Submitted by the Arkansas Division of Higher Education on behalf of the Governor's Office to the Arkansas Workforce Development Board and approved on 5.21.26.

Executive Summary

State of Arkansas Workforce Pell Implementation Plan

The State of Arkansas has established a comprehensive, data-driven, and employer-validated framework to implement Workforce Pell in alignment with federal requirements under 34 CFR §§690.93–690.95. This plan ensures that all approved programs deliver high-quality, workforce-aligned training that leads to strong employment outcomes and economic mobility for students.

State Leadership and Governance

The Governor, in consultation with the Arkansas State Workforce Development Board, serves as the approving authority for all eligible workforce programs. The Arkansas Division of Higher Education (ADHE) and the Arkansas Department of Commerce (ACOM) collaboratively support program review, data validation, and ongoing accountability, with employment and wage outcome verification through ARData at the Arkansas Department of Shared Administrative Services.

Workforce-Aligned Program Approval

Arkansas uses its established 5-Star Occupational Demand methodology—which evaluates demand, growth, retention, and earnings—to ensure programs align with high-skill, high-wage, or in-demand occupations. Programs must demonstrate alignment through CIP-to-SOC mapping and meet clearly defined thresholds for workforce relevance.

Employer-Driven Validation

Programs must provide direct evidence of employer demand, including:

- Employer commitments to hire, interview, or prioritize completers
- Demonstrated job placement outcomes, or
- Ongoing employer engagement in program design and delivery

This ensures that all approved programs are responsive to real labor market needs.

Credential Quality and Career Pathways

All programs must lead to a recognized, stackable, and portable credential, including industry certifications, licensure, or Registered Apprenticeships. Programs must also demonstrate clear

pathways to additional credentials or degrees, supported by articulation agreements or prior learning credit policies.

Data-Driven Accountability

Arkansas leverages its statewide longitudinal data system (ARData) and the Arkansas Higher Education Information System (AHEIS) to validate outcomes. Programs must meet federal performance thresholds, including:

- ≥70% completion rate, and
- ≥70% job placement rate, verified through UI wage records

Annual data matching ensures ongoing program eligibility and continuous improvement.

Transparent Processes

The State has established a standardized, publicly available process for program approval, including:

- Clearly defined criteria and submission requirements
- A structured review timeline with interagency coordination
- A formal appeals process with independent review and consistent timelines

These processes ensure fair and transparent treatment across all eligible institutions.

Value and Student Protection

Arkansas incorporates the value-added earnings (VAE) analysis, comparing program cost to completer wages, to ensure programs provide a positive return on investment for students and taxpayers.

Commitment to Continuous Improvement

Approved programs are subject to annual review and re-certification, tied to institutional Program Participation Agreements. The State will maintain ongoing alignment with workforce needs through regular updates to labor market data and employer engagement strategies.

Arkansas's Workforce Pell implementation ensures that public investment supports programs that are aligned to employer demand, validated by outcomes, and designed to advance student success and workforce competitiveness.

State of Arkansas Workforce Pell Implementation Plan

I. Governance and Authority

The Governor, in consultation with the State Workforce Development Board (AWDB), will determine program eligibility in accordance with federal requirements. The Arkansas Division of Higher Education (ADHE) and the Arkansas Department of Commerce (ACOM) collaboratively support program review, data validation, and ongoing accountability, with employment and wage outcome verification through ARData at the Arkansas Department of Shared Administrative Services.

Evidence, Process, and/or Policy

- Governor-issued certification for each program
- Documentation of AWDB consultation via:
    - Official memorandum on Governor's letterhead
    - AWDB meeting minutes

II. Program Eligibility Determination (34 CFR 690.93(a))

A. Alignment to High-Skill, High-Wage, or In-Demand Occupations

Programs must align to state-identified workforce demand.

Evidence, Process, and/or Policy

- Arkansas's 5-Star methodology (Demand, Growth, Retention, Earnings)
- Programs must map CIP codes to SOC codes rated:
    - 3+ stars, OR
    - 2 stars with demand score >60
- State-level data or for the region(s) served by the institution
- Methodology published annually by DWS
- Registered Apprenticeship RTI programs automatically qualify for this requirement
- Alternative LMI source considerations: While the Arkansas Demand Occupation List is based on a comprehensive analysis of labor market information, conditions may change during the year due to factors such as emerging industries, new businesses locating to an area, or the impact of technology on the workforce. Therefore, institutions can request that training programs aligned with occupations not meeting the set job demand ratings and thresholds be considered for Workforce Pell, if they demonstrate that there is a significant workforce need in their labor market area. Examples of documented need include:

    - A collection of letters (minimum of two) from employers stating their current intention to hire and a recurring need for individuals trained in the program.
    - Proof that the training program experiences repeated high placement and wages.
    - Results from labor market surveys that utilize reliable procedures (i.e., survey of local employers to see how many workers they anticipate needing within the next year).
    - Proof from Chambers of Commerce, the Arkansas Economic Development Commission and/or local industrial development organizations of the verified need for additional trained workers in the training program.
    - Information that relates to staffing patterns. Examples include plant openings or expansions or emerging occupations related to technical changes.
    - ADHE/ACOM will review the request and determine if the submitted documentation merits approving the occupation and training program. Programs must still meet the 12-month requirement per federal regulations.

B. Employer Hiring Requirements

Programs must demonstrate alignment with employer hiring needs.

Evidence, Process, and/or Policy

Institutions must provide validated employer demand evidence through one of the following for at least two employers:

- Employer letters of support that:
    - State demand for the specific skills/credentials
    - Indicate intent to hire, interview, or prioritize completers
    - Reference local/regional workforce needs, not just general support
- Record of successful job placement and retention for program completers
- Evidence of employer engagement in program through curriculum development, advisory councils, WBL opportunities for students, and/or asset contribution (financial donation, equipment/materials, staff serving as instructors).
- Formal endorsement or recognition by employer-facing industry association that represents two or more employers
- Survey responses provided by industry partners
- MOU’s or contracts showing evidence of recurring employer sponsored cohorts of training in program
- Registered Apprenticeship RTI providers must provide Employer Acceptance Agreement

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C. Credential Requirements

Programs must (1) result in a recognized, stackable, and portable credential, or (2) prepare students for employment in an occupation for which there is only one recognized postsecondary credential and provides students with the credential upon completion of the program.

Evidence, Process, and/or Policy

For (1):

- Documented stackable pathway(s) within the IHE or with other IHE

  AND

Select one of the following:
- Industry-recognized certificate or certification (Third-party credentials recognized by multiple employers)
- State licensure
- Registered Apprenticeship
- Credential included on a state or national credential registry

For (2):

- Brief narrative providing explanation and justification why the credential is the only one recognized for the occupation.
  AND

Select one of the following:
- Industry-recognized certificate or certification (Third-party credentials recognized by multiple employers)
- State licensure
- Registered Apprenticeship
- Credential included on a state or national credential registry

  AND

Select one of the following:
- Licensure/Certification pass rates for program completers
- Credentials awarded by the IHE
- Program documentation showing the credential is embedded in program completion requirements
- Documented in AHEIS PST course file as Licensure/Certification

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D. Postsecondary Pathways and Credit Mobility

Programs must articulate into credit-bearing pathways.

Evidence, Process, and/or Policy

Credit applicability must be clearly defined and accepted toward credentials.

Select one of the following:

- Documented stackable pathway(s) within the IHE or with other IHE
- Program prior learning credit policy or degree plan
- Articulation agreement(s)

III. State Process for Program Approval (34 CFR 690.93(b))

A. Published Criteria and Workforce Alignment

Evidence, Process, and/or Policy

Previously outlined in II (A). Additionally, must meet legislated requirements:

- 8 -14 instructional weeks
- 150 - 599 clock hours or equivalent credit hours (clock-credit hour conversion outlined in the U.S. Department of Education Calculation of a Federal Pell Grant for an eligible workforce program guidance document)

B. Employer Alignment Policy

State policy for determining whether a program meets the hiring requirements of employers in the high-skill, high-wage, or in-demand sectors and occupations that the program prepares students for employment in, demonstrating the expected competencies for which the recognized postsecondary credential intends, align with the competencies needed in such high-skill, high-wage, or in-demand sectors and occupations.

Evidence, Process, and/or Policy

Institutions must:

- Submit employer evidence (Section II.B)
  AND
- Provide a curriculum crosswalk or skills taxonomy linking course student learning outcomes/skills/competencies to industry standards identified by employers, industry associations, certifications, or ONET descriptions.

C. Stackability and Portability Policy

Evidence, Process, and/or Policy

- Verified through Section II.C

D. Credit for Prior Learning / Articulation Policy

Evidence, Process, and/or Policy

- Verified through Section II.D

E. Institutional Data Submission Requirements

Evidence, Process, and/or Policy

Institutions must report program-level and student-level data to AHEIS (credit or PST files) as requested by ADHE, including but not limited to:

- Student First Name
- Student Last Name
- Student SSN
- Student DOB
- Student Race
- Student Ethnicity ·
- Student Sex
- # Contact or Credit Hours Completed
- Academic Year
- Program or Degree Name
- Credential Completion Type(s) or Degree Level
- Program CIP Code
- Program SOC Code
- Program Start Date
- Program Completion Date
- # of Instructional Weeks

IV. Review Timeline and Approval Process

2026 Initial Implementation

- Jan–Mar: ADHE/ACOM on behalf of the Governor's Office draft an implementation plan.
- April: Governor's Office reviews implementation plan and provides feedback. ADHE/ACOM incorporate feedback and edit as needed.
- Apr–May: Governor's representative submits implementation plan to the State Workforce Board for review/approval.
- May: Institutions are notified of the implementation plan and approved SOCs and are invited to submit programs for review.
- May–June: Institutions submit new Workforce Pell program applications.
- June–July: Governor's Office, ADHE, and ACOM review submissions to determine if the programs meet the requirements; ARData is consulted to confirm outcomes using SLDS and UI Wage Data.
- July: Governor's representative submits a list of programs meeting requirements to the State Workforce Board for review/approval.
- End of July: Governor's representative notifies institutions of program approval status and submits to the U.S. Department of Education.

Ongoing (2027+)

- Jan–March: Institutions submit new or revised Workforce Pell program applications.
- Mar–Apr: Governor's Office, ADHE, and ACOM review submissions to determine if the programs meet the requirements; ARData is consulted to confirm outcomes using SLDS and UI Wage Data.
- Apr–May: Governor's representative submits a list of programs meeting requirements to the State Workforce Board for review.
- June-July: Governor's representative notifies institutions of program approval status and submits to the U.S. Department of Education.

Evidence, Process, and/or Policy

- Standardized statewide review workflow
- Use of administrative data for validation

V. Appeals Process

(Must determine the platform for institutions to submit appeals.)

A standardized appeals process ensures fairness and consistency.
Institutions may appeal determinations through a formal, time-bound process.

Evidence, Process, and/or Policy

1. Right to Appeal

An eligible institution may appeal a determination regarding whether a program meets the requirements outlined in 34 CFR 690.93(a).

Appeals are limited to final determinations and may be submitted only once per determination.

2. Grounds for Appeal

An appeal must clearly demonstrate one or more of the following:

- Procedural Error: The process used to reach the determination did not follow established policies or timelines and materially affected the outcome
- Substantive Error: The determination was not supported by substantial evidence in the record
- New Information: Significant, relevant information that was not reasonably available at the time of review and could materially impact the decision

3. Filing Requirements

Institutions must submit a written appeal that includes:

- Identification of the program and the determination being appealed
- A clear statement of the basis for appeal (aligned to the grounds above)
- Supporting documentation and evidence
- The specific remedy or outcome requested

Appeals must be submitted electronically to the Governor's office or designated state office.

4. Timeline for Filing

- Appeals must be filed within 30 calendar days of the issuance of the written determination
- The appeal window begins only after the institution has received formal notice, including appeal instructions

5. Review Process

a. Acknowledgment

- The Governor's office or designated state office will acknowledge receipt of the appeal within 5 business days

b. Record Review

- The review will be based on:
    - The original record submitted during program review
    - Any additional materials permitted under the appeal grounds

c. Appeal Body

- Appeals will be reviewed by an Appeals Panel consisting of a subset of the State Workforce Board to include:
    - Commissioner of the Arkansas Division of Higher Education, or designee
    - Director of Arkansas Workforce Connections, or designee
    - Board Member representing business and industry

- Panel members will submit their written decision to the Governor's office.

6. Decision Timeline

- A written decision will be issued within 45–60 calendar days of receipt of a complete appeal
- The decision will include:
    - Findings of fact
    - Determination (affirm, modify, or remand)
    - Rationale for the decision

7. Outcomes of Appeal

The Appeals Panel may:

- Affirm the original determination
- Modify the determination
- Remand the determination for reconsideration with specific guidance

8. Finality

The appeal decision constitutes final agency action. No further administrative appeal is available, though institutions retain any rights available under applicable law.

9. Fair, Transparent, and Consistent Provisions

To ensure fairness across all eligible institutions:

- Standardized templates and submission requirements will be used
- All appeals will be evaluated using the same criteria and documented rubric
- Timelines and procedures will be uniformly applied
- The state will publish:
    - Appeal procedures

    - Timelines
    - Contact information

VI. Governor Certification Process (34 CFR 690.93(d))

The Governor will certify each approved program using a standardized template.

Evidence, Process, and/or Policy

Each certification includes:

- Program name, CIP, SOC(s)
- Approval date
- Verification of 12-month compliance
- Wage and outcome (70/70 requirement) validation via ARData
- Value-added earnings calculation (cost vs wages)
- Agreements to:
    - Provide documentation upon request
    - Notify federal agencies within 15 days of withdrawal
    - Provide additional information, as required

VII. Data Validation and Outcomes Tracking (34 CFR 690.94)

Leverage statewide data systems for outcome validation.

Evidence, Process, and/or Policy

- Annual process:
    - Sept/Oct: Institutions submit completer data through AHEIS
    - Oct/Nov: ADHE reviews and transfers data to ARData
    - Nov/Dec: ARData team connects UI Wage Data to WFP program completers
    - January: Finalized list of job placement data available Jan to determine continued program eligibility

- Used to:
    - Verify ≥70% completion and job placement rates
    - Determine continued eligibility

VIII. Apprenticeship Provisions

Registered Apprenticeship RTI programs are streamlined.

Evidence, Process, and/or Policy

- Automatically meet:

    - Occupation alignment
    - Employer demand requirements
- Must still meet all other eligibility criteria
- Applies only to federally registered apprenticeships (not pre-apprenticeships)

IX. Value and Cost Transparency

Programs must demonstrate value relative to earnings.

Evidence, Process, and/or Policy

- State calculates Value-Added Earnings (VAE)
- Included in Governor certification

X. Continuous Approval and Renewal

- Approval tied to Program Participation Agreement lifecycle
- Annual data review required
- Re-certification required prior to expiration

XI. Interstate Agreements (Future Development)

In the future, Arkansas will establish processes for:

- Bilateral agreements with other states
- Cross-state enrollment eligibility
- Data-sharing agreements for outcomes tracking

This will not be done for the initial Workforce Pell Program approval cycle.
