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## STATE INSTRUCTION NUMBER 25-18

**To:** The Coordinating Council for Workforce Development (CCWD)  
Executive Committee

**Subject:** **Eligible Workforce Pell Programs**

**Issuance Date:** June 26, 2026

**Effective Date:** July 1, 2026

**Purpose:** To provide guidance on the process by which educational programs become an eligible workforce program to receive the Workforce Pell Grant.

**References:**

- Higher Education Act of 1965, Public Law 89-329
- Workforce Innovation and Opportunity Act, Public Law 113-128
- Working Families Tax Cuts Act, Public Law 119-121
- Carl D. Perkins Career and Technical Education Act, Public Law 109-270
- 34 CFR 690.90-690.97

**Background:** The Working Families Tax Cuts Act (WFTCA), signed into law on July 4, 2025, made numerous changes to the Federal Pell Grant Program under Title IV of the Higher Education Act (HEA) of 1965, as amended. Specifically, the WFTCA expanded Pell Grant eligibility to eligible workforce programs through the Accountability in Higher Education and Access Through Demand-Driven Workforce Pell regulation (Workforce Pell). These programs are shorter in duration than the undergraduate programs currently eligible for Pell Grants, and they must meet specific accountability metrics related to graduate earnings, as well as indicia of employer demand – requirements that are not applicable to other eligible programs.

The Governor of South Carolina has delegated the core responsibilities of Workforce Pell to the South Carolina Coordinating Council for Workforce Development (CCWD), in consultation with the State Workforce Development Board (SWDB). The Department of Employment and Workforce (DEW), the state entity responsible for administering the Workforce Pell program, will hereinafter be referred to as “the State”.

Initial implementation of the Workforce Pell Grant will focus on a targeted set of occupations and sectors to allow for ongoing evaluations and future refinement.

**Policy:** All eligible institutions and eligible workforce programs must comply with the criteria, requirements, and procedures established within this policy.

## I. GOVERNANCE

To be considered eligible, a workforce program must meet the requirements under 34 CFR § 668.8 and all Workforce Pell eligibility criteria for the 12 months preceding the date on which the institution applied for program eligibility. An eligible workforce program must meet the following standards:

- A. Requires a minimum of 8 weeks, but less than 15 weeks of instruction
- B. Has a duration of —
  - (i) At least 150 clock hours but less than 600 clock hours,
  - (ii) At least 4 but less than 16 semesters or trimesters, or
  - (iii) At least 6 but less than 24 quarter hours
- C. Is not offered using —
  - (i) Correspondence courses, as defined under 24 CFR § 600.2,
  - (ii) Coursework that takes place as part of a study abroad program, or
  - (iii) Credit or clock hour equivalencies that are part of a direct assessment program under 34 CFR § 668.10
- D. Is provided by an institution that is in compliance with the requirements outlined in section **II. INSTITUTION ELIGIBILITY DETERMINATION**
- E. Meets the requirements outlined in section **III. WORKFORCE PROGRAM REQUIREMENTS**, established by the US Department of Education (DoEd) for subsection **a. Federal Approval Requirements**, and established by the State for subsection **b. State Eligibility Requirements**
- F. Receives approval from the CCWD, and receives documentation of such approval by the State, as outlined in section **IV. WORKFORCE PROGRAM APPROVAL PROCESS**
- 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 Title IV of the HEA

## II. INSTITUTION ELIGIBILITY DETERMINATION

### a. Initial Eligibility

Institutions seeking approval for initial eligibility on South Carolina's Eligible Workforce Pell List (EWPL) must apply quarterly through SC Works Online Services (SCWOS). The application window opens on the first business day of each quarter and remains open for 15 business days.

Institutions must meet the following initial eligibility requirements through submission of necessary documents and staff verification:

1. Submission of a signed Program Participation Agreement (PPA), in compliance with 34 CFR § 690.93(f)
2. Documentation of institutional compliance with all state licensure requirements and current licensing status
3. Be a legal entity
4. Be in good standing and current on state unemployment insurance taxes

**NOTE:** To search for active or satisfied unemployment insurance tax liens, visit: <https://uitax.dew.sc.gov/LienRegistry/#/registry/home>.

The institution's initial eligibility status remains in effect for one year from the date that they received approval.

### b. Continued Eligibility

After the one-year initial eligibility period, an institution seeking continued eligibility approval must submit the following in SCWOS:

1. The necessary documentation and staff verification items required in the above subsection — **a. Initial Eligibility**
2. As detailed in section **III. WORKFORCE PROGRAM REQUIREMENTS** —
  - The data from subsection **a. Federal Performance Requirements**, including the published tuition and fees for the eligible workforce program.
  - The submission for approval of any changes to what was previously approved in subsection **b. State Eligibility Requirements**, including a current program description and contact information.

The State reviews the information in SCWOS to ensure all required information has been submitted correctly and notifies an institution if the information is incomplete or inconsistent. Should an institution and/or its workforce program(s) lose their eligibility, they must follow the instructions in section **VI. LOSS OF ELIGIBILITY**.

### III. WORKFORCE PROGRAM REQUIREMENTS

#### a. Federal Performance Requirements

The eligible institution's workforce program must meet the performance requirements established by DoEd and outlined in this section.

##### Completion and Job Placement Rates

For the award years **2026-27**, **2027-28**, and **2028-29**, eligible workforce programs must meet the following standards:

- A completion rate of at least 70%, within 150% of the normal time to completion.
- A job placement rate of at least 70%, calculated as the percentage of students who are employed during the second quarter after exiting the program.

For each award year **after the 2028-29** award year, the completion and job placement rate requirements are determined according to the following standards:

- A completion rate of at least 70%, within 150% of the normal time of completion, as determined under 34 CFR 668.6(f).
- A job placement rate of at least 70%, calculated as the percentage of students who are employed in either:
  - The occupation(s) for which the program prepares students, or
  - A comparable high-skill, high-wage, or in-demand occupation during the second quarter after successful program completion, based on CCWD analysis using administrative data, including wage records.

For each award year after the eligible workforce program is approved, the institution must submit to the State a list of students who completed the program during the award year and the information necessary for the State to verify the job placement rate for such award year.

##### Value-Added Earnings

An eligible workforce program's total published tuition and fees may not exceed the value-added earnings of program graduates who received a Pell Grant for enrollment, completed the program three years prior to the current award year, and are now working.

Value-added earnings are determined by calculating the difference between the median earnings of program graduates the first full tax year following program completion, and 150% of the poverty line applicable to a single individual for such tax year. Programs with a calculated value-added earning of zero or negative value are not eligible for the Pell Grant.

No later than three months prior to the beginning of each award year, DoEd publishes the value-added earnings applicable to the eligible workforce program for that upcoming award year. Institutions must keep **published tuition and fees at or below the value-added earnings** calculated for the workforce program during the award year that begins following the annual release of the workforce program's value-added earnings.

#### **b. State Eligibility Requirements**

The CCWD, in consultation with the SWDB, approves a workforce program based on whether it:

- 1) Provides an education aligned with the requirements of high-skill, high-wage, or in-demand industry sectors or occupations, and
- 2) Meets the hiring requirements of potential employers in high-skill, high-wage, or in-demand industry sectors and occupations.

*High-skill.* An occupation or industry sector in South Carolina that typically requires education or training resulting in the attainment of a recognized postsecondary credential.

*High-wage.* An occupation or industry sector that pays at least the median hourly or median annual wage for South Carolina.

*In-demand.* An occupation or industry sector that currently has or is projected to have a substantial impact (including leading to economic self-sufficiency and opportunities for advancement) in South Carolina, contributing to the growth or stability of supporting businesses or industry sectors.

The State determines which industry sectors and occupations are high-skill, high-wage, or in-demand. The list of such occupations and sectors is publicly available on [SCWorks.org](https://www.scworks.org). This determination is reviewed no less than every two years. The State's initial implementation of the list will focus on a targeted set of occupations and sectors to allow for ongoing evaluations and future refinement.

#### Credential or Degree Credit

The workforce program must lead to either:

- A recognized post-secondary credential that is stackable, portable, and transferable across more than one employer, or
- Preparation for employment in an occupation for which there is only one recognized post-secondary credential, which is provided to students upon program completion.

*Recognized Postsecondary Credential.* An industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship under 29 CFR Part 29, a license recognized by the State or Federal government, or an associate or baccalaureate degree.

*Stackable.* A series of credentials that can be combined or sequenced with other credentials to increase an individual's skills and qualifications within a career pathway.

*Portable.* Credentials that are widely recognized by educational institutions and allow the credential holder to move along an educational pathway; widely recognized by employers in the associated industries and across geographic locales, allowing the credential holders to change jobs and possibly advance in their career.

*Transferable.* Credentials (or courses) that are articulated by educational institutions and are applicable to progress towards other credentials.

The workforce program must prepare students to pursue one or more certificate or degree programs at one or more institutions, including the institution providing the program. Once the student completes the program and enrolls in a related certificate or degree program, they must receive academic credit that is accepted for the certificate or degree program requirements.

#### Registered Apprenticeships

A program that serves as a related instruction component of the Registered Apprenticeship Program meets the requirements to 1) provide an education aligned with the requirements of high-skill, high-wage, or in-demand industry sectors or occupations, and 2) meet the hiring requirements of potential employers in high-skill, high-wage, or in-demand industry sectors or occupations.

#### **IV. WORKFORCE PROGRAM APPROVAL PROCESS**

Workforce program applications are first reviewed by the State to verify that all documents are included, and all eligibility requirements are met, as set forth in section **I. GOVERNANCE**. This review verifies the description of each workforce program offered by the institution. The State makes a content-only determination within 15 calendar days of the initial application.

If an application is incomplete, the institution is notified and the application remains open for 15 calendar days from the date of receipt. If the institution fails to submit all required information or materials within this 15-day period, the State deletes the application. The institution may reapply when the next application submission window opens.

Once the State has made a content-only determination, the completed application is given concurrently to delegated SWDB and CCWD committees. The committees confirm that the program meets the hiring needs of potential employers and provide feedback on the application within 15 calendar days of receipt of the application.

The finalized feedback from both committees is collected and given to the CCWD Executive Committee, who provides final approval of the workforce program applications from that quarter.

#### **a. State Certification**

Upon approval from the CCWD, DEW certifies the workforce program and issues documentation of the determination to the institution including the following information:

1. The name of the program
2. The 6-digit Classification of Instructional Programs (CIP) Code of the program
3. The Standard Occupational Classification (SOC) code(s) for which the program prepares the individuals for employment
4. Approval that the program currently meets, and has met for the 12 months immediately preceding the State Eligibility Requirements
5. The date that the eligible workforce program was approved

Approved institutions are responsible for maintaining up-to-date information for the EWPL in SCWOS to continue receiving Workforce Pell referrals and funds. Failure to update program information may result in removal of the program from the EWPL. Any significant change to a program, including a change in the program's cost, may require re-evaluation for approval.

#### **b. Federal Approval**

Final eligibility determination and approval of any workforce program must be provided by the Federal Department of Education.

Please refer to the attachment *South Carolina Workforce Pell Quick Start Guide* for verification of institutional eligibility and program requirements.

## **V. REPORTING REQUIREMENTS**

Workforce Pell performance reports are intended to provide critical information regarding participants' employment, earnings, and credential outcomes for programs on the EWPL. The purpose of these reports is to maximize informed customer choice by assisting Workforce Pell participants, and the general public, in identifying effective workforce programs and institutions.

To generate an aggregate report via SCWOS, institutions must submit the following information for all students engaged in programs on the EWPL, regardless of funding source, no later than August 15<sup>th</sup> of each program year (July 1<sup>st</sup> to June 30<sup>th</sup>):

- First and Last Name
- Social Security Number
- Program Credential Preparation Identification
- Post Program Certification Preparation Identification
- Program Entry and Start Date
- Program Completion Date
- Enrollment Status
- Credential Earned
- Program Cost

Approval for inclusion on the EWPL is contingent on the timely submission of all student data. Failure to submit all student data for the prior program year for each approved program of training will result in the denial or removal of programs from the EWPL.

## VI. LOSS OF ELIGIBILITY

An institution must deliver results and provide accurate information to retain its eligibility status on the EWPL. An institution and/or its workforce program(s) may lose eligibility for reasons that include, but are not limited to:

- The initial or continued application is not completed by the established due date or is missing required information.
- The workforce program does not lead to a stackable and portable recognized postsecondary credential or prepare students for employment in an occupation for which there is only one recognized post-secondary credential.
- The required student data is not submitted by the established due date.
- The institution willfully submits inaccurate or falsified information.
- The institution repeatedly fails to submit the required information or fails to cooperate with the State.
- The institution fails to maintain required licenses or accreditation from its accrediting body.
- The institution or workforce program fails to meet minimum performance levels, including completion rate or job placement rate requirements.
- The institution does not meet the definition of an eligible workforce program.
- The workforce program's total published tuition and fees exceed the value-add earnings of students who are working, receive a Pell Grant for enrollment in the program, and completed the program during the cohort period.

#### a. **Regaining Eligibility**

For two years from the loss of eligibility because of a failure to meet the **Federal Performance Requirements**, or a voluntary discontinuation of a failing program, an institution may neither:

- Seek to reestablish eligibility of a failing workforce program, or
- Establish eligibility for a substantially similar program sharing both the same four-digit CIP code and identical SOC codes according to the Federal CIP SOC Crosswalk.

For a loss of eligibility because the published tuition and fees were higher than the value-added earnings, the institution may request that the program's eligibility be reinstated by:

- Providing DoEd with a new **State Certification** of the workforce program,
- Submitting to DoEd the program's updated published tuition and fees and an attestation that they have been reduced and will remain equal to or less than the program's recalculated value-added earnings, and
- Requesting a recalculation of the program's value-added earnings to determine whether the updated tuition and fees exceed the value-added earnings.

For a loss of eligibility because of a failure to meet the **State Eligibility Requirements**, an institution may reestablish eligibility after:

- DoEd receives certification that the workforce program has since met the **State Eligibility Requirements**, and
- DoEd determines the workforce program meets the **Federal Performance Requirements**.

## VII. APPEAL PROCESS

If an institution and/or its workforce program(s) loses their eligibility and wishes to file an appeal, they must contact [WFPell@dew.sc.gov](mailto:WFPell@dew.sc.gov) within 30 calendar days of receipt of the notification. An institution choosing to appeal must submit the following information to the previously mentioned email:

- A statement of the desire to appeal
- A description of the program in question
- A detailed justification for gaining or retaining approval, including all supporting facts

All appeals are sent to the Governor's office, or its designee, for final determination.

A final determination is issued within 60 calendar days of receipt of the appeal. Institutions may continue seeking eligibility for denied programs in subsequent application cycles, in alignment

with the parameters outlined in section **VI. LOSS OF ELIGIBILITY**, subsection **a. Regaining Eligibility**.

**a. Appeal Based on Discrimination Claim**

All alleged violations of discrimination under protected bases are directed to the Office of Equal Opportunity (EO) for investigation. Any subsequent decision on these bases regarding the inclusion or removal of an institution and/or its workforce program(s) from the EWPL will be made by the State EO Officer.

See the most updated state instruction letter on *Programmatic and Discrimination Complaint Procedures Under WIOA* for more information.

**b. Institution Fraud or Violation of Workforce Pell Requirements**

Institutions found to have willfully submitted inaccurate or falsified information, or substantially violated any Workforce Pell requirements, implementing regulations, or applicable federal and state policies and guidance, must be removed from the EWPL, must remain eligible for no less than two years, and are liable to repay funds received during the period of noncompliance. To reestablish eligibility, the institution must apply through the initial eligibility process.

For questions regarding the Workforce Pell appeal process, contact [WFPell@dew.sc.gov](mailto:WFPell@dew.sc.gov).

**Action:** Please ensure that all appropriate staff receive and understand this policy.

**Inquiries:** Questions may be directed to [WorkforcePolicy@dew.sc.gov](mailto:WorkforcePolicy@dew.sc.gov).

*Nina Stagers*

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Nina Stagers, Assistant Executive Director  
Workforce Development Division

**ATTACHMENT**

- South Carolina Workforce Pell Quick Start Guide

# SOUTH CAROLINA WORKFORCE PELL

## Quick Start Guide

An eligible institution's certification for an eligible Pell Workforce Program is dependent on the CCWD's review and approval of all items listed below. The eligibility items must be met by the institution and its workforce program for the **12 months immediately preceding certification**.

### Institution Requirements:

- Creation of an SC Works Online Services (SCWOS) account
- A signed Program Participation Agreement (PPA), in compliance with 34 CFR § 690.93(f)
- Compliance with all state licensure requirements and current licensing status
- Be a legal entity
- Be in good standing and current on state unemployment insurance taxes

### Workforce Program Standards:

- A minimum of 8 weeks, but less than 15 weeks of instruction
- Has a duration of:
  - At least 150 clock hours, but less than 600 clock hours
  - At least 4 semesters/trimesters, but less than 16 semesters/trimesters
  - At least 6 quarter hours, but less than 24 quarter hours
- Is not offered using any of the following:
  - Correspondence courses (24 CFR 600.2)
  - Coursework that takes place as part of a study abroad program
  - Credit or clock hour equivalencies that are part of a direct assessment program (34 CFR 668.10)

*(These items are verified by the US Department of Education.)*

### Federal Performance Requirements:

- Completion Rate
  - Award years **2026-27**, **2027-28**, and **2028-29**: at least 70%, within 150% of the normal time to completion
  - Award years **after 2028-29**: at least 70%, within 150% of the normal time of completion, as determined under 34 CFR 668.6(f)
- Job Placement Rate
  - Award years **2026-27**, **2027-28**, and **2028-29**: at least 70%, calculated as the percentage of students who are employed during the second quarter after exiting the program
  - Award years **after 2028-29**: at least 70%, calculated as the percentage of students who are employed in either:
    - i. the occupation(s) for which the program prepares students, or

- ii. a comparable high-skill, high-wage, or in-demand occupation during the second quarter after successful program completion
- Value-Added Earnings
  - Total published tuition and fees may not exceed the value-added earnings of program graduates who received a Pell Grant for enrollment, completed the program three years prior to the current award year, and are now working.
    - i. Determined by calculating the difference between the median earnings of program graduates the first full tax year following program completion, and 150% of the poverty line applicable to a single individual for such tax year.
  - Published tuition and fees must be at or below the value-added earnings

**State Eligibility Requirements:**

- Provides an education aligned with the requirements of high-skill, high-wage, or in-demand industry sectors and occupations
- Meets the hiring requirements of potential employers in high-skill, high-wage, or in-demand industry sectors and occupations
- Provides either of the following:
  - A recognized postsecondary credential that is stackable and portable across more than one employer; or
  - Preparation for employment in an occupation with only one recognized postsecondary credential, which they are given upon completion
- Prepares students to pursue one or more certification or degree program at one or more eligible institution
- Provides academic credit that is acceptable toward meeting the certificate or degree program requirements

**Post-Program Requirements:**

- Each award year after program approval, the institution must submit to the State:
  - A list of students who completed the program during the award year
  - The information necessary to verify the job placement rate
- After the one-year initial eligibility period, an institution seeking continued eligibility approval must submit the following in SCWOS:
  - The **Federal Performance Requirements** data
  - Any changes to the previously approved **State Eligibility Requirements**, including a current program description and contact information
  - A current PPA for the upcoming award year, in compliance with 34 CFR § 690.93(f)
  - All student data, as required in the state policy under **Reporting Requirements**
- Each award year, the institution must report the published tuition and fees for the eligible workforce program

For additional information, contact [WFPell@dew.sc.gov](mailto:WFPell@dew.sc.gov).