State of Nevada

Workforce Pell Policy

Effective Date: July 1, 2026, *this policy becomes effective upon adoption and applies beginning with the first Federal award year in which Workforce Pell programs are implemented.*

Policy Statement:

Nevada will administer Workforce Pell in a manner that:

- Aligns training programs with **high-skill, high-wage, and in-demand industries**
- Ensures **quality, accountability, and positive labor market outcomes**
- Provides **equitable access** to short-term credentials
- Maintains full compliance with federal regulations

I. Authority and Purpose

This policy establishes the framework for Nevada's administration, oversight and approval of Workforce Pell programs, defining requirements, processes and controls for implementation.

This policy is adopted pursuant to the authority granted under:

- Title IV of the Higher Education Act of 1965, as amended (20 U.S.C. §1070a et seq.);
- Federal Workforce Pell Grant provisions (34 CFR Parts 668 and 690, Subpart H) (Federal Register Document No. 2026-04520); and
- Applicable Nevada Revised Statutes governing workforce development and postsecondary education.

The purpose of this regulation is to:

- Expand Pell Grant eligibility to short-term workforce training programs that are aligned with in-demand occupations;
- Expand access to short-term, high-quality workforce training programs;
- Align education and training with Nevada's workforce and economic development priorities;
- Establish requirements for approval and administration of Workforce Pell Grant programs in the State of Nevada;
- Ensure alignment with workforce demand and economic development priorities;
- Provide accountability for student outcomes and public funds through performance, cost, and earnings outcomes.

II. Administration

Administration;

The Governor designates the Department of Employment, Training, and Rehabilitation (DETR) Office of Workforce Innovation (OWINN) as the Governor's designee to:

- Create policy and processes for Workforce Pell implementation;
- Approve programs;
- Certify compliance with federal criteria;
- Ensure alignment with state workforce priorities;
- Verify employer demand validation;
- Outcome feasibility;
- Collect and analyze data;
- Coordinate and provide technical assistance to institutions.

III. Definitions

As used in this Policy, the following terms shall have the meanings set forth below:

CIP Code: (Classification of Instructional Programs or CIP) is a six-digit taxonomy (xx.xxxx) developed by the U.S. Department of Education (ED) to standardize, track, and report academic programs across higher education institutions.

Cohort Period: is defined as the award year that ends three full award years prior to the beginning of the award year for which value-added earnings are being determined. It is used to calculate "value-added earnings" to determine the financial effectiveness of eligible workforce programs. While the primary definition refers to a specific award year, programs are allowed to aggregate up to four award years to meet minimum cohort size requirements.

Earnings Measurement Period: is the first full tax year following the award year in which the student completed the eligible workforce program.

Eligible Institution: an institution of higher education authorized to participate in Title IV federal student aid programs.

Eligible Program: an eligible program is an educational program offered by an eligible institution that leads to a degree (associate, bachelor's, graduate, or professional) or prepares students for gainful employment in a recognized occupation. It must meet specific duration, curriculum, and accreditation requirements to qualify for Federal Student Aid. *34 CFR 668.8*

Eligible Workforce Program: is defined as a high-quality, short-term undergraduate program that meets specific duration, instruction, and approval criteria, designed to lead to in-demand, high-wage employment. The program must be approved by the Governor/ Governor's designee and meet standards established by the U.S. Secretary of Education.

Governor's Office: the Governor of the State of Nevada or a designated agency acting on behalf of the Governor. For the purposes of this policy, the Governor's Office will refer to OWINN within DETR as the designated agency acting on behalf of the Governor.

High- Skill: refers to occupations requiring significant training, education, or credentials beyond a high school diploma.

High-Wage: wages above the median wage for all occupations in Nevada

In-Demand/ Target Industry: an industry identified by the State as having current or projected workforce demand, having a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors.The Governor's Office of Economic Development (GOED) updates the state's target industries quarterly. More information about Nevada's Target industries can be found here Target Industries | Governor's Office of Economic Development

In-Demand Occupation 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. Nevada's top 20 In-Demand Occupations can be found here In-Demand Occupations - OWINN

Industry Recognized Credential (IRC): is a portable, third-party verified document affirming an individual's mastery of technical skills, based on standards endorsed by industry associations or employers. These credentials, which include certificates, licenses, degrees and apprenticeships, are used to secure or advance in employment. To be added to the IRC list in Nevada, the IRC must be aligned with the state's target industries and in-demand occupations. A link to Nevada's IRC List and more information about IRCs can be found here Industry Recognized Credentials - OWINN

Median Earnings: the exact middle point of all individual incomes within an occupation in the state of Nevada, where 50% of earners fall below this amount and 50% earn above it. Median is the middle value (or midpoint between two middle values) in a set of data arranged in order of increasing or decreasing magnitude. As such, one-half of the items in the set are less than the median and one-half are greater.

Portable Credential: a credential is considered portable when it is recognized and accepted as verifying the qualifications of an individual in other settings such as other geographic areas across the country, other educational institutions, or other industries or businesses. For example, Registered Apprenticeship Program (RAP) Certificates of Completion are considered to be nationally (and in some cases internationally) portable.

Recognized postsecondary credential: is a qualification (such as a degree, industry certificate, or license) that certifies an individual has attained specific, measurable skills needed for employment or career advancement. Oftentimes used interchangeably with IRC.

SOC code: (Standard Occupational Classification or SOC) the code is a six-digit federal system/statistical standard used to categorize workers into specific occupations based on job duties rather than job titles primarily for the purpose of collecting, calculating, or disseminating data.

Stackable Credential: A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or career ladder to different and potentially higher-paying jobs. For example, an individual can stack a high school diploma, an associate's degree, and then typically take two more years of appropriate postsecondary education to attain a bachelor's degree. An individual can also stack a certificate with an apprenticeship, and later earn a degree or advanced certification.

Value-added earnings (VAE): are determined by calculating the difference between the adjusted median earnings of student completers during the earnings measurement period as defined in § 690.91 and 150 percent of the U.S. Federal Poverty Guidelines applicable to a single individual

- *The Secretary of Education shall publish the VAE that will apply to the eligible programs for the upcoming year no later than 3 months prior to the beginning of the award year*

Workforce Pell Grant Program: means a short-term postsecondary training program approved for federal Pell Grant eligibility under federal law.

IV. Program Eligibility Requirements

An educational program must meet the following criteria to qualify as an Eligible Workforce Program in Nevada:

A. Federal Baseline Requirements

In order to meet federal baseline requirements, the program must:

- Meet the definition of an eligible program under 34 CFR 668.8;
- Provide a minimum of 8 weeks and maximum of 14 weeks of instruction;
- Be at least 150, but less than 600 clock hours/4-15 semester hours - calculated using ratios of 37.5 clock hours to each semester hour;
- Provide recognized postsecondary credentials;
- Have existed for at least 12 months in its current format (length,hours, and delivery) before the U.S. Department of Education (ED) determination and
- Have a 70% job placement and a 70% completion rate
- Programs must show that graduates' median earnings exceed the tuition/fees charged.
- Not be offered via:
    - Correspondence education;
    - Study abroad;
    - Direct assessment models;
- Obtain ED approval
- Be offered by an accredited and eligible Title IV federal financial aid institution in good standing with no Title IV sanctions within the past five years.

B. Nevada-Specific Alignment Requirements

In order to meet Nevada's requirements, the program must:

- Meet all federal baseline requirements
- Align with Nevada's high-skill, high-wage,or in-demand industry or occupations as identified by the State
- Demonstrate direct employer demand and hiring needs
- Lead to a stackable and portable credential or a credential required for a specific occupation within Nevada's targeted industries.
- Provide articulated academic credit into degree or certificate programs.
- Be on the Eligible Training Provider List (ETPL) prior to submitting an application
- Receive approval from the Governor's Workforce Development Board (GWDB)
- Receive Governor approval

Institutions must have a data sharing agreement in place with DETR and actively be providing data to DETR at least 12 months prior to submitting their program to OWINN for approval.

V. Governor's Approval Process

A. Administration

The Governor designates OWINN within DETR as the state agency/ Governor's designee to

- Approve programs
- Obtain program approval from the GWDB

- Coordinate and provide technical assistance to institutions
- Ensure approved programs are submitted to ED
- Publish the list of Workforce Pell Grant Programs

B. Application Submission

Institutions must submit a Workforce Pell Program application directly to OWINN via email at nvworkforcepell@detr.nv.gov (application requests and inquiries should also be sent to the email). Applications will be reviewed quarterly.

Applications must include:

- Program description and curriculum;
- CIP and SOC codes;
- Employer partnerships and labor market alignment evidence;
- Credential details;
- Articulation agreements;
- Completion and job placement data/ outcome projections;
- Expiration date of the institution's Program Participation Agreement.
- Tuition and fee structure

Institutions must submit an application along with supporting documentation that shows the program meets all required metrics for Workforce Pell.

C. Evaluation Criteria and Process

All programs will be reviewed to ensure they meet federal and state eligibility requirements. Programs submitted by an Nevada System of Higher Education (NSHE) institution will be shared with the NSHE System Administration Office for review and sign-off prior to OWINN review. Once in receipt of an application OWINN and the GWDB, will evaluate programs based on:

1. **Labor Market Alignment**
   - Use of Nevada labor market data;
   - Alignment with state target industries;
   - Alignment with state in-demand occupation lists;
2. **Employer Engagement**
   - Documented employer input;
   - Validation of skills and competencies;
3. **Credential Value**
   - Stackability and portability;
   - Industry recognition;
4. **Career Pathways**
   - Transferability of academic credit;
   - Alignment with postsecondary pathways;
5. **Outcomes Readiness**
   - Ability to meet completion and placement thresholds.

Institutions will be required to present their programs to the GWDB for approval. NSHE will present programs on behalf of NSHE institutions.

C. Approval Process

- Programs must meet **all federal and state criteria** in order to be approved.
- Once the program is approved institutions will receive a state certification letter from OWINN, certifying state program approval.
    - If the program is not approved the institution will receive an email from OWINN explaining why the program is not approved.
- The eligible institution must submit the certification letter to ED.

D. Federal Submission

The eligible institution must forward the state program approval certification to ED for final approval. Institutions must share a copy of ED's response with OWINN. Once approved by ED the approval remains valid through the institution's Program Participation Agreement (PPA) period.

Appeals Process

If your program is not approved you have the right to appeal. Nevada will maintain a transparent and timely appeals process for denied applications, ensuring equitable treatment across institutions. Eligible institutions whose program is denied will have 15 calendar days from the date of that determination to submit an appeal in writing to OWINN via email at nvworkforcepell@detr.nv.gov. The institution must clearly state the reasons they believe the denial was unjustified and include evidence and documentation pertaining to the program that supports the appeal.

Following receipt of the appeal, an Appeals Review Panel will be appointed by OWINN. The Appeals Review Panel will provide its recommendation to OWINN and a final decision will be issued by OWINN within 30 calendar days of receipt of the appeal.

OWINN and the Appeals Review Panel will only review the information submitted by the institution in writing when making the final decision. The institution should ensure all necessary information is included with the appeal. Institutions may only appeal a program one time.

OWINN does not have the ability to issue exceptions to the law, regulations, or policy governing the Workforce Pell Grant Program and such appeals will not be accepted.

VI. Performance Accountability

A. Completion and Placement Rates

Programs must meet:

- **Completion Rate:** ≥ 70% within 150% of program length
    - At least 70% of enrolled students must finish the program, measured within 150% of the program's normal duration.
- **Job Placement Rate:** ≥ 70% employment within the second quarter after completion
    - At least 70% of graduates must secure employment in their field (or a similar high-skill/high-wage occupation) within 180 days of finishing.

Programs must achieve at least 70% completion and 70% job placement rates to qualify for Workforce Pell designation. The institution provides the raw data below. For award years 2026-27 through 2028-29, an interim Governor-certified methodology aligned with WIOA reporting applies (§ 690.94(a)(2)(i))

Interim (AY 2026-27 through 2028-29): *Percentage of exiters employed during the second quarter after program exit (any employment aligns with WIOA § 116).*
AY 2029-30 and later: *Percentage of completers employed in the qualifying occupation or a comparable high-skill, high-wage, or in-demand occupation during the second quarter after completion.*

B. Data Reporting

Institutions must annually:

- Submit completer data to the State;
- Provide wage and employment verification data;
- Report tuition and fees.

C. Exclusions

Students are excluded from metrics if they:

- Are deceased;
- Become medically unable to work;
- Enter military service (>30 days);
- Become incarcerated.

VII. Value-Added Earnings Requirement

The Governor's office must certify that the program's cost was considered relative to anticipated wages prior to the Secretary's initial value-added earnings determination (§ 690.93(d)(9)). Once the Secretary publishes value-added earnings (first applicable for the 2030-31 award year), published tuition and fees may not exceed that amount (§ 690.94(d)).

Programs must meet "value-added earnings" requirements, demonstrating that graduates see a meaningful increase in earnings compared to the cost of the program. This metric ensures program tuition does not exceed the financial benefit gained by students

A. Cost-to-Earnings Standard

Programs must ensure:

- Tuition and fees **do not exceed value-added earnings**.

B. Calculation

Value-added earnings =
Median earnings of program graduates three years after completion
− 150% of the federal poverty level

C. Compliance

- Programs with zero or negative value-added earnings are ineligible;
- Institutions must adjust tuition if thresholds are exceeded.

VIII. Institutional Responsibilities

Institutions must:

- Notify OWINN when the eligible workforce program application has been submitted to ED;
- Notify OWINN when the institution have received a decision from ED;
    - Institutions must share a copy of ED's response with OWINN.
- Maintain compliance with all federal and state requirements;
- Notify OWINN if an approved program is deemed ineligible by ED for any reason;
- Ensure accurate reporting of:
    - Student outcomes;

    - Tuition and fees;
- Maintain documentation for audit and review;
- Adhere to written arrangement rules under 34 CFR 668.5 when partnering with ineligible entities:
    - ≤ 25% program delivery (or up to 50% under specific conditions);
    - No shared ownership conflicts;
    - Accreditor approval when required.

Funding and award structure;

- Awards are prorated based on program length
- Average estimated award ≈ $2,200 (varies by need)
- Only Pell Grant funding is available (no loans)

NOTE: Financial Aid Limitation Rule: If non-federal aid (state, institutional, private) fully covers cost of attendance Pell must be reduced or eliminated.

IX. Student Eligibility

Students must:

- Be enrolled in an approved Workforce Pell program
- Meet Federal Pell Grant eligibility requirements
- Not receive Pell for two programs simultaneously
- Not be enrolled in a graduate program or possess a graduate credential;
- Not be concurrently enrolled in another Pell-eligible program;
- Not be enrolled in correspondence courses, study abroad, or direct assessment
- Enroll solely in the Workforce Pell program during the award period.
- Not receive Workforce Pell and other Title IV aid concurrently

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X. Program Monitoring and Renewal

A. Ongoing Data Collection, Reporting & Review

Institutions must report enrollment, completion rates, job placement rates and earnings outcomes.

Nevada will:

- Review program alignment with labor market needs at least every two years;
- Monitor performance outcomes annually;
- Audit institutional reporting

- Validate data and submit required reports to ED

B. Renewal

Programs must be re-certified prior to the expiration of the institution's PPA. If the program has not received renewal approval by ED by the PPA expiration date the program will no longer be eligible and will be removed from the state's Workforce Pell Program List.

- Institutions must go through the complete application process in order for a program to be renewed.
- Programs will be renewed if all metrics are met
- Programs must maintain eligibility on the ETPL
- Institutions must report the published tuition and fees for the short-term program through a process *determined by ED*.

XI. Loss of Eligibility

A program will lose eligibility if it:

- Fails performance metrics;
- Repeatedly fails to meet outcomes;
- Exceeds value-added earnings thresholds;
- Fails federal compliance requirements;
- Loses Governor approval;
- No longer meets the definition of an eligible program

Loss of eligibility becomes effective at the next payment period or award year, depending on the violation.

A Workforce Pell Grant Program that loses eligibility cannot reapply for, or regain, eligibility for two years.

XII. Regaining Eligibility

Programs may regain eligibility by:

- Reapplying and receiving Governor approval;
- Demonstrating compliance with performance metrics;
- Adjusting tuition to meet value-added earnings requirements (e.g. reduce tuition);
- Observing mandatory waiting periods (e.g., two years for failed performance programs).

XIII. Inter-State Agreements

Nevada may enter into bilateral agreements with other states to:

- Allow cross-state enrollment;
- Share data for performance tracking;
- Ensure alignment with both states' workforce priorities.

XIV. AUDIT & RISK MANAGEMENT

Risk areas:

- Misreporting outcomes
- Over-awarding aid
- Noncompliant programs

Controls:

- Annual audits
- Data validation checks
- Federal compliance reviews

XV. RECORD RETENTION

- Minimum: 3–5 years
- Includes:
    - Student records
    - Financial aid files
    - Outcome data

XVI. Transparency

Nevada will publicly maintain:

- A list of all approved Workforce Pell Grant Programs
    - The list will be updated (quarterly) and published to the OWINN website
- An In-demand occupations list hosted on the OWINN website;

- Workforce Pell Grant Program application criteria and processes hosted on the OWINN website
- Performance outcomes where permissible.

REFERENCES

- Federal Register: Workforce Pell Rule (2026-04520)
- Higher Education Act §401(k)
- U.S. Department of Education NPRM (March 2026)
- 34 CFR § 668.8 - Eligible program
- DETR - Home - Nevada Department of Employment, Training and Rehabilitation
- DETR Research and Analysis Division - Home
- OWINN - Home - OWINN
- GOED - Nevada's State Economic Development Experts