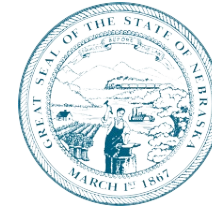


# STATE OF NEBRASKA

OFFICE OF THE GOVERNOR



## Program Eligibility Policies and Application Procedures

### Workforce Pell Grant Program

*Pursuant to 34 CFR § 690.93*

Effective Date: May 20, 2026

## I. Introduction

**Purpose** These Policies establish the eligibility criteria and application procedures for workforce programs seeking to participate in the Workforce Pell Grant Program. They are issued in accordance with the Working Families Tax Cuts Act (WFTCA), H.R. 1, Pub. L. No. 119-21 (signed July 4, 2025), and its implementing regulations at 34 C.F.R. Parts 600, 668, and 690, as implemented through the Department of Education's final rule, *Accountability in Higher Education and Access through Demand-driven Workforce Pell: Pell Grant Exclusion Relating to Other Grant Aid; and Workforce Pell Grants*, Docket ID ED-2026-OPE-0133, RIN 1840-AD99, 91 Fed. Reg. 29254 (May 19, 2026)

**Applicability** These Policies apply to all institutions seeking Governor approval to participate in the Workforce Pell Grant Program. Participation is voluntary, but institutions that choose to apply must comply with these Policies in full.

**Administering Entity** Pursuant to the Governor's designation authority, the Nebraska Department of Labor (NDOL) serves as the Governor's authorized designee for receiving and reviewing applications under these Policies.

**Public Availability** These Policies will be published on the NDOL website and made available to eligible institutions. Any amendments will be posted publicly before taking effect.

## II. Definitions

For purposes of these Policies, the following definitions apply:

- **Eligible Workforce Program:** An undergraduate program of instruction lasting between 8 and less than 15 weeks, consisting of 150-599 clock hours (or 4-15 semester/trimester credit hours, or 6-23 quarter hours), that meets all requirements of 34 CFR § 690.92.
- **Governor:** The Governor of Nebraska.
- **State Board:** The Nebraska Workforce Development Board (NWDB).
- **Recognized Postsecondary Credential:** A credential consisting of an industry-recognized certificate or certification, a certificate of completion of a Registered Apprenticeship under 29 CFR Part 29, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.
- **High-Skill:** Occupations that require some college, no degree, or a higher level of educational attainment are high-skill, as well as occupations that require a high school diploma or equivalent plus long-term on-the-job training, an apprenticeship, or internship/residency.
- **High-Wage:** Occupations are high-wage when at least half of their wage measures are at or above the regional average for all occupations.
- **In-Demand Industry Sector or Occupation:** Has the meaning given in Section 3(23) of the Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3102(23), which defines the term to mean:
  - (a) an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or
  - (b) an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.
- **Completion Rate:** The percentage of students who successfully complete a program or course of study at a minimum threshold of 70%, within a timeframe no greater than 150% of the program's standard duration.
- **Job Placement Rate:** The percentage of completers who secure employment in the occupation(s) for which their program prepared them, with a minimum threshold of 70% of completers achieving such placement. During the 2026–2029 award years, any employment in the second quarter after exiting satisfies this requirement.

### III. Program Evaluation Criteria

NDOL will review institutional data to determine whether programs meet all Federal Workforce Pell requirements. Programs that qualify will be added to Nebraska's approved Workforce Pell program list for the 2026-27 academic year. NDOL may ask institutions for additional information before making a final decision.

To be approved, programs must meet all Federal Workforce Pell requirements, including:

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

## Registered Apprenticeship Programs

If a program serves as the classroom or technical instruction portion of a federally Registered Apprenticeship, it automatically meets two of the eligibility requirements — workforce alignment and employer demand — without needing to demonstrate them separately. This is because Registered Apprenticeships are already built around real employer needs and in-demand occupations.

However, these programs still need to meet the remaining requirements, including:

- Students earn a recognized, stackable, and portable credential.
- The coursework applies toward academic credit.
- The program meets the 70% completion and 70% job placement benchmarks.
- The program must last for at least 8 weeks, but less than 15 weeks and the program must provide between 150 and 599 clock hours of instruction.

Institutions offering apprenticeship-linked programs must identify the specific Registered Apprenticeship in their application and include documentation confirming its registration status.

Institutions will receive written notice of whether their programs are approved or denied. State approval means the program is eligible to be on the list — but federal approval is still required before students can actually receive Workforce Pell funds.

## Stackable and Portable

A program must demonstrate (i) leads to a recognized postsecondary credential that is stackable and portable across more than one employer, or prepares students for and awards the sole recognized postsecondary credential required for employment in the occupation, and (ii) ensures that academic credit is awarded and accepted toward a certificate or degree program where required.

An eligible program must ensure that upon completion and enrollment in a related program, the student will receive academic credit accepted toward meeting certificate or degree requirements at one or more eligible institutions.

**Stackability:** The institution must demonstrate that the credential 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, partnership, or similar arrangement — confirming that academic credit earned through the program will be accepted toward meeting certificate or degree requirements at one or more eligible institutions.

Institutions must notify NDOL within 30 days of any substantive modification, expiration, or termination of executed agreements. Failure to maintain evidence demonstrating compliance with this policy may result in the program becoming ineligible for Workforce Pell.

**Portability:** To satisfy the portability requirement under 34 CFR § 690.93(a)(3)(i), a program must lead to a recognized postsecondary credential that is accepted and valued by more than one employer in the relevant industry sector or occupation. Institutions must demonstrate cross-employer portability through at least one of the following, evaluated in combination with Nebraska real-time labor market information (LMI) where available:

1. **Employer attestation.** The institution provides two signed letters from at least two unaffiliated employers in the relevant sector confirming that the credential is recognized and would be considered in hiring decisions for the target occupation.
2. **Labor market evidence.** The institution provides real-time labor market data, such as job posting analysis from Nebraska’s LMI system or comparable sources, demonstrating that the credential appears as a listed qualification across multiple employer job postings in the relevant occupation within Nebraska or the applicable regional labor market.
3. **Work-based learning or hiring pipelines:** Signed agreements for clinicals, apprenticeships, or internships, or signed agreement for direct hiring pipelines.

### **Out-of-State Distance Education Programs (Bilateral Agreements)**

Under 34 CFR § 690.93(h), the Governor of Nebraska may enter into a written agreement with the Governor of another state to allow Nebraska students to use Workforce Pell Grants for programs offered by institutions in that other state through distance education (or vice versa).

Any such agreement will:

- Be published publicly;
- Include data-sharing provisions between the two states for completion and placement rate calculations; and
- Only be entered into after: (a) the Governor of Nebraska confirms, in consultation with the Nebraska Workforce Development Board, that the occupations or sectors covered by the out-of-state program are on Nebraska’s list of high-skill, high-wage, or

in-demand occupations developed under 34 CFR § 690.93(b)(1)(i); and (b) the Governor of the state where the institution is located confirms, in consultation with that state's State board, that the program meets the requirements of that regulation.

## IV. 2026-2027 Initial Occupation List

Nebraska's Governor, in consultation with the NWDB, reviewed and approved the occupations eligible for Workforce Pell Grants in Nebraska. These programs were selected because they lead to jobs that are high-skill, high-wage, and/or in-demand. The NWDB has officially approved these occupations as eligible for Workforce Pell Grants in Nebraska.

**See the 2026–2027 Initial Eligible Occupation and Program List for the complete list of approved occupations.** Available on the NDOL website ([dol.nebraska.gov](http://dol.nebraska.gov))

For information on how Nebraska identifies Workforce Pell programs, reference the methodology outlined in *"Occupation Eligibility: How Nebraska Identifies Workforce Pell Programs."*

## V. Institution Submission Requirements

An institution seeking Governor approval for an eligible workforce program must submit a complete application package to NDOL. Incomplete applications will not be reviewed.

### A. Application Submission Process

1. Applications must be submitted electronically through the NDOL Workforce Pell Grant Program Application Portal, available on the NDOL website ([dol.nebraska.gov](http://dol.nebraska.gov)).
2. To be considered for program approval, applications must be received no later than 45 days prior to a quarterly NWDB meeting.
3. Institutions may submit applications for multiple programs simultaneously but must submit a separate application package for each program.

### B. Application Requirements

Each application must include the following:

Field Name	Category	Description / Notes
Institution name	<b>Institution</b>	Legal name of the institution offering the program
Contact information	<b>Institution</b>	Primary contact details (name, phone, email address)
Institution information	<b>Institution</b>	General background about the institution
OPE ID	<b>Institution</b>	Office of Postsecondary Education Identifier
Accrediting agency	<b>Institution</b>	Name of the body that accredits the institution or program
Accreditation status	<b>Institution</b>	Current standing (e.g., accredited, candidate for accreditation, not accredited)
Program name	<b>Program</b>	Official title of the training program
Program History	<b>Program</b>	The program must have been operating and enrolling students for at least 12 months before the application is submitted
Eligible Training Provider List	<b>Program</b>	Is this program listed on the State’s Eligible Training Provider List (ETPL)
Program site location	<b>Program</b>	Physical address or online/hybrid designation where training is delivered
Description of program	<b>Program</b>	Summary of program content, goals, and target learners
Credential type	<b>Program</b>	Type of award granted (e.g., certificate, certification, license, degree)
Field of study — CIP code	<b>Program</b>	Classification of Instructional Programs (CIP) code
Delivery format	<b>Program</b>	Mode of instruction (in-person, online, hybrid)
Program length (weeks)	<b>Program</b>	Total duration expressed in weeks – must be 8 but less than 15 weeks
Program length (credit hours)	<b>Program</b>	Total duration of credit hours – must be 4-15 semester/trimester or 6-23 quarter hours

Field Name	Category	Description / Notes
Program length (clock hours)	<b>Program</b>	Total duration expressed in clock hours – must be 150-599 clock hours
Start dates / rolling enrollment	<b>Program</b>	Scheduled cohort start dates or indication of open/rolling admission
Target occupations (SOC codes)	<b>Program</b>	Standard Occupational Classification codes for intended career outcomes
Stackable	<b>Program</b>	The credential must lead to a recognized postsecondary credential that prepares students to pursue one or more certificate or degree programs at one or more eligible institutions.
Portable	<b>Program</b>	The credential must be recognized by more than one employer in the relevant industry.
Industry partnerships	<b>Program</b>	Employers or sector organizations partnered with the program
Labor market demand evidence	<b>Program</b>	Data demonstrating workforce need for program completers
Regional demand justification	<b>Program</b>	Regional evidence supporting demand for program
Completion rate (%)	<b>Outcomes</b>	Percentage of enrolled students who finish the program
Job placement rate (%)	<b>Outcomes</b>	Percentage of completers employed in a related field within a defined period
Median earnings after completion	<b>Outcomes</b>	Median wage of completers post competition
Licensure pass rates (%)	<b>Outcomes</b>	Pass rate on required licensure or certification exams, if applicable
Tuition cost	<b>Costs</b>	Total tuition charged for the full program
Fees	<b>Costs</b>	Additional required fees (e.g., technology, materials, registration)

Field Name	Category	Description / Notes
Total cost of attendance	<b>Costs</b>	All-in cost including tuition, fees, books, and living expenses
Available financial aid options	<b>Costs</b>	Types of aid offered (financial aid, scholarships, grants, etc.)
Course list / modules	<b>Curriculum</b>	Enumerated courses or training modules comprising the program
Work-based learning components	<b>Curriculum</b>	Internships, apprenticeships, or hands-on learning
Assessment methods	<b>Curriculum</b>	How student learning is measured
Meets minimum hours requirement	<b>Compliance</b>	Confirmation that program meets state or federal minimum clock-hour standards
Aligns with in-demand occupations	<b>Compliance</b>	Verification program aligns with in-demand occupations
Data accuracy certification	<b>Compliance</b>	Authorized signature attesting that all submitted data is accurate and complete
Supporting documentation	<b>Compliance</b>	Attachments required to substantiate reported data (e.g., accreditation proof, curriculum outline, employer letters, outcome data reports)

### C. NDOL Review, Compliance Determination, and Cure Process

Upon receipt of a complete application, NDOL shall conduct an initial review to determine whether the application satisfies all eligibility criteria set forth in Section III. This review process proceeds as follows:

1. **Compliance Determination.** If NDOL determines the application is compliant with all eligibility criteria, it shall transmit the application to the NWDB for consultation.
2. **Deficiency Notice and Opportunity to Cure.** If NDOL determines that an application does not meet one or more eligibility requirements, it shall notify the institution in writing, identifying each deficiency. The institution shall have 30 calendar days from the date of the deficiency notice to submit a written response addressing the identified deficiency or deficiencies ("cure period"). Written responses must be submitted to [ndol.workforcepell@nebraska.gov](mailto:ndol.workforcepell@nebraska.gov)

3. Cure Outcome. If the institution’s response during the cure period satisfactorily addresses all identified deficiencies, NDOL shall treat the application as compliant and transmit it to the NWDB for consultation. If the institution’s response does not satisfactorily cure the identified deficiencies, or if the institution fails to respond within the cure period, NDOL shall issue a Determination of denial, subject to the appeal rights.

**Important Note**

NWDB approval occurs on a quarterly basis only. Institutions should plan accordingly, as cure responses received after a quarterly deadline will be considered at the next scheduled NWDB meeting. NWDB meeting dates are available on the NDOL website.


### D. Governor Submission to U.S. Department of Education

Once the Governor approves a qualifying job training program, the state must notify the U.S. Secretary of Education. This is done by the Governor directly, or by the Nebraska Department of Labor (NDOL) acting on the Governor's behalf.

Every approved program is reviewed each year by the U.S. Department of Education to make sure it's still meeting required standards — including completion rates, job placement rates, and whether completers are earning more as a result of the program. NDOL must cooperate with these federal reviews and provide updated data when asked.

## VI. Adoption and Effective Date

These Written Policies and Procedures are adopted pursuant to 34 CFR § 690.93 and are effective as of the date signed below.



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Jim Pillen, Governor  
State of Nebraska



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Katie Thurber, Commissioner  
Nebraska Department of Labor  
Authorized Designee

Date: 5/20/26

Date: 5/20/26