



Comments submitted by the NC Coalition on Aging on 4-19-2026

## **Proposed NCWorks Commission Policy Statement CPS 04-2026**

- The subject of the policy statement is **Workforce Pell Grant Program Eligibility Requirements and Application Process.**

The **NC Coalition on Aging** (a non-profit state-level membership-based organizations of aging advocates, providers of services and consumers) is excited about the Workforce Pell program and its potential as a tuition resource for individuals pursuing the Certified Nursing Assistant (CAN) credential and for other caregiving workforce cohorts who may rely on short-term training programs. Thank you for this opportunity to provide a few comments on proposed policy and process based on feedback we have received from several of our members. Our input is as follows:

- Clarify that the CNA credential is covered.
  1. CNA is on Appendix B list but Two Star rating appears to conflict with Three Star criteria.
- Clarify that private and employer-based CNA training schools can be included.
  1. This will impact a large percentage of CNA training schools.
  2. Potential CNA candidates need diversification of access—a community college will not be a viable option for many CNA candidates.
    - Private schools may create more language-inclusive programs.
    - Many CNA candidates are intimidated by community college experience (e.g. badge, parking pass, registration, navigating large campuses).
    - Private schools create flexible arrangements with employer-supported workers.
- Hourly requirement:
  1. If two courses are bundled (Nurse Aide Course+ Medication Aide Course), can this meet the 150 hour criteria? These two specific courses are often bundled together as a base and stackable credential within long-term care and supports career progression.

- 70% Employment within 180 days:
  1. Within 180 days
    - When does clock start?
      - Testing lag (may be up to 2 months before testing).
  2. 70% employment
    - How will requirement be verified?
    - If Nurse Aide I moves between employers within 180 days, will this count?  
If leaves the field before 180 days but is employed elsewhere (Target, etc.), will this satisfy requirement?
    - Does a student who completes CNA coursework and secures CNA credential, but starts a nursing program the subsequent semester count towards employment goal?
  3. Tracking will be labor intensive for private schools.
- Where does credit for prior learning fit into credit articulation requirement?
  1. If a private school provides only CNA training, how can it meet this criteria?
- Need to recognize that a lot of direct care workers are excluded from this criteria despite being essential.