



Maryland Workforce Pell Program Determination Policy

Governor's Workforce Development Board

April 27, 2026

PUBLIC COMMENT DRAFT



Policy Issuance 2026-01

[Public Comment Draft]

TO: Institutions of Higher Education, WIOA Eligible Training Providers, Local Workforce Development Boards, Registered Apprenticeship Sponsors, Maryland Apprenticeship & Training Council, Maryland Higher Education Commission, Maryland Department of Labor, and other interested parties

FROM: Governor's Workforce Development Board (GWDB)

DATE: April 27, 2026

SUBJECT: Workforce Pell Proposed Policy Framework and Determination Process

PURPOSE: This policy outlines Maryland's standards and implementation framework for "Workforce Pell" - a provision enacted within U.S. Congress H.R. 1 (2025), to expand Pell Grant eligibility to students enrolled in short-term, career-focused training programs that meet rigorous performance requirements and lead to recognized postsecondary credentials. The policy outlines key definitions and standards that are within the Governor's authority to establish for Maryland, and provides an overview of the program eligibility determination process. Interested parties are invited to submit comments on the policy by 11:59 pm ET on May 4, 2026, via email to: GWDB.Maryland@Maryland.gov.

ACTION: The GWDB shall have the authority to determine whether a participating institution's program meets the requirements of this policy and is eligible for State approval and to seek approval by the U.S. Department of Education (ED). Approval by ED authorizes approved programs at eligible institutions to award Workforce Pell grants to qualifying students in accordance with federal statute and regulations.

EFFECTIVE: [TBD] and effective indefinitely, until rescinded or amended and reissued

QUESTIONS:

Rachael Stephens Parker Executive Director,
Governor's Workforce Development Board
rachael.parker@maryland.gov
C/O: 443-800-5702

[TBD]

Maryland Higher Education Commission

[TBD]

For general inquiries, please email GWDB.maryland@maryland.gov.

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Executive Summary

Overview and Purpose

Maryland's Workforce Pell Program Determination Policy establishes the State's process to review and approve short-term workforce training programs for the federal Workforce Pell Grants beginning July 1, 2026. Workforce Pell creates a new opportunity to provide Pell-eligible learners with industry-aligned training that leads to a good job in an in-demand occupation – including occupations in Maryland's core economic sectors such as healthcare, cybersecurity, and infrastructure, as well as in its "lighthouse industries" for economic growth such as life sciences, information technology, and aerospace.¹

Maryland adopts the U.S. Department of Education (ED)'s Workforce Pell regulations by reference, and the Governor's Workforce Development Board (GWDB) retains authority to modify the following policy and will notify stakeholders of substantive updates if needed to comply with federal regulations.

Program Eligibility Standards

Participation by eligible institutions is voluntary. Federal statute requires that, to be eligible for Workforce Pell Grant use, a program must be offered at a Higher Education Act Title IV eligible postsecondary institution.² Under Federal law and Maryland policy, to be considered eligible a program must:

1. Have 8 - 15 weeks of instruction;
2. Have a 150-599 clock hour duration; 4-15 semester or trimester hours; or 6-23 quarter hours;
3. Lead to a recognized postsecondary credential that is stackable and portable, or prepares students for employment for which there is only one recognized postsecondary credential;
4. Train students for a high-wage, high-skill, or in-demand occupation as defined by the State, and, where the occupation does not meet the State's high-wage definition, the program demonstrates stackability of the credential into a high-wage occupational pathway;
5. Demonstrate alignment to the hiring needs of employers;
6. Demonstrate a program completion rate of 70%;
7. Demonstrate a six-month job placement rate of 70%;
8. Provides students academic credit for at least one certificate or degree program at one or more eligible institutions;
9. Have total tuition and fees that are less than the value-added earnings (VAE) of program completers three years prior (beginning award year 2029-2030); and
10. Have met these requirements for at least one year.

¹ Office of the Governor of Maryland. (2024). EO 01.01.2024.39: Strengthening Maryland's business climate to bolster economic competitiveness.

² The Federal School Code List contains the unique identifiers assigned by the U.S. Department of Education to schools participating in the Title IV federal student aid programs. [2026-27 Federal School Code List of Participating Schools \(February 2026\)](#)

Programs must be approved by the Governor or their designee through a process as described in the Federal regulations for Workforce Pell, then approved by ED.

Programs that serve as a component of a Registered Apprenticeship recognized by the U.S. Department of Labor or the Maryland Department of Labor are considered eligible against criteria 3 - 7 (inclusive) in the list above, under federal regulation and Maryland state law. Programs seeking eligibility as part of a Registered Apprenticeship must count both related instruction and on-the-job training conducted under general supervision of the appropriate faculty toward the program duration requirements in criteria 1-2 above.^{3 4}

Application and Eligibility Determination

Maryland will use its Workforce Innovation and Opportunity Act (WIOA) Eligible Training Provider List (ETPL) and associated application platform as the point of entry for Workforce Pell program certification. This will support the collection and reporting of required program outcome metrics for all institution types, provides the ability to scale over time as additional programs become eligible, and fosters integration of high-quality training programs into the public workforce system and braiding of resources to support learners with barriers to employment. Applications will be accepted on a rolling basis and will undergo bi-annual review by a cross-agency Workforce Pell Review Committee. Programs with a consensus recommendation by the Review Committee will receive a State eligibility certification, which will be submitted by the State for final approval by ED.

Governance

The GWDB sets State program eligibility standards, coordinates the cross-agency review process, and issues program eligibility determinations for ED review on behalf of the Governor or their designee; the Maryland Higher Education Commission (MHEC) administers aid and issues complementary regulations and guidance; the Maryland Department of Labor (MD LABOR) provides labor market data and analysis to maintain the list of qualifying occupations, administers the first step in the program review process, and collaborates with the Maryland Longitudinal Data System Center (MLDSC) on collection, analysis, and reporting of program outcomes data.

Policy Amendments due to Legal or Regulatory Change

This policy is subject to immediate change at any time to comply with applicable federal law, regulation, or regulatory guidance. The GWDB reserves the right to revise this policy accordingly, without advance notice, and authorizes its staff to make such changes if necessary as a result of changes to such laws, regulation or guidance.

Public Comment

³ U.S. Department of Education (2026) 34 C.F.R. Part 600 - Notice of Proposed Rulemaking Draft. [NPRM](#)

⁴ Maryland General Assembly. (2026) S.B. 0509 - *Higher Education - Workforce Pell Grant Program - Implementation*. [SB 509](#)

The GWDB invites interested parties to submit written comments by May 4, 2026, to gwdb.maryland@maryland.gov. Items highlighted in yellow are intended for edit or removal prior to final publication of the policy.

Purpose & Authority

In the U.S. Congress H.R. 1 (2025), Pell Grant eligibility is expanded to students enrolled in short-term, career-focused training programs that meet defined quality requirements and lead to industry-recognized credentials. This expansion is now commonly referred to as “Workforce Pell.” Workforce Pell is available to any Pell Grant-eligible student enrolled in a qualifying program approved by both the State and by ED.

Federal law gives Governors considerable authority to define key eligibility standards and processes to ensure that Workforce Pell-eligible programs work for their residents and drive economic growth, in consultation with their State Workforce Development Boards. In Maryland, the GWDB leads Workforce Pell policy development and implementation on behalf of the Governor, to drive resources to the highest-performing programs that address critical workforce needs and to better align postsecondary training to high-skill, high-wage, and in-demand jobs.

ED released proposed regulations in March 2026. Maryland adopts ED’s Workforce Pell regulations by reference and the following policy is designed in compliance with these regulations as drafted.⁵

Applicable federal authorities include:

- U.S. Congress. (2025) H.R. 1 - *An act to provide for reconciliation pursuant to title II of H. Con. Res. 14* (Public Law No. 11921, Subtitle B, Section 83002)
- Higher Education Act of 1965, Title IV, 20 U.S.C. §§ 1070-1099d
- 34 C.F.R. Part 600

In April 2026, the Maryland General Assembly further passed Senate Bill 0509, *Higher Education - Workforce Pell Grant Program - Implementation*, which reiterates several authorities of Maryland agencies, including the GWDB’s and MHEC’s, in Workforce Pell Grant Implementation. This legislation also underscores the streamlined Workforce Pell eligibility standards for programs that serve as a component of a Registered Apprenticeship, and provides that both the related instruction and on-the-job training, when supervised by an instructor affiliated with an eligible institution, may count toward the program duration criteria.⁶

⁵ U.S. Department of Education (2026) 34 C.F.R. Part 600 - Notice of Proposed Rulemaking Draft. [Fed NPRM](#)

⁶ Maryland General Assembly. (2026) S.B. 0509 - *Higher Education - Workforce Pell Grant Program - Implementation*. [SB 509](#)

Program Eligibility

This section outlines the key standards and definitions that will guide the certification of program eligibility under Workforce Pell.

I. FEDERALLY-DETERMINED PROGRAM ELIGIBILITY REQUIREMENTS

To be eligible for Workforce Pell, a program must be offered by an accredited public, nonprofit, or for-profit entity eligible to participate in student aid programs under Title IV of the Higher Education Act and meet all Workforce Pell eligibility criteria in federal law for at least 12 months before applying for approval. Under federal law, an eligible program must:

- Have a minimum of 8 weeks, but less than 15 weeks of instruction;
- Have a duration of at least 150 clock hours but less than 600 clock hours; at least 4 but less than 16 semester or trimester hours; or at least 6 but less than 24 quarter hours;
- Is not offered using correspondence courses as defined by federal regulations, coursework that takes place as part of a study abroad program; or credit or clock hour equivalencies that are part of a direct assessment program;
- Lead to a recognized postsecondary credential that is stackable and portable (or prepares students for employment for which there is only one recognized postsecondary credential), and ensures that a student receives academic credit for at least one certificate or degree program at one or more eligible institutions;
- Be approved by the Governor or their designee through a process as described in the federal regulations for Workforce Pell;
- Demonstrate a completion rate of 70% within 150% of normal time and a job placement rate of 70% at 180 days after program completion;
- Have total tuition and fees that are less than Value-Added Earnings (VAE) of program completers three years prior (beginning award year 2029-2030);
- Be offered by an institution that is eligible for Title IV aid and, during the five years preceding the date of the determination, has not been subject to any suspension, emergency action, or termination of programs.⁷

Furthermore, the program must be approved by the Governor or their designee through a publicly available process outlined in the state's policy. This process must address how the state evaluates whether the program:

- Provides an education aligned with high-skill, high-wage, or in-demand sectors or occupations as defined by the State;
- Meets employer hiring requirements in those sectors or occupations;
- Leads to a stackable and portable credential, or where only recognized credential exists, prepares students for employment in that occupation and provides that credential upon program completion;
- Ensures students receive academic credit that will be accepted toward at least one certificate or degree program at one or more eligible institutions.

⁷ The Federal School Code List contains the unique identifiers assigned by the U.S. Department of Education to schools participating in the Title IV federal student aid programs. [2026-27 Federal School Code List of Participating Schools \(February 2026\)](#)

The process must include:

- The state's methodology for determining and periodically updating which occupations or sectors are high-skill, high-wage, or in-demand, and where this information will be publicly posted.
- A written policy for assessing whether programs meet employer hiring requirements in the relevant sectors or occupations.
- A written policy for determining whether a credential is stackable and portable, including documented connections for additional credentials, available data on credential progression, real-time labor market information, and a process for employer validation.
- A written policy establishing how institutions must demonstrate that an eligible program ensures the award of academic credit that will be accepted toward a certificate or degree program at one or more eligible institutions.

FEDERAL REQUIREMENTS FOR PROGRAM PERFORMANCE

In addition to setting and assessing whether programs meet definitions, Governors or their designee are required to ensure that programs submitted to ED for approval for Workforce Pell meet the performance requirements in the law.

A. COMPLETION RATE

Programs must meet a **completion rate of at least 70 percent**.

- For the 2026-27, 2027-28, and 2028-29 award years only, the completion rate will be calculated as the percentage of students completing the program within 150 percent of the normal time to completion, based on the Governor or their designee's analysis using administrative data, including wage records.
- Starting in the 2029-2030 award year, the completion rate will be calculated as the percentage of students who complete within 150 percent of the normal time to complete, based on a calculation made by the institution and audited by federal authorities under federal regulations.

B. JOB PLACEMENT RATE

The Governor or their designee is required to certify, based on an analysis of administrative data, including wage records, that programs meet a **job placement rate of at least 70 percent**.

- For the 2026-27, 2027-28, and 2028-29 award years only, the job placement rate is calculated as the percentage of students that are employed during the second quarter after exiting the program.
- Starting in the 2029-2030 award year, job placement is calculated as the percentage of students who are employed in the occupation(s) for which the program prepares the students (as determined by the Governor or their designee in certifying Workforce Pell eligibility) or a comparable high-skill, high-wage, or in-demand occupation during the second quarter after successfully completing the program.

C. VALUE-ADDED EARNINGS

Programs are required to meet a median value-added earnings measure. This is calculated by determining whether program graduates receiving Workforce Pell funds earn more than the cost of the program (for all students) plus 150 percent of the poverty line, regionally adjusted, 3 years after completion.

ED will eventually make this calculation. In the interim, Governors or their designee are required to assess ROI until data are available for the federal calculation. The Workforce Pell Review Committee will collaborate with the MLDSC, MD Labor, Labor Market Information (LMI) Unit, and others as needed to pre-screen against this test during the program review process and will reject programs that do not pass the test.

II. STATE-DETERMINED PROGRAM ELIGIBILITY REQUIREMENTS

A. Workforce Pell Eligible Occupations

To be eligible for Workforce Pell, programs must provide an education aligned with the requirements of high-skill, high-wage, or in-demand industry sectors or occupations. Under federal statute, programs only need to meet one of these standards to be eligible. In Maryland, if a program is not high-wage as defined in this policy, it must demonstrate stackability of awarded credentials in at least one high-wage occupational pathway. Registered Apprenticeship programs are presumed to meet one or more of these three definitions and thus are automatically presumed to fill this requirement.

1. HIGH-SKILL

- a. For Workforce Pell, a **high-skill** occupation is assigned an O*NET Job Zone of 3 or higher – meaning that medium, considerable, or extensive preparation is required, typically including a postsecondary credential or degree.⁸

2. HIGH-WAGE

- a. In Maryland, a **high-wage** occupation is one that:
 - i. Pays a median wage that is higher than the State median wage in the most recently available Occupational Employment and Wage Statistics (OEWS).⁹

3. IN-DEMAND

- a. In Maryland, for the purposes of Workforce Pell, an **in-demand occupation** means an occupation that satisfies one or more of the following:

⁸ "O*NET Job Zones" refers to the categorical framework established by the [O*NET Resource Center](#), which organizes various occupations into five distinct zones based on the requisite levels of education, professional experience, and vocational training.

⁹ If an institution wishes to submit a program for consideration that trains learners for an occupation that does not meet the State's high-wage definition, but that it believes is in demand within its service area, the institution must include with its application a letter from the Chair of the Local Workforce Development Board for the area in which the institution is located. The letter must verify that, within the Local Workforce Development Area (LWDA), the occupation meets the applicable median wage criteria.

- i. State Threshold Test: An occupation is considered to pass this test if it meets both of the following criteria:
 1. Projected total number of annual openings is in the top 30 percent of annual openings projections statewide; **and**
 2. Projected growth rate in annual openings is equal to or greater than the statewide average annual openings growth rate projection.¹⁰
- ii. Governor's Strategic Designation: Is designated by the Governor, or the Governor's Workforce Development Board when designated by the Governor, as strategically critical to the State's economy, with public documentation of the rationale.

Upon issuance of this policy, the GWDB will maintain a publicly-available list of occupations meeting one or more of the definitions above, in coordination with and leveraging the analysis of the MD Labor's LMI Unit. This list will be updated on at least a bi-annual basis.

B. Aligns to Employer Hiring Needs

To be eligible for Workforce Pell, a program must be **aligned to employer hiring needs**. In Maryland, a program will be considered to meet this requirement if the institution provides evidence that the program's credential and competencies are valued in hiring for the target occupation(s), through one of the following pathways:

1. **Registered Apprenticeship:** The eligible program serves as a component of related technical instruction for a Registered Apprenticeship program in a qualifying occupation and has active apprentices enrolled; **or**
2. **Employer Validation of Alignment:** The program:
 - a. Awards an industry-recognized credential or recognized postsecondary credential (as defined in this policy); **and either**
 - b. Demonstrates documented employer validation in the form of:
 - i. A letter of endorsement from a state or regional sector partnership, or from one or more local workforce development boards, that confirms recent hiring and/or future intent to hire within the relevant occupation and confirms that the skills and competencies trained by the program align with industry needs; **or**
 - ii. Letters of support from three or more employers that confirms recent hiring and/or future intent to hire within the relevant occupation, that the skills and competencies trained by the program align with industry needs.

¹⁰ If an institution wishes to submit a program for consideration that trains learners in an occupation that does not meet the State In-Demand Threshold Test but the institution believes is in-demand within their service area, then the institution must provide with their application a letter from the Chair of the Local Workforce Development Board within whose Area the institution is located, verifying local area demand and providing data with cited sources. If such data is already cited for the occupation in the Local Area's most recent WIOA Plan, that Plan can serve as the cited data source.

C. Leads to a Recognized Postsecondary Credential that is Stackable and Portable

1. CREDENTIAL

To be eligible for Workforce Pell, a program must result in a **recognized postsecondary credential**, defined in 34 CFR Part 600 as: An industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship under 29 CFR Part 29, a license recognized by the State involved or federal government, or an associate or baccalaureate degree. In the case of a Registered Apprenticeship Program applying for Workforce Pell, the Workforce Pell-eligible component of the program does not need to culminate in the certificate of completion of the Registered Apprenticeship; the fact that the apprentice is expected to be awarded this credential at the end of their apprenticeship is considered sufficient for meeting this criteria.¹¹ In Maryland, eligible credentials include approved credentials under Maryland's industry-recognized credential policy.¹²

2. CREDENTIAL STACKABILITY

Additionally, an eligible program must result in a credential that is **stackable, unless it prepares students for employment in an occupation for which there is only one recognized postsecondary credential.**

- a. For Maryland, a credential is stackable if it can:
 - i. Be transferred seamlessly to postsecondary work through acceptance for credit or hours in core program courses at an eligible institution of higher education; **or**
 - ii. Be counted toward hours in an approved Registered Apprenticeship program; **or**
 - iii. Be part of a prescribed coherent sequence of industry-recognized credentials that show progressive skill development and qualify credential earners for professional advancement within their industry;
 - iv. If the program is a component of a Registered Apprenticeship; **or, if none of the above are true, and upon appeal by the applying institution,**
 - v. Has been obtained by a significant number of workers who have subsequently obtained further related credentials and sustained earnings increases.
- b. For programs aligned to occupations that do not meet the State's definition of high-wage, institutions must provide evidence that the credential is stackable within a pathway leading to employment in a high-wage occupation as defined in this policy. Evidence may include, but is not limited to:
 - i. Articulation agreements demonstrating articulation of credit into higher certificate or degree programs that prepare graduates for high-wage occupations;
 - ii. Longitudinal data demonstrating wage progression for program

¹¹ Maryland Governor's Workforce Development Board, Career and Technical Education (CTE) Committee. (2024). Industry-Recognized Credential (IRC) Policy. <https://gwdb.maryland.gov/policy/gwdbcte2024commindustrycredentialpolicy.pdf>

¹² Maryland State Department of Education. (2026). State-approved list of industry-recognized credentials. <https://marylandpublicschools.org/about/pages/approved-credentials.aspx>

- completers; **or**
- iii. Inclusion of the program as part of a Registered Apprenticeship with appropriate wage progression.

The Review Committee will evaluate such evidence as part of the program eligibility determination process described in Appendix A.

3. CREDENTIAL PORTABILITY

- a. A credential must also be **portable**. In Maryland, a credential is portable if:
 - i. The credential can support employment at more than one employer, in more than one county of the state, and, where applicable, outside the state; **and** [once measurable]
 - ii. Individuals with the credential are employed in a related field (as defined above) for the credential at more than one employer in the state; **or**
 - iii. The eligible program is a component of a Registered Apprenticeship, as the culminating certificate of completion at the end of the apprenticeship is a nationally-recognized credential.

D. Articulation to Credit

To be eligible for Workforce Pell, federal statute requires that a program must lead to credit toward a higher certificate or degree program. A program leads to a certificate or degree program if it:

- 1. Provides evidence of either (a) course transferability or (b) awarding of academic credit for prior learning into an existing academic program; and
- 2. Aligns to a related field of study, as determined by a shared CIP family at the 2-digit level.¹³

Institutions must provide written documentation that a program leads to such credit, such as established articulation agreements, transfer-of-credit agreements, consortium or partnership agreements. Any such documentation must delineate which institution(s) accept(s) credit for the program applying; how many credits each program completion will translate into; and provide documentation that it is translating into credit for programs in the same 2-digit CIP family.

Program Eligibility Determination Overview & Timeline

I. ELIGIBILITY DETERMINATION PROCESS OVERVIEW

The GWDB, in collaboration with MD Labor and MHEC, coordinates the administration of identification and recommendation processes for Workforce Pell eligibility, ensuring compliance with federal mandates and associated regulatory standards.

¹³ CIP family (2-digit level)" refers to the broad field-of-study groupings defined by the National Center for Education Statistics within the [Classification of Instructional Programs](#) taxonomy, which organizes academic programs into general categories based on subject matter

Maryland utilizes the State's ETPL as the primary intake mechanism ("front door") for institutions seeking program designation. This strategy ensures seamless integration with Maryland's existing workforce infrastructure, minimizes administrative duplication for providers, and leverages established data performance and vetting protocols under WIOA.

Final certification authority is vested in the GWDB Chair on behalf of the Governor. Program recommendations are informed by a rigorous cross-agency review conducted by a dedicated Workforce Pell Review Committee, as detailed further in Appendix A.

II. ELIGIBILITY DETERMINATION TIMELINE AND CADENCE

Maryland will accept applications on a rolling basis via the ETPL platform, with a minimum bi-annual eligibility determination cycles, structured as follows:

- **Application Submission (Rolling via ETPL):** Commencing upon the release of final federal regulations and State guidance. Anticipated between May 31 - June 30, 2026.
- **Bi-Annual Eligibility Determinations:**
 - Initial Application Completeness Review
 - Review Committee Evaluation and Recommendations to GWDB Chair
 - Decisions Issued by GWDB Chair on behalf of the Governor
- **ED Review and Approval:** Governed by federal timelines as specified in forthcoming final federal regulations.
- **Public Posting of Approved Programs:** Approved programs will be indicated on the ETPL and will be listed publicly on MHEC's website within 30 days of receipt of ED eligibility determinations.

Please see Appendix A: Application and Eligibility Determination Process for additional information.

Governance

The implementation of Workforce Pell in Maryland will be supported through a coordinated, cross-agency approach that integrates workforce, higher education, and economic development perspectives to ensure high-quality program determinations.

The GWDB will play a central coordinating role in this process, working in partnership with MD Labor, MHEC, and other relevant Maryland State agencies to support policy development, program review, and certification of eligible programs in accordance with federal requirements.

The roles of key entities are outlined below:

- **GWDB:**

Provides statewide leadership on Workforce Pell policy and priorities, establishes key definitions and standards, and supports coordination of the program review and certification process.
- **MD Labor:**

Supports administration of the application process, including intake through the Eligible Training Provider List (ETPL), and provides labor market data and analysis to inform program eligibility determinations.

- **MHEC:**
Supports alignment with postsecondary education requirements, including accreditation, credit articulation, and credential quality considerations.
- **MLDSC:** Partners on outcomes measurement and reporting to State agencies, the Maryland General Assembly, the U.S. Department of Education, and the public.
- **Cross-Agency Review Process:** State partners will collaborate through a Workforce Pell Review committee to assess program applications, including labor market alignment, employer engagement, and expected outcomes.

Final program eligibility determinations will be issued on behalf of the State for submission to ED, consistent with federal requirements.

Guidance & Resources

The State will publicly post an online resource hub for Workforce Pell policy, guidance, regulations, and technical assistance resources. These may include the following:

1. **GUIDANCE ON CREDIT TRANSFER AND CREDIT FOR PRIOR LEARNING**

MHEC and the GWDB recognize the critical need for clear regulations and comprehensive guidance regarding transfer and the awarding of credit for prior learning (CPL) to implement this policy. Earned college credit should be transferable and applied to specific programs of study, utilizing the regulatory framework that was revised in 2023 (see COMAR [13B.06.02](#) and complementary [2022 Guidance](#)).

Regulations regarding the awarding of college credit for prior learning will be updated to incorporate national best practices. Interim CPL policies will ensure equity between students with similar prior learning (i.e., consistency in the awarding of credit and objectivity of assessments), transparency (i.e., institutional policies on the awarding of credit for prior learning are easily accessible by the general public), and clearly indicate the awarding of credit for specific coursework (rather than a general number of credits).

2. **TEMPLATES AND MODEL MATERIALS**

The state partners may develop templates, forms, models, and other materials where applicable to simplify the application process for institutions while maintaining adherence to rigorous evaluation standards. Such materials may include, but are not limited to, templates for employer validation letters, and will be provided alongside the final issuance of the State policy, as well as via the application web platform.

3. **INFORMATION SESSIONS AND APPLICATION OFFICE HOURS**

Upon publication of final federal regulations and State policy, the GWDB, MHEC, MD Labor, and other partners, as relevant, will coordinate to deliver information sessions, application office hours, and be available for other technical assistance. The information sessions and application office hours will be posted to the MHEC and GWDB pages and distributed by MHEC to Title IV providers.

Appendix A | Application Process & Required Components

1. Point of Entry: Eligible Training Provider Application

All prospective institutions seeking program eligibility for Workforce Pell must utilize Maryland's WIOA Eligible Training Provider List (ETPL) system, administered by the Maryland Department of Labor, as the formal point of entry. This requirement applies to any eligible institution as defined in Program Eligibility, section I of this policy.

Programs already listed on the ETPL will be able to submit an abbreviated application. Programs not currently listed on the ETPL may achieve ETPL eligibility in accordance with existing State policies while also seeking Workforce Pell eligibility.

2. Required Application Components

Institutions must submit information sufficient to meet both ETPL and Workforce Pell eligibility. List (A) below reflects items required for both ETPL and Workforce Pell, and list (B) reflects items required only for Workforce Pell eligibility determinations. Institutions already listed on the ETPL will be required to submit only list (B) items.

A. Required for ETPL Eligibility + Workforce Pell Eligibility

Applicants must provide all information required under Maryland's ETPL policy. Similar information is required under draft federal Workforce Pell regulations, presenting an opportunity for programs to receive both WIOA and Workforce Pell funding eligibility in an efficient manner through the process outlined below. Required information includes the following, as well as other information required in the current Maryland ETPL policy.¹⁴

Provider and Program Information

- Provider eligibility and registration information
- Program title, description, and instructional format
- Program length and total instructional hours
 - Programs, as defined in this policy, must be between 150-599 clock hours and 8-15 weeks of instruction to qualify for Workforce Pell

Credential Information

- Credential(s) offered upon completion
- Stackability, portability, and articulation to credit documentation

Cost and Access

- Tuition and fees
- Availability of financial assistance or supportive services

Performance and Outcomes

- Program completion rate (all participants)

¹⁴ Maryland Department of Labor. (2021). Policy issuance 2021-07: Eligible Training Provider List (ETPL) policy. <https://labor.maryland.gov/employment/mpi/mpi7-21.pdf>

- Programs between 150-599 hours must report a minimum 70% completion rate to qualify for Workforce Pell, and meet ETPL eligibility (in accordance with current Maryland Department of Labor ETPL policy)
- Employment rate second quarter after exit (all participants)
 - Programs between 150-599 hours must report a minimum 70% employment rate second quarter after exit to qualify for Workforce Pell, and meet ETPL eligibility (in accordance with current Maryland Department of Labor ETPL policy)

Compliance and Assurances

- Agreement to comply with WIOA and State ETPL requirements
- Nondiscrimination and accessibility assurances

B. Additional Application Requirements for Workforce Pell Certification

In addition to ETPL application requirements, institutions must submit supplemental information to demonstrate eligibility under Workforce Pell criteria:

Labor Market Alignment and Demand

- Identification of the program's 6-digit CIP code(s) and associated occupational SOC code(s)
- Alignment of CIP code(s) and associated SOC codes to Maryland's high-skill, high-wage or in-demand occupations as defined in Program Eligibility, section II of this policy¹⁵

Program Quality and Design

- Employer validation of curriculum alignment to industry standards, as described in section II of this policy
- Description of student supports, including career navigation and job placement services, where applicable
- Description of work-based learning components, where applicable

Registered Apprenticeship programs may meet the above by providing their federal- or state-approved Registered Apprenticeship Agreement as documentation.

Accreditation and Institutional Eligibility

- Accreditation status and standing
- Compliance with federal Title IV participation requirements

Additional Federal Requirements

- Any additional information required by the U.S. Department of Education for Workforce Pell eligibility (pending final federal regulations)¹⁶

¹⁵ [Standard Occupational Classification \(SOC\) codes](#) refer to the federal classification system used to categorize workers into occupational groups, as maintained by the U.S. Bureau of Labor Statistics under the Standard Occupational Classification system

¹⁶ [U.S. Department of Education \(2026\) 34 C.F.R. Part 600 - Notice of Proposed Rulemaking Draft. NPRM](#)

The State may issue standardized templates or data collection forms to support consistent submission of Workforce Pell-specific information.

Appendix B | State Review & Determination Process

Institutions are invited to submit programs for consideration on a quarterly basis. Workforce Innovation & Opportunity Act (WIOA) Eligible Training Provider List (ETPL) eligibility will be determined in accordance with Maryland ETPL policy, and Workforce Pell eligibility will be determined on a minimum of a bi-annual basis.

1. Initial Screening: Application Completion

The State's program eligibility review will include two components:

A. WIOA Eligible Training Provider List Eligibility Review

State staff will verify the program's approval in accordance with current Maryland ETPL policy. Applications that do not meet ETPL requirements will not advance to Workforce Pell review and will be returned to the institution with guidance for corrective action.

B. Workforce Pell Application Completeness Review

For programs that meet ETPL requirements, State staff will review Workforce Pell-specific components to:

- Confirm submission of all required supplemental information
- Conduct preliminary validation of labor market alignment and outcomes data
- Identify any gaps requiring clarification prior to Committee review

Incomplete applications may be returned for revision prior to advancement.

2. Workforce Pell Review Committee

Applications that meet both ETPL and Workforce Pell completeness requirements will be advanced to the Workforce Pell Review Committee. The Review Committee will be comprised of staff representatives of:

- The Governor's Workforce Development Board
- The Maryland Higher Education Commission
- The Maryland Department of Labor
- The Maryland Department of Commerce
- The Maryland Apprenticeship & Training Program within MD Labor, when Registered Apprenticeship programs are under review

The Review Committee will assess the program's eligibility for Workforce Pell certification based on the criteria outlined in the Program Eligibility section of this policy, including estimating the value-added earnings test calculation as required in the first years of implementation. The Review Committee may request additional information or clarification from applicants during the review process.

3. State Certification of Eligible Programs

Based on its review, the Committee will make a formal recommendation to the Chair of the Governor's Workforce Development Board, as the Governor's designee, to:

- Approve the program for Workforce Pell eligibility;
- Deny the application; **or**
- Request revisions and resubmission of the application.

The GWDB Chair will serve as the Governor's designee and will issue the final determination in writing. Programs certified by the Chair will be notified by the State, and their applications will be sent to ED for final review and determination of Workforce Pell eligibility.¹⁷

4. Public Posting

All programs approved by the State and by ED for Workforce Pell aid will be denoted with this approval, where they appear on Maryland's ETPL list.

Additionally, MHEC will annually publish on its website a list of all current Maryland- and federally-approved Workforce Pell programs. This list will be updated within 30 days after ED's final approval of the Governor-certified program list. Published information will include the program name, provider, credential type, CIP/SOC alignment, tuition and fees, and other disclosures required by state or federal law.

¹⁷ U.S. Department of Education. (2026). Accountability in higher education and access through demand-driven Workforce Pell (Pell Grant) program (Notice of Proposed Rulemaking). Federal Register. <https://www.federalregister.gov/documents/2026/03/09/2026-04520/accountability-in-higher-education-and-access-through-demand-driven-workforce-pell-pell-grant>

Appendix C | Appeal & Eligibility Renewal

1. APPEALS PROCESS

Institutions may formally appeal a denial of eligibility by submitting written notification within 15 days of denial to gwdb.maryland@maryland.gov and the designated application point of contact at MD Labor, detailing the grounds for appeal and providing clarifying data.

Appeals will be reviewed by the Workforce Pell Review Committee. A final determination will be issued within 60 calendar days of receipt of the appeal. Institutions may continue seeking eligibility for denied programs in subsequent application review cycles.

2. ELIGIBILITY RENEWAL

Designated programs remain subject to continuous performance evaluations, federal eligibility criteria, and periodic State-level compliance reviews.¹⁸

The State reserves the right to revoke or decline renewal of eligibility for programs failing to meet established performance or compliance standards.

¹⁸ U.S. Department of Education. (2026). Accountability in higher education and access through demand-driven Workforce Pell (Pell Grant) program (Notice of Proposed Rulemaking). Federal Register. <https://www.federalregister.gov/documents/2026/03/09/2026-04520/accountability-in-higher-education-and-access-through-demand-driven-workforce-pell-pell-grant>

Appendix D | High-Wage, High-Skill, or In-Demand Occupations Draft List

The following lists high-wage, high-skill, or in-demand occupations in Maryland as of April 15, 2026, and as defined according to the definitions in this policy. The following also lists occupations that may potentially receive the Governor’s Strategic Designation as defined on pages 9-10 of this policy, based on economic development priority alignment. This data has been provided by the Labor Market Information Unit in the Maryland Department of Labor.

For Workforce Pell specifically, this list excludes occupations that meet the high-wage, high-skill, or in-demand definitions outlined in this policy that require a bachelor’s, master’s, doctoral, or professional degree or that can typically be obtained with only a high school diploma or equivalent. **Maryland’s final policy will include related Classification of Instructional Program (CIP) codes.**

Additionally, the program eligibility requirements articulated in this policy will further narrow the list of occupations toward which Workforce Pell Grants support training.

SOC Code	Occupational Title
11-9171	Funeral Home Managers
13-1032	Insurance Appraisers, Auto Damage
15-1231	Computer Network Support Specialists
17-3011	Architectural and Civil Drafters
17-3012	Electrical and Electronics Drafters
17-3013	Mechanical Drafters
17-3019	Drafters, All Other
17-3021	Aerospace Engineering and Operations Technologists and Technicians
17-3022	Civil Engineering Technologists and Technicians
17-3023	Electrical and Electronics Engineering Technologists and Technicians
17-3024	Electro-Mechanical and Mechatronics Technologists and Technicians
17-3025	Environmental Engineering Technologists and Technicians
17-3026	Industrial Engineering Technologists and Technicians
17-3027	Mechanical Engineering Technologists and Technicians
17-3028	Calibration Technologists and Technicians
17-3029	Engineering Technologists and Technicians, Except Drafters, All Other
19-4012	Agricultural Technicians
19-4013	Food Science Technicians
19-4031	Chemical Technicians
19-4042	Environmental Science and Protection Technicians, Including Health
19-4043	Geological Technicians, Except Hydrologic Technicians
19-4044	Hydrologic Technicians
19-4051	Nuclear Technicians
19-4071	Forest and Conservation Technicians
19-4099	Life, Physical, and Social Science Technicians, All Other
23-2011	Paralegals and Legal Assistants

23-2099	Legal Support Workers, All Other
25-2011	Preschool Teachers, Except Special Education
25-4031	Library Technicians
27-3092	Court Reporters and Simultaneous Captioners
27-4011	Audio and Video Technicians
27-4012	Broadcast Technicians
27-4014	Sound Engineering Technicians
27-4015	Lighting Technicians
29-1124	Radiation Therapists
29-1126	Respiratory Therapists
29-1292	Dental Hygienists
29-2031	Cardiovascular Technologists and Technicians
29-2032	Diagnostic Medical Sonographers
29-2033	Nuclear Medicine Technologists
29-2034	Radiologic Technologists and Technicians
29-2035	Magnetic Resonance Imaging Technologists
29-2042	Emergency Medical Technicians
29-2043	Paramedics
29-2051	Dietetic Technicians
29-2053	Psychiatric Technicians
29-2055	Surgical Technologists
29-2056	Veterinary Technologists and Technicians
29-2057	Ophthalmic Medical Technicians
29-2061	Licensed Practical and Licensed Vocational Nurses
29-2072	Medical Records Specialists
29-2099	Health Technologists and Technicians, All Other
29-9021	Health Information Technologists and Medical Registrars
29-9093	Surgical Assistants
29-9099	Healthcare Practitioners and Technical Workers, All Other
31-1131	Nursing Assistants
31-2011	Occupational Therapy Assistants
31-2021	Physical Therapist Assistants
31-9011	Massage Therapists
31-9091	Dental Assistants
31-9092	Medical Assistants
31-9094	Medical Transcriptionists
31-9097	Phlebotomists
33-1021	First-Line Supervisors of Firefighting and Prevention Workers
33-2011	Firefighters
33-2021	Fire Inspectors and Investigators
35-2013	Cooks, Private Household
39-4011	Embalmers
39-4031	Morticians, Undertakers, and Funeral Arrangers
39-5011	Barbers
39-5012	Hairdressers, Hairstylists, and Cosmetologists
39-5092	Manicurists and Pedicurists

39-5094	Skincare Specialists
43-4161	Human Resources Assistants, Except Payroll and Timekeeping
43-9031	Desktop Publishers
49-2021	Radio, Cellular, and Tower Equipment Installers and Repairers
49-2022	Telecommunications Equipment Installers and Repairers, Except Line Installers
49-2091	Avionics Technicians
49-2093	Electrical and Electronics Installers and Repairers, Transportation Equipment
49-2094	Electrical and Electronics Repairers, Commercial and Industrial Equipment
49-2095	Electrical and Electronics Repairers, Powerhouse, Substation, and Relay
49-2097	Audiovisual Equipment Installers and Repairers
49-3011	Aircraft Mechanics and Service Technicians
49-3023	Automotive Service Technicians and Mechanics
49-3052	Motorcycle Mechanics
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers
49-9062	Medical Equipment Repairers
49-9081	Wind Turbine Service Technicians
51-4111	Tool and Die Makers
51-5111	Prepress Technicians and Workers
51-9162	Computer Numerically Controlled Tool Programmers
53-2012	Commercial Pilots
53-2021	Air Traffic Controllers
53-3032	Heavy and Tractor-Trailer Truck Drivers
53-5021	Captains, Mates, and Pilots of Water Vessels
53-5031	Ship Engineers

Appendix E | Additional Definitions

ADDITIONAL FEDERALLY-DEFINED TERMS

Student Eligibility. A student is eligible to receive a Workforce Pell Grant if the student meets all applicable eligibility requirements for a Federal Pell Grant under Title IV of the Higher Education Act. The student must be enrolled in an eligible workforce program and must not be enrolled in, accepted for enrollment in, or have completed a program of study at the graduate level or obtained a graduate credential.

In-demand industry sector or occupation.

(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.¹⁹

ADDITIONAL STATE DEFINITIONS

Program means an eligible workforce program submitted by an eligible institution for Workforce Pell approval, including credit or noncredit offerings as permitted under federal rules. A program must:

- Lead to a credential as defined in this policy;
- Be assigned an appropriate CIP code for reporting; and
- Have clearly defined and documented mastery of skills and/or competencies.

Where an institution offers multiple pathways that lead to the same credentials, each pathway must be treated as a distinct program for Workforce Pell eligibility determination purposes. A program may consist of one or more courses that collectively fulfill the above requirements for a program and meet other Workforce Pell eligibility criteria.

Completer means a student who has satisfied all established program completion requirements, including:

- Required clock or credit hours;
- Required coursework or competencies; and
- Any required examinations or assessments,

and who has been formally awarded the identified credential.

Service area means the geographic region from which a program primarily draws students and to which it is designed to respond for workforce demand purposes.

¹⁹ U.S. Department of Education (2026) 34 C.F.R. Part 600 - Notice of Proposed Rulemaking Draft. [NPRM](#)

This may include:

- One or more local workforce development areas;
- The institution's officially recognized service area; or
- A statewide designation, where appropriate.

In instances of virtual or distance learning across state lines, Maryland will comply with federal rules allowing Governors or their designee to enter into bilateral agreements for cross-state approvals.

Academic Credit is defined by Maryland Higher Education Commission as under COMAR 13B.02.02.03 as the certification of a student's successful completion of a unit of a course of study leading to a formal award granted by an in-state institution approved to offer a collegiate degree, such as an associate or higher degree. It does not include credit awarded for remedial education.

The Governor or their designee may allow either statewide or local workforce development area labor market analysis to satisfy occupational demand requirements for program eligibility, according to the methodology below.

Related Fields. A program is considered to place completers into related fields if that field's 4-digit SOC code is a match against the program's 4-digit CIP code.²⁰ A 4-digit SOC-CIP "match" means a correspondence between occupational and instructional program codes as identified through established crosswalk methodologies linking the Standard Occupational Classification system and the Classification of Instructional Programs, including crosswalks developed or endorsed by the National Center for Education Statistics and the U.S. Bureau of Labor Statistics.

²⁰ National Center for Education Statistics & Bureau of Labor Statistics. (2020). *CIP SOC crosswalk* [Data file]. U.S. Department of Education & U.S. Department of Labor. [NCES](#)



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