

STATE OF DELAWARE

Workforce Pell Program

Program Policy

Office of Workforce Development

Delaware Department of Labor



[Workforce Pell Application](#)

FINAL POLICY

July 2026

I.	Purpose:	4
II.	Background:	4
III.	Governance Structure	5
IV.	Federal and State Responsibilities	5
V.	Ongoing Federal Guidance and Technical Assistance	5
a.	State Lead Entity:	6
b.	Delaware Workforce Development Board (DWDB):	6
c.	Workforce Pell Review Committee:	6
d.	Agency Coordination:	7
VI.	Program Eligibility Criteria	7
a.	Labor Market Alignment:	7
b.	Employer Hiring Needs:	8
c.	Program Structure Requirements:	8
d.	Credential Requirements:	9
e.	Program Alignment:	9
f.	Program Structure Requirements:	10
g.	Academic Credit and Postsecondary Progression:	10
VII.	Performance and Accountability:	10
a.	Completion Rate	11
b.	Job Placement Rate	11
c.	Value-Added Earnings	11
d.	Monitoring and Corrective Action:	12
e.	Recertification:	12
VIII.	Data Reporting Requirements:	12
a.	Institutional Reporting Requirements:	12
b.	Data Sources:	13
c.	Data Integration and Use:	13
d.	Data Privacy and Security:	14
e.	Public Reporting:	14
IX.	Program Eligibility Determination Process Overview:	14
X.	Eligibility Determination:	15
XI.	Relationship with Existing Workforce Systems:	16
a.	Workforce Innovation and Opportunity Act (WIOA) Alignment:	16
b.	Alignment with State Education and Workforce Investments:	17

c. Economic Development Alignment:	17
d. Funding Coordination and Braiding:	17
APPENDIX A: Approved Occupation List	18
Appendix B: Workforce Pell Program Appeals Policy	22
Appendix C: Definitions	24

I. Purpose:

This policy defines the eligibility policy and process for Workforce Pell short-term education and training programs. This policy implements federal Workforce Pell requirements while advancing Delaware's workforce, education, and economic development priorities. Specifically, the policy establishes standards and procedures to ensure Workforce Pell-eligible programs align with employer demand, support high-skill, high-wage, and in-demand occupations, provide pathways to continued education and career advancement, and deliver positive outcomes for students and employers.

Delaware's Workforce Pell implementation strategy is designed to align federal requirements with the State's workforce priorities, including expansion of career pathways, Registered Apprenticeship, workforce credential attainment, employer-driven talent development, and economic growth. The State will leverage existing workforce, education, and data systems to ensure Workforce Pell-funded programs deliver value for students, employers, and taxpayers.

[H.R. 6585](#) requires Governors, or their designated entities, to certify that Workforce Pell-eligible programs meet standards related to labor market demand, employer hiring needs, credential quality, stackability, portability, academic credit, completion rates, and employment outcomes.

The Office of Workforce Development (OWD), within the Delaware Department of Labor, serves as the Governor's designated entity responsible for Workforce Pell administration and implementation. OW D carries out these responsibilities in coordination with the Delaware Workforce Development Board (DWDB), the Delaware Department of Education (DDOE), postsecondary institutions, adult technical centers, employers, and other workforce and education partners.

II. Background

Delaware's Workforce Pell implementation strategy utilizes an occupation-first approval model aligned to the State's High Demand Occupation List (HDOL). Under this approach, the State will identify occupations that meet Delaware's definitions of high-skill, high-wage, or in-demand employment and maintain a publicly available list of eligible occupations. Postsecondary institutions may then apply for Workforce Pell eligibility for programs that prepare students for those occupations and meet all federal and state quality requirements. This approach promotes consistency, transparency, and alignment between Workforce Pell investments, employer workforce needs, and Delaware's broader workforce and economic development priorities.

Why Workforce Pell Matters

Workforce Pell creates an opportunity for Delaware to expand access to affordable, workforce-aligned education while addressing critical talent shortages across the state's economy. By extending federal financial aid to high-quality short-term training programs, Workforce Pell helps learners quickly acquire in-demand skills, earn credentials of value, and enter career pathways that support long-term economic mobility.

Workforce Pell provides a mechanism to better align education, workforce, and economic development strategies around occupations that are critical to Delaware's future growth and competitiveness.

What is Workforce Pell?

The Workforce Pell Grant program expands access to federal Pell Grants for students enrolled in short-term education and training programs that lead to high-skill, high-wage, or in-demand occupations. Authorized through federal legislation and implemented through final regulations issued by the U.S. Department of Education in 2026, Workforce Pell allows eligible students to use federal financial aid to enroll in approved workforce training programs ranging from 150 to 599 clock hours (or equivalent credit hours) and lasting at least eight weeks.

Historically, Pell Grants have primarily supported degree programs and longer-term certificate programs. Workforce Pell represents a significant expansion of federal financial aid, creating new opportunities for learners to access high-quality, workforce-aligned training that leads to recognized postsecondary credentials, employment, and continued education. Eligible programs must meet federal quality standards related to labor market alignment, employer demand, academic credit, credential portability and stackability, completion rates, employment outcomes, and earnings.

III. Governance Structure

[H.B. 6585](#) requires Governors, or their designated entities, to certify that Workforce Pell-eligible programs meet standards related to labor market demand, employer hiring needs, credential quality, stackability, portability, academic credit, completion rates, and employment outcomes. The Office of Workforce Development (OWD), within the Delaware Department of Labor, serves as the Governor's designated entity responsible for Workforce Pell administration and implementation.

IV. Federal and State Responsibilities

Under federal law, Governors play a central role in determining Workforce Pell eligibility. Before a program may receive Workforce Pell funding, the Governor or the Governor's designated entity, which in Delaware is the Office of Workforce Development, must certify that the program meets federal and state requirements related to workforce demand, employer hiring needs, credential quality, stackability, portability, academic credit, completion rates, and employment outcomes. Programs must subsequently be reviewed and approved by the U.S. Department of Education before students may access Workforce Pell funding.

V. Ongoing Federal Guidance and Technical Assistance

The U.S. Department of Education may continue to issue technical guidance, implementation resources, FAQs, and other sub-regulatory guidance to support consistent implementation of Workforce Pell nationwide. Delaware will periodically review and update

this policy, related procedures, and program requirements to ensure continued compliance with federal law and alignment with emerging federal guidance and state workforce priorities.

a. **State Lead Entity:**

The Office of Workforce Development (OWD), housed within the Delaware Department of Labor (DOL), serves as the Governor's designated entity responsible for administering Delaware's Workforce Pell program. OWD shall:

- i. Develop and maintain Workforce Pell policies, procedures, and guidance;
- ii. Coordinate program review, eligibility determination, and recertification processes;
- iii. Align Workforce Pell implementation with Delaware's workforce, education, and economic development priorities;
- iv. Ensure coordination among state agencies, postsecondary institutions, employers, and workforce partners;
- v. Convene and manage the Workforce Pell Review Committee;
- vi. Maintain the State's Workforce Pell Eligible Occupation List and associated methodologies; and
- vii. Issue program eligibility determinations on behalf of the Governor.

b. **Delaware Workforce Development Board (DWDB):**

The Delaware Workforce Development Board serves as the State's primary advisory body for Workforce Pell and shall:

- i. Review and approve methodologies used to identify high-skill, high-wage, and in-demand occupations;
- ii. Review and recommend updates to the Workforce Pell Eligible Occupation List;
- iii. Advise on Workforce Pell policy development and implementation;
- iv. Review program eligibility recommendations submitted by OWD;
- v. Ensure Workforce Pell investments align with Delaware's workforce priorities and employer needs; and
- vi. Support ongoing monitoring of program outcomes and labor market relevance.

c. **Workforce Pell Review Committee:**

OWD shall convene a Workforce Pell Review Committee responsible for reviewing applications and making recommendations regarding Workforce Pell program eligibility.

- i. The Committee shall include representatives from:
 1. Office of Workforce Development (OWD);
 2. Delaware Workforce Development Board (DWDB);
 3. Delaware Department of Education (DDOE);
 4. Delaware Department of Labor (DOL);
 5. Additional subject matter experts identified by OWD, as necessary.

d. Agency Coordination:

Successful implementation of Workforce Pell requires coordination across Delaware's education, workforce, and economic development systems.

- i. Delaware Department of Education (DDOE)
 1. Postsecondary education alignment;
 2. Career and Technical Education (CTE) pathway alignment;
 3. Credit articulation and transferability (i.e., Credit for Prior Learning);
 4. Coordination with state and federal education policies.
- ii. Postsecondary Institutions
 1. Program design and delivery;
 2. Student support and financial aid administration;
 3. Data reporting and performance monitoring;
 4. Employer engagement and credential attainment.
- iii. Delaware Department of Labor (DOL), Division of Employment and Training (DET), and Delaware Workforce Development Board (DWDB)
 1. Labor market analysis and occupational demand validation;
 2. Eligible Training Provider List (ETPL) coordination;
 3. Performance monitoring and accountability;
 4. Workforce system alignment and employer engagement.
- iv. Additional State Partners: Other state agencies, including economic development, human services, and workforce system partners, may support Workforce Pell implementation through data sharing, program alignment, and coordination of complementary funding and support services.

VI. Program Eligibility Criteria

Programs must satisfy both federal Workforce Pell eligibility requirements and Delaware-specific approval criteria. Meeting state requirements alone does not guarantee eligibility for federal Workforce Pell funding. Workforce Pell-eligible programs must prepare students for employment in occupations identified as high-skill, high-wage, or in-demand and must demonstrate strong alignment with employer hiring needs, credential quality standards, academic progression opportunities, and workforce outcomes.

Delaware utilizes an occupation-first eligibility model. Only programs aligned to occupations included on Delaware's Workforce Pell Eligible Occupation List may be considered for Workforce Pell eligibility unless otherwise permitted under federal law. The State shall maintain and publicly post a Workforce Pell Eligible Occupation List consisting of occupations that meet Delaware's definitions of high-skill, high-wage, or in-demand employment. Programs seeking Workforce Pell eligibility must prepare students for one or more occupations included on this list.

Registered Apprenticeship programs recognized under 29 CFR Part 29 must still satisfy all other applicable federal Workforce Pell eligibility requirements, including institutional eligibility, academic credit requirements, and Title IV participation, unless otherwise provided under federal law.

a. Labor Market Alignment

- a. Eligible programs must:

1. Prepare students for employment in one or more occupations included on Delaware's Workforce Pell Eligible Occupation List;
2. Demonstrate alignment with Delaware's workforce and economic development priorities;
3. Address documented employer demand within the State or region; and
4. Align with at least one priority industry sectors identified by the Delaware Workforce Development Board.

1. Priority clusters¹ include:

1. Healthcare & Education
2. Construction & Mechanical Trades
3. Manufacturing / Advanced Manufacturing & Logistics
4. Financial & Business Services
5. Food & Agriculture
6. Science & Technology

b. **Employer Hiring Needs:**

Programs must demonstrate documented employer demand and hiring alignment.

Acceptable evidence includes:

- Validation from a Registered Apprenticeship sponsor;
- Employer validation forms;
- Industry association endorsements;
- Sector partnership endorsements; or
- Documentation from at least three employers with recent or projected hiring demand.

Employer validation must confirm:

- Current or anticipated hiring demand;
- Alignment between program competencies and workforce needs;
- Recognition of the credential within the industry; and
- The program's relevance to employment within the target occupation.
- OWD may also consider labor market information, employer hiring commitments, sector partnership recommendations, job posting analytics, workforce demand analyses, and other objective evidence when evaluating employer demand. Letters of support alone may not be sufficient to demonstrate employer demand.

ETPL eligibility alone does not qualify a program for Workforce Pell funding.

Programs seeking Workforce Pell certification must satisfy all additional federal and state requirements related to labor market alignment, employer hiring needs, credential quality, stackability, portability, academic credit, completion rates, job placement outcomes, and value-added earnings.

c. **Program Structure Requirements:**

To be eligible for Workforce Pell, a program must:

- i. Be offered by a Title IV-eligible institution of higher education;

¹ [Career Clusters - Advance CTE](#)

- ii. Consist of between 150 and 599 clock hours, or the equivalent credit-hour thresholds established under federal regulations;
- iii. Be offered over a period of not less than eight weeks;
- iv. Lead to a recognized postsecondary credential;
- v. Award academic credit applicable toward at least one aligned certificate or degree program or articulate to a Registered Apprenticeship program;
- vi. Demonstrate alignment to employer hiring needs;
- vii. Meet federal completion, placement, and value-added earnings requirements;
- viii. Have operated for at least one year prior to application;
- ix. Must have at least 70% of enrolled students must complete the program within 150% of the normal time for completion;
- x. Must have at least 70% of completers be placed in a job within 180 days of finishing the program. Beginning 2029-2030 award year, at least 70% of completers must be employed in the specific occupation for which the program trained them, as defined by the SOC code or comparable high-demand occupation. ; and
- xi. Meet all applicable federal accreditation, financial aid, and program participation requirements.

d. **Credential Requirements:**

Must be an Essential or Advanced credential as defined by the Delaware Department of Education. ²

- i. Credentials must be stackable and portable unless the occupation has only one recognized credential pathway. A credential shall be considered stackable if it:
- ii. Awards academic credit applicable toward a higher certificate or degree that is aligned to the program's occupational and educational pathway.
- iii. Articulates into a Registered Apprenticeship;
- iv. Represents a documented step within a career pathway that leads to additional credentials and earnings advancement; or
- v. Demonstrates documented progression into higher-level credentials through institutional or labor market evidence.

e. **Program Alignment:**

Programs aligned to occupations that do not meet Delaware's high-wage threshold must demonstrate that the credential serves as part of a pathway leading to a high-wage occupation. A credential shall be considered portable if it is:

- i. Recognized and valued by multiple employers within the relevant industry or occupation, as evidenced through employer hiring practices, job postings, workforce demand analyses, employer validation forms, industry association endorsements, sector partnership recommendations, or demonstrated employment outcomes among credential holders.
- ii. Recognized by an industry association or licensing authority;
- iii. Accepted across geographic regions or employers; or

² [Credentials of Value – Delaware Department of Education](#)

- iv. Embedded within a Registered Apprenticeship pathway.

f. Program Structure Requirements:

To be eligible for Workforce Pell, a program must:

- i. Be offered by a Title IV-eligible institution of higher education;
- ii. Consist of between 150 and 599 clock hours, or the equivalent credit-hour thresholds established under federal regulations;
- iii. Be offered over a period of not less than eight weeks;
- iv. Lead to a recognized postsecondary credential;
- v. Award academic credit applicable toward at least one aligned certificate or degree program or articulate to a Registered Apprenticeship program;
- vi. Demonstrate alignment to employer hiring needs;
- vii. Meet federal completion, placement, and value-added earnings requirements;
- viii. Have operated for at least one year prior to application;
- ix. Must have at least 70% of enrolled students must complete the program within 150% of the normal time for completion;
- x. Must have at least 70% of completers be placed in a job within 180 days of finishing the program. Beginning 2029-2030 award year, at least 70% of completers must be employed in the specific occupation for which the program trained them, as defined by the SOC code or comparable high-demand occupation. ; and
- xi. Meet all applicable federal accreditation, financial aid, and program participation requirements.

g. Academic Credit and Postsecondary Progression

Programs must award transcribed academic credit that is accepted toward at least one aligned certificate or degree program at the institution offering the program or another eligible institution through a documented articulation or transfer agreement.

Institutions must provide documentation demonstrating:

- Credit articulation agreements;
- Transfer agreements;
- Prior learning assessment policies³; or
- Other formal mechanisms through which program completion results in advanced standing within a course or pathway.

Documentation must identify the receiving institution, the number of credits awarded, and the certificate or degree programs to which the credit applies. Credit awarded must be transferable in accordance with institutional policy and applicable accreditation standards.

VII. Performance and Accountability

Programs certified for Workforce Pell in Delaware must meet federal performance and accountability requirements and demonstrate that students are completing programs,

³ [Credit for Prior Learning – Delaware Department of Education](#)

obtaining employment, and earning wages that justify the cost of training. OWD, as the Governor's designee, will review program performance as part of initial certification, annual monitoring, and recertification.

a. Completion Rate

- i. Programs must demonstrate a completion rate of at least 70 percent.
- ii. For the 2026–27, 2027–28, and 2028–29 award years, Delaware will calculate completion using available administrative data and institutional records. Completion shall be measured as the percentage of students who complete the program within 150 percent of the normal time to completion.
- iii. Beginning with the 2029–30 award year, completion will be calculated consistent with federal requirements, based on institutional reporting and subject to federal review, audit, or verification.

b. Job Placement Rate

- i. Programs must demonstrate a job placement rate of at least 70 percent.
- ii. For the 2026–27, 2027–28, and 2028–29 award years, Delaware will calculate job placement using available administrative data, including wage records where available. Placement shall be measured as the percentage of students employed during the second quarter after exiting the program.
- iii. Beginning with the federally required implementation date, or the 2029–30 award year unless otherwise modified by the U.S. Department of Education, job placement will be calculated as the percentage of program completers employed in the occupation for which the program prepares students, or in a comparable high-skill, high-wage, or in-demand occupation, during the second quarter after completion. Delaware may use wage records, institutional data, apprenticeship records, employer verification, and other reliable administrative data sources to support this determination.

c. Value-Added Earnings

- i. Programs must meet the federal value-added earnings (VAE) standard. The VAE measure compares the median annual earnings of Workforce Pell recipients, measured three years after completing the program, adjusted for regional price differences, against a threshold equal to the total tuition and fees charged for the program plus 150 percent of the Federal Poverty Guideline for a single individual, as calculated in accordance with applicable federal regulations.
- ii. Until sufficient data are available to complete the federal value-added earnings calculation, OWD will conduct an initial return-on-investment review during program application and certification. This review may consider program cost, expected wages, occupational wage data, employer demand, credential value, and projected earnings outcomes.
- iii. Programs that do not demonstrate a reasonable likelihood of meeting the federal value-added earnings standard may be placed on provisional approval, required to submit a corrective action plan, or otherwise addressed in accordance with federal guidance as sufficient outcome data become available.

d. Monitoring and Corrective Action

OWD will monitor Workforce Pell-certified programs on an annual basis using available institutional, workforce, and administrative data. Monitoring may include review of:

- i. Enrollment and demographic data;
- ii. Completion rates;
- iii. Job placement rates;
- iv. Employment and wage outcomes;
- v. Program costs and student charges;
- vi. Credential attainment;
- vii. Employer validation and hiring demand; and
- viii. Continued alignment with Delaware's Workforce Pell Eligible Occupation List.

Programs that fail to meet required performance thresholds or other eligibility requirements may be placed on provisional status, required to complete a corrective action plan, suspended from new Workforce Pell enrollment, or removed from Delaware's certified program list.

- e. **Recertification:** Workforce Pell-certified programs must be reviewed for continued eligibility at least every two years, or more frequently if required by federal law, state policy, or program performance concerns. Recertification shall consider continued compliance with federal requirements, labor market alignment, employer hiring needs, credential quality, academic credit, completion, placement, earnings, and student outcomes.

VIII. Data Reporting Requirements:

To support Workforce Pell eligibility determinations, program monitoring, federal reporting requirements, and continuous improvement efforts, institutions participating in Workforce Pell must submit program-level and student-level data as required by OWD and applicable federal agencies.

- a. **Institutional Reporting Requirements:**

Institutions shall report data necessary to evaluate program eligibility, performance, and student outcomes, including but not limited to:

- i. **Student Enrollment and Demographics**

1. Enrollment counts;
 2. Student demographics;
 3. Program start and exit dates;
 4. Enrollment status;
 5. Pell Grant participation and award amounts;
 6. Student residency status.

- ii. **Program Information**

1. Program title and description;
 2. CIP code(s);

3. Associated occupation(s) and SOC code(s);
4. Credential name and type awarded;
5. Program length and instructional hours;
6. Academic credit awarded;
7. Tuition, fees, and total program costs.

iii. Student Outcomes

1. Credential attainment;
2. Program completion;
3. Withdrawal and non-completion outcomes;
4. Time to completion;
5. Transition to additional education or training;
6. Credit articulation and transfer outcomes.

iv. Employment and Earnings Outcomes

1. Employment status following program completion;
2. Placement in the occupation or industry for which the program prepares students;
3. Wage and earnings outcomes;
4. Participation in Registered Apprenticeship or other work-based learning opportunities;
5. Employment retention, where available.

v. Employer Alignment

1. Employer validation documentation;
2. Advisory committee participation;
3. Employer hiring demand information;
4. Industry partnership participation;
5. Work-based learning opportunities associated with the program.

b. Data Sources:

To the maximum extent permitted by law, Delaware may utilize administrative data sources to support Workforce Pell certification, monitoring, and accountability activities, including:

- Unemployment Insurance wage records;
- Workforce Innovation and Opportunity Act (WIOA) data;
- Registered Apprenticeship data;
- Postsecondary education records;
- State licensure and credentialing data;
- Eligible Training Provider List (ETPL) data;
- Other workforce and education data systems approved by the State.

c. Data Integration and Use:

Workforce Pell data shall be integrated into Delaware's workforce longitudinal data system known as the Delaware Integrated Data System (DIDS) infrastructure to support:

- i. Program eligibility determinations;
- ii. Performance monitoring and recertification;

- iii. Completion, placement, and earnings calculations;
- iv. Return-on-investment and value-added earnings analyses;
- v. Equity and access analyses;
- vi. Workforce and labor market planning; and
- vii. Public reporting and transparency requirements.

d. Data Privacy and Security:

All data collection, sharing, reporting, and analysis activities shall comply with applicable federal and state privacy laws, including FERPA, state data governance requirements, and relevant workforce data confidentiality provisions. Data sharing agreements may be established as necessary to support Workforce Pell administration and accountability.

e. Public Reporting:

OWD shall maintain a publicly available list of Workforce Pell-certified programs and may publish aggregate program performance information, including completion rates, employment outcomes, earnings outcomes, program costs, and other measures necessary to support transparency and informed student decision-making.

IX. Program Eligibility Determination Process Overview:

The Office of Workforce Development (OWD), acting as the Governor's designated entity, is responsible for administering Delaware's Workforce Pell eligibility determination process. In coordination with the Delaware Workforce Development Board (DWDB), the Delaware Department of Education (DDOE), and other relevant state partners, OWD shall review, evaluate, and recommend programs for Workforce Pell certification in accordance with federal law, federal regulations, and this policy.

Delaware utilizes the Eligible Training Provider List (ETPL) as the primary entry point ("front door") for Workforce Pell eligibility consideration. Leveraging the ETPL allows Delaware to build upon existing workforce system infrastructure, reduce administrative burden on institutions, align Workforce Pell with WIOA and other workforce investments, and utilize established provider vetting and performance accountability processes.

Applications shall be reviewed by the Workforce Pell Review Committee, a cross-agency body convened by OWD. The Review Committee shall evaluate each application against federal and state eligibility requirements and make recommendations regarding certification, provisional certification, denial, renewal, suspension, or removal of Workforce Pell eligibility.

Following review and recommendation, OWD shall issue Workforce Pell certification determinations on behalf of the Governor. Programs certified by the State shall be submitted to the U.S. Department of Education for federal review and approval.

Workforce Pell eligibility becomes effective only after both State certification and federal approval have been granted.

X. Eligibility Determination

Delaware will accept Workforce Pell applications on a rolling basis through the Office of Workforce Development (OWD) utilizing the Workforce Pell application processes. OW D may establish application windows, submission deadlines, and review schedules as necessary to support efficient administration and alignment with federal approval timelines.

The Workforce Pell eligibility determination process shall include the following stages:

1. Application Submission

Eligible institutions submit Workforce Pell applications and supporting documentation to OW D in accordance with state application requirements and published submission deadlines.

2. Initial Completeness Review

OW D conducts an administrative review to determine whether all required documentation, data, attestations, and supporting materials have been submitted.

Institutions may be provided with an opportunity to correct deficiencies or submit missing information within a timeframe established by OW D.

3. Program Eligibility Review

The Workforce Pell Review Committee evaluates completed applications to determine compliance with federal and state eligibility requirements, including:

- Labor market alignment;
- Occupation eligibility;
- Employer hiring needs;
- Credential quality;
- Stackability and portability;
- Academic credit requirements;
- Program costs;
- Completion, placement, and earnings outcomes; and
- Other federal and state Workforce Pell requirements.

4. State Certification Determination

Following review, OW D shall issue Workforce Pell certification determinations on behalf of the Governor. Programs may be:

- Approved;
- Provisionally Approved;
- Denied; or
- Returned for additional information.

Institutions shall receive written notification of all certification decisions.

5. Federal Review and Approval

Programs certified by the State shall be submitted to the U.S. Department of Education for federal review and approval in accordance with applicable federal requirements and timelines. Workforce Pell eligibility shall become effective only after both State certification and federal approval have been granted.

6. Public Posting and Notification

OWD shall maintain and publish a current list of State-certified and federally approved Workforce Pell programs. Approved programs shall be identified on the Eligible Training Provider List (ETPL) and through other publicly available state resources as determined by OWD.

7. Ongoing Monitoring and Recertification

Certified programs shall be subject to annual monitoring and periodic recertification to ensure continued compliance with federal and state requirements. Programs that fail to meet required performance thresholds or eligibility requirements may be placed on provisional status, required to implement corrective actions, suspended, or removed from Workforce Pell eligibility.

XI. Relationship with Existing Workforce Systems:

Workforce Pell is intended to complement, not replace, existing federal, state, institutional, and employer investments in workforce development. Delaware will coordinate Workforce Pell implementation across education, workforce, economic development, and human services systems to maximize student access, reduce duplication, strengthen career pathways, and improve workforce outcomes.

Programs seeking Workforce Pell eligibility should demonstrate alignment with Delaware's workforce priorities, workforce development infrastructure, and related education and training investments.

a. Workforce Innovation and Opportunity Act (WIOA) Alignment:

Workforce Pell-certified programs shall align with Delaware's workforce development system and, where applicable, support the goals and priorities outlined in Delaware's WIOA State Plan.

- i. Workforce Pell programs should maintain eligibility on the Eligible Training Provider List (ETPL), where appropriate;
- ii. Workforce Pell and WIOA funding may be braided to support participant success, reduce financial barriers, and expand access to high-quality training opportunities;
- iii. Workforce Pell should be leveraged alongside Individual Training Accounts (ITAs), supportive services, career services, and other workforce investments where permitted by law;
- iv. Workforce Pell-certified programs should support career pathways leading to employment in high-skill, high-wage, and in-demand occupations.

b. Alignment with State Education and Workforce Investments:

Workforce Pell-certified programs should align, where appropriate, with existing state workforce, postsecondary education, and talent development initiatives, including:

- i. State financial aid and scholarship programs, especially those administered through the Delaware Higher Education Office;
- ii. Elevate Delaware;
- iii. Blue Collar Training Fund initiatives;
- iv. Learning for Careers and work-based learning opportunities;
- v. Registered Apprenticeship and pre-apprenticeship programs;
- vi. Career and Technical Education (CTE) programs and pathways;
- vii. Postsecondary credential and degree attainment initiatives; and
- viii. Other workforce and economic mobility initiatives designated by the State.

Workforce Pell funding should be coordinated with these investments to expand access, improve outcomes, and support seamless transitions across education and workforce systems.

c. Economic Development Alignment:

Workforce Pell-certified programs should support Delaware's economic development priorities and talent needs by preparing learners for occupations that are critical to the State's economic competitiveness and growth.

OWD, DWDB, DDOE, institutions of higher education, employers, and economic development partners shall work collaboratively to ensure Workforce Pell investments support:

- i. Priority industry sectors;
- ii. Employer talent pipeline needs;
- iii. Workforce attraction and retention strategies;
- iv. Regional economic development goals; and
- v. Long-term economic mobility for Delaware residents.

d. Funding Coordination and Braiding:

Workforce Pell shall be considered a complementary funding source within Delaware's broader workforce development system.

State agencies, institutions, workforce boards, and other partners are encouraged to coordinate and braid Workforce Pell with federal, state, local, philanthropic, institutional, and employer-supported funding sources whenever permissible to maximize student access, improve completion and employment outcomes, and strengthen return on investment.

APPENDIX A: Application and Approved Occupation List

Workforce Pell Application: [Division of Employment and Training Workforce Pell Application](#)

Delaware requires Workforce Pell-eligible programs to be aligned with one or more of the occupations on a state-maintained [High Demand Occupations List](#) (HDOL) developed and approved by the DWDB. The list reflects current and projected labor-market demand and wage opportunities. [High Demand Occupation Policy](#)

Exclusions: Occupations typically requiring a bachelor's degree or higher, or occupations typically accessible with only a high school diploma, are excluded from Workforce Pell priority designation.

Review and update to the list: Workforce Pell occupations will be updated every two years in alignment with DWDB update to the HDOL and in alignment with the State Plan and Modification.

Registered Apprenticeship Occupations: Occupations offered through Registered Apprenticeship must be approved by the Delaware Department of Labor and meet all applicable federal Registered Apprenticeship requirements. Approval confirms that the occupation, work process schedule, and Related Technical Instruction (RTI) meet established industry standards and are eligible for Workforce Pell consideration.

Inclusion of an occupation on Delaware's Workforce Pell Eligible Occupation List does not constitute approval of any institution or educational program for Workforce Pell funding. The Eligible Occupation List serves as the State's initial screening and identifies occupations that may be considered for Workforce Pell eligibility.

All institutions seeking Workforce Pell approval must submit a complete for each program requesting Workforce Pell eligibility. Applications shall be reviewed by the Workforce Pell Review Committee to determine compliance with all applicable federal and state eligibility requirements.

The Workforce Pell Review Committee shall recommend approval, provisional approval, or denial of each program based on its compliance with all federal requirements. Final approval of a program for Workforce Pell funding shall be made in accordance with the procedures established in this policy.

SOC Code	Occupation	Primary CIP	Additional Acceptable CIPs
11-3071	Transportation, Storage, and Distribution Managers	52.0203 Logistics & Supply Chain Management	52.0201 Business Administration; 52.0204 Logistics & Operations Management
13-1031	Claims Adjusters, Examiners, and Investigators	52.1701 Insurance	43.0107 Criminal Justice/Investigations; 52.0801 Finance
15-1232	Computer User Support Specialists	11.1006 Computer Support Specialist	11.0901 Computer Systems Networking; 11.0103 Information Technology; 11.0101 Computer Science
17-3031	Surveying and Mapping Technicians	15.1102 Surveying Technology	15.1301 Drafting Technology; 15.1303 CAD/CADD Technology; 40.0607 GIS
19-5012	Occupational Health and Safety Technicians	15.0703 Occupational Safety & Health Technology	51.2202 Environmental Health; 15.0507 Environmental Engineering Technology
21-1093	Social and Human Service Assistants	44.0000 Human Services	44.0701 Social Work; 51.1504 Community Health
21-1094	Community Health Workers	51.2208 Community Health Worker	51.1504 Community Health; 44.0000 Human Services
25-3021	Self-Enrichment Teachers	13.1302 Adult & Continuing Education	19.0708 Child Care; 13.1202 Family & Consumer Sciences
29-2042	Emergency Medical Technicians	51.0904 EMT	51.0905 Paramedic; 51.0909 Emergency Medical Services
29-2052	Pharmacy Technicians	51.0805 Pharmacy Technician	51.0803 Pharmacy
29-2072	Medical Records Specialists	51.0707 Health Information Technology	51.0713 Medical Insurance Coding; 51.0710 Medical Office Management
29-2099	Health Technologists & Technicians, All Other	51.9999 Health Professions, Other	Any related 51.x clinical technology program
29-9021	Health Information Technologists & Medical Registrars	51.0707 Health Information Technology	51.0713 Medical Coding; 51.0710 Medical Office
31-1131	Nursing Assistants	51.3902 Nursing Assistant/Aide and Patient Care Assistant	51.3901 Practical Nursing; 51.2601 Health Aide
31-9091	Dental Assistants	51.0601 Dental Assisting	51.0602 Dental Hygiene
31-9092	Medical Assistants	51.0801 Medical Assistant	51.0710 Medical Office; 51.0899 Allied Health
31-9093	Medical Equipment Preparers	51.0910 Sterile Processing (or equivalent)	15.9999 Engineering Technologies, Other; 51.0909 Surgical Technology
31-9097	Phlebotomists	51.1009 Phlebotomy	51.1004 Clinical Laboratory Assistant
35-1011	Chefs and Head Cooks	12.0503 Culinary Arts	12.0505 Food Preparation; 12.0501 Baking & Pastry
43-3021	Billing and Posting Clerks	52.0302 Accounting Technology	51.0713 Medical Billing & Coding; 52.0803 Finance

43-3031	Bookkeeping, Accounting & Auditing Clerks	52.0302 Accounting Technology	52.0803 Finance; 52.0305 Accounting
43-5061	Production, Planning & Expediting Clerks	52.0204 Logistics	15.0613 Manufacturing Engineering Technology; 52.0203 Supply Chain
43-6012	Legal Secretaries & Administrative Assistants	22.0302 Paralegal	52.0401 Administrative Assistant
43-9041	Insurance Claims & Policy Processing Clerks	52.1701 Insurance	52.0803 Finance
47-1011	First-Line Supervisors of Construction Trades	46.0000 Construction Trades	52.0201 Business Management; 15.1001 Construction Management
47-2031	Carpenters	46.0201 Carpentry	46.0000 Construction Trades
47-2061	Construction Laborers	46.0000 Construction Trades	46.9999 Construction Trades, Other
47-2073	Operating Engineers & Heavy Equipment Operators	49.0202 Heavy Equipment Operation	47.0302 Heavy Equipment Maintenance
47-2111	Electricians	46.0302 Electrician	15.0399 Electrical Engineering Technology
47-2152	Plumbers, Pipefitters & Steamfitters	46.0503 Plumbing	46.0502 Pipefitting
47-2211	Sheet Metal Workers	48.0506 Sheet Metal Technology	46.0401 Building Construction
49-1011	First-Line Supervisors of Mechanics	47.9999 Mechanic & Repair Technologies	52.0201 Business Management
49-3023	Automotive Service Technicians	47.0604 Automotive Technology	47.0615 Hybrid/Electric Vehicle Technology
49-3031	Bus & Truck Mechanics	47.0613 Diesel Technology	47.0605 Automotive Technology
49-3042	Mobile Heavy Equipment Mechanics	47.0302 Heavy Equipment Maintenance	47.0613 Diesel Technology
49-9021	HVAC Mechanics	47.0201 HVACR Technology	46.0302 Electrician; 15.0503 Energy Systems Technology
49-9041	Industrial Machinery Mechanics	47.0303 Industrial Mechanics & Maintenance Technology	15.0613 Manufacturing Engineering Technology; 15.0405 Mechatronics
49-9043	Maintenance Workers, Machinery	47.0303 Industrial Mechanics & Maintenance Technology	15.0405 Mechatronics; 47.9999 Mechanic Technologies
49-9051	Electrical Power-Line Installers	46.0303 Lineworker	15.0399 Electrical Engineering Technology
49-9071	Maintenance & Repair Workers	47.0399 Heavy/Industrial Equipment Maintenance, Other	47.0303 Industrial Maintenance; 15.0405 Mechatronics
49-9098	Helpers—Installation, Maintenance & Repair	47.9999 Mechanic & Repair Technologies, Other	47.0303 Industrial Maintenance

49-9099	Installation, Maintenance & Repair Workers, All Other	47.9999 Mechanic & Repair Technologies, Other	47.0303 Industrial Maintenance; 15.0405 Mechatronics
51-1011	First-Line Supervisors of Production Workers	15.0613 Manufacturing Engineering Technology	52.0204 Operations Management; 15.9999 Industrial Technology
51-4041	Machinists	48.0501 Machine Tool Technology	15.0613 Manufacturing Engineering Technology
51-4121	Welders	48.0508 Welding Technology	15.0613 Manufacturing Technology
51-8031	Water & Wastewater Treatment Operators	15.0507 Environmental Engineering Technology	03.0104 Environmental Science; 15.1501 Water Quality Technology
51-9011	Chemical Equipment Operators	15.0403 Chemical Engineering Technology	41.0301 Chemical Technology
51-9061	Inspectors, Testers, Sorters, Samplers & Weighers	15.0612 Industrial Technology Technician	15.0613 Manufacturing Engineering Technology; 15.0702 Quality Assurance Technology
53-3032	Heavy & Tractor-Trailer Truck Drivers	49.0205 Commercial Truck Driver	52.0203 Logistics
53-3052	Bus Drivers	49.0205 Commercial Driver	52.0203 Transportation Management
53-4031	Railroad Conductors & Yardmasters	49.0208 Railroad Operations	52.0203 Logistics
53-6031	Automotive & Watercraft Service Attendants	47.0604 Automotive Technology	47.9999 Mechanic Technologies
53-7051	Industrial Truck & Tractor Operators	49.0209 Industrial Equipment Operator	52.0203 Logistics; 15.0613 Manufacturing Technology
53-7062	Laborers & Freight, Stock & Material Movers	52.0203 Logistics & Supply Chain Management	49.0209 Industrial Equipment Operation; 52.0204 Operations Management
53-6031	Automotive and Watercraft Service Attendants	47.0604 Automotive Technology	47.9999 Mechanic Technologies
53-7051	Industrial Truck and Tractor Operators	49.0209 Industrial Equipment Operator	52.0203 Logistics; 15.0613 Manufacturing Technology
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	52.0203 Logistics & Supply Chain Management	49.0209 Industrial Equipment Operation; 52.0204 Operations Management

Appendix B: Workforce Pell Program Appeals Policy

Appeals of Workforce Pell Eligibility Determinations

Institutions may appeal any determination regarding Workforce Pell eligibility, including:

- Denial of an institution's application.
- Denial of an eligible education or training program.
- Suspension of Workforce Pell eligibility.
- Removal of an institution or program from the Workforce Pell Program.
- Recovery of Workforce Pell funds due to noncompliance.
- Any determination that an institution or program no longer meets Workforce Pell eligibility requirements.

Grounds for Removal

An institution or program may be immediately suspended or removed from the Workforce Pell Program for any of the following:

1. Providing false, misleading, or inaccurate information during the application, reporting, or monitoring process.
2. Failure to maintain required institutional accreditation, licensure, or state authorization.
3. Failure to comply with applicable federal or state laws, Workforce Pell Program policies, grant requirements, or reporting obligations.
4. Failure to maintain satisfactory program performance, including student completion, credential attainment, employment outcomes, or other performance measures established by OWD.
5. Failure to implement an approved corrective action plan.
6. Misuse of Workforce Pell funds.
7. Failure to cooperate with monitoring, audits, or program reviews.
8. Any other substantial violation of Workforce Pell Program requirements.

Substantial Violation

A substantial violation occurs when:

- An institution intentionally provides false or misleading information; or
- An institution commits two or more violations of Workforce Pell Program requirements within a single program year after receiving written notice of the initial violation.

The first violation will generally result in a written warning and the opportunity to submit a corrective action plan. Failure to correct the deficiency or subsequent violations may result in suspension or removal of the program or institution from the Workforce Pell Program.

Appeals Process

Step 1 – Notice of Determination

OWD will provide written notification of any denial, suspension, removal, or adverse determination. The notice will include:

- The reason(s) for determination;
- The effective date;
- The institution's right to appeal; and
- Instructions for submitting an appeal.

Institutions with pending appeals will not receive new Workforce Pell awards until the appeal is resolved unless otherwise authorized by OWD.

Step 2 – Submission of Appeal

The institution shall have 30 calendar days from the date of the determination letter to submit a written appeal.

The appeal must include:

- Institution name;
- Program(s) affected;
- A detailed explanation of why the determination should be reconsidered;
- Supporting documentation;
- Any corrective action plan, if applicable; and
- The signature of an authorized institutional representative.

Only written appeals submitted by the deadline will be considered.

Step 3 – Administrative Review

Within 60 calendar days of receiving a complete appeal the Workforce Pell Review Committee will review all submitted documentation and may request additional information from the institution.

The Committee may:

- Uphold the original determination;
- Modify the determination;
- Approve the appeal with conditions;
- Approve a corrective action plan in lieu of suspension or removal; or
- Reverse the original determination.

The institution will receive written notice of the decision.

Reinstatement

Institutions or programs removed from the Workforce Pell Program may not reapply for eligibility for a period of two (2) years, unless otherwise authorized by the Office of Workforce Development as part of an approved corrective action plan or settlement agreement.

Substantive Appeals

Appeals must be based upon substantive issues, including but not limited to:

- Eligibility determinations;
- Accreditation or licensure findings;
- Compliance determinations;
- Performance calculations;
- Reporting determinations;
- Monitoring or audit findings;
- Corrective action requirements; or
- Interpretation or application of Workforce Pell Program policies.

Non-Substantive Appeals

The Office of Workforce Development will not consider appeals based solely on disagreement with a policy decision or program requirement. Appeals that do not present factual, procedural, or regulatory grounds for reconsideration will be dismissed.

Appendix C: Definitions

High-Skill: Generally, requires a journeyperson’s credential, bachelor’s degree, or more.

Middle and High-Wage: Occupations, determined through a single, or group of Standardized Occupation Classification (SOC) codes, are defined as those meeting the upper limit of “Below Average” and/or bottom limit of “Average” in the most recent *Occupation & Industry Projections* publication from the Delaware Department of Labor.

In-Demand: In-demand is determined through a single, or group of Standardized Occupation Classification (SOC) codes, the occupation has a projected job growth rate greater than or equal to 0.7% annually over the next ten years and/or evidence of at least 25 job openings regionally aligned to the occupation or family of occupations. For reporting purposes, data will be at the Cluster level. For program approval, data will be analyzed at the sub-cluster level.

Stackable Credential: A credential that satisfies ONE of the following: 1. Confers any advanced standing, accelerated time to completion, and/or articulated credit for prior learning within an aligned major or academic program at an institution of higher education; 2. Is a required part of a prescribed, coherent sequence of industry recognized credentials that show progressive skills development; or 3. Provides advanced standing, accelerated time to completion, and/or credit for prior learning within an industry recognized training or Delaware Department of Labor approved apprenticeship program.

Eligible Workforce Program: Program of 150-599 clock hours delivered over at least 8 weeks but no more than 14 weeks that meet governor-approved, federally defined quality requirements.

Eligible Institution: An institution is a Title IV-eligible, accredited postsecondary institution authorized to operate in Delaware or serving learners located in Delaware and offers one or more programs meeting federal requirements.

Career Pathways: In Delaware, a career pathway is a structured sequence of courses, experiences, and credentials that connect what students learn in school to a specific career area, preparing them for both college and career success

Career and Technical Education Pathway: In Delaware, Career and Technical Education (CTE) is defined as an organized set of educational activities that provide students with rigorous academic content, relevant technical knowledge and skills, and leadership development, or provide students with the opportunity to participate in work-based learning and to earn a recognized postsecondary credential as well as advanced postsecondary credit or standing.

Portable Credential: A portable credential is a nationally recognized, verifiable credential that Recognized across Delaware and/or regionally; accepted as verifying the qualifications of an individual in other settings— either in other geographic areas, at other educational institutions, or by other industries or employing companies.

Value-added earnings (VAE): Value-added earnings refer to the median earnings of program completers after graduation, adjusted for local cost of living, compared to the program's tuition and fees.

Post-secondary credential: A postsecondary credential is defined within the state's Career & Technical Education (CTE) framework as a credential that equips students with the knowledge, skills, and certifications needed to advance along high-wage, high-demand career paths