible institution.
 - e. Provides at least seventy-five percent of the program instruction by an eligible institution or organization, except where federal regulations or participation in a Registered Apprenticeship Program permit otherwise.
- 2. Program Length Requirements
 - a. An eligible program shall consist of:
 - i. At least eight weeks and less than 15 weeks of instructional time; and
 - ii. One of the following:
 - o 150-599 clock hours;
 - o Four to fifteen semester credit hours;
 - o Four to fifteen trimester credit hours; or
 - o Six to twenty-three quarter credit hours
- 3. Portable and Stackable Requirement
 - a. Portable requirement: A credential is portable if it is recognized across multiple employers and is not customized for a single employer. Programs clearly written for one company do not meet this requirement. In-state portability is the standard (out-of-state recognition is not required).
 - i. Documentation may include one or more of:
 - o National credential documentation;
 - o State licensure information;
 - o Employer recognition across multiple employers;
 - o Credential registry listing; or
 - o Industry certification documentation
 - b. Stackable requirement: A credential is stackable if it presents that it articulates to academic credit toward a related certificate or degree within a career pathway
 - i. Documentation may include:
 - o Academic pathway mapping;
 - o Program sequence;
 - o Guided pathway documentation; or
 - o Degree mapping
- 4. Academic Credit Requirement

- a. The institution shall demonstrate that successful completion of the program results in academic credit applicable toward at least one certificate or degree program offered by one or more eligible institutions.
 - b. Documentation may include:
 - i. Demonstration of the guided pathway within your own institution.
 - ii. Articulation agreement, MOU, or Prior Learning Agreement with another institution of higher education; or
 - iii. Other documentation approved by the State.
 - c. Regardless of which form is used, the documentation must, at a minimum:
 - I. Identify the specific receiving certificate or degree program(s) to which the credit applies including the six-digit CIP code of both the Workforce Pell program and each receiving program;
 - II. State the number of credits awarded upon completion consistent with applicable federal requirements.
 - III. Specify how the credit applies, whether toward required coursework or major or technical electives, and confirm that it does not count solely toward general education or free electives; and
 - IV. Demonstrate that the credit applies to a related field, defined as a receiving program that shares the same two-digit CIP family as the Workforce Pell program.
5. Recognized Postsecondary Credential Requirement
- a. A Workforce Pell program shall lead to a recognized postsecondary credential consistent with applicable federal law. Recognized postsecondary credentials include those recognized under applicable federal Workforce Pell requirements, such as:
 - i. Industry-recognized certificates;
 - ii. Industry-recognized certifications;
 - iii. Registered Apprenticeship certificates of completion;
 - iv. State or federal occupational licenses;
 - v. Postsecondary certificates;
 - vi. Associate degrees; or
 - vii. Baccalaureate degrees
6. Program Metrics Requirement
- a. Before the state approves an eligible program, and in each year afterward, the state verifies three federal performance thresholds, using State administrative data and as requested from the institution (as needed):
 - i. Completion rate: Arizona requires at least 70 percent of a cohort to complete within 150 percent of the program's normal length (§ 690.94). Because a program must already have operated for at least

one year to be eligible, this is screened at initial approval, and on an ongoing basis. To verify it, the institution submits a list of each cohort's entrants and completers, and OEO sets certification policies, collects institutional data submissions, and calculates completion rates at initial approval and annually through the 2028–29 award year.

- ii. Job placement rate: Arizona requires at least 70 percent of students to be employed (§ 690.94). Because a program must already have operated for at least one year to be eligible, Arizona screens this at initial approval, confirming the program met the 70 percent rate over the 12 months immediately preceding the application, and on an ongoing basis. For each award year after approval, the institution submits a list of the students who completed the program that year, with the information the Workforce Arizona Council needs to verify the rate, and OEO calculates job placement using administrative data systems, including wage records:
 - Through the 2028–29 award year, Arizona counts any student employed at any point in the second quarter after leaving the program, whether or not they completed it, and whether or not the job relates to the field of study
 - Beginning in 2029–30, the standard narrows to completers: at least 70 percent of those who complete must be employed in the second quarter after completion, in the occupation the program prepares them for (by Standard Occupational Classification, or SOC, code) or a comparable high-skill, high-wage, or in-demand occupation.
- iii. Value-added earnings: A program's published tuition and fees may not exceed its value-added earnings: the median earnings of completers over the measurement period, minus 150 percent of the federal poverty line for a single individual, regionally adjusted (§ 690.95). The U.S. Secretary runs the official calculation once completer-earnings data exist (beginning 2030–31); until then, § 690.93(d)(3) requires Arizona to weigh a program's cost against the target occupation's anticipated wages, a permanent part of the initial screen. Arizona's Office of Economic Opportunity will at initial approval and for every applicant: (1) collect program tuition and fees data; (2) estimate value-added earnings from anticipated wages in the target occupation using available earnings data; and (3) decline to certify programs whose published costs are likely to exceed projected value-added earnings.
- iv. Federal rules (§ 690.94(e)) exclude certain students from both the numerator and denominator of the completion and placement calculations: those who die, develop a medical condition that prevents employment, are ordered to service in the uniformed services, or who become incarcerated.

D. Ineligible Workforce Programs

1. The following programs are not eligible for Workforce Pell designation:
 - a. Graduate-level programs
 - b. Correspondence programs
 - c. Study-abroad programs
 - d. Direct assessment programs prohibited under applicable federal Workforce Pell regulations
 - e. Programs that fail to meet the minimum federal Workforce Pell eligibility requirements
 - f. Programs offered through institutions determined ineligible under federal Title IV requirements.

E. Eligibility Determination

Meeting the requirements of this section establishes eligibility for Workforce Pell review only and does not constitute approval for Workforce Pell designation.

Programs determined eligible under this section shall proceed to review under Sections 6 through 12 of this policy, including evaluation of workforce alignment, employer demand, credential quality, employment outcomes, value-added earnings, Governor Approval, and federal approval requirements.

F. Eligibility Appeal

An institution may appeal a determination that a program or institution does not satisfy the eligibility requirements established in this section. Eligibility appeals shall be limited to documentation errors, administrative errors, or submission of information demonstrating compliance with applicable federal and State eligibility requirements. Eligibility appeals shall not permit waiver of federal Workforce Pell eligibility requirements.

1. Appeals shall be submitted to the Workforce Arizona Council within thirty (30) calendar days of the eligibility determination and shall include supporting documentation. The state shall issue a written determination affirming, modifying, or reversing the eligibility determination within (30) calendar days of receiving the appeal.
2. A determination under this subsection is limited to eligibility for Workforce Pell review and does not constitute approval for Workforce Pell designation. Once a program is determined eligible, the Workforce Arizona Council certifies it, and the institution submits the signed certification to the U.S. Department of Education for final approval. If a program is denied at initial review, the institution may appeal the determination, and may also correct the identified deficiencies and reapply within one year (to be confirmed). There is no federal waiting period for reapplying after an initial denial
3. If an approved program later loses eligibility for failing the completion or job-placement thresholds, a federal two-year bar applies; the institution may not re-establish the same or a substantially similar program (one sharing the same four-digit CIP code and identical SOC codes) until two years after the loss (34 CFR 690.94).

6. ALIGNMENT WITH EMPLOYER HIRING NEEDS

This section establishes requirements for demonstrating that an Eligible Workforce Program meets employers' hiring needs.

A. Employer Validation

Applicants shall provide evidence that employers recognize the credential, competencies, and training outcomes associated with the program by submitting signed, dated documentation that names the program and the roles employers expect to hire for.

1. Acceptable documentation may include one or more of the following:
 - a. Employer support letters, on employer letterhead, stating the employer hires (or intends to hire) completers and naming the role(s);
 - b. Hiring Commitments, a signed letter, Memorandum of Understanding (MOU), or agreement to interview or hire qualifying completers;
 - c. Industry association endorsements, a signed statement from a recognized industry body attesting that the credential meets hiring standards;
 - d. Sector partnership recommendations, a letter from a recognized sector partnership identifying the program as aligned with hiring needs;
 - e. Advisory committee documentation, meeting minutes, or a signed statement from the program's employer advisory committee;
 - f. Other evidence accepted by the State.

B. State Review

The Workforce Arizona Council may consult employers, industry associations, Local Workforce Development Boards, and other workforce stakeholders when evaluating employer demand.

C. Approval Consideration

Programs that cannot demonstrate employer demand may be denied a state certification necessary for a Workforce Pell designation.

7. APPLICATION PROCESS & TIMELINE

This section establishes Arizona's Workforce Pell program certification review process, including the Workforce Arizona Council application submission, technical review, and final certification submitted to the U.S. Department of Education for the Workforce Pell designation.

A. Process Overview

Arizona's approval process follows the following steps across institutions, state, and federal levels:

1. The institution submits a Letter of Interest, allowing OEO to communicate directly as state policy is finalized.
2. The institution submits its application to the Workforce Arizona Council.
3. WAC review of the criteria and viability assessment. The WAC staff will coordinate a completeness review to assess initial eligibility and ongoing metric verification.

4. A final determination will be made by the Governor's designated Statewide public official to certify the program. If rejected, the institution may revise and resubmit, as directed. If a program is approved, the WAC provides the institution with a signed certification confirming the program meets Workforce Pell requirements. The State certification will only be valid through the existing PPA and the institution will need to reapply at the time a new PPA is executed
5. The institution must submit the State's certification to the U.S. Department of Education (USDoE) to receive a Workforce Pell designation. A State certification does not guarantee or imply an automatic approval for the Workforce Pell designation.

B. Qualifying Occupations List: Size, Crosswalk, And Review

The Office of Economic Opportunity shall maintain a Workforce Pell qualifying-occupations list derived from its high-skill, high-wage, and in-demand methodology. The list shall be expressed as Standard Occupational Classification (SOC) codes and mapped to eligible programs through a published SOC/CIP crosswalk, so institutions can identify which Classification of Instructional Programs (CIP) codes align to each qualifying occupation. A program whose CIP does not appear on the crosswalk may still qualify by demonstrating alignment to a listed occupation. The Office of Economic Opportunity shall review and update the list and crosswalk every two years. The list shall apply statewide with regional variations.

C. Written and Third-Party Arrangements

1. A "written arrangement" is a formal agreement (34 CFR 668.5) under which part of an eligible program is delivered by another organization, while the eligible Title IV institution remains responsible for the program.
2. Any written arrangement involving an ineligible institution or organization shall comply with applicable federal Workforce Pell requirements.
3. Unless otherwise permitted under federal regulation or as part of a Registered Apprenticeship Program, no more than twenty-five percent of an Eligible Workforce Program may be provided through an ineligible institution or organization.
4. The eligible institution shall remain responsible for compliance with all Workforce Pell requirements, reporting obligations, performance outcomes, and credential attainment requirements.
5. An institution may offer distance education programs to students in another state only through a bilateral agreement established by the Governors of both states. These agreements must mandate inter-state data sharing to support calculations for student completion and job placement. Out of state distance education programs must meet all of the requirements to operate within the state according to state and federal law and a state authorization reciprocity agreement (for participating states). Out-of-state distance education programs must also meet all eligibility requirements for Workforce Pell, in addition to the bilateral agreement.

D. Eligibility Determination Timeline And Cadence

The Workforce Arizona Council will lead an eligibility process for programs twice annually, which will be determined in coordination with the Council's meeting schedule.

Each cycle includes: an initial completeness review; review committee evaluation and recommendations; a State certification issued; US DoE review per federal timelines; and public posting of approved programs.

Once approved, programs are subject to ongoing renewal and continued eligibility (see Section 13 for more details).

E. Program Modifications

Once a program receives eligibility approval at the state and federal levels, program modifications are acceptable as long as the modifications do not cause a change in Workforce Pell program eligibility. Providers are required to notify the Workforce Arizona Council in writing within 15 days of any program modifications. If it is determined that the program no longer satisfies Workforce Pell eligibility requirements, approval shall be withdrawn, and the notifications required by 34 CFR 690.93(d)(8) shall be issued within 15 calendar days of the final determination

8. STATE CERTIFICATION

For each eligible program, the Workforce Arizona Council will determine and shall certify that:

- The approval process and all of its requirements are published and publicly available (a link is supplied on the form);
- The program was approved after consultation with the WAC
- The program aligns with high-skill, high-wage (under section 112 of the Carl D. Perkins Act, 20 U.S.C. 2342) or in-demand industry sectors or occupations (29 U.S.C. 3112), automatically met where the program is the related instruction component of a Registered Apprenticeship Program;
- The program meets the hiring requirements of potential employers in the applicable sectors or occupations;
- The program leads to a recognized postsecondary credential that is stackable and portable across more than one employer

The Workforce Arizona Council will report and attest to each program's six-digit CIP code, SOC code(s), the date the program met eligibility (covering at least the 12 months immediately preceding certification), a completion rate of at least 70% (within 150% of normal time), and a job placement rate of at least 70%. The Workforce Arizona Council further commits to providing completion and placement data to the Department annually (through the 2028–29 award year, after which only placement rates are certified), making the State's approval-process documentation available to the Secretary of Education on request, notifying the institution of any withdrawal within 15 calendar days; weighing program cost against anticipated industry or occupation wages ahead of the Department's value-added-earnings determination (34 CFR § 690.95), and reassessing each program before the institution's Program Participation Agreement (PPA) expires.

9. DATA MANAGEMENT & REPORTING

A. Reporting Process

This section establishes the State's requirements for collecting, maintaining, validating, reporting, and using Workforce Pell program information to support a state certification, continued program eligibility, federal reporting, monitoring and program evaluation.

The State will utilize the Arizona Integrated Data System (IDS) as the primary data integration and reporting framework for Workforce Pell programs, to the extent authorized in law or under this policy.

At a minimum, eligible institutions will be asked to share data with OEO for eligibility and monitoring purposes. Formal participation in the Integrated Data System will be required following a program's eligibility at the state and federal levels.

B. Data Submission

Institutions approved or seeking approval as an eligible program shall submit all information required by the State to evaluate eligibility, support continued State certification, satisfy federal reporting requirements, and maintain continued approval.

At a minimum, at the end of a participant's program completion, institutions shall submit program identification information, enrollment information, completion information, credential attainment, tuition and fee information, employer validation documentation, academic credit and transfer documentation, program modification information, and any additional information required under federal or State Workforce Pell requirements.

Institutions must submit, each award year, a list of program participants and completers, as well as the information needed for the Governor to verify completion and job placement rates (§ 690.94(b)). The State verifies outcomes using administrative data, including Unemployment Insurance wage records.

Placement and earnings are measured against Unemployment Insurance (UI) wage records; for completers who work outside Arizona, these outcomes will be determined using available data.

C. Arizona Integrated Data System

The Arizona Integrated Data System (IDS) shall serve as the state's primary longitudinal reporting and data integration system for Workforce Pell programs to the extent authorized under law and regulation.

The IDS will integrate information submitted by participating institutions with administrative data maintained by State agencies to support:

1. Program eligibility;
2. Continued State certification;
3. Participant employment and wage outcomes;
4. Credential attainment;
5. Performance accountability;
6. Program evaluation;
7. Federal reporting requirements

D. Administrative Data Validation

Arizona may validate institutional submissions using the administrative records maintained by State agencies and other authorized data sources.

Administrative validation may include verification of but not limited to the following:

1. Enrollment;
2. Credential completion
3. Academic credit information;
4. Employment outcomes
5. Employer participation
6. Occupational and industry alignment
7. Academic credit information;
8. Institutional eligibility requirements;
9. Any additional information necessary to verify program compliance

Institutions shall cooperate with all validation requests and provide additional documentation upon request.

E. Wage Recording Matching

Arizona shall verify employment and earnings outcomes using Unemployment Insurance wage records and other administrative wage data authorized under applicable federal and State law. When Arizona wage records are unavailable, the State may utilize interstate wage exchange agreements, federal data sources, and other authorized employment verification methods. Employment and earnings information shall be used to evaluate Workforce Pell performance outcomes, continued State certification, and federal reporting requirements.

F. Institutional Reporting

Each participating institution shall submit training records to support the evaluation of Workforce Pell-funded programs in the format established by the Arizona Office of Economic Opportunity. Each participating institution shall enter into a Data Use Agreement to allow OEO to meet all federal reporting requirements in annual reports. Annual reports shall include, at a minimum:

1. Participant counts;
2. Enrollment;
3. Completion rates;
4. Credential attainment;
5. Employment outcomes;
6. Academic credit articulation outcomes;
7. Performance measures;
8. Any additional information required by the Governor or the State

Institutions shall certify the accuracy and completeness of all submitted information

G. Data Quality and Validation

Institutions are responsible for maintaining accurate, complete, timely, and auditable records supporting all reported Workforce Pell Information. The State of Arizona may conduct desk reviews, monitoring activities, audits, or other validation procedures to verify submitted information.

If reporting errors or deficiencies are identified, the State of Arizona may require corrective action, resubmission of data, additional documentation, or other actions necessary to ensure data integrity.

Failure to provide accurate or timely information may result in corrective action, probation, suspension, withdrawal of State certification or other actions authorized under this policy.

H. Data Confidentiality

All Workforce Pell information shall be collected, maintained, shared, and used in accordance with applicable federal and State privacy, confidentiality and information security requirements.

Personally identifiable information shall only be disclosed as authorized by law. Data sharing between State agencies shall occur only through authorized agreements to support the administration, monitoring, evaluation, or reporting of Workforce Pell programs.

I. Federal Reporting

Arizona shall utilize information submitted by participating institutions, together with administrative data and other authorized information sources, to satisfy applicable federal Workforce Pell reporting requirements. Institutions shall cooperate with all requests necessary to support federal reporting, program evaluation, monitoring activities, audits, and performance accountability.

Failure to provide required information may affect continued State certification or participation in Workforce Pell.

J. Monitoring

OEO will annually verify that approved programs continue to meet the completion and job placement requirements and remain aligned with high-skill, high-wage, or in-demand occupations, employer requirements, credential design, and articulation (§ 690.93(e)–(f)). OEO will take program cost and the anticipated wages of the industry or occupation into account before the Department's value-added-earnings determination under 34 CFR § 690.95, and must reassess each program before the institution's Program Participation Agreement expires (see Section 13).

OEO will publish a public dashboard that compares each program's published tuition and fees against completer's measured earnings, so programs trending toward failure are flagged before the federal determination.

K. Corrective Action

When a program no longer meets an eligibility requirement, the State shall take appropriate action, which may include technical assistance, a corrective action period, or withdrawal of approval, consistent with Section 12 (Loss of Eligibility). The State shall inform the U.S. Department of Education and the institution of any final decision to withdraw approval within 15 calendar days.

OEO must inform the U.S. Department of Education and the institution of any final decision to withdraw approval within 15 calendar days. A program removed for failing the federal completion or placement requirements is subject to a federal two-year ban on reapplication.

10. ELIGIBLE TRAINING PROVIDER LIST COORDINATION

Approved programs eligible for Workforce Pell will automatically be added to the Eligible Training Provider List (ETPL), if the provider elects to be added to the ETPL.

11. REGISTERED APPRENTICESHIPS

A program that serves as the related technical instruction component of a Registered Apprenticeship Program (RAP) registered with the U.S. Department of Labor Office of Apprenticeship or the State Apprenticeship Office is eligible for Workforce Pell designation, if the institution chooses to participate and the related technical instruction is offered by a Title IV–eligible institution. Because the apprenticeship has already been vetted and registered, such a program is deemed to satisfy the high-skill, high-wage, or in-demand alignment and the employer hiring-needs requirements (34 CFR 690.93(g)), and is not required to separately demonstrate them.

The related technical instruction must independently meet all other Workforce Pell requirements. It must fall within the program-length limits (150–599 clock hours, delivered over 8 to fewer than 15 weeks, though it may be delivered intermittently); lead on its own to a recognized postsecondary credential, separate from the credential awarded for completing the full apprenticeship; and meet the completion, job-placement, and value-added-earnings requirements. Apprentices who complete the related technical instruction but not the full apprenticeship are included in the completion and job-placement calculations. Workforce Pell supports only the related technical instruction; it does not support the on-the-job learning component.

To be designated for Workforce Pell, a Registered Apprenticeship Program shall provide the occupation(s) included within the program; the name and address of the program sponsor; the name and address of the related technical instruction provider, including the facility location if different from the sponsor's address; the method and length of the related technical instruction; the number of active apprentices; and published cost information, including tuition and fees, for the related technical instruction.

A program must be certified by the U.S. Department of Labor Office of Apprenticeship as a nationally approved program or the State Apprenticeship Office as an active Registered Apprenticeship Program to be eligible for Workforce Pell designation. Where the related technical instruction is delivered by an entity that is not the Title IV–eligible institution, that entity may provide more than 25 percent but less than 50 percent of the instruction, with accreditor approval (34 CFR 668.5). Registered Apprenticeship Programs shall keep cost information, including tuition and fees, current, and the State shall review this information periodically to ensure its accuracy.

If a Registered Apprenticeship program is de-registered by the State Apprenticeship Office pursuant to [29 CFR 29.8](#), the State Apprenticeship Office will notify the WAC.

Loss of Registered Apprenticeship status does not, in itself, constitute withdrawal of Workforce Pell approval; however, it shall initiate an expedited continued designation review. If the Governor's statewide designated official determines that the program no longer satisfies Workforce Pell eligibility requirements, approval shall be withdrawn, and the notifications required by 34 CFR 690.93(d)(8) shall be issued within 15 calendar days of the final determination.

12. LOSS OF ELIGIBILITY

A program loses Workforce Pell eligibility if it no longer meets the federal requirements as stated in 34 CFR § 690.93 and 34 CFR § 690.94, including falling below the 70% completion or 70% placement thresholds, or failing the value-added-earnings test once it takes effect, or if the State withdraws approval. Removal on the federal rate-based grounds is non-discretionary; the State must notify the U.S. Departments of Education and Labor and the institution within 15 calendar days of any decision to withdraw approval, and a program removed on federal performance grounds is subject to a two-year bar on reapplication.

13. REAPPROVAL

A program must continue to meet the federal accountability measures, completion and placement, and (in later award years) value-added earnings, for as long as it participates. (§ 690.93(e)–(f).

Arizona shall review each program annually to ensure that the required program metrics have been met or exceeded and that the program is aligned with high-skill, high-wage, or in-demand occupations. Arizona shall reapprove each Workforce Pell program at least once every two (2) years. The reapproval cycle is established by the State and is independent of the institution's Program Participation Agreement term. At each reapproval, the State shall confirm that the program continues to meet all eligibility criteria, including occupational alignment, employer demand, credential and credit articulation, and stackability, drawing on longitudinal data.

In each year between reapprovals, the State shall verify through the IDS that each program continues to meet the completion and job-placement requirements and, when in effect, the value-added-earnings requirement. A program that fails an annual accountability review may lose eligibility before its scheduled reapproval.

Effective date: September 17, 2026 (expected)

This policy is effective immediately upon approval by the Workforce Arizona Council. The Council shall review this policy at least annually and revise it as necessary to reflect changes in law, regulation, strategic priorities, or workforce system needs. The WAC reserves the right to revise it accordingly, without advance notice.