

Wisconsin Workforce Pell Implementation Policy

Governor's Council on Workforce Investment
Wisconsin Department of Workforce Development

July 2026





Tony Evers

Office of the Governor | State of Wisconsin

July 20, 2026

Subject: STATE WORKFORCE PELL PROGRAM ADMINISTRATION AND IMPLEMENTATION POLICY

In accordance with Federal Law, I, Tony Evers, Governor of the State of Wisconsin, approve the State Workforce Pell Program Administration and Implementation Policy.

The policy provides initial guidance for Workforce Pell programs – including the criteria, processes, and procedures the designated entities will use to determine whether programs prepare students for in-demand or high-skill/high-wage occupations, are validated by employers, lead to recognized and portable credentials, support continued postsecondary progression, meet required completion and job placement outcomes, and remain aligned with workforce needs. It also describes institutional application requirements, federal approval responsibilities, ongoing reporting, appeals, re-application, and public transparency obligations.

The momentum we have built in Wisconsin's workforce is undeniable. Strategic investments have driven measurable results across the state from record low unemployment to significant wage increases with our apprenticeship programs consistently setting new records by connecting workers with high-demand careers. In 2025, Wisconsin's Registered Apprenticeship program achieved its fourth consecutive record-breaking year in its 115-year history, while Youth Apprenticeship participation reached a consecutive fifth year high. Furthermore, our dedication to opportunity has resulted in my administration recently awarding over \$410,000 in worker training grants through the Wisconsin Fast Forward Program to assist in training more than 600 healthcare workers and help fill critical workforce needs, and in 2021, we launched the state's Workforce Solutions Initiative, which works to connect unemployed or underemployed workers with new opportunities. To date this program collectively served 127,775 Wisconsinites across the state.

I have delegated the authority and responsibility to the Wisconsin Department of Workforce Development Secretary to act on my behalf to effectuate the approvals and requirements the Workforce Pell program. I look forward to working closely with Secretary Pechacek, the Department of Workforce Development and higher education institutions to continue the pattern of record-breaking success through the new Workforce Pell Program.

Sincerely,

A handwritten signature in blue ink that reads 'Tony Evers'.

Tony Evers
Governor

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Purpose and Authority

This policy establishes Wisconsin's public process for reviewing, determining, certifying, and maintaining state/governor approval for short-term programs seeking consideration as eligible workforce programs under the federal Workforce Pell Grant provisions. The policy intends to satisfy the governor process requirements in the final rule ([91 Fed. Reg. 29254 \(May 19, 2026\)](#)) establishing the Workforce Pell Grant and creating 34 CFR Part 690 Subpart H and to support institutional submission to the U.S. Department of Education (ED) for final program approval.

The final rule establishes Workforce Pell requirements 34 CFR Part 690 Subpart H and related provisions in 34 CFR Parts 600 and 668. For purposes of the Workforce Pell, this policy is Wisconsin's process and methodology for implementing the federal Workforce Pell regulations and, in particular, the process and methodology for identifying high-skill/high-wage and in-demand occupations served by eligible short-term postsecondary programs. The policy outlined in this document is intended to ensure compliance with federal requirements while supporting Wisconsin's workforce development priorities.

The policy balances three aims:

1. Align programs with high-skill, high-wage, in-demand occupational needs;
2. Ensure quality outcomes (completion, placement, and value-added earnings); and
3. Provide a transparent, consistent process for institutions and learners.

Policy principles:

- **Compliance:** Wisconsin will not approve a program unless it has been reviewed and determined to meet all state/governor approval requirements applicable under federal law and regulation.
- **Federal approval not presumed:** Governor/designee certification is a prerequisite to federal review, not the final federal eligibility determination.
- **Employer-driven quality:** Applications must document employer demand, competencies, and hiring relevance.
- **Pathway value:** Approved programs should support immediate employability and meaningful progression to additional credentials, certificates, or degrees.
- **Data minimization and accountability:** Wisconsin will use verified administrative data where possible while collecting only the information needed for eligibility, monitoring, reporting, and federal compliance.
- **Public transparency:** Wisconsin will publish the approval process, occupation methodology, application windows, appeal procedures, and approved program information.

Governance

Governors have significant authority over how Workforce Pell is implemented in their state or territory. Federal law requires the governor, in consultation with their state workforce board and ED, to determine eligible programs that are high-skill, high-wage, in-demand, stackable, and portable across employers. Federal law also requires the governor to establish a process through which postsecondary institutions may request approval of short-term training programs to determine eligibility for Workforce Pell funding.

The implementation of Workforce Pell in Wisconsin 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 Governor's Council on Workforce Investment (CWI) will serve an important role in coordinating this process by working with state agencies and stakeholders to support policy development, program review, and certification of eligible programs in accordance with state and federal requirements.

Governor and Governor's Designee

The governor retains responsibility for state level approval under federal Workforce Pell requirements. For implementation purposes in Wisconsin, Governor Evers has delegated the authority and responsibility to the Department of Workforce Development (DWD) Secretary to act on his behalf to administer the review process, issue certifications, and communicate state determinations, subject to any requirements established by the Governor and federal law (see Designation Letter in Appendix B).

Thus, the DWD Secretary has the authority and responsibility to:

- Establish and maintain the publicly available Workforce Pell program approval process;
- Ensure consultation with the CWI, Wisconsin's state workforce board, before approval determinations;
- Issue certification for approved programs using the format required by ED;
- Decline to approve programs that do not meet applicable requirements;
- Notify ED, U.S. Department of Labor (DOL), and the applying institution within required timelines if state approval is withdrawn; and
- Provide continued approval certifications before expiration of the institution's Program Participation Agreement, as required.

Governor's Council on Workforce Investment

CWI serves as Wisconsin's state workforce board. CWI consultation must occur before the DWD Secretary issues state approval. CWI consultation will occur at the CWI's quarterly full council meetings where the CWI will hold a formal vote to approve or deny programs.

The CWI consultations will include determining that programs provide education aligned with the requirements of high-skill/high-wage, and/or in-demand industry sectors or occupations, meet the hiring requirements of potential employers, and satisfy educational prerequisites for professional licensing or certification in the state.

CWI consultation documentation must include:

- Program name,
- Institution,
- Review summary,
- Recommendation,
- Meeting date or consultation date,
- An attestation that CWI was consulted, and
- Dissents of any council member related to the recommendations or vote of the council.

Department of Workforce Development

DWD will provide administrative support for the review process. DWD's responsibilities include:

- Publishing the policy, application instructions, deadlines, templates, checklists, appeal process, and approved program information;
- Conducting intake and completeness review;
- Maintaining the Hot Jobs list and Standard Occupational Classification (SOC)/ Classification of Instructional Programs (CIP) crosswalk or coordinating with the appropriate data unit to obtain relevant information;
- Coordinating labor market, employer validation, wage, and data verification review as needed;
- Coordinating with the Wisconsin Technical College System (WTCS), Universities of Wisconsin, Wisconsin Association of Independent Colleges and Universities (WAICU), local workforce development boards, Registered Apprenticeship representatives, and other partners as needed;
- Compiling recommendation packages for CWI consultation and certification decision; and
- Maintaining official records of applications, determinations, appeals, certifications, and continued approvals.

Workforce Pell Review Committee

The Workforce Pell Review Committee will support consistent application review and advise the DWD Secretary and CWI on Workforce Pell. Committee membership includes representatives from DWD, Wisconsin Technical College System (WTCS), Universities of Wisconsin, Wisconsin Association of Independent Colleges and Universities (WAICU), and community-based organizations. Subject matter experts may be consulted as reviewers when technical program knowledge is required, including representatives from other data governance entities, local workforce development boards, Registered Apprenticeship, and CWI.

Institution and Education Providers

Institutions and education providers are responsible for determining whether to seek Workforce Pell approval for a program and for submitting complete, accurate, and verifiable documentation. Institutions remain responsible for federal application submission, federal financial aid compliance, student disclosures, record retention, reporting published tuition and fees through the federal process, and maintaining Title IV of the Higher Education Act eligibility.

Eligibility Requirements

Federal Workforce Pell law requires governors to establish a publicly available process allowing providers to request a determination that their program meets specific federal Workforce Pell criteria. The following section outlines Wisconsin's criteria and process in accordance with the federal requirements.

Training Provider Eligibility

Eligible training institutions and education providers must be accredited institutions that are eligible to access federal financial aid under Title IV of the Higher Education Act and maintain an active Program Participation Agreement with ED. The institution must be authorized to offer the program and be in good standing with applicable federal, state, accreditor, and institutional oversight requirements. An eligible institution may enter into a written agreement that permits an outside entity or ineligible provider to offer up to 25% of the education program (see Ineligible Partner Agreement section below for additional details).

Federal Good-Standing

- The institution must not have been subject to suspension, emergency action, or termination of Title IV programs by the U.S. Secretary of Education during the five (5) years preceding the determination date.
- The institution must disclose any pending or recent adverse action by an accreditor, state authorization agency, federal agency, or other oversight entity that could affect program integrity, student protection, or Title IV eligibility.
- The institution must provide the Program Participation Agreement (PPA) expiration date so Wisconsin can track continued approval and re-certification.

Registered Apprenticeship and Related Instruction

A program that serves as the related instruction component of a Registered Apprenticeship program is treated under federal rules as meeting the governor-determined alignment and employer hiring requirements. The program must still satisfy all other applicable Workforce Pell requirements, including program length (counting only classroom-based instruction, not on-the-job learning), hours or credits, program-to-credit articulation, U.S. Secretary of Education review, value-added earnings, and any other federal or state requirements.

Ineligible Partner Arrangements

Institutions may enter into written arrangements with outside entities or ineligible institutions with specific expertise and resources, such as employers, to provide a portion of the eligible workforce program. If an eligible institution uses a written arrangement with an ineligible institution or organization, the institution must document compliance with federal written-arrangement limits. An ineligible institution or organization may not provide more than 25% of instruction for an eligible workforce program, except that an arrangement above 25% and below 50% may be permissible only when the program is a related instruction component of a Registered Apprenticeship program and applicable accreditor or state agency standards are met.

Program Eligibility

To qualify for state approval for Workforce Pell eligibility, a program must be offered by an accredited public, non-profit, or for-profit entity eligible to participate in student aid programs under Title IV of the Higher Education Act and satisfy all state and federal Workforce Pell eligibility requirements.

Institutions are encouraged to complete a self-review before applying and consult with their governing system or central office to ensure compliance with any system-level requirements.

Federally Determined Program Eligibility Requirements

A program must satisfy all applicable federal Workforce Pell eligibility requirements and all Wisconsin state/governor criteria set by this policy before Wisconsin will issue certification.

Wisconsin approval does not guarantee federal approval.

Wisconsin is unable to waive federal requirements or certify programs that fail to meet federal requirements. DWD, CWI, and other partners may provide technical feedback to assist programs in meeting federal requirements. Wisconsin may deny or defer certification when documentation is incomplete, inconsistent, unverifiable, not current, or insufficient to support a federal certification statement.

Eligibility Criterion	Requirement
Length	Program requires a minimum of 8 weeks but less than 15 weeks of instruction ¹ .
Hours or credits	Program is 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.
Modality restrictions	Program is not offered through correspondence courses, study abroad coursework, or credit/clock-hour equivalencies that are part of a direct assessment program.
Operating history	Program has sufficient operating history to document 12-month compliance where required by 34 CFR §§ 690.93 and 690.94 .
Institution good standing	Institution is Title IV eligible, has an active Program Participation Agreement, and has not been subject to suspension, emergency action, or termination during the preceding five (5) years.
Priority occupation alignment	Program prepares participants for an occupation or sector that: • aligns with Wisconsin's high-skill/high-wage, and/or in-demand criteria; or • provides clear evidence documenting employer validation of the program's competencies and hiring needs.
Employer hiring needs	Program meets the hiring requirements of potential employers and aligns program competencies with occupational competencies.
Credential	Program leads to a recognized postsecondary credential that:

¹ For federal student aid purposes, a week of instructional time is defined as any consecutive 7-day period in which at least one day of regularly scheduled instruction, examination, or authorized academic activity occurs. Eligible Workforce Pell Grant programs must contain at least 8 but fewer than 15 weeks of instructional time, but can be scheduled to include breaks when no instruction occurs.

	• is stackable and portable across more than one employer; or • prepares students for an occupation with only one recognized postsecondary credential and provides that credential upon completion.
Program-to-credit articulation	Program ensures that a student who completes the program and enrolls in a related certificate or degree program receives academic credit accepted toward the certificate or degree requirements at one or more eligible institutions.
Completion and placement	Program meets Completion Rate and Job Placement Rate, as described in the Federal Requirements for Program Performance below.
Cost and value-added earnings	Before federal value-added earnings are available, Wisconsin will consider program cost and anticipated wages. After ED calculates value-added earnings, the institution must keep published tuition and fees at or below ED's published value-added earnings for the program.
Federal approval	The U.S. Secretary of Education must approve all Workforce Pell eligible programs.

Federal Requirements for Program Performance

Programs must meet the following federal requirements for program performance before their application is submitted to ED:

Completion Rate

Programs must meet a completion rate of at least 70%.

- 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% of the normal time to completion, based on the governor or their designee's analysis using administrative data, including wage records.
- Starting in the 2029-30 award year, the completion rate will be calculated as the percentage of students who complete within 150% of the normal time to complete, based on a calculation made by the institution and audited by federal authorities under the federal regulations.

Job Placement Rate

Programs must meet a job placement rate of at least 70%.

- 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 2029-30 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, and/or in-demand occupation during the second quarter after successfully completing the program.

State-Defined Eligibility Requirements

This section establishes Wisconsin's criteria which the governor, in consultation with CWI, will use to ensure that programs:

- Align with high-skill, high-wage, as defined in the [Wisconsin Perkins V State Plan](#) (May 2026), or in-demand sectors or occupations.
- Meet hiring requirements of employers.
- Lead to a credential that is:
 - Stackable and portable across more than one employer; or
 - The only credential for a specific occupation and awarded upon completion.
- Prepare students to pursue one or more certificate or degree programs and ensure academic credit is accepted at those programs.

Identification of High-Wage/High-Skilled, and In-Demand Occupations and Industry Sectors

Wisconsin will use a data-driven priority occupation methodology to ensure Workforce Pell-supported programs prepare students for employment in occupations and sectors that are high-skill, high-wage, and in-demand. Program must meet high-skilled and high-wage and/or in-demand criteria **or** provide evidence documenting employer validation of the program's competencies and hiring needs. For initial implementation, Wisconsin uses the following criteria to determine high-wage, high-skilled, and in-demand:

- **High-skilled:** Wisconsin recognizes programs of study with an industry-validated curriculum that results in an industry-recognized certificate or credential, certificate of completion of an apprenticeship, a license recognized by Wisconsin or federal government, or degree as training for high-skills.
- **High-wage:** Wisconsin recognizes programs of study that train for occupations that have a median wage higher than the state median salary as training for high-wage.
- **In-demand:** Wisconsin recognizes programs of study that train for occupations included on DWD's Hot Jobs list as the primary source for identifying training for in-demand occupations. DWD will publish the Workforce Pell priority occupation list and a SOC/CIP crosswalk for institutions.

DWD's [Hot Jobs](#) list identifies high projected growth occupations that meet all of the following baseline criteria:

- Median salary is above the statewide median salary;
- Projected percentage growth is greater than the statewide average; and
- The occupation has significant projected openings.

The Hot Jobs list uses SOC codes, and academic programs use CIP codes. DWD will link eligible SOC codes to the corresponding CIP codes and publish this SOC/CIP crosswalk. This

crosswalk will serve as the definitive list institutions can use to determine whether a program's CIP code aligns with an eligible occupation and therefore qualifies for review.

High-Skill, High-Wage, and In-Demand Definitions for Wisconsin Workforce Pell

Term	Wisconsin Definition
High-skill	High-skill refers to industry-validated curriculum programs that result in industry-recognized certificates, credentials, degrees, or apprenticeship diplomas.
High-wage	As defined in Wisconsin's Perkins V State Plan , high-wage occupations are those with hourly wages above the Wisconsin state median based on the DWD's estimates pursuant to the most current available data . (Wisconsin All Occupations Hourly Median Wage: \$24.17; Source: US Bureau of Labor Statistics (BLS) Occupational Employment and Wage Statistics (OEWS), May 2025)
In-demand	In-demand occupations and industries in Wisconsin are those officially identified by Wisconsin's workforce agencies (state or local workforce development boards) as experiencing persistent employer demand, high job vacancy rates, or significant projected growth—particularly within the state's priority sectors. These designations must be supported by state or regional labor market data and employer input and are required for Workforce Pell eligibility under federal statute.
Priority occupation	A priority occupation is an occupation that meets Wisconsin's high-skill, high-wage, and in-demand criteria and is included on the published Workforce Pell priority occupation list. Additional occupations may still be approved by providing clear evidence documenting employer validation of the program's competencies and hiring needs.

DWD will review the priority occupation list and SOC/CIP crosswalk at least every two years, concurrent with the development or modification of the Workforce Innovation and Opportunity Act (WIOA) State Plan under WIOA section 102(c). DWD may conduct interim updates when significant labor market shifts occur, when federal guidance changes, or when Wisconsin adopts a new priority occupation methodology.

Additional Considerations for Regional or Emerging Demand

Wisconsin may consider programs that do not meet the above methodologies for high-wage, high-skilled, or in-demand but can demonstrate strong regional or emerging demand in other ways. To be considered, programs must provide equivalent or stronger evidence of high-skill, high-wage, or in-demand status, employer hiring need, and wage value (see the table below for examples of evidence types).

Employer Hiring Requirements

With the exception of Registered Apprenticeship programs, programs seeking Workforce Pell eligibility approval must provide clear evidence that they meet employer hiring requirements. Expected program competencies must align with the employers' needs in the eligible occupation or sector.

Examples of evidence for employer hiring requirements (including but not limited to):

Evidence type	Minimum content
Job postings analysis	Analysis from Job Center of Wisconsin, state or national job posting aggregators, Lightcast, or another reputable labor market analytics source. The analysis must align to the program geography, use recent postings, identify unique postings where possible, and show that a meaningful share of postings require or prefer the program competencies or credential.
Employer letters	Letters from at least two (2) unique employers or a relevant employer association. Each letter should identify hiring need, prior or planned hiring of graduates, required competencies, credential recognition, employer commitment to consider program completers for related positions (i.e., commitment to interview or commitment to hire), and an employer contact for validation.
Workforce development board or sector partnership evidence	Local workforce development board letter, sector partnership documentation, advisory committee minutes, or occupational advisory meeting minutes that include employer participation and document hiring need and competency alignment.
Registered Apprenticeship documentation	For related instruction components of Registered Apprenticeship programs, apprenticeship standards, sponsor documentation, or registration documentation may establish employer validation for the governor-determined alignment and hiring requirements.
Supplemental evidence	Employer surveys, industry association reports, occupational licensing standards, advisory committee rosters, curriculum-to-competency crosswalks, graduate employer feedback, or other evidence approved by DWD.

Evidence Freshness and Validation

Employer validation evidence should generally be dated within 24 months of the application unless the evidence is a standing licensing, apprenticeship, or accreditation requirement. DWD may contact employers, workforce boards, employer associations, apprenticeship sponsors, or institutional staff to verify submitted evidence. False, misleading, unverifiable, or materially incomplete evidence is grounds for denial, withdrawn approval, or referral for additional review.

Credential Criteria (Stackability, Portability, and Single-Credential Occupation)

The program must lead to a recognized postsecondary credential that is stackable and portable unless the program prepares students for an occupation for which there is only one recognized postsecondary credential and provides that credential upon completion. The state review shall consider whether the credential is recognized by employers, supports employment in the applicable sector or occupation, and can reasonably support student progression along a career pathway.

Recognized Postsecondary Credentials

Acceptable credentials may include industry-recognized certificates or certifications, state or federally recognized licenses, certificates of completion of Registered Apprenticeship under 29 CFR part 29, associate degrees, baccalaureate degrees, or other credentials meeting the federal definition.

Stackability

A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or career ladder to different and potentially higher-paying jobs. A stackable credential does not need to be fully embedded or 100% contained within a larger program and does not need to stack within the same institution. Credentials are considered stackable if they provide documented, articulated credit as part of a related credential program sequence at one or more eligible institutions across all higher education sectors in alignment with Wisconsin statutes and requirements.

To demonstrate stackability, the institution shall submit evidence that the credential has standalone labor market value and connects to additional training, education, credentials, apprenticeships, certificates, diplomas, or degrees.

Evidence of stackability may include:

- Published career pathway maps showing progression from the workforce program to additional credentials or degrees;
- Written articulation, transfer-of-credit, credit for prior learning, consortium, or partnership agreements;
- Documentation of additional credentials students may earn after completing the Workforce Pell program;
- Evidence that the program's credential is embedded in or connected to a broader academic or career pathway;
- Data showing students have historically progressed to additional credentials or related employment, if available; and
- Public-facing program materials that disclose progression opportunities, credit awarded, timelines, and related labor market outcomes.

Portability

A credential is considered portable when it is recognized and accepted as verifying the qualifications of an individual in other settings— such as other geographic areas, other educational institutions, employment at more than one employer, or enable credit transfer across institutions of higher education.

To demonstrate portability, the institution shall submit evidence that the credential is valued by more than one employer within an industry or across industries.

Evidence of portability may include:

- Letters from multiple employers recognizing or preferring the credential;
- Job postings from multiple employers listing the credential or associated competencies;
- Labor market analytics showing demand for the credential or associated competencies across employers;
- Industry-recognized certification documentation;
- Licensure requirements recognized by the state or federal government;
- Registered Apprenticeship sponsor or industry association documentation; and
- Local workforce development board or sector partnership validation.

Single-Recognized-Credential Pathway

If an institution asserts that an occupation has only one recognized postsecondary credential, it must submit written evidence identifying the occupation, the sole recognized credential, the legal or industry basis for that credential, and documentation that students receive the credential upon completion of the program.

If an institution asserts that an occupation has only one recognized postsecondary credential, the application must document the applicable occupation, credential, licensing or industry framework, and evidence that the program provides the credential upon completion. The exception does not waive employer validation, program-to-credit articulation, completion, placement, cost/wage, or other federal eligibility requirements.

Evidence may include state licensure statutes or rules, federal requirements, national certification requirements, or authoritative industry standards.

Review Standard

The Review Committee shall evaluate applications to ensure they are stackable, portable, and meet the single-credential occupation requirements.

Program-to-Credit Articulation

To be eligible for Workforce Pell, federal law 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 similar curricular area which may be evidenced by a CIP or SOC code.

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 appropriate CIP family.

Acceptable Articulation Documentation

- Established articulation agreement;
- Transfer-of-credit agreement;
- Credit for prior learning policy with a program-specific crosswalk;
- Consortium, partnership, or system-level agreement confirming credit acceptance;
- Institutional policy or catalog provision guaranteeing credit for completion of the program; or
- Other formal documentation approved by DWD that demonstrates guaranteed or standardized credit recognition.

Required Elements of Articulation Evidence

- Name of the institution(s) that will accept credit;
- Name of the receiving certificate or degree program(s);
- Number and type of credits awarded;
- Courses, requirements, electives, or credential blocks satisfied by the credit;
- CIP code, SOC code, or curricular relationship showing that the receiving program is in a related field of study;
- Conditions students must meet to receive the credit, such as minimum grade, credential exam, enrollment deadline, or documentation requirements; and
- Effective date, expiration date, renewal process, and signatures or approval evidence from authorized officials.

An institution must notify DWD of changes to articulation arrangements within 10 calendar days of the change and before the institution relies on the changed arrangement for state or federal Workforce Pell approval.

Program Review, Determination, and Certification Process

Wisconsin training providers seeking state approval must submit a separate, complete application for each program through the application published on: cwi.wisconsin.gov/grants/workforce-pell. All applications, supporting artifacts, institutional data submissions, attestations, and amendments must be submitted electronically unless an alternative procedure is approved by DWD and documented.

Application completeness

Incomplete applications will be returned without full review. Application reviewers may allow a limited opportunity to correct, amend, or supplement applications for minor omissions or administrative errors if doing so does not compromise consistent treatment of applicants. Substantive missing evidence, unsigned attestations, unsupported data files, and/or failure to use required templates may result in denial or deferral to a later cycle.

Application Components

Institutions are encouraged to conduct a self-review of state and federal requirements and eligibility criteria before submitting applications.

Component	Information/Documentation Description
Institutional information	Institution name, Office of Postsecondary Education ID (OPEID), campus or location, authorized official, PPA expiration date, Title IV status, accreditor, state authorization, ETPL status (if applicable), and disclosure of adverse actions.
Program identity	Program name, credential awarded, CIP code, SOC code(s), instructional weeks, clock hours or credit hours, modality, location, catalog description, normal time to complete, costs, and program capacity.
Federal eligibility self-review	Institutional attestation and evidence that the program meets length, hour/credit, modality, operating history, written-arrangement, and good-standing requirements.
Occupation alignment	Identification of eligible SOC/CIP alignment using the Workforce Pell crosswalk or an approved pathway, if available.
Employer validation	Job postings, employer letters, workforce board evidence, advisory minutes, Registered Apprenticeship documentation, competency crosswalk, or other approved evidence.
Credential documentation	Recognized credential documentation, stackability evidence, portability evidence, or single-recognized-credential evidence.
Program-to-credit articulation	Articulation agreement, transfer agreement, credit for prior learning crosswalk, consortium agreement, or other written agreements or policies showing academic credit accepted toward at least one related certificate or degree program at one or more eligible institutions.
Performance data	Completion and placement data sufficient to verify applicable federal thresholds, plus data certification signed by an authorized official. Whenever possible, DWD will verify performance data using the ETPL. DWD may need to contact the applying institution to collect data to verify performance outcomes and metrics.

Cost and wage evidence	Published tuition and fees, required books/supplies/tools/exam fees, total student charges, anticipated wages, labor market wage sources, and any student debt or payment plan information requested by DWD.
Attestations and certifications	Authorized official attestation regarding accuracy, data privacy, federal/state compliance, notification duties, and ongoing reporting obligations.

DWD shall conduct an initial completeness review. If an application is incomplete, DWD may return it without substantive review or provide opportunity to correct, amend, or supplement applications. Additionally, if clarification or further information is needed for the program screening, data verification, or qualitative review portion of the review process, the Workforce Pell Review Committee may return the application and require information necessary to complete the review be provided within an allowable timeframe.

A typical timeframe to complete corrective action on applications will be 10 business days unless DWD or the Workforce Pell Review Committee sets a different period in the instructions provided to the applicant. A program is not considered ready for CWI consultation or certification decision until DWD determines the application is complete.

Review Process

Wisconsin will use a multi-tier review process administered by DWD in coordination with partner agencies and in consultation with CWI. The Workforce Pell Review Committee is advisory. The DWD Secretary, as the governor's designee, issues the certification required by the federal process.

Tier	Review Activity	Lead
Tier 0: Pre-application self-review	Institution reviews all federal and Wisconsin requirements, confirms eligibility status to the extent possible, and prepares evidence.	Institution
Tier 1: Intake and completeness	Verify required fields, signatures, artifacts, data, and required information was submitted successfully.	DWD
Tier 2: Baseline program screening	Verify Title IV eligibility, program level, program length, hours/credits, modality, operating history, good-standing status, and written arrangements.	DWD/Review Committee
Tier 3: Data and SOC/CIP verification	Confirm program CIP and associated SOC code(s) align with Wisconsin's published priority occupation list and crosswalk or approved petition. Review completion, credential, placement, cost, wage, and participant-level data;	DWD data staff/partner data stewards Review Committee

	conduct authorized wage matching or data validation.	DWD labor market staff
Tier 4: State-defined qualitative review	Evaluate employer validation, credential stackability/portability or single-credential exception, and program-to-credit articulation.	Review Committee/subject matter experts
Develop recommendation package	Compile findings, supporting evidence, unresolved issues, draft approval/denial rationale, CWI consultation materials, and certification package.	DWD/Review Committee
Tier 5: CWI consultation and recommendation decision	Review recommendation package and provide consultation. Consultation and recommended outcome are documented and attested.	CWI
Governor/designee determination	If CWI determines a program meets Wisconsin requirements, the DWD Secretary, as governor's designee, will certify the approval as directed by the federal government. Certification or denial notice is issued. Denied programs will receive a response documenting the reason.	Governor/designee
Federal submission	Institution uploads the State Workforce Pell Certification Form and required materials through the federal E-App/program approval process.	Institution
State notification	The institution must notify DWD when U.S. Department of Education approves, denies, requests additional information on, or withdraws approval of the program.	Institution
Documentation and recordkeeping	Document issued certification or denial notice; maintain official records; update public program list as appropriate.	DWD

Clarification requests

DWD may request additional information at any point before a determination is issued. The institution shall respond within the timeframe specified in the request or otherwise as may be agreed to by DWD. Failure to respond may result in the application being delayed, withdrawn, or denied.

Determination types

Wisconsin may issue the following state-level determination outcomes:

- **Approved:** The program meets all governor-determined requirements as provided in this and is certified for federal submission.
- **Denied:** The program does not meet one or more requirements or the institution failed to provide sufficient evidence.
- **Returned as incomplete:** The application lacks required information or artifacts and is not ready for substantive review.
- **Deferred or clarification requested:** DWD needs additional information before a final recommendation, subject to published deadlines and fair treatment of applicants.
- **Withdrawn application:** The institution voluntarily withdraws the application or fails to respond within the allowed time.
- **Withdrawn approval:** State approval is withdrawn after initial approval due to loss of eligibility, material misrepresentation, failure to maintain requirements, failure to provide data, or other grounds in this policy.

An institution with a program approved by Wisconsin will receive the state Workforce Pell certification required for the federal program approval process. The state certification will include:

- The program name,
- Six-digit CIP code,
- SOC code(s),
- Approval date,
- Statement that the program currently meets and has met the governor-determined requirements for the preceding 12 months,
- CWI consultation attestation,
- Any applicable completion or placement certifications,
- Agreement to provide documentation to ED or DOL upon request,
- Agreement to notify ED, DOL, and the institution within 15 calendar days of a final decision to withdraw approval, and
- Certification that Wisconsin considered program cost and anticipated wages before ED's initial Value-Added Earnings determination.

The institution is responsible for submitting the state certification and all required materials to ED through the federal Application to Participate/E-App or other process established by ED. The institution must notify DWD when ED approves, denies, requests additional information on, or withdraws approval of the program.

Determination notice

For programs that are denied, returned as incomplete, or deferred/clarification requested at the state-level, DWD shall issue a written notice identifying the reason(s) for determination under the applicable policy or regulatory requirement(s), and, if applicable, the insufficiencies with the application, any appeal rights, and instructions for resubmission in a future review cycle.

Appeals

As provided by 34 CFR § 690.93(b)(3), an institution that has received a determination from DWD that it is ineligible for Workforce Pell funding may submit an appeal to DWD based on the following:

- **Workforce Alignment:** Whether the program aligns with high-skill, high-wage, or in-demand industry sectors or occupations as defined by Wisconsin's published Workforce Pell policies for purpose of this grant (see Appendix A for definitions).
- **Employer Validation:** Whether appropriate and sufficient wage outcomes data sources were used, as defined by Wisconsin's published Workforce Pell policies for purpose of this grant (see Appendix A for definitions).
- **Credential Stackability and Portability:** Whether the program leads to a recognized postsecondary credential that is stackable within a career pathway as defined by Wisconsin's published Workforce Pell policies for purpose of this grant (see Appendix A for definitions).
- **Articulation Agreements:** Whether the program includes documented agreements ensuring transferability into degree or certificate pathways, as defined by Wisconsin's published Workforce Pell policies for purpose of this grant (see Appendix A for definitions).
- **Performance Metrics**
 - Whether the following rate requirements were met:
 - 70% completion rate calculations
 - 70% employment placement rates
 - Whether appropriate wage outcomes data verification was used, as defined by Wisconsin's published Workforce Pell policies for purpose of this grant (see Appendix A for definitions).

Note: Any denials from ED, including those concerning federal data calculations and value-added earnings, are outside the scope of this appeals process. Institutions should consult with ED on federal administrative procedures for denials by ED.

Filing deadline and submission

The institution must submit a written appeal to the Appeal Committee within 14 calendar days of the date of the adverse determination notice by email to WorkforcePell@dwd.wisconsin.gov.

The following must be submitted with the appeal:

- Institution name, program name, CIP code, SOC code(s), and authorized contact;
- Basis for the appeal, including each alleged factual error;
- Any supporting documentation;
- Requested outcome; and
- Authorized official signature (electronic signature is acceptable).

Appeal Process

Appeals will be reviewed by an Appeal Committee established by DWD. Members should not have served as primary reviewers of the application when feasible. In conducting its review, the Appeal Committee may consult subject matter experts within DWD. The review shall be based

on the application and any supporting materials submitted to DWD, documents or evidence used to evaluate the application, and the determination notice.

The Appeal Committee will make a recommendation on the appeal determination to the DWD Secretary or designee.

A final written appeal determination shall be issued within 30 calendar days of receipt of an appeal. The appeal determination may affirm, reverse, or modify the original ineligibility determination. Programs that are denied on appeal may submit a new application unless federal or state requirements prohibit resubmission or impose a waiting period.

Reapplication and Restoration of Eligibility

Performance-Based Disqualification (70/70 Rule)

If an institution fails to submit data to verify, or it is determined by ED that the program failed to meet, the completion rate and job placement rate requirements (70/70 rule), the institution may not seek to reestablish the eligibility of the failing program, or to establish eligibility for a substantially similar program sharing both the same four-digit CIP code, and identical SOC codes according to the CIP SOC Crosswalk that is provided by a Federal agency, until two (2) years following the loss of eligibility.

Governor Approval or Cost-Related Disqualification

Institutions may reapply when programs:

- Demonstrate compliance.
- Correct the required conditions.
- Obtain new approval through the standard process.

A denied institution may submit a revised application in a subsequent application cycle unless prohibited by federal or State requirements.

Program Determination Timeline

Applications will be accepted on a rolling basis. DWD, in coordination with the Review Committee, is responsible for preparing submission packages for each program, including a recommendation for CWI to approve or not approve the program for recommendation to the Secretary.

CWI will review recommendations and vote on formal approval at its quarterly full council meetings. The quarterly meeting schedule is available on the CWI website: cwi.wisconsin.gov/activities.htm.

All application materials and requested information, including any related to cure, corrected action, or appeals, must be received by DWD no later than 45 calendar days prior to the scheduled CWI quarterly meeting date to be considered by the CWI for formal approval at the subsequent meeting. Applications with incomplete information or missing materials not received by DWD at least 45 calendar days prior to a CWI quarterly meeting will not be presented to the CWI at the meeting for that quarter. Institutions may submit information or materials necessary to complete the application and, if all other eligibility criteria are met, be presented to the CWI for formal approval at a later meeting date.

If the CWI determines a program meets Wisconsin requirements, the DWD Secretary, as the governor's designee, will certify the approval as directed by the federal government. Denied programs will receive a response documenting the reason.

Wisconsin will use a multi-tier review process administered by DWD in coordination with additional partners and in consultation with CWI. The published process shall be applied consistently and equitably.

Milestone	Action	Timeframe
Application period opens	Applications will be accepted on a rolling basis.	
Application deadline	Institutions submit complete program applications and required documents and data.	45 calendar days prior to scheduled quarterly CWI full council meeting to be considered for that quarter.
Completeness check	DWD performs Tier 1 intake review and returns incomplete submissions or issues cure requests.	Within 10 business days where feasible.
Multi-tier review	DWD and Review Committee complete baseline eligibility, labor market information, data, employer, credential, and articulation reviews.	To be published.
Corrective action period	A typical period for an applying institution to complete corrective action will be 10 business days unless DWD or the Review Committee sets a different period in the instructions provided to the applicant.	
CWI consultation	CWI reviews recommendation package and votes to approve or deny.	On a quarterly basis aligned to CWI meeting schedule
Governor/designee determination	Governor or designee issues approval, denial, deferral, or request for clarification.	Following CWI consultation.
Determination notice	DWD sends certification letter or denial notice to the institution and updates records.	Following formal governor/designee determination.
Appeal window	Denied institutions file written appeal and evidence.	14 calendar days from notice unless modified.
Final appeal decision	Appeals Committee issues written decision.	Within 30 calendar days of complete appeal.

Policy and Methodology Update Cycle

DWD, in coordination with additional partners and in consultation with the CWI, will review this policy, the priority occupation methodology, employer validation standards, stackability and portability criteria, and program-to-credit articulation standards at least every two years in alignment with the WIOA State Plan modification process. DWD may recommend technical updates at any time to comply with federal law, federal guidance, state law, governor direction, CWI action, or implementation needs.

Appendix A: Wisconsin Workforce Pell Implementation – State Definitions

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 similar curricular area which may be evidenced by a Classification of Instructional Program (CIP) code or a Standard Occupational Classification (SOC) code.

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 appropriate CIP family.

High-Skill, High-Wage, or In-Demand Industry Sectors or Occupations

To be eligible for Workforce Pell, a program must provide an education aligned with the requirements of high-skilled, high-wage, or in-demand industry sectors or occupations as described below.

High-Skilled:

High-skilled, for the purposes of Workforce Pell, refers to industry-validated curriculum programs that result in industry-recognized certificates, credentials, degrees, or apprenticeship diplomas.

High-Wage:

As defined in the [Wisconsin Perkins V State Plan](#) high-wage occupations are those with hourly wages above the Wisconsin state median based on the Department of Workforce Development's (DWD) pursuant to²

² Wisconsin All Occupations Hourly Median Wage: \$24.17

Source: US Bureau of Labor Statistics (BLS), Occupational Employment and Wage Statistics (OEWS), May 2025

In-Demand:

Federal Workforce Pell regulations define *"in-demand industry sector or occupation"* as follows:

- (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.*

In-demand occupations and industries in Wisconsin are those officially identified by Wisconsin's workforce agencies (state or local workforce boards) as experiencing persistent employer demand, high job vacancy rates, or significant projected growth—particularly within the state's priority sectors. These designations must be supported by state or regional labor market data and employer input, and they are required for Workforce Pell eligibility under federal statute.

Portable

A credential is considered portable when it is recognized and accepted as verifying the qualifications of an individual in other settings—such as other geographic areas, other educational institutions, employment at more than one employer, or enable credit transfer across institutions of higher education.

Stackable

A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or career ladder to different and potentially higher-paying jobs. A stackable credential does not need to be fully embedded or 100% contained within a larger program and does not need to stack within the same institution. Credentials are considered stackable if they provide documented, articulated credit as part of a related credential program sequence at one or more eligible institutions across all higher education sectors in alignment with Wisconsin statutes and requirements.

Wage Outcomes Data Verification & Sources

The approved data sources for verifying outcomes to assess Workforce Pell eligibility are unemployment insurance (UI) wage data, occupational employment and wage statistics (OEWS), Lightcast, graduate outcomes survey data, employer attestations, licensure pass list, and college completion data. Other supplemental data may be considered as needed.

Appendix B: Wisconsin State Workforce Pell Program Administration and Certification Delegation of Authority



Tony Evers

Office of the Governor | State of Wisconsin

June 29, 2026

**RE: STATE WORKFORCE PELL PROGRAM ADMINISTRATION AND CERTIFICATION
DELEGATION OF AUTHORITY**

In accordance with Wisconsin state law, I, Tony Evers, Governor of the State of Wisconsin, delegate the authority and responsibility to the Wisconsin Department of Workforce Development Secretary to act on my behalf to effectuate the approvals and requirements of the Governor under 34 CFR §§ 690.90-.97 (effective July 1st, 2026). Namely, I delegate such authority and responsibility to:

Name: Amy Pechacek

Title: Secretary

Agency: Department of Workforce Development

Address: 201 E. Washington Ave., P.O. Box 7946, Madison, WI 53707-7946

Telephone: 608-266-3131

Email: sec@dwd.wisconsin.gov

The momentum we have built in Wisconsin's workforce is undeniable. Strategic investments have driven measurable results across the state, from record-low unemployment to significant wage increases, with our apprenticeship programs consistently setting new records by connecting workers with high-demand careers. In 2025, Wisconsin's Registered Apprenticeship program achieved its fourth consecutive record-breaking year in its 115-year history, while Youth Apprenticeship participation reached a consecutive fifth year high. Furthermore, our dedication to opportunity has resulted in my administration recently awarding over \$410,000 in worker training grants through the Wisconsin Fast Forward Program to assist in training more than 600 healthcare workers and help fill critical workforce needs, and in 2021, we launched the state's Workforce Solutions Initiative, which works to connect unemployed or underemployed workers with new opportunities. To date this program has collectively served 127,775 Wisconsinites across the state.

I look forward to working closely with the Wisconsin Department of Workforce Development and higher education institutions to continue this pattern of record-breaking success through the new Workforce Pell program.

Sincerely,

A handwritten signature of Tony Evers in dark ink.

Tony Evers
Governor