

# WIOA Program Data: Data Analysis of Workforce Pell Criteria

December 4, 2025

*Preliminary Analysis—Internal Draft Memo*

## I. Key Takeaways

The One Big Beautiful Bill Act created new eligibility for Pell Grants (“Workforce Pell”) designed to support enrollment in short-term workforce programs. In an effort to approximate the scope of educational programs potentially eligible under the Workforce Pell program, DQC examined the programmatic and performance data available for the most comparable federal program, the Workforce Innovation and Opportunity Act (WIOA). While WIOA has different eligibility criteria than the new Workforce Pell grant program, it supports programs of a similar length and focus. Moreover, its [TrainingProvidersResults.gov](https://www.trainingprovidersresults.gov) (TPR) dataset is the only national and readily available data set on short-term workforce programs and their participant outcomes.

Significantly, TPR data has the following limitations:

- It only covers programs and participants funded through WIOA, not the entirety of the current workforce training program system.
- TPR is missing data on completion, employment, median earnings, and credentials for a large number of programs as there is no real enforcement of reporting required data.
- Many training programs are small; their data gets suppressed for privacy purposes.
- The data that is reported lags, so it takes time for new programs to appear in the data.
- WIOA does not require accreditation, so the TPR data does not include an accreditation-related metric. For Workforce Pell a program must be offered by an accredited institution of higher education that is eligible for federal student aid (Title IV participating).

With these limitations in mind, DQC reviewed the TPR data,<sup>1</sup> filtering for program length, completion rates, placement rates, costs and earnings. This analysis also includes all WIOA programs whether or not offered at an accredited institution. **Of the 77,087 programs in the TPR data set, DQC identified 530 programs that might currently meet the Workforce Pell eligibility and accountability criteria.**<sup>2</sup>

## II. Workforce Pell Eligibility

For a program to be eligible for Workforce Pell funding, it must:

- Be at least 150 clock hours of instruction (or equivalent credit hours) but less than 600 clock hours and instruction must be offered for a minimum of 8 weeks but less than 15 weeks.
- Have been offered by the institution for at least 1 year prior to becoming eligible.
- Meet the following verified performance benchmarks:
  - **Completion Rate:** A verified completion rate of at least 70%, measured within 150% of the normal time for completion.

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<sup>1</sup> TPR data was for program year 2022.

<sup>2</sup> The definitions WIOA uses for its performance metrics will not be an exact match to those used by Workforce Pell. However, they are the closest approximation we have at this time for those metrics.

- **Job Placement Rate:** A verified job placement rate of at least 70%, measured 180 days after completion.
- **Earnings Requirement (Value-Added Earnings Test):** The program must demonstrate positive earnings value. Specifically, the program must show that the median total tuition and fees published for the program do not exceed the median earnings of completers one year after completion (after subtracting 150% of the federal poverty line [FPL]). Programs with earnings below 150% of the FPL will not qualify for Workforce Pell.

### III. Methodology and Data Analysis

The analysis started with 77,087 WIOA training programs; however, a total of 54,809 programs did not have sufficient data reported (the primary missing data component was earnings) and were therefore not included in the analysis.

Based on the Workforce Pell eligibility requirements identified in legislation, the following variables were identified and applied to programs:

- **Program Weeks:** 8,165 programs met the 8 to 15 weeks requirement.
- **Median Earnings:** 2,445 programs reported median earnings.
- **Program Hours:** 1,596 programs met the 150–600 clock hours requirement.<sup>3</sup>
- **Entity Type and Associated Credentials:** 1,547 programs offered non-degree credentials.<sup>4</sup>
- **Completion and Placement Rate:** 620 programs met the minimum 70% program completion and placement rate requirement.<sup>5</sup>

#### ***Value-Added Earnings Method***

Because WIOA's reported median earnings are calculated at the second quarter after exit (i.e., showing quarterly earnings), the analysis created an annual earnings estimate by multiplying the WIOA variable "Annual Estimate - Median Earnings" by four.

For the total cost of the program, this analysis aggregated two variables—"d11\_non\_wioa\_tuition\_cost" and "d12\_non\_wioa\_supplies\_cost"—to estimate total program costs. This analysis did not use the WIOA-specific costs metric, which would only capture the cost of offering the program to WIOA participants (as opposed to capturing the cost of offering the program to all participants).

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<sup>3</sup> The WIOA metric "d113\_program\_length\_hours" was multiplied by the number of weeks to offer an estimated total number of hours.

<sup>4</sup> Programs that offered degrees were filtered out on the assumption that they would not meet the short-term program length requirements.

<sup>5</sup> WIOA does not have a placement metric. Instead, the metric "c\_q2\_employment\_percent" was used to calculate placement, assuming if a participant was employed, they were placed. The Department of Education's proposed language would allow states to use a straight employment rate for this requirement for the first three years of the initiative, after which a more precise employment in a related occupation rate is required.

To identify the value-added earnings for the programs, the analysis subtracted 150% of the FPL for a single adult (\$19,320)<sup>6</sup> plus the cost of the program from the annual median earnings estimate. Neither the FPL nor median earnings were regionally adjusted to capture the broadest set of potentially eligible programs.

#### IV. Findings

After applying Workforce Pell eligibility requirements, assessing the value-added earnings, and removing programs that did not have sufficient data reported, **a total of 530 programs remained**<sup>7</sup> as potentially eligible for Workforce Pell. However, this figure is likely much lower given the training provider type has not been accounted for in this dataset. These findings suggest that as states implement Workforce Pell, leveraging or emulating existing processes like WIOA's Eligible Training Provider List may not be an effective strategy to scale high-quality opportunities.

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<sup>6</sup> This is 150% of poverty for a single person in 2022.

<sup>7</sup> 76,467 programs were removed from the analysis, including 54,809 that were missing data needed to determine their eligibility (usually earnings).