



Workforce Pell Certification Policy

Purpose and Background

This policy outlines the criteria and methodology the Ohio Department of Higher Education (ODHE) will use to determine whether a short-term program meets Ohio's requirements for approval as a federally funded Workforce Pell grant program.

Institutions seeking to obtain ODHE approval for their workforce program should review this policy and submit an application. The application can be found at www.highered.ohio.gov/WorkforcePell.

Identification of In-Demand Occupations and Industry Sectors

To be eligible for Workforce Pell, programs must provide an education aligned with the requirements of high-skill, high-wage (as identified by section 122 of the Carl D. Perkins Career and Technical Education Act), or in-demand industry sectors or occupations.

ODHE utilizes [Ohio's Top Jobs](#) list as the source for identifying eligible occupations under Workforce Pell. Review of Ohio's Top Jobs list will occur at least every two years, concurrent with the State Plan under Section 102(c) of the Workforce Innovation and Opportunity Act and as required by Ohio Revised Code 6301.111.

The Top Jobs list uses Standard Occupational Classification (SOC) codes, and academic programs use Classification of Instructional Programs (CIP) codes. ODHE will link eligible SOC codes to the corresponding CIP codes and publish this SOC/CIP crosswalk. This crosswalk will serve as the definitive list institutions can use to determine whether a program's CIP code aligns with an eligible occupation and therefore qualifies for review.

Employer Hiring Requirements

To determine whether a program meets employer hiring requirements and aligns to the competencies needed in the occupation, institutions must provide documentation demonstrating employer validation of program competencies and hiring needs.

Acceptable documentation includes, but is not limited to, job postings, employer letters of support, workforce board letters, and minutes from workforce board or occupational advisory board meetings.

Please note, Registered Apprenticeship programs are determined to have met the employer hiring requirement. If submitting a Registered Apprenticeship, no additional documentation that the program meets employer hiring requirements is necessary.

Recognized Postsecondary Credential

To be eligible for Workforce Pell, a program must lead to a recognized postsecondary credential. "Recognized postsecondary credential" is defined by 34 CFR Section 690.91 as:

- a credential consisting of an industry-recognized certificate or certification,
- a certificate of completion of a Registered Apprenticeship,
- a license recognized by the state or federal government, or
- an associate or baccalaureate degree.

Institutions must indicate in the application the postsecondary credential to which the program leads. If an institution indicates the program leads to an industry-recognized certificate or certification, then that certificate must be on ODHE's approved Third-Party Credential List, found [here](#).

If a program leads to an industry-recognized certificate or certification not currently on the Approved Third-Party Credential List, the institution must follow ODHE's established procedure for adding it to the list.

Certifications added to the list must meet the following parameters:

- Demonstrate preparation for an occupation or occupational cluster.
 - » Certifications, such as OSHA 10 or CPR, that encompass only basic safety or a basic skill requirement and do not demonstrate a distinguishable competency for a specific job, standing alone, may not qualify a certificate program as technical.
- Be governed by a regional, statewide, national, or international body for the related field or industry.
 - » Preference is given to national and international bodies.
- Be valued and recognized by employers, especially sector partnerships, as leading to employment.
 - » Certifications that are valued only for association or affinity group membership are not recommended.
- Be related to the learning objectives of the program of study.
- Be awarded based on results from standardized and reliable assessments that measure the designated competencies of the occupation or skill set.
 - » The state prefers but does not require that assessments are independently graded from the educational institution.

Recognized Postsecondary Credential and Its Relationship to Portability

A program that, by ODHE confirmation, leads to one of the credential types listed above will, by definition, be considered portable for purposes of Workforce Pell eligibility.

Credit Articulation

To be eligible for Workforce Pell, both for-credit and non-credit programs must ensure the award of academic credit toward a related certificate or degree.

To demonstrate credit articulation, each institution must document one of the following:

Academic Credit Awarded (*eligible institutions only*)

If an institution asserts that a Workforce Pell program articulates to a certificate or degree at that institution, it must submit documentation that:

- Confirms the program has undergone a program-level review for academic credit.
- Clearly identifies the certificate(s) or degree(s) to which Workforce Pell credit will apply.
- Demonstrates that the Workforce Pell program, without exception, will be treated uniformly with respect to credit applicability.
- Specifies that no additional assessments, proficiency exams, placement tests, or similar requirements may be imposed for the Workforce Pell credit to count toward the identified certificate(s) or degree(s).

Acceptable documentation includes, but is not limited to:

- A formal intra-institutional articulation agreement
- A board resolution
- A catalog entry
- Any other institutionally published record deemed sufficient by ODHE

All documentation must be signed and dated by institutional leadership.

Academic Credit Awarded by Another Institution:

If the applicant institution asserts that the Workforce Pell program articulates to a certificate or degree at another institution, it must submit:

- A written articulation agreement with the receiving institution that includes:
 - » The specific certificate(s) or degree(s) to which the Workforce Pell credit will apply.
 - » Course-to-course mappings or program-to-program alignment showing how Workforce Pell content matches receiving institution requirements.
 - » Term of the agreement.
 - » Explicit statement that no additional assessments, competency tests, placement exams, or proficiency requirements may be required for the Workforce Pell credit to count toward the identified certificate(s) or degree(s).

Statewide Articulation Pathway

Credit articulation requirements are met if the Workforce Pell program leads to a credential included in a [statewide articulation pathway](#) such as the statewide Industry Recognized Credential Transfer Assurance Guides (ITAGs) or other ODHE-endorsed statewide articulation agreements. The institution must indicate which statewide articulation pathway applies.

Credit Articulation and Its Relationship to Stackability

A program that, by ODHE confirmation, leads to the awarding of academic credit applicable toward a related certificate or degree will, by definition, be considered stackable for the purposes of Workforce Pell eligibility.

Program Completion and Job Placement Rates

ODHE will collect student-level data for all programs seeking Workforce Pell approval. All institutions seeking approval for Workforce Pell programs are required to provide complete and accurate student-level data in the manner established by the Chancellor.

The specific data includes, but is not limited to:

- Student Name
- Student Social Security Number
- Student Date of Birth
- Program Identifier
- Student Start Date
- Student Completion Date (actual, if completed)
- Student Exit Date (if not completed)
- Program Length
- Student Exclusion Category (if permitted by Workforce Pell regulations)

Institutions must indicate if any students should be excluded from the completion or job placement calculations based on any exclusion permitted under Workforce Pell regulations.

Using the data submitted, ODHE will calculate program completion rates. ODHE will audit the data provided, which may include comparing the data with ODHE-maintained records or requesting additional documentation.

ODHE will provide the necessary student-level data to the Ohio Department of Job and Family Services (ODJFS). ODJFS will calculate job placement rates using wage records and other administrative data consistent with federal Workforce Pell regulations.

Value-Added Earnings

Until the federal value-added data is available, ODHE will consider the tuition and fees charged by the institution to the student when deciding whether to approve the program.

These costs will be compared to the median annual wage for the related occupation.

To establish a reasonable benchmark, ODHE will apply the following standard: The total program cost should not exceed the median earnings minus 150 percent of the federal poverty line:

Published Tuition and Fees < Median Earnings – 150% of the federal poverty guidelines for a family of 1

If a program's cost exceeds this benchmark, the program will not be approved.

Review and Certification Process

Applications will be accepted according to a timeline set by ODHE, which will be posted on [higher.ed.gov/WorkforcePell](https://higher.ed.gov/workforcepell).

If ODHE determines a program meets Ohio's requirements, ODHE will certify the approval as directed by the federal government. ODHE will update the Governor's Executive Workforce Board at each of the board's scheduled meetings or by email at time intervals determined by the Chancellor. Denied programs will receive a response documenting the reason.

Appeal Process

Institutions may appeal the denial decisions. Appeals should be submitted as follows:

1. Within 14 days from the date of the denial notice, the applicant may file an appeal on a form provided by ODHE.
2. Applicants should also submit any documentation that could support the appeal.
3. The written appeal should be submitted to workforcepell@higher.ed.gov.
4. ODHE will review the appeal and issue a written decision within 60 days of receipt of the appeal.

Annual Attestation and Ongoing Compliance Requirements

On an annual basis, institutions with approved Workforce Pell programs must attest that the program continues to meet all Workforce Pell eligibility requirements. Additionally, institutions must submit student-level data to allow ODHE to verify the institution maintains the 70% completion rate and the 70% job placement rate. Failure to provide complete and accurate evidence may result in review, suspension, or removal of program approval.

Approved by:



Mike Duffey
Chancellor

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Date



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