

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

**From:** Tamar Hoffman and Zoe Kemmerling (Legal Aid Negotiators)

**Re:** Ensuring transferability of credit and application of credit toward certificate or degree requirements

**Date:** December 9, 2025

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Below, we propose an update to the Department's proposed language establishing a process for governors' approval of Workforce Pell programs to reflect the academic credit transferability requirements in the law.

### **Background**

The One Big Beautiful Bill Act (OBBBA) specifies that Workforce Pell programs must ensure students, "upon completion of the program and enrollment in such a related certificate or degree program, will receive academic credit for the Workforce Pell program that will be accepted toward meeting such certificate or degree program requirements."

This is an important section of the law. One of the promises of short-term programs is that they will be "stackable" toward other credentials, enabling students to move from short-term programs that may have a quicker – but fast-fading – benefit on their careers, into longer-term programs that may yield longer-lasting returns.

However, research suggests that students rarely actually stack their certificates. Bipartisan Policy Center recently [wrote](#) that "most learners...do not stack, and [rates of stacking](#) vary by state, field, and learner demographics." In an evaluation of Virginia's FastForward program, MDRC [reported](#) that "less than 12 percent of FastForward students pursued subsequent training in credit-bearing programs." In part, this is no doubt driven by low rates of transfer across the higher education system generally; a [2014 study](#) from the National Center of Education Statistics found that even when students do transfer, about 40 percent do not transfer any credits with them, forcing them to start over and wasting time and money. On average, students lost 13 credits in their first transfer.

### **Recommendation**

To ensure states take seriously this requirement, we recommend that the Department not only require an assurance of states' review of credit transferability among Workforce Pell programs, but that states submit to the Department information sufficient to confirm that articulation agreements or other formal avenues for credit transfer have been put in place prior to the program receiving approval for Pell

Grants. This change will be especially important if the Department determines that some non-credit clock hour programs will be approved for Workforce Pell eligibility, since such programs are likely to be among the biggest offenders of credit transfer failures.

### Amended Language

#### § 690.93 Components determined by Governors

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(d) The Secretary documents the Governor's approval and determination that an eligible workforce program meets the requirements in paragraph (a) of this section by accepting a certification by the Governor or their designee that includes the following—

(1) The name of the program;

(2) The Classification of Instructional Programs (CIP) Code of the program;

(3) A signed statement that the eligible workforce program was approved by the Governor and that the program meets the requirements described in paragraph (a);

(4) Documentation of the articulation agreement(s) and/or institutional policy regarding credit transfer for the program that confirms that completing students will receive academic credit for all coursework in the program and have such credit applied toward certificate or degree program requirements;

(45) The date the eligible workforce program was approved;

(56) If applicable, a certification that the State determined that the program meets alternative completion and placement standards under 34 CFR 690.94(a)(3)(i);

(67) An agreement that, upon request of the Secretary of Education or Secretary of Labor, the Governor will make available to the Secretary of Education and Secretary of Labor documentation of its process established under paragraph (b) for making the determination in paragraph (a) of this section;

(78) An agreement that the Governor will inform the Department of Education and Department of Labor and the institution within 15 calendar days of its final decision to withdraw approval of the eligible workforce program; and

(89) Such other information as the Secretary of Education or Secretary of Labor may require.

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