Workforce Pell for Community College Noncredit Education: How Well Positioned is the State Noncredit Data Infrastructure?

Mark M. D'Amico

The University of North Carolina at Charlotte

Michelle Van Noy

Education and Employment Research Center, Rutgers University

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Abstract

With the passage of H.R. 1 on July 4, 2025, Workforce Pell, which authorizes Pell Grants for programs as short as 150 hours and eight weeks, is now a reality. Workforce Pell will open the door for many students to use federal need-based aid for noncredit community college education programs that meet the many articulated guardrails. Over time, literature on short-term programs and related credentials have shown modest labor market gains, which necessitates discussions of quality and value established through data. Findings presented from the State Noncredit Data Project show how community college noncredit course/programs often fall short of the mandated duration for Workforce Pell, and many state data repositories do not capture all of the data needed to identify noncredit offerings that are potentially eligible. The Noncredit Data Taxonomy 2.0 may help states and institutions consider data elements needed for Workforce Pell and better document the community college noncredit mission and outcomes.

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After years of discussion and debate, Workforce Pell, which makes students eligible for need-based Pell Grants for programs as short as 150 hours and eight weeks became law on July 4, 2025 with passage of H.R. 1 (One Big Beautiful Bill Act, 2025). This legislation has broad implications for noncredit community college education offerings that meet the programmatic and student eligibility requirements. Despite the fact that approximately 40% of community college headcount enrollment is estimated to be in noncredit education (AACC, 2025), so much is unknown about noncredit, which is often referred to as the "hidden college" (Voorhees & Milam, 2005). Even less has been documented about the data needed to capture the noncredit landscape and determine who and what programs will be Workforce Pell eligible (D'Amico et al., 2017; Van Noy et al., 2008). In this paper, we describe noncredit community college education, what is known about noncredit data and related outcomes of short-term programs, details about the eligibility requirements for programs (i.e., guardrails) included in Workforce Pell legislation, and program-level findings from a multi-state initiative to describe readiness to employ the new Pell requirements.

Noncredit Background

Noncredit community college education is most often short-term training that occurs through four main types: "occupational training (often paid for by individuals), sponsored occupational (contract) training, personal interest, and pre-college" (D'Amico et al., 2014, p. 157). Occupational training through noncredit instruction is the primary focus of the current discussion due to its adaptability to labor markets, workforce focus, and the emphasis on work-based skills (D'Amico, 2017; D'Amico et al., 2019; Jacoby, 2021). Participants in noncredit

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occupational education do so "to prepare for a new job, remain current in one's field, or advance within an existing job" (Cronen & Murphy, 2013, p. 6), and noncredit programs are often geared toward certifications in specific career-focused areas such as business, health care, technology, and the skilled trades (Van Noy et al., 2008). Although structural barriers often occur such as limited funding and lack of pathways to credit-based programs, noncredit education has been described as a promising entrance point to higher education due to its open access and lower cost (Grubb et al., 2003). It is this promise that has led to ongoing discussions on aid-supported, shorter-term training. While Workforce Pell may include credit-bearing programs, it is likely that many noncredit programs in addition to shorter-term credit programs will now qualify for federal need-based aid.

Funding for noncredit programs seems as varied as their subject areas. Prior studies have shown that from nearly half to two-thirds of states provide some level of funding for noncredit (D'Amico et al., 2017; Jenkins & Boswell, 2002; Milam, 2005; Oleksiw et al., 2007; U.S. GAO, 2004; Van Noy et al., 2008). Recent work has shown diverse funding streams that include state funding from special workforce initiatives and performance-based systems (Archer-Rosenthal, 2022) to more traditional enrollment-formula funding and even some limited need-based state funding for training and wraparound student support (D'Amico et al., 2023; Van Noy et al., 2024). Many states have been devoting substantial resources to support short-term credentials including noncredit through a variety of workforce funding initiatives—estimated at close to $4 billion in recent years (Murphy, 2023). Although need-based aid has not historically been a primary avenue of noncredit funding, individual enrollment noncredit can include participants who qualify for resources through the Workforce Innovation Opportunity Act (WIOA) and other sources to support their tuition.

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One of the perennial challenges with understanding noncredit has been lacking data, and generally the data collected have not been standardized (Davaasambuu et al., 2018). The lack of standardization is partially linked to the varied funding mechanisms that may or may not mandate data collection as well as a lack of federal incentive, since the Integrated Postsecondary Education Data System (IPEDS) does not mandate noncredit data reporting (Milam, 2005; Romano et al., 2019; Romano & D'Amico, 2021). While it is presumed that community colleges offering noncredit education collect data in a variety of ways, prior analyses have shown that around three out of four states have historically captured noncredit community college data at the state level (D'Amico et al., 2017; Sykes et al., 2014; Van Noy et al., 2008). A key challenge resulting from limited data is a fundamental lack of understanding of what noncredit programs are. Fundamentally, their content, including duration, format, and field of study, is often not well understood. The likely variation in their content leads to greater questions about the potential outcomes to expect from these programs.

Noncredit and Short-Term Program Outcomes

The discussion of Workforce Pell is often rooted in questions of value and outcomes. With relatively scant data over time, the prior literature on noncredit outcomes is not nearly as robust as on credit-based programs. However, recent momentum around noncredit education and related credentials has resulted in a growing body of research that informs the question of Workforce Pell relevance and program eligibility.

Several studies have applied more traditional higher education success metrics, such as completion and continued enrollment. Each study places these outcomes within a workforce-relevant context. For example, D'Amico et al. (2020) looked at the number of noncredit completions within fields of study and found that students in health care fields generally had a

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greater number of noncredit course and program completions than other career areas. This industry-specific finding can potentially be attributed to completion and licensure requirements for positions in that industry. Another noncredit theme is considering short-term education as an avenue into higher education and whether it leads to further education. Xu and Ran (2020), however, found that just over half of noncredit students returned for a subsequent term, and Bahr et al. (2022) explained mixed results on transitions. In three states that are predominantly focused on occupational noncredit, a small fraction of students transitioned to credit-based education, while California, which uses noncredit for pre-college remediation, had a much higher transition rate. Connections between noncredit and credit-based programs have long been studied for their structural barriers and practices limiting student transitions (Buckwalter & Maag, 2019; Education Strategy Group, 2020).

More recent studies have focused on labor market outcomes. For instance, Bahr et al. (2022) found modest gains in labor market outcomes from noncredit education. In a study of Virginia, Tessler et al. (2024) found modest wage and employment gains for noncredit participants earning a credential, a key feature of the state-funded FastForward program. Differences in earnings were largely dependent on program and credential areas, showing the importance of field- or program-specific outcomes. Beer et al. (2021) found substantial variation in outcomes by industry across regions and states for students with short-term community college credentials. McConville et al. (2021) noted completers with employment in a related field had wages gains three times larger than those who did not. In a study specifically considering Pell expansion for short-term programs, Thomas et al. (2024) found that offering aid enhanced completions but did not have a positive effect on earnings or employment over time. And a recent study of non-degree credentials showed only modest wage gains the year following

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completion with limited outcomes related to switching careers or advancing in one's field (Sigelman et al., 2025), further noting that "only 1 in 3 credentials meet a minimum threshold vs. counterfactual peers" for the studied outcomes (Sigelman, 2025, para. 2). In their synthesis of research on outcomes, Van Noy et al. (2024) found evidence for overall modest labor market outcomes with a great deal of variation by industry and geography, which tells an important story about community college noncredit education.

In the end, noncredit is not, and must not be treated as, a monolith. Outcomes for noncredit education and non-degree credentials are highly variable, especially by program area (Beer et al., 2021; Van Noy et al., 2023), as well as by their design, duration, and intent. Essentially, value is in perennial question, and one that led Van Noy et al. (2019) to develop a non-degree credential quality framework that includes credential design, related competencies, and outcomes while considering responsiveness to the market. Considering the importance of evaluating value, the literature shows that not all short-term programs should necessarily be eligible for public investment. Critical to the question of value is the need for a deeper look into the Workforce Pell legislation and states' preparedness to meet the standards for eligibility.

Workforce Pell

Presently, Pell Grants provide student aid for eligible programs that run for at least 600 hours and 15 weeks. The recently passed Workforce Pell provisions allow need-based aid to be used for programs of at least 150 contact hours and eight weeks beginning on July 1, 2026 (One Big Beautiful Bill Act, 2025). Eligible students who meet general Pell criteria, except for a provision that those who have earned a bachelor's degree also qualify, may use Workforce Pell to participate in a short-term course/program that meets a series of guardrails articulated in H.R. 1:

- The course cannot be a "correspondence course,"

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- The Governor verifies that the program is aligned with "high-skill, high wage … or in demand" areas,
- The offering matches employer hiring criteria,
- It leads to a "stackable and portable" credential or results in a credential that is the only postsecondary credential for employment in a particular occupation,
- The program results in credit that articulates to additional degrees and/or certificates,
- The program has been offered for at least one year,
- The program has a completion rate of 70% or higher in 150% of the program's normal time period,
- The program's post-completion job placement rate is 70% or higher 180 days following completion,
- Program costs (tuition and fees) do not exceed value-added earnings. (pp. 280-281)

The U.S. Department of Education (2025) announced that a negotiated rulemaking process will occur to guide implementation of the legislation., This process should help more clearly define the role of the governors' offices, higher education institutions and systems, and the U.S. Department of Education in terms of identifying potential programs, acquiring data, calculating measures related to the guardrails, and determining eligibility.

In the years leading up to the passage of Workforce Pell, several concerns emerged. Most prevalent among them is the idea of program and credential quality, largely discussed in the previous section on research related to short-term programs. Another central concern is the inclusion of unaccredited providers that could threaten quality and take advantage of the system and students (Knox, 2025; Whistle & Fishman, 2025). Ultimately, the final legislation holds the

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same Title IV eligibility requirements for Workforce Pell, ensuring that unaccredited providers will not be able to participate.

Additional concerns have also been shared regarding proposed guardrails, mostly that only high-quality programs are eligible. One of the particular concerns has been about stackability, which has proven elusive in the noncredit space and will be difficult for the U.S. Department of Education to verify (Whistle & Fishman, 2025) and adds a layer of difficulty beyond the program-specific labor market returns (Baum et al., 2021), which have traditionally been difficult to measure with available data. It is important when considering prior work on the outcomes of short-term programs to realize that the guardrails would make many short-term noncredit programs ineligible for funding (Cohn, 2023; Cooper, 2024) due to both not meeting the standards and not having the data to establish eligibility. With Workforce Pell now the law, institutions and state systems must evaluate their preparedness to identify noncredit courses and programs that may fit within the guardrails.

State Noncredit Data Project

Since 2021, the State Noncredit Data Project[1] has worked with state-level community college entities to map out their noncredit data. One of the key products has been the development of a taxonomy for states to build out their noncredit data infrastructure through the identification of four data categories (purpose & design, outcomes, enrollment & demographics, and finance & policy) and a series of 90 different data elements relevant to noncredit education (see Figure 1; D'Amico et al., 2025). Two central drivers of this effort have been to prepare states, and ultimately colleges, for eventual noncredit data collection by IPEDS and the potential for Workforce Pell. While there has not been movement on IPEDS, and expansion may be

[1] https://sites.rutgers.edu/state-noncredit-data/

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unlikely considering the current political realities at the Department of Education, Workforce Pell is now a reality. Using course/program-level data from eight research partner states representing state-level community and technical college entities in Iowa, Louisiana, Maryland, New Jersey, Oregon, South Carolina, Tennessee, and Virginia, we sought to provide information on the following: (1) whether states maintained data needed to appropriately satisfy Workforce Pell guardrails? (2) whether noncredit course/program-level data showed alignment with Workforce Pell criteria?

Figure 1

Noncredit Data Taxonomy 2.0

Source: D'Amico et al., 2025, p. 12

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Findings and Implications

Using the Noncredit Data Taxonomy 2.0, we first identified course/program-level findings relevant to Workforce Pell guardrails to include program length; field of study; associated academic, labor market, and non-degree credential outcomes; student identifiers; and tuition (see Table 1). It is important to note that eligibility will be determined on specific programs and institutions, and the data shown here are those housed in state-level data systems. However, the state-level data will also reflect many of the data elements captured institutionally due to reporting requirements. In addition, state-level entities are often involved in guiding data standards due to existing policy and data-sharing agreements related to credential and labor market outcomes. So, while institution-level data may be more robust in some circumstances, the state-level data reflect the ability of community/technical college systems to help institutions seek Workforce Pell eligibility.

The data in Table 1 are reflective of what we know about noncredit data more generally—noncredit data collection is highly variable state-by-state.[2] Nearly all states in the current project capture program length and program name. The exception is New Jersey Office of the Secretary of Higher Education (OSHE).[3] Program length is the most essential data point for Workforce Pell eligibility, but program name and Classification of Instructional Programs (CIP) codes, which are captured less frequently, may also be helpful determinants of relevancy to state economic and workforce needs.

[2] With two phases of the state noncredit data project, data included in Tables 1 and 2 include years ranging from 2020-2021 to 2022-2023, based on the most recent complete year at the time of data collection. The presentation of data may not represent the most current data collection, since many states in the project have been working to enhance data systems over time.

[3] New Jersey OSHE collects robust student-level data, but it appears that they have little data in Table 1, since they do not capture data by noncredit program.

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Table 1

*State-Level Availability of Workforce Pell-Relevant Data Elements**

Taxonomy Subcategory/Data Element	States								
	Iowa (2020-21)	Louisiana (2020-21)	Maryland (2022-23)	New Jersey OSHE (2021-22)	Oregon (2022-23)	South Carolina (2021-22)	Tennessee Community Colleges (2022-23)	Tennessee Colleges of Applied Technology (2022-23)	Virginia (2020-21)
Purpose and Design									
Program Length									
Total contact hours	All	Most	All	None	All	All	All	Many	All
Field of Study									
Course/program name	All	All	All	None	All	All	All	All	All
CIP code	All	Most	Most	None	Some	None	None	All	Most
Associated Non-Degree Credentials	Many	Many	All	None	Some	None	None	Some	Most
Outcomes									
Academic Outcomes									
Students continue to credit	All	Some	None	None	All	None	None	None	All
Completion data	All	Most	Many	None	None	None	None	Some	All
Labor Market Outcomes									
Pre-enrollment employment	Many	Some	Many	None	None	None	None	None	All
Post-enrollment employment	Many	Some	Many	None	None	None	None	None	All
Pre-enrollment salary/wage	Many	Some	Many	None	None	None	None	None	All
Post-enrollment salary/wage	Many	Some	Many	None	None	None	None	None	All
Non-Degree Credential Outcomes									
Industry certification	Many	Many	Many	None	None	None	Most	None	Most
Occupational licensure	Some	Some	Many	None	None	None	None	None	Most
College-issued certificate	Many	Many	None	None	Some	None	None	Some	None
Microcredentials	None	Some	None	None	None	None	None	None	None
Apprenticeship	None	None	None	None	Some	None	None	None	None
Demographics and Enrollment									
Student Identifiers									
Social Security Number	All	Most	Many	Many	Some	Some	None	Most	All
Institutional ID number	All	Most	Many	All	None	All	None	All	Most
Name	All	Most	Many	None	All	All	None	All	Most
Birth date	All	Most	Many	Some	Some	All	None	Most	Most
Finance and Policy									
Funding									
Course/Program Tuition	None	Most	None	None	None	None	None	None	All

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Data Availability Legend	
The degree to which data are available on each data element at the offering (course/program) level	
All	Data are available on all noncredit offerings.
Most	Data are available on 2/3 or more offerings.
Many	Data are available on more than 1/3 but fewer than 2/3 of offerings.
Some	Data are available on 1/3 or fewer offerings.
None	Data are available on no offerings.

*Note: The availability of data by course/program does not guarantee that data are available on all students within programs.
Source: Data from in this table are extracted from two prior cross-state reports representing phases of the State Noncredit Data Project (D'Amico et al., 2023; Van Noy et al., 2025). The years of data collection vary from 2020-2021 to 2022-2023 and may not fully capture current state data collection.

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Credentials associated with programs and student-level academic outcomes are particularly important to identifying eligible offerings based on the guardrails. These data elements are far less common to collect with two of the eight states in our sample having no data on credential outcomes, half of states with no labor market outcomes such as earnings and employment, and multiple states not capturing program completion nor those students who continue to credit-based programs. Again, some of these data may be captured at the institution level, but missing state-level data demonstrate current priorities and efforts to ensure consistent data collection statewide. Student identifiers are captured by most state systems, which would be essential to measure student academic and labor market outcomes. In addition, only three of the eight states maintained tuition data at the state level, though tuition data should be available within each institution.

The highly inconsistent readiness of data calls into question states' preparedness to identify noncredit courses/programs for Workforce Pell. However, there are multiple ways to describe preparation. First, some state-level entities will be more prepared to identify programs across their respective states. For example, Iowa, Louisiana, and Virginia, all states with more complete state-level noncredit data, have most of the required data. And they are advantaged through current statewide funding mechanisms that drive data reporting mandates. For example, Virginia's FastForward program provides state funding for noncredit programs resulting in a credential, Iowa includes noncredit in their state-funding formula for workforce-oriented programs, and Louisiana has the MJ Foster Scholarship program for programs leading to credentials of value (D'Amico et al., 2023). Each of these policy structures requires data collection. States without more complete centralized data will still be able to identify potential Workforce Pell-eligible courses and programs, but institutions may have a greater burden. We

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contend that the identification of offerings that may be eligible will be more seamless and consistent when the state-level community college organization has the data to pre-identify courses and programs statewide.

In addition to information on the state-level data inventory, program-level findings also provide a snapshot into the prevalence of programs that could be eligible for Workforce Pell. Table 2 shows data that offer insights into the Workforce Pell eligibility of noncredit courses/programs by state. First, except for the Tennessee Colleges of Applied Technology (TCAT) that offer lengthy workforce-oriented programming, the median number of contact hours for occupational training programs range from 15 in New Jersey to 100 for the FastForward-eligible offerings in Virginia. Thus, the typical noncredit offerings as currently configured fall well below the 150-hour minimum threshold for Workforce Pell. In the coming months, institutions across the country could begin grouping existing courses into longer-term offerings to match the threshold, if that is determined to meet the provision that courses and programs must have been offered for at least one year. It will also be critically important for states to capture certification and labor market data, since several states in our sample may be less able to identify potentially eligible offerings based on certifications, employment, or earnings. Among states with certification data, we see a range from about one-fourth of offerings yielding certifications to Virginia's 100% of FastForward-eligible offerings (but 0% of Non-FastForward).

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Table 2
Noncredit Course/Program Characteristics and Data Related to Workforce Pell Guardrails

State	Median Contact Hours in Occupational Offerings	% of Occupational Offerings with Industry-Awarded Certification*	% of Occupational Offerings with Post-Enrollment Employment Data	% of Occupational Offerings with Post-Enrollment Salary/Wage Data
Iowa	26	54%	43%	43%
Louisiana	40	93%	10%	2%
Maryland	20-40 (based on subcategories)	40%	Many**	Many**
New Jersey	15	NA	NA	NA
Oregon	20	NA	NA	NA
South Carolina	24	NA	NA	NA
Tennessee CCs	20	26%	NA	NA
Tennessee TCAT	1,512	NA	NA	NA
Virginia	100 (FastForward)	100%	100%	100%
	15 (Non-FastForward)	0%	100%	100%

*Based on courses/programs with available data
**While data are available on many Maryland offerings, exact percentages are not available.
Note: All data are based on availability at the time of data collection. Years listed in Table 1. Years range from 2020-2021 to 2022-2023.

At this point, it is unclear until a negotiated rulemaking process occurs what data colleges will be required to gather to satisfy the gubernatorial verification process as well as the ultimate review by the U.S. Department of Education. One notable example will be whether labor market outcomes (e.g., job placement rates) will be calculated at the state or federal level. Either way, states with data associated with guardrail determinations will be able to more accurately pre-identify noncredit offerings that could potentially be eligible. Regarding the many critiques of short-term programs, current data show with certainty that not all occupational noncredit programs will be included in Workforce Pell. In the end, Workforce Pell has the potential to provide student-level, need based funding for occupationally oriented noncredit courses and programs; however, there have been well-documented concerns about noncredit program quality and the benefits to students.

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Conclusions and Recommendations

Our intent through this discussion was to highlight many of the emerging issues now that Workforce Pell has become law. We are in support of rigorous data-based guardrails to protect the interests of students and taxpayers. In addition, findings from the State Noncredit Data Project lead to multiple recommendations for research and practice.

First, determining noncredit course and program eligibility based on the guardrails will not be an easy task. Many state-level datasets will not be equipped without additional institutional engagement, expansion of data elements, and acquisition of labor market and related credential data. We encourage system and institutional leaders to consider the mapping of guardrails to data elements provided in the Noncredit Data Taxonomy 2.0 (D'Amico et al., 2025) to first inventory what they already collect and then to begin filling gaps.

Second, the Workforce Pell legislation involves an education and workforce development ecosystem beyond campus borders. Institution- and state-level community and technical college leaders should be working together to pre-identify noncredit courses and programs that may be Workforce Pell eligible. This collaboration can take many forms. One area, noted previously, is related to needed data, particularly around credentials and labor market outcomes. Where data are not available, state entities may be able to work with external organizations and agencies to secure data partnerships and prevent significant effort from each individual college. Another is to begin working with the Governor's office or appointed workforce agency that will be involved with program verifications in the lead up to ultimate program identification. Finally, institutions and systems should closely follow the negotiated rulemaking process set to occur and provide input in the coming years to ensure that Workforce Pell is configured to enhance student access

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to education of value and that community colleges are positioned to be key providers in this work.

Third, confirming Cohn (2023) and Cooper's (2024) findings, many noncredit offerings in their current forms will not be eligible for Workforce Pell based on contact hours alone, not to mention the challenges in determining quality. Over the next year, colleges and systems may have opportunities to reconfigure offerings, connect courses and programs with credentials, and work toward noncredit-to-credit-articulation. In many ways, Workforce Pell could provide states and institutions with an incentive to examine the quality and value of noncredit programs and offer viable pathways to further education. To date, these programs have had relatively few students progressing on to additional education (Bahr et al., 2023; Xu & Ran, 2020). The Pell expansion will provide institutions with an important opportunity to strengthen the quality of these programs through better pathways.

Fourth, the existing research on short-term programs has not shown strong positive outcomes, but some have shown positive outcomes for a subset of the offerings (e.g., Bahr et al., 2022; Sigelman et al., 2025; Tessler et al., 2024). The coming years will provide opportunities for more empirical studies focused on Workforce Pell-eligible courses and programs to determine the efficacy of the guardrails and outcomes of vetted short-term programs. The future of need-based funding for short-term programs will depend on effective policy and practice, a robust data infrastructure, engagement among key providers and policymakers, and rigorous research on program quality and student outcomes.

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