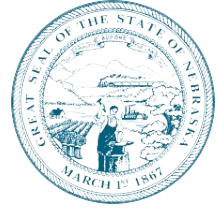


# STATE OF NEBRASKA

## OFFICE OF THE GOVERNOR



---

## Occupation and Program Eligibility: How Nebraska Identifies Qualifying Occupations and Programs

### Workforce Pell Grant Program

Effective Date: May 20, 2026

---

### What This Document Explains

The federal Workforce Pell Grant allows students to use federal financial aid to pay for short-term job training programs — typically 8 to 15 weeks — that lead to real employment in high-demand fields. Before any training program can qualify for Workforce Pell funding, the state must first identify which occupations in Nebraska are high-skill, high-wage, or in-demand for purposes of Workforce Pell funding.

This document explains two things:

- How Nebraska identifies eligible occupations — the step-by-step process NDOL uses to narrow the full universe of jobs down to those that are the best fit for short-term Workforce Pell training programs.
- How Nebraska connects occupations to training programs — the process for linking approved occupations to specific CIP codes (the federal classification system for training and education programs) that institutions use when applying for program approval.

Both processes are required under federal law, and this document presents them in plain language so that institutions, employers, and the public can understand how program approval decisions are made.

---

### Why This Process Exists

Federal law requires the Governor of each state to establish a process for identifying which occupations short-term training programs may serve before those programs become approved for Workforce Pell funding. Specifically, the Governor must:

- Define what it means for an occupation to be high-skill, high-wage, or in-demand in Nebraska
- Identify a list of occupations that meet those standards
- Establish a process for postsecondary institutions to apply for program approval based on that list

The Governor designated the Nebraska Department of Labor (NDOL) as the lead agency responsible for developing the occupation list and reviewing program applications. NDOL carries out this work using current labor market data from Nebraska's own workforce information systems.

This policy is issued under the proposed final federal Workforce Pell regulations and is subject to change as those regulations are finalized.

## Part 1: How Nebraska Identifies Eligible Occupations

### The starting point: Nebraska's H3 List

NDOL begins with Nebraska's statewide H3 list — a regularly published labor market tool that identifies occupations as high-wage, high-skill, and/or high-demand based on current data. This list serves as Nebraska's primary indicator of workforce priority occupations and is the foundation for the Workforce Pell occupation selection process.

From the full H3 list, NDOL applies a series of filters to narrow the list to occupations that are the best fit for short-term training programs. The filters are designed to ensure that approved programs lead to real jobs with real earning potential — not just any job that exists in Nebraska.

### The filters, applied in order:

	Filter by Typical Education Level
<b>STEP 1</b>	<p>Workforce Pell is designed for short-term training that gets people into jobs quickly — not for multi-year degree programs. This filter removes occupations that typically require a two-year or four-year college degree.</p> <p><b>Keep occupations with typical entry education of:</b></p> <ul style="list-style-type: none"><li>• No formal educational credential</li><li>• High school diploma or equivalent</li><li>• Postsecondary non-degree award (certificate, license, etc.)</li><li>• Some college, no degree</li></ul> <p><b>Remove occupations typically requiring:</b></p> <ul style="list-style-type: none"><li>• Associate's degree</li><li>• Bachelor's degree</li><li>• Master's degree</li><li>• Doctoral or professional degree</li></ul>

<b>Result</b>	808 occupations → 474 occupations remain
---------------	--

STEP  
2

### Filter by Typical Work Experience Required

Workforce Pell targets people who are entering or re-entering the workforce — not those who already have years of experience in a field. Occupations that typically require 5 or more years of prior work experience are removed because short-term training programs are unlikely to prepare someone to meet that bar from the start.

**Remove:** Occupations requiring 5 or more years of prior work experience to enter the field.

<b>Result</b>	474 occupations → 467 occupations remain
---------------	--

STEP  
3

### Keep Only High-Demand or High-Wage Occupations

Federal law requires Workforce Pell programs to serve occupations that are high-skill, high-wage, or in-demand. Nebraska uses its H3 designation system to apply this requirement.

**An occupation qualifies if it is flagged as at least one of the following:**

- High demand — employers consistently need more workers in this field than are currently available
- High wage — workers in this occupation earn above-average wages for Nebraska

The "high skill" requirement is automatically met when a training program in a recognized CIP code leads to the occupation, because earning that credential requires education or training beyond high school — or substantial on-the-job training.

<b>Result</b>	467 occupations → 348 occupations remain
---------------	--

STEP  
4

### Filter by Entry-Level Wage

To ensure that approved programs lead to jobs that provide meaningful financial stability, NDOL applies a minimum entry-level wage threshold. This also supports the federal value-added earnings requirement — the idea that the wages a completers earns must justify the cost of the training.

**Threshold:** Entry-level wages at or above \$18.00 per hour (120% of the current Nebraska minimum wage), or that was flagged for high wage from the H3 list.

**How entry-level wages are calculated:** The entry wage is the average of the lower one-third of all reported wages for an occupation. It represents a realistic estimate of what someone brand-new to that occupation can expect to earn.

Important note: The wage data used in H3 calculations is typically at least one year old by the time the list is published. As a result, some occupations may show wages near or at the minimum wage — these are generally the lower-paying occupations in the dataset.

**Result** 348 occupations → 193 occupations remain

### Filter by Annual Job Openings

Training programs should prepare workers for occupations where jobs are actually available — not just theoretically in-demand. NDOL applies a minimum threshold for average annual job openings using the most recent projections data to ensure that completers will have real opportunities to find employment.

STEP  
5

**Threshold:** At least 120 average annual openings statewide — roughly 10 openings per month across Nebraska. This step also removes occupations without an estimated number of annual openings which indicates low employment levels.

This figure counts all types of openings: positions created by workers retiring or leaving the labor force, workers changing to different jobs, and new positions created by industry growth.

**Result** 193 occupations → 48 occupations remain

### Manual Review for Known Data Issues

STEP  
6

Labor market data doesn't always tell the full story. Some occupations may pass all of the automated filters but still be poor fits for Workforce Pell training programs due to structural issues that data alone can't capture. NDOL conducts a manual review of the remaining list to identify and remove these occupations.

**Reasons an occupation may be removed during manual review:**

- Known labor supply and demand imbalances not reflected in the data
- Occupations where the crosswalk to a training program CIP code is not meaningful or accurate

**Examples of occupations removed in this step due to data anomalies:**

- Meat, poultry, and fish cutters and trimmers
- Slaughterers and meat packers
- Cutting and slicing machine setters, operators, and tenders

**Result**

48 occupations → approximately 45 target occupations

**Confirm Current Demand Using NEworks Job Postings**

The H3 list reflects projected demand based on historical data — it tells us where employers have historically needed workers. To verify that demand is current and active, NDOL cross-references the remaining occupation list against job postings on NEworks, Nebraska's official job board.

**Threshold:** At least 12 total job postings, statewide, in the most recent three months at the time of verifying.

**How to read NEworks posting data:**

- Total openings — the total number of active postings for an occupation at a point in time
- New postings — postings that have appeared recently, not just remained active

**What the data can signal:**

- Many total openings + few new postings → consistent, ongoing hiring; may include seasonal positions not currently active; watch for "ghost postings" (positions already filled but not removed from the board)
- Many new postings as a share of total → increasing employer demand, start of active recruiting, or seasonal surge

**Occupations removed in this step (example):**

- First-line supervisors of landscaping, lawn service, and groundskeeping workers
- First-line supervisors of farming, fishing, and forestry workers

**Result**

45 occupations → 41 target occupations remain

STEP  
7

<b>STEP</b> <b>8</b>	<b>CIP Code Match Required</b>
	No valid CIP code match → occupation removed. Threshold: valid SOC-to-CIP match required. Data Source: NCES SOC-CIP Crosswalk. Result: 41 occupations → 40 occupations remain.

<b>STEP</b> <b>9</b>	<b>CIP Code Crosswalk</b>
	Map approved occupations to eligible training programs using the NCES SOC-CIP Crosswalk. Result: 114 total SOC-to-CIP matches, representing 97 unique CIP codes.

<b>STEP</b> <b>10</b>	<b>Occupations Designated at the Governor’s Discretion</b>
	At the Governor’s discretion, additional occupations may be added to the eligible occupation and program list.

## Part 2: How Nebraska Connects Occupations to Training Programs

Once the occupation list is finalized, NDOL takes a second critical step: matching each approved occupation to the training programs that prepare workers for that job. This is done using the federal SOC-to-CIP crosswalk.

### Key Terms

<b>SOC Code</b>	Standard Occupational Classification — the federal system for categorizing jobs. Example: SOC 51-4121 = Welders, Cutters, Solderers & Brazers.
<b>CIP Code</b>	Classification of Instructional Programs — the federal system for categorizing academic and training programs. Example: CIP 48.0508 = Welding Technology/Welder.
<b>SOC-CIP Crosswalk</b>	A published reference that links each occupation (SOC) to the training programs (CIP) that typically prepare workers for that job. Maintained by National Center for Education Statistics (NCES).
<b>Why it matters</b>	Institutions must use a recognized CIP code when applying for Workforce Pell approval. The crosswalk confirms that a program logically connects to an approved occupation on the eligible list.

### The CIP Matching Process

Using the most current version of the SOC-CIP crosswalk, NDOL maps each of the 40 approved occupations to one or more CIP codes that represent training programs logically connected to that occupation.

**CIP match required for occupation eligibility.** A valid CIP match is required for an occupation to remain on the eligible occupation list. If no recognized CIP code can be logically connected to an occupation through the SOC-CIP crosswalk, that occupation will be removed from the list. This requirement ensures that every approved occupation has at least one associated training program pathway through which an institution can apply for Workforce Pell approval. Occupations removed at this step are documented and may be reconsidered in future cycles if an appropriate CIP code becomes available.

**Result of the CIP matching step:** 114 total SOC-to-CIP matches, representing 97 unique CIP codes.

This means that across the 40 approved occupations, there are 97 distinct types of training programs that institutions may potentially offer under Workforce Pell.

### How Institutions Use the CIP List

When a postsecondary institution wants to apply for Workforce Pell program approval, it must identify the CIP code that corresponds to its training program and confirm that CIP code appears on Nebraska's approved list (or request a review if it does not).

The CIP code is the bridge between a specific training program and the occupation it is designed to lead to. It is also how NDOL verifies that a program is aligned to an approved occupation rather than simply claiming to be.

#### Important Note

The CIP codes listed in the crosswalk are not exhaustive. If an institution believes its program's CIP code aligns with an eligible occupation but is not listed, it should contact NDOL to discuss an exception review.

### How the CIP List Is Applied in Program Review

NDOL uses the SOC-CIP crosswalk as a starting point — not an automatic approval. Institutions that apply with a listed CIP code must still demonstrate that their specific program meets all other Workforce Pell eligibility requirements (see Part 3 below).

The CIP code confirms that the program type is logically connected to an approved occupation. It does not guarantee that the program's curriculum, length, outcomes, or credential meet federal standards.

## Part 3: What Programs Must Demonstrate to Be Approved

---

Inclusion on the occupation list — or having a matching CIP code — does not automatically qualify a program for Workforce Pell. Each program must separately demonstrate that it meets all federal eligibility requirements.

The table below summarizes what is required:

Requirement	What It Means
<b>Program history</b>	Must have been operating for at least 12 months before applying
<b>Program length</b>	Between 150 and 599 clock hours of instruction
<b>Program duration</b>	8 weeks or more, but fewer than 15 weeks
<b>Credential awarded</b>	Must result in a recognized, portable, stackable postsecondary credential. The credential must be stackable, meaning it can count toward a higher-level credential, and portable, meaning it is recognized by employers beyond a single workplace. If only one recognized credential exists in a given field, a program may still qualify as long as it prepares students for work in that field and awards that credential upon completion.
<b>Employer engagement</b>	Must demonstrate active employer or industry involvement in program occupation list
<b>Cost transparency</b>	Tuition and all fees must be clearly disclosed
<b>Completion rate</b>	At least 70% of students must complete the program
<b>Placement rate</b>	At least 70% of completers must be placed in relevant employment. During the 2026–2029 award years, any employment in the second quarter after exiting satisfies this requirement.
<b>Earnings outcome</b>	Program must demonstrate value-added earnings — completers must earn enough above the poverty line to justify the cost of training
<b>Instruction format</b>	Cannot be a correspondence course, study abroad program, or direct assessment program (distance education is allowed)
<b>Delivery</b>	Must be taught 100% by the applying institution or another Workforce Pell-eligible institution

NDOL will issue written notification to institutions regarding approval or denial. Approval by NDOL places a program on Nebraska's eligible program list, but final authorization to award Workforce Pell funds requires subsequent review and approval by the U.S. Department of Education.

## 2026-2027 Initial Occupation List

See the **2026–2027 Initial Eligible Occupation and Program List** for the complete list of approved occupations.

## Summary: The Full Occupation Selection Process at a Glance

Step	Filter	Threshold	Occupations Remaining	Data Source
—	Starting universe	All statewide H3 occupations	808	NDOL H3 List
1	Education level	No degree required beyond postsecondary non-degree award or below	474	H3 List / BLS
2	Work experience	Less than 5 years required	467	H3 List / BLS

Step	Filter	Threshold	Occupations Remaining	Data Source
3	H3 demand/wage flag	Must be flagged high demand OR high wage	348	NDOL H3 List
4	Entry-level wage	At or above \$18.00/hour	193	NDOL Wage Data
5	Annual job openings	120+ openings per year statewide	48	NDOL Projections
6	Manual review	Remove data anomalies and known mismatches	45	Subject matter review
7	Current job postings	12+ active postings on NEworks	41	NEworks
8	CIP Code match required	No valid CIP code match → removed	40	NCES SOC-CIP Crosswalk
9	CIP code crosswalk	Map to eligible training programs	114 matches / 97 CIP codes	NCES SOC-CIP Crosswalk
10	Occupations Designated at the Governor's Discretion	Governor's determination		

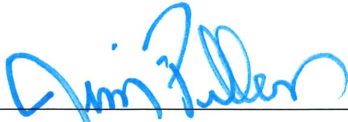
## Data Sources

Data Source	How It Is Used
<b>NDOL Statewide H3 List</b>	Primary list of occupations reviewed; provides high wage, high skill, and high demand designations
<b>NDOL Occupational Wage Data</b>	Entry-level wage figures used for the wage threshold filter
<b>NDOL Labor Market Projections</b>	Projected annual job openings used for the demand threshold filter
<b>NEworks Job Board</b>	Current employer job postings used to verify real-time demand
<b>NCES SOC-CIP Crosswalk</b>	Maps approved occupations to eligible training program types by CIP code
<b>Bureau of Labor Statistics (BLS)</b>	Typical education and experience requirements for each occupation

## Adoption and Effective Date

---

These Written Policies and Procedures are adopted and are effective as of the date signed below.



---

Jim Pillen, Governor  
State of Nebraska

Date: 5/20/24



---

Katie Thurber, Commissioner  
Nebraska Department of Labor  
Authorized Designee

Date: 5/20/26