

To: Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) Committee

From: Tamar Hoffman and Zoe Kemmerling

Re: Ensuring Accreditors Review Workforce Pell Programs

Date: December 10, 2025

The Department has noted several times that it expects accrediting agencies to review Workforce Pell programs. While some agencies conduct reviews of non-credit programs, many do not. Below, we propose an update to the Department's proposed language for an eligible Workforce Pell program to ensure that Workforce Pell programs undergo basic review by an accrediting agency, consistent with existing requirements. It will also affirm the longstanding requirement that an institution's programs be provided within the scope of the institution's accreditation in order to be eligible for Title IV. This will provide additional clarity to the field – both accrediting agencies and institutions – about the reviews needed for approval of a Workforce Pell program, since some agencies review these programs, but others do not.

Recommendation:

We recommend a new provision in 34 CFR 690.92 that requires that Workforce Pell programs be approved by the institution's accreditor and included within the scope of the institution's accreditation (as all Title IV-eligible programs must be).

Amended Language:

§ 690.92 Eligible workforce program

An educational program is an eligible workforce program if the Secretary determines that it is an undergraduate program that–

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(f) Complies with the annual value-added earnings requirements as described in 34 CFR § 690.95; **and**

(g) Is offered by an institution that, during the five years preceding the date of the determination, has not been subject to any suspension, emergency action, or termination of programs under this title; **and**

(h) Has been reviewed and approved by the institution's accrediting agency as a substantive change in accordance with 34 CFR 602.22 and included within the scope of the institution's accreditation.