

WORKFORCE PELL IN NEBRASKA

Frequently Asked Questions for Institutions and Employers

This FAQ is an overview for institutions and employers in Nebraska working with Workforce Pell. It is not legal advice. For official guidance, consult the rule, the U.S. Department of Education's Federal Student Aid resources, and the Nebraska Department of Labor's (NDOL) published [Workforce Pell policies](#).

Institutions are encouraged to review all applicable policies before applying.

Note for students. This FAQ is written for institutions and employers, not as student guidance. If you are a student with questions about a specific eligible workforce program, applying, financial aid, or your own Pell Grant eligibility or award, please contact that institution's financial aid office directly. NDOL does not advise individual students.

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THE BASICS

What is Workforce Pell?

Workforce Pell extends Federal Pell Grant eligibility to a new category of short-term programs called "eligible workforce programs" (workforce program). Before this change, Pell Grants generally required programs of at least 600 clock hours over at least 15 weeks (or 300+ clock hours over 10+ weeks for students with an associate equivalent). Workforce Pell allows shorter, job-focused programs to qualify, provided they meet new quality and outcome requirements.

When does it take effect?

The underlying law set an effective date of July 1, 2026.

Why was this created?

Congress, through the Working Families Tax Cuts Act (WFTCA) signed into law on July 4, 2025, sought to expand access to high-quality, performance-based, short-term training that supports workforce needs while building in accountability metrics tied to earnings and employer demand.

Who administers Workforce Pell in Nebraska?

The Governor of Nebraska has designation authority over the Workforce Pell program. The Governor has designated the Nebraska Department of Labor (NDOL) as the authorized designee responsible for receiving and reviewing applications, developing the eligible occupation list, monitoring compliance, and handling appeals. NDOL carries out this work in consultation with the Nebraska Workforce Development Board (NWDB).

WHAT COUNTS AS AN "ELIGIBLE WORKFORCE PROGRAM"

How long must a workforce program be?

A qualifying workforce program must run at least 8 weeks but less than 15 weeks of instruction, AND fall within one of these ranges:

- 150 to fewer than 600 clock hours, or
- 4 to fewer than 16 semester/trimester credit hours, or
- 6 to fewer than 24 quarter hours.

Both the week requirement and the hour requirement must be met, not one or the other.

Can the weeks be non-consecutive?

Yes. The workforce program does not have to run in a continuous block. What matters is that the weeks of instructional time used to determine Pell eligibility total less than 15 weeks.

What workforce program formats are excluded?

Correspondence courses, study-abroad coursework, and direct assessment (competency-based) programs cannot qualify as eligible workforce programs. Distance education is allowed.

Does the workforce program have to award college credit?

The workforce program may be offered in credit hours or clock hours, and a non-credit clock-hour workforce program can qualify. However, completion must lead to academic credit that will be accepted toward a certificate or degree at one or more eligible institutions, and the workforce program must lead to a recognized postsecondary credential.

Can an employer run the workforce program?

No. The workforce program must be offered by an accredited, state-authorized eligible institution. An employer or other ineligible organization can provide part of the workforce program through a written arrangement, but cannot offer the program itself.

Does a workforce program have to already be up and running before an institution applies?

Yes. This is a federal requirement, not a Nebraska-specific one: under the U.S. Secretary of Education's approval criteria, a workforce program must have met the length requirements and been operating and enrolling students for at least 12 months before an institution applies for federal approval.

Who is allowed to teach the workforce program?

The applying institution (or another Nebraska Workforce Pell-eligible institution) must provide the substantial majority of instruction. As described above, an ineligible organization may provide part of the workforce program through a written arrangement, generally up to 25%, or up to just under 50% if the workforce program is the related-instruction component of a Registered Apprenticeship, but may not offer the program itself.

CREDENTIALS: STACKABLE AND PORTABLE

What does it mean for a credential to be "stackable"?

A stackable credential is one that leads to a recognized postsecondary credential that prepares students to pursue one or more certificate or degree programs at one or more eligible institutions. The institution must provide a written agreement, such as an articulation, transfer-of-credit, consortium, or partnership agreement, confirming that academic credit earned through the workforce program will be accepted toward a certificate or degree at one or more eligible institutions.

What does it mean for a credential to be "portable"?

A portable credential is one that is accepted and valued by more than one employer in the relevant industry sector or occupation. Nebraska institutions must demonstrate cross-employer portability through at least one of the following, evaluated together with Nebraska real-time labor market information where available:

- **Employer attestation:** signed letters from at least two unaffiliated employers confirming the credential is recognized and would be considered in hiring decisions.
- **Labor market evidence:** real-time labor market data (such as Nebraska's LMI system) showing the credential is a listed qualification across multiple employer job postings.

- **Work-based learning or hiring pipelines:** signed agreements for clinicals, apprenticeships, internships, or direct hiring pipelines.

What if only one recognized credential exists for an occupation?

A workforce program may still qualify if it prepares students for work in that field and awards that sole recognized credential upon completion.

Do institutions need to keep these agreements up to date?

Yes. Institutions must notify NDOL within 30 days of any substantive modification, expiration, or termination of an executed stackability or portability agreement. Failing to maintain evidence of compliance can make the workforce program ineligible for Workforce Pell.

STUDENT ELIGIBILITY RULES (INSTITUTIONAL REFERENCE)

Which students may an institution award a Workforce Pell Grant to?

Otherwise-eligible students enrolled in an approved eligible workforce program, including, notably, students who already hold a bachelor's degree (a departure from the usual rule barring Pell for bachelor's holders).

Which students are institutions prohibited from awarding a Workforce Pell Grant to?

Students who are enrolled in, accepted into, or have already earned a graduate credential cannot receive a Workforce Pell Grant. A graduate credential includes a master's, doctoral, or first-professional degree (such as an MD, DDS, or JD) and graduate certificates. Post-baccalaureate teacher licensure/certification does NOT count as a graduate credential.

Can an institution award Pell for two workforce programs at once?

No. An institution cannot award a student concurrent Pell Grants for two or more different workforce programs, including two workforce programs.

Can institutions package other title IV aid with a Workforce Pell Grant?

No. A student in an eligible workforce program is eligible only for the Pell Grant, not Direct Loans, FSEOG, or Federal Work-Study.

Institutions should direct students with questions about their own eligibility, award amount, application status, or other financial aid to the institution's financial aid office. NDOL does not determine or advise on individual student eligibility.

THE APPROVAL PROCESS

Who approves a workforce program?

Approval is a two-step process: first the Governor of Nebraska (acting through NDOL, after consulting the NWDB), and then the U.S. Secretary of Education. Both must approve before a workforce program is Pell-eligible. State approval places a workforce program on Nebraska's eligible occupation and program list, but federal approval is still required before students can actually receive Workforce Pell funds.

What does the Governor have to determine?

That the workforce program aligns with high-skill, high-wage, or in-demand industry sectors or occupations; meets employers' hiring needs; leads to a stackable and portable recognized credential (or prepares students for an occupation with a single recognized credential); and ensures students receive transferable academic credit. The Governor also confirms, before initial approval, that the workforce program's cost to students has been considered in relation to anticipated wages for the occupation.

Is participation mandatory for Nebraska institutions?

No. Developing eligible workforce programs is voluntary for institutions, but institutions that choose to apply must comply with Nebraska's Workforce Pell policies in full.

How long does a Governor's approval last?

It expires when the institution's Program Participation Agreement (PPA) with the U.S. Department of Education expires, and the Governor must re-certify continued approval before that expiration. Eligible institutions must notify NDOL of their request for continued renewal at least 90 days before the PPA expires.

Can a Nebraska workforce program serve students in another state online?

Only through a bilateral agreement between the Governor of Nebraska and the Governor of the other state. Each state's Governor must independently confirm the workforce program meets that state's workforce needs, and any such agreement must be published publicly and include data-sharing provisions for calculating completion and placement rates.

HOW NEBRASKA IDENTIFIES ELIGIBLE OCCUPATIONS

Where does Nebraska's occupation list come from?

NDOL starts with Nebraska's statewide H3 List, a labor market tool that flags occupations as high-wage, high-skill, and/or high-demand, and then applies a series of filters designed to narrow that list down to occupations that are a good fit for short-term training.

What are the filtering steps?

In order, NDOL filters out occupations that: typically require an associate's degree or higher; typically require 5+ years of prior work experience; are not flagged as high-demand or high-wage; fall below an entry-level wage threshold of \$18.00/hour (120% of Nebraska's minimum wage); have fewer than 120 average annual job openings statewide; show known data anomalies on manual review; lack at least 12 recent job postings on NEworks; or lack a valid SOC-to-CIP crosswalk match. The Governor may also add occupations at his or her discretion.

How many occupations and workforce programs are on the initial list?

For the 2026–27 initial list, 40 occupations passed Nebraska's full screening process, mapping to 114 SOC-to-CIP matches representing 97 unique CIP codes (training program types). The complete, current list is published as the 2026–2027 Initial Eligible Occupation and Program List on the NDOL website (dol.nebraska.gov/ne-workforce-pell).

What if my program's CIP code isn't on the list?

The published crosswalk is not exhaustive. If an institution believes its workforce program's CIP code logically aligns with an eligible occupation but is not listed, it should contact NDOL to request an exception review. Being on the list also does not guarantee approval; a workforce program must still separately demonstrate that it meets all other Workforce Pell eligibility requirements.

APPLYING FOR APPROVAL IN NEBRASKA

How does an institution apply?

Applications must be submitted electronically through the NDOL Workforce Pell Grant Program Application Portal, available at dol.nebraska.gov/ne-workforce-pell. Incomplete applications will not be reviewed.

What is the application deadline?

Applications must be received no later than 45 days prior to a quarterly NWDB meeting to be considered at that meeting. NWDB approval occurs only on a quarterly basis, so institutions should plan accordingly.

Can an institution apply for more than one workforce program at a time?

Yes, but a separate application package is required for each individual workforce program.

What does the application need to include?

- **Institution information:** legal name, contact details, OPE ID, accreditation.
- **Program details:** name, history, site, CIP and SOC codes, length in weeks/credit hours/clock hours, delivery format, stackability and portability.
- **Outcomes data:** completion rate, job placement rate, median earnings, licensure pass rates.
- **Cost data:** tuition, fees, total cost of attendance, available aid.

- **Curriculum information:** course list, work-based learning components, assessment methods.
- **Compliance materials:** certifications and supporting documentation such as accreditation proof and employer letters.

What happens after an institution submits its application?

NDOL reviews the application against the eligibility criteria. If it is compliant, NDOL transmits it to the NWDB for consultation. If NDOL finds one or more deficiencies, it issues a written deficiency notice identifying each issue, and the institution has 30 calendar days from that notice to submit a written cure response to ndol.workforcepell@nebraska.gov.

What happens if the deficiencies aren't cured?

If the institution's response satisfactorily addresses the deficiencies, NDOL treats the application as compliant and transmits it to the NWDB. If the response doesn't cure the deficiencies, or the institution doesn't respond within the 30-day cure period, NDOL issues a Determination of Denial, which the institution may appeal.

What happens once the state approves a workforce program?

Once the state approves a workforce program, the institution attaches the Governor's certification to its E-App and submits it to the U.S. Department of Education. The Governor then commits to annually reporting completion and placement data (through 2028-29). The Governor must also notify the U.S. Department of Education and the institution within 15 days if approval is ever revoked, reassess the workforce program before the institution's Program Participation Agreement expires, and make approval-process documentation available if the federal Secretaries request it.

OUTCOME REQUIREMENTS

What metrics must workforce programs meet?

Three: a completion rate of at least 70% (within a timeframe no greater than 150% of the workforce program's standard duration), a job placement rate of at least 70%, and a value-added earnings test (where published tuition and fees may not exceed the workforce program's value-added earnings).

How is job placement measured?

Through the 2026–29 award years, the Governor certifies a 70% placement rate using available administrative data (such as wage records), counting any employment in the second quarter after a student exits the workforce program, whether or not they completed it. Beginning in 2029–30, placement must generally be measured among completers only, in the occupation the workforce program trains for (or a comparable high-skill, high-wage, or in-demand occupation). Self-employment counts as placement.

What are "value-added earnings"?

The difference between the adjusted median earnings of working program completers (measured three full years after completion) and 150% of the Federal poverty guideline for a single individual. A workforce program's tuition and fees cannot exceed this figure. The U.S. Department of Education, not the state, calculates it, first for the 2030–31 award year. Workforce programs with zero or negative value-added earnings are not eligible.

Are there exclusions from the rate calculations?

A student is excluded from completion and placement rates if they die, develop a medical condition preventing employment, are called to uniformed service for more than 30 days, or become incarcerated. For value-added earnings, students who are not working or who are enrolled in another program during the measurement period are excluded.

REPORTING REQUIREMENTS AFTER APPROVAL

What do approved institutions have to report to NDOL?

Once a workforce program is approved, the institution must submit quarterly performance data using NDOL's performance reporting tool (an .xlsx file). Reports are due by the last day of the month following the end of each quarter. Each report covers only that quarter's data, it is not cumulative, and institutions with no workforce program activity during a quarter must still submit a report indicating no activity.

What student-level data is required each quarter?

- Social Security Numbers for all students
- Start date (MM/DD/YYYY; cannot be a future date)
- Status: enrolled, completed, withdrew, or transferred (defaults to "enrolled" if left blank)
- Exit date (MM/DD/YYYY; cannot be a future date or earlier than the start date)
- Credential status: yes, no, or unknown

Is anything reported annually rather than quarterly?

Yes. Institutions must also report published tuition and fees for the upcoming award year to the U.S. Secretary of Education through the process the Secretary establishes, and must provide documentation on request confirming tuition and fees do not exceed the workforce program's value-added earnings.

WRITTEN ARRANGEMENTS AND APPRENTICESHIPS

How much of a workforce program can an outside organization provide?

Generally, an ineligible institution or organization may provide no more than 25% of an eligible workforce program through a written arrangement. The one exception: if the workforce program serves as the related-instruction component of a Registered Apprenticeship, an ineligible entity may provide more than 25% but less than 50%.

Can a Registered Apprenticeship qualify?

Yes. The related-instruction component of a Registered Apprenticeship can qualify as an eligible workforce program (or be delivered across several such programs), provided each meets the length and other requirements. Such workforce programs automatically satisfy the workforce-alignment and employer-demand criteria without needing to demonstrate them separately, because Registered Apprenticeships are already built around real employer needs. They still must independently show that students earn a recognized, stackable, and portable credential; that coursework applies toward academic credit; and that the workforce program meets the 70% completion and 70% placement benchmarks. Institutions must identify the specific Registered Apprenticeship in their application and document its registration status.

LOSING AND REGAINING ELIGIBILITY

When does a workforce program lose eligibility?

When the Governor withdraws or fails to renew approval; when the U.S. Department of Education determines the completion or job placement requirements were not met; when tuition and fees exceed value-added earnings (or value-added earnings are zero/negative); or when the offering institution has been subject to a suspension, emergency action, or termination by the U.S. Secretary of Education within the preceding five years.

How is that five-year suspension/termination screen applied?

Before granting initial approval, NDOL checks publicly available U.S. Department of Education records to confirm the institution hasn't been subject to a suspension, emergency action, or termination in the prior five years. No approval or certification will be issued if the institution fails that screen, and if an already-approved institution becomes subject to such action later, the workforce program's eligibility is treated as lapsed.

How quickly must Nebraska notify the federal government of a withdrawal?

The Governor must notify the U.S. Department of Education, the U.S. Department of Labor, and the institution within 15 calendar days of a final decision to withdraw approval.

Can a failing workforce program just relaunch under a new name?

No. If a workforce program loses eligibility on completion or placement grounds, or is voluntarily discontinued while failing, the institution cannot reestablish it for two years from the date eligibility was lost or the program was discontinued. This restriction also applies to starting a substantially similar workforce program sharing the same four-digit CIP code and identical SOC codes.

How can a workforce program regain eligibility after losing Governor approval?

The Governor must provide a new certification of approval to the Secretary, and the Secretary must determine the workforce program again meets all eligibility criteria.

How can a workforce program regain eligibility after a value-added earnings failure?

The institution must: (1) obtain a new certification of Governor approval confirming the workforce program still meets all eligibility criteria; (2) submit documentation of current tuition and fees along with an attestation that tuition has been reduced and will stay at or below the workforce program's recalculated value-added earnings; and (3) request a recalculation of value-added earnings to determine whether the updated tuition qualifies for the next award year.

What about students enrolled when a workforce program loses eligibility?

If a workforce program loses eligibility based on value-added earnings, the institution (not the student) bears any Pell liability, and affected students have their lifetime Pell eligibility (Pell LEU) restored.

APPEALS

How can an institution contest a denial or an adverse determination?

The institution must submit a written notice of contest to the NDOL Commissioner by email at ndol.workforcepell@nebraska.gov no later than 30 calendar days from the date the notice was mailed. The notice must include the contesting party's name, institution, title, phone number, email address, mailing address, and a statement of the grounds for the contest.

What happens after a notice of contest is filed?

The Commissioner provides a hearing consistent with Nebraska's Administrative Procedure Act (Neb. Rev. Stat. § 84-917) and NDOL's Rules of Practice and Procedure for Hearings on Contested Cases (223 NAC 5-001).

Is there further recourse after a final agency decision?

Yes. Any party aggrieved by a final decision in a contested case may seek judicial review in the district court of the county where the agency action was taken. A petition for judicial review must be filed within 30 days after the date the notice of the final decision was mailed.

TRIBAL NATIONS

Can Nebraska Tribal Nations run their own approval process?

Yes. Nebraska Tribal Nations retain full sovereignty over decisions to authorize and approve eligible workforce programs, and each Tribal Nation may choose either of two pathways: (1) use Nebraska's existing Workforce Pell application process and adhere to the State's framework, procedures, and timelines; or (2) develop and adopt its own Tribal Council policies and application process suited to the needs of the Tribal community.

Is federal approval still required for Tribally approved programs?

Yes, regardless of which pathway a Tribal Nation chooses. The Tribal Council must submit all Tribal Council-approved eligible workforce programs to the U.S. Secretary of Education for final approval before those workforce programs become eligible for Workforce Pell funding.

Is State Board consultation still required before a Tribal Government can approve a program?

Yes. Regardless of which pathway a Tribal Nation chooses, the Tribal Council is required to consult with the State Board before approving a program. Only consultation is required; the Tribal Nation does not have to accept or follow the State Board's recommendation.

WHERE TO LEARN MORE

- **Students:** contact your institution's financial aid office for questions about a specific eligible workforce program, applying, or your own financial aid.
- The full federal rule: search Docket ID ED-2026-OPE-0133 at [regulations.gov](https://www.regulations.gov), or the May 19, 2026, Federal Register (91 FR 29254).
- Federal Student Aid resources and the FSA Handbook at fsapartners.ed.gov.
- Nebraska's Workforce Pell policies (Program Eligibility Policies and Application Procedures; Occupation and Program Eligibility; Monitoring and Compliance Policies; Appeal Policy; and the Tribal Nations policy), the Application Portal, NWDB meeting dates, and the current Eligible Occupation and Program List are all published on the NDOL website (dol.nebraska.gov/ne-workforce-pell).
- For Nebraska-specific program approval questions, contact NDOL at ndol.workforcepell@nebraska.gov.

Note: Several operational details (forms, data systems, and sub-regulatory guidance) were still being developed when the federal rule was published. Check for updated Department and NDOL guidance before relying on specifics.