

## The One Big Beautiful Bill: Federal Pell Grant Changes Planning & Implementation Checklist

The One Big Beautiful Bill Act (OBBBA) makes several changes to student eligibility for Pell Grants and expands Pell Grant eligibility to certain short-term programs. Use this implementation checklist to plan institutional policy changes, systems updates, and communication plans.



Student Eligibility for Pell Grants		
Task	Institutional Targeted Completion Date	✓
<ul style="list-style-type: none"> <li>No Pell Grant for students with cost of attendance fully covered by non-federal grants and scholarships</li> <li>No Pell Grant for students with SAI equal to or greater than twice the maximum Pell Grant (closing "Pellionaire" loophole)</li> <li>Inclusion of foreign income in Pell Grant determinations</li> </ul>		
<b>Financial Aid Staff:</b> Ensure that financial aid staff are familiar with new regulations, know where to find ED and NASFAA resources, and are trained on institutional policies related to changes.		
<b>Campus Partners:</b> Facilitate cross-functional strategy sessions with admissions, academic advising, athletics, and other applicable teams to align on changes to Pell Grant eligibility and collaboratively address downstream impacts.		
<b>Students at Risk of Losing Pell:</b> Review current student populations to identify students who may lose Pell Grant eligibility and model resulting funding gaps, considering institutional costs, other available aid, etc.		
<b>Outreach to Current Students:</b> Proactively communicate with current students who may lose Pell Grant eligibility for 2026-27 based on the new criteria.		
<b>FAMS/Coding:</b> Collaborate with financial aid management system (FAMS) vendors/IT to configure, test, and implement system updates, ensuring new Pell Grant eligibility and awarding rules are accurate.		
<b>Packaging Formulas:</b> Revise and test automated packaging algorithms to identify and accurately apply new Pell Grant eligibility criteria.		
<b>Student-Facing Communications:</b> Audit and update any written communications (e.g., financial aid website, student portal, student aid offer, consumer information pages) to reflect the new Pell Grant eligibility rules.		
<b>Policy &amp; Procedure Manual:</b> Revise Policy & Procedure manuals to reflect new Pell Grant eligibility criteria, including eliminating the manual process that was previously used to determine if foreign income should be included in Pell Grant determinations.		

<b>Workforce Pell (Pell Grant eligibility for short-term programs)</b> <i>Skip this section if not participating</i>		
<b>Task</b>	<b>Institutional Targeted Completion Date</b>	<b>✓</b>
<b>Current short-term programs:</b> Collaborate with campus partners to identify existing programs that may be eligible for Workforce Pell.		
<b>New programs:</b> Work with campus stakeholders to explore potential new Workforce Pell-eligible programs that would meet workforce and employer needs, while also assessing how workforce programs might align with institutional goals.		
<b>Special Needs for Student Population:</b> Determine special needs for the Workforce Pell recipient population and ensure those needs can be met or new resources can be developed to meet them. New administrative processes may be needed to support short-term program timelines.		
<b>State Government Approval Process:</b> Engage with state government officials to determine the state approval process for eligible programs, including the institutional steps and timeline.		
<b>Apply for State Approval:</b> Follow the state’s program approval process.		
<b>Apply for ED Approval:</b> Add programs to the institution’s Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App) and submit to the Department of Education (ED) in order to participate in the Pell Grant program for eligible short-term programs.		
<b>Staff &amp; Campus Partners:</b> Educate aid administrators and campus partners on the Workforce Pell regulations, emphasizing that Workforce Pell is an extension of the Pell Grant program, not a separate program.		
<b>FAMS/Coding:</b> Work with FAMS vendors/IT to configure software to accurately package Pell Grant funds for any new Workforce Pell-eligible programs.		
<b>Update Packaging Formulas:</b> Adjust packaging formulas to ensure that students in Workforce Pell-eligible programs are packaged with Pell Grant funds accurately.		
<b>Student-Facing Communications:</b> Update any written communications (e.g., financial aid website, student portal, student aid offer, consumer information pages) to clearly explain Pell Grant eligibility to prospective and current students, including for any new Workforce Pell-eligible programs.		
<b>Policy &amp; Procedure Manual:</b> Revise Policy & Procedure manuals to reflect new expansion of Pell Grant eligibility to approved Workforce Pell-eligible programs.		

The Department of Education released the Accountability in Higher Education and Access Through Demand-driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid and Workforce Pell Grants (AHEAD) final regulations in the May 19, 2026, Federal Register. In the preamble to the Final Rule, ED indicates that additional subregulatory guidance will be issued to support implementation of certain provisions. All information provided here reflects NASFAA’s current understanding of how to apply the May 19 rules based on the regulatory text and preamble discussion. Because ED has indicated that further guidance is forthcoming, this interpretation may be subject to change.