

State of New Hampshire
Workforce Pell Grant Program
Policies and Procedures

Purpose: This policy establishes 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)

Policy: This policy applies 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 the policies in full. Pursuant to the Governor's designation authority, the Department of Business and Economic Affairs (BEA) serves as the Governor's authorized designee for receiving and initially reviewing applications under this policy.

Definitions: The following definitions apply to this policy.

- **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 New Hampshire
- **The State Workforce and Innovation Board (SWIB):** Serves as the advisory body for the development, update, and evaluation of the planning process to ensure New Hampshire's workforce development programs are responsive to the state's economic development and labor market needs. This is accomplished by partnering with businesses; educational institutions, and organizations, which all support a unified and innovative workforce to meet the needs of New Hampshire's economy.
- **Recognized Postsecondary Credential:** Industry-recognized certificate, license, certification, or credential
- **High-Skill:** Occupations requiring specialized technical knowledge or training
- **High-Wage:** Occupations paying above regional/state median wages
- **High Demand Occupation List:** The list of occupations in New Hampshire that show significant job growth and high demand within the following sectors: Construction,

Healthcare, Hospitality, Manufacturing and Technology. The criteria for the ETPL are determined by OWO in consultation with the SWIB and are reviewed every two years.

- **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.

Procedures: BEA will review institutional data to determine whether programs meet all Federal Workforce Pell requirements. Once all steps of program approval have been completed and a program is found eligible for Workforce Pell, BEA will add the eligible program to the PY26-PY27 Workforce Pell Approved Program listing which will be available on the BEA-Workforce Pell website. BEA 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
Program History	Must have been operating for at least 1 year before applying and must be listed on the NH Eligible Training Provider List
Program Length	Between 150 and 599 clock hours of instruction
Program Duration	8 weeks or more, but fewer than 15 weeks
Instructional Format	Cannot be a correspondence course, study abroad program, or direct assessment program (distance education is allowed)
Delivery Method	Must be taught 100% by the applying institution or another Workforce Pell-eligible institution
Credential Awarded	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.
Cost Transparency	Tuition and all fees must be clearly disclosed
Completion Rate	At least 70% of students must complete the program

Placement Rate	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.
Earnings Outcome	Program must demonstrate value-added earnings — completers must earn enough above the poverty line to justify the cost of training

Registered Apprenticeship Programs: If a program serves as the classroom or technical instruction portion of a federally Registered Apprenticeship, it automatically meets some of the eligibility requirements, however, these programs still need to meet the remaining requirements.

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

Stackable and Portable: A program must demonstrate that it 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. It must also ensure that academic credit is awarded and accepted toward a certificate or degree program where required.

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

Portability: To satisfy the portability requirement, 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 New Hampshire 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 positively in the hiring decision for the target occupation.

2. **Labor market evidence.** The institution provides real-time labor market data, such as job posting analysis from NH's LMI system or a comparable source, demonstrating that the credential appears as a listed qualification across multiple employer job postings in the relevant occupation within New Hampshire.
3. **Work-based learning or hiring pipelines:** Signed agreements for clinicals, apprenticeships, or internships, or signed agreement for direct hiring pipelines.

Application Requirements

Each application must include the following below which may be found in your application to join the ETPL. This information should reflect what has been inputted into the ETPL:

Field Name	Category	Description
Institution name	Institution	Legal name of the institution offering the program
Contact information	Institution	Primary contact details (name, phone, email address)
Institution information	Institution	General background about the institution
OPE ID	Institution	Office of Postsecondary Education Identifier
Accrediting agency	Institution	Name of the body that accredits the institution or program
Accreditation status	Institution	Current standing (e.g., accredited, candidate for accreditation, not accredited)
Program name	Program	Official title of the training program
Program History	Program	The program must have been operating and enrolling students for at least 12 months before the application is submitted

Eligible Training Provider List	Program	Is this program listed on the State's Eligible Training Provider List (ETPL)
Program site location	Program	Physical address or online/hybrid designation where training is delivered
Description of program	Program	Summary of program content, goals, and target learners
Credential type	Program	Type of award granted (e.g., certificate, certification, license, degree)
Field of study — CIP code	Program	Classification of Instructional Programs (CIP) code
Delivery format	Program	Mode of instruction (in-person, online, hybrid)
Program length (weeks)	Program	Total duration expressed in weeks – must be 8 but less than 15 weeks
Program length (credit hours)	Program	Total duration of credit hours – must be 4-15 semester/trimester or 6-23 quarter hours
Program length (clock hours)	Program	Total duration expressed in clock hours – must be 150-599 clock hours
Start dates / rolling enrollment	Program	Scheduled cohort start dates or indication of open/rolling admission
Target occupations (SOC codes)	Program	Standard Occupational Classification codes for intended career outcomes

Stackable	Program	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	Program	The credential must be recognized by more than one employer in the relevant industry.
Industry partnerships	Program	Employers or sector organizations partnered with the program
Labor market demand evidence	Program	Data demonstrating workforce need for program completers
Regional demand justification	Program	Regional evidence supporting demand for program
Completion rate (%)	Outcomes	Percentage of enrolled students who finish the program
Job placement rate (%)	Outcomes	Percentage of completers employed in a related field within a defined period
Median earnings after completion	Outcomes	Median wage of completers post competition
Licensure pass rates (%)	Outcomes	Pass rate on required licensure or certification exams, if applicable
Tuition cost	Costs	Total tuition charged for the full program

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

Institution Submission Requirements:

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

Application Submission Process:

- 1) Applications must be submitted electronically. No paper applications will be accepted.
- 2) Institutions may submit applications for multiple programs simultaneously but must submit a separate application package for each program.
- 3) To be considered for program approval, applications must be received by BEA no later than 45 calendar days prior to a quarterly SWIB meeting. BEA may waive the time requirement at the discretion of the Director of the Office of Workforce Opportunity. This waiver will be communicated publicly on the BEA website along with regular closure dates for applications.

BEA Review, Compliance Determination, and Cure Process

Upon receipt of a complete application, BEA shall conduct an initial review to determine whether the application satisfies all eligibility criteria. The review process proceeds as follows:

1. Compliance Determination. If BEA determines the application is compliant with all eligibility criteria, the application will be forwarded to the SWIB.
2. Deficiency Notice and Opportunity to Cure. If BEA 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").
3. Cure Outcome. If the institution's response during the cure period satisfactorily addresses all identified deficiencies, BEA shall treat the application as compliant and transmit it to the SWIB 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, BEA shall issue a Determination of Denial which is subject to appeal rights.

Important Note: SWIB 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 SWIB meeting. SWIB meeting dates are available on the BEA website.

State Workforce Innovation Board Process:

Once BEA has determined that the application meets all eligibility requirements and is considered compliant, a compiled packet is sent to the State Workforce Innovation Board (SWIB) for review. The Office of Workforce Opportunity (OWO), who serves as staff support to

the SWIB, will be the point of contact for the SWIB and provide additional support to the SWIB. After review and discussion, the SWIB will vote on all applications at their quarterly SWIB meeting. Staff from OWO will present the items for consideration with OWO staff recommendation to the full SWIB. The SWIB will discuss the items and vote to either approve or deny the application. If the application is approved, the program will be sent to the Governor, or other designee, for final review and approval. All approved programs will be submitted to the U.S. Department of Education and once approved, will be added to the NH Workforce Pell Eligible Program Listing. If the application is denied by the SWIB, OWO will provide a written notification of the denial to the institution. This notification will contain the appeals process which is found below.

Appeal Process

To contest a determination of denial, a written electronic notice of contest must be submitted to the Chairperson of the SWIB electronically by emailing the Director of the Office of Workforce Opportunity, no later than 30 calendar days from the date the notice of denial was sent. The notice shall include the contesting party's name, institution, title, phone number, email address, mailing address, and a statement of the grounds upon which the contest is based. The Chairperson of the SWIB will review the notice of contest and render a decision within 30 calendar days of receiving the notice of contest. The decision of the Chairperson of the SWIB will be final, however the program may be submitted again for consideration.

Submission to U.S. Department of Education

Once the SWIB recommends approval for the program, the Governor, or the Commissioner of the Department of Business and Economic Affairs, acting on behalf of the Governor, must notify the U.S. Secretary of Education.

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. BEA must cooperate with all federal reviews and provide updated data when asked.

Action: This policy is posted on the BEA - Workforce Pell website and made available to eligible institutions.