

Minnesota Workforce Pell Program Determination Policy 2026-27
Public Comment Response Report

Comment Topic	Comment Summary	Comment Response	Policy Change
Program Duration	Comments were received requesting clarification and, in some cases, expansion of the eligible program duration requirements.	The federal final rule on Workforce Pell Grants clarifies that while the law establishes that eligible programs must be a minimum of 8 weeks, but less than 15 weeks, the US Department of Education (ED) interprets that to mean a program cannot last or exceed 15 weeks, therefore, ED proposes a 14-week maximum duration. The law is also clear that eligible programs must be at least 150, but less than 600 clock hours (or the credit hour equivalent) As a result, Minnesota must keep the 14-week and 599 clock hour maximum duration in its proposed policy to be compliant with the federal final rule.	None
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Provider eligibility	Comments were received requesting an expansion of provider eligibility to include non-Title IV-eligible providers.	Minnesota’s proposed Workforce Pell program determination policy limits eligibility to institutions that participate in the Title IV program established under the federal Higher Education Act. Federal Workforce Pell Grant law and final rule restrict Workforce Pell eligibility to programs offered by Title IV-eligible institutions. The final rule does allow for up to 25 percent of an eligible program to be offered by an ineligible provider through a written agreement with the eligible provider. Up to 49 percent of an eligible program can be offered by an ineligible provider through written agreement if the eligible program serves as the related instruction for a registered apprenticeship.	Language added in section 3 of the policy to clarify allowances for instruction provided through written agreements with non-eligible providers: <i>“No more than 25 percent of the eligible program can be offered by an ineligible provider through written agreement with an eligible provider. Up to 49 percent of an eligible program may be offered by an eligible provider through written agreement with an eligible provider if the program serves as the related instruction for a registered apprenticeship program.”</i>

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Supplemental programs	Comments were received requesting expansion of available programs and/or additional funding to support recipients in accessing Workforce Pell.	These comments, while valuable, fall outside the scope of the proposed Workforce Pell program determination policy. The state will continue to look for opportunities to provide additional guidance related to funding support for individuals participating in Workforce Pell programs.	None
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Income limits and integrity safeguards	Comments were received requesting clarification and, in some cases, expansion of Pell Grant income limits and recipient eligibility.	Workforce Pell recipients must meet all current federal Pell Grant income and eligibility criteria, just as they would for traditional Pell funding. Eligibility checks, including FAFSA submission, dependency status, and verification of household income, are managed at the federal level and not impacted or governed by Minnesota's policy.	None
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Outcomes Metrics	Comments were received requesting additional clarity and, in some cases, alternative standards for assessing whether an eligible program achieves successful outcomes.	The federal Workforce Pell law and final rule outline the requirements for the 70 percent program completion and job placement rates. For the first three Workforce Pell award years (2026–27, 2027–28, 2028–29), job placement will be measured by whether program exiters are employed 180 days after completion. By the 2029–30 award year, 70 percent of students who complete the program must be employed in the occupation or occupations for which the program prepares them, or in a comparable high-skill, high-wage, or in-demand occupation, as determined by Governors using administrative data.	None

		<p>As a result, state wage record data must be enhanced to comply with this federal requirement by the 2029–30 award year. In the meantime, the 70 percent job placement calculation is based solely on whether program exiters are employed in any occupation 180 days (second quarter) after exiting.</p> <p>Because these standards are federally required, the state must ensure that eligible programs meet the federal completion and job placement thresholds to maintain Workforce Pell certification.</p>	
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Occupational appeals process	<p>Comments were received indicating that the Workforce Pell Priority Occupations Methodology does not adequately incorporate regional variation for occupations that may be considered high-skill, high-wage, or in-demand in a particular region.</p>	<p>The proposed priority occupations list reflects a methodology centered on the state’s existing data that tracks in-demand occupations and additional filters specific to Workforce Pell requirements. Due to the time constraints and lack of adequate time to implement and lack of federal guidance, the inception list reflects a statewide list of priority occupations that captures occupations that are in-demand across multiple economic planning regions. While this approach limits regional variation, the Governor’s Workforce Development Board’s (GWDB) intent is to incorporate additional regional factors into a future methodology.</p> <p>To better incorporate regional variation into the proposed policy, the policy has been updated to allow eligible providers to submit a program not reflective of an occupation on the</p>	<p>The following language was added to Section 3.1.6 to incorporate a program appeals process:</p> <p><i>“An eligible provider may submit a program for consideration that trains learners in an occupation that does not meet the threshold for the state Workforce Pell Priority Occupations Methodology, but the provider believes in in-demand within their service area. The eligible provider must include the following documentation with its application:</i></p> <ul style="list-style-type: none"> <i>• A letter of support from the Chair of the Local Workforce Development Board (LWDB) for the area in which the institution is located. The letter must verify that the</i>

		<p>priority occupations list for consideration that it believes is in demand within its service area. To make such a request, the eligible provider must include a letter from the Chair of the Local Workforce Development Board for the area in which the institution is located. The letter must verify that, within the Local Workforce Development Area (LWDA), the occupation meets the applicable median wage criteria and is in high demand. Additionally, one of the three required employer validation forms must attest that the program aligns with the employer’s hiring needs and that they intend to hire graduates of the programs.</p>	<p><i>occupation is in demand within the Local Workforce Development Area (LWDA) and provide data with cited sources. If such data is already cited for the occupation in the Local Area’s most recent WIOA Plan, that Plan can serve as the cited data source.</i></p> <ul style="list-style-type: none"> • <i>One of the three required employer validation forms must attest that the program aligns with their workforce needs and that they intend to hire graduates of the program.”</i>
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Family sustaining wage	Comments were received requesting additional clarity on the family sustaining wage variable within the Workforce Pell Priority Occupations Methodology.	<p>The family-sustaining wage used in the Workforce Pell Priority Occupations methodology is derived from Minnesota’s Cost of Living Tool, which estimates the hourly wage needed to meet basic needs for a typical Minnesota household of three people, using federal and state data. This measure reflects the minimum wage necessary to support a family’s basic living costs.</p> <p>Regarding the use of the 25th percentile wage in the Priority Occupations methodology: Median wage statistics reflect the point at which half of workers earn below the wage and half earn above it. While this measure is appropriate for describing overall wage distribution, it does not align with the earnings</p>	<p>Language was added to section 3.1.3 to clarify how “family-sustaining wage” is being defined for the purposes of Workforce Pell:</p> <p><i>“25th percentile hourly wage at or above the regional family-sustaining wage, defined as the hourly wage derived from DEED’s Cost of Living Tool. This wage reflects a typical Minnesota household of three people, with one full-time worker and one part-time worker, and represents the hourly wage needed to meet basic living costs regardless of how work hours are distributed between adults.”</i></p>

		typically available to individuals entering an occupation for the first time. To better approximate expected entry-level wages, the methodology utilizes the 25th percentile wage, which represents the point at which 25 percent of workers earn at or below that wage and 75 percent earn above it. This provides a more appropriate indicator of the wages new entrants are likely to earn upon completing a Workforce Pell-eligible program.	
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Program determination process	Comments were received requesting additional clarity regarding the program determination and appeals process for the initial determination of a program's Workforce Pell eligibility.	<p>An interagency review committee will be established to determine whether a program is eligible for Workforce Pell certification and for what grounds an eligible provider can appeal an initial determination.</p> <p>Eligible providers may formally appeal a denial of eligibility by submitting a written notification within 15 days of denial to the designated application point of contact at the Minnesota Office of Higher Education, detailing the grounds for appeal and providing clarifying data. Appeals will be reviewed by an appeals committee established by the Workforce Pell Review committee. A final determination will be issued within 60 calendar days of receipt of the appeal. Eligible providers may continue seeking eligibility for denied programs in subsequent application review cycles.</p>	<p>Language was added to section 4.3 to establish an interagency Workforce Pell Review Committee to determinate whether an applying provider meets federal and state requirements:</p> <p><i>“Applications that meet completeness requirements will be advanced to the Workforce Pell Review Committee. The Review Committee will be comprised of staff representatives of:</i></p> <ul style="list-style-type: none"> • <i>The Governor’s Workforce Development Board</i> • <i>The Minnesota Office of Higher Education</i> • <i>The Minnesota Department of Employment and Economic Development</i> • <i>The Minnesota Department of Labor and Industry, when Registered Apprenticeship programs are under review</i>

			<p><i>The Review Committee will assess the program’s eligibility for Workforce Pell certification based on the criteria outlined in the Program Eligibility section of this policy. The Review Committee may request additional information or clarification from applicants during the review process.”</i></p> <p>Language in section 4.4 was refined to clarify the timing and process for an applying provider to appeal a program determination eligibility decision:</p> <p><i>“Institutions may formally appeal a denial of eligibility by submitting written notification within 15 days of denial to the designated application point of contact at the Minnesota Office of Higher Education, detailing grounds for appeal and providing clarifying data.</i></p> <p><i>Appeals will be reviewed by an appeals committee established by the Workforce Pell Review Committee. The appeals committee will consist of staff from the agencies represented on the Workforce Pell Review Committee and may include additional staff, as appropriate, based on the nature of the appeal. A final determination will be issued within 60 calendar</i></p>
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Employer Validation	Comments were received proposing alternative methods to satisfy the employer validation requirement.	<p>Federal Workforce Pell requirements emphasize that eligible programs must lead directly to employment. For the first three award years, job placement is measured by whether completers are employed 180 days after finishing the program; beginning in 2029–30, 70 percent of completers must be employed in the occupation for which they were trained or a comparable high-skill, high-wage, or in-demand occupation.</p> <p>ED has clarified that completers who continue directly into further education rather than employment will not count as job placements and will remain in the placement calculation.</p> <p>As a result, the requirement for three employer validations is essential to ensure that Workforce Pell-eligible programs prepare learners for occupations with immediate hiring demand and can meet federal placement thresholds.</p>	<p>Language in section 3.2.4 was refined to clarify that three employer validations are necessary to fulfill the requirement of employer validation for the purposes of Workforce Pell:</p> <p><i>“Employer validation must include input from a minimum of three employers:</i></p> <ul style="list-style-type: none"> • <i>Have recent or anticipated hiring demand in the occupation(s) associated with the program; and</i> • <i>Represent the relevant regional or industry labor market served by the program.”</i>