



DOL Nursing Expansion Grant Program Key Policy Clarifications to Frequently Asked Questions (FAQs)

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Document Revision History

Date	Version	Revisions
1/31/2024	1.0	Document is released
8/12/2024	2.0	Revised the document title for clarification Converted document formatting to meet 508-compliance standards Alphabetized sub-topics under each major heading Added a Table of Contents Corrected non-substantive issues in the body of the text (i.e., typos) Updated the following sub-topics with further clarification and/or citations: • Grant Profit • Incumbent Worker Salaries • Paid Wages for Employees vs. Incumbent Workers • Populations Eligible to be Served • Preceptor Training • Requests for Adding Additional Partners • Selective Service Registration Requirements • Supportive Services Requirement • Supportive Services vs. Training Activities • Training Activities for Currently Employed Workers • Training Along a Nursing Career Pathway • Use of Grant Funds for Tuition (now titled Tuition) • Use of Grant Signed Commitments for Employers (now titled Signed Commitments Between Participants and Employers) Added the following sub-topics: • Capacity Building Activities • Documentation and Recordkeeping for Performance Reporting • Grantee Reporting Requirements • Making Changes to a Data File • Other Important Policy Resources • Paid Work-Based Learning for Incumbent Workers • Preceptor Activities Paid for with Grant Funds • Recording and Transcribing DOL-Sponsored Events • Re-Enrolling Participants • Reporting an Individual as a Participant • Social Security Numbers • Stipends • Training Activities for Currently Employed Workers (i.e., Incumbent Workers)

9/1/2024	2.1	Clarified the following sub-topic in alignment with the Funding Opportunity Announcement policy: • Incentives
1/22/2026	2.2	Updated hyperlinks Updated QNR section designated for Track 2 grantees reporting the preceptor outcome

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Participant Eligibility and Target Populations

Definition of a Participant

A participant is any individual who is determined eligible for and receives a DOL Nursing Expansion grant-funded service beyond a determination of eligibility.

Co-enrolling DOL Nursing Expansion Participants

H-1B-funded grants have specific policies for co-enrolling participants in H-1B-funded grant programs and non-H-1B-funded grant programs.

Co-enrollment with Other H-1B-Funded Grant Programs

The intent of co-enrollment is to meet the training and employment needs of program participants and provide as many participants as possible with comprehensive services that may not otherwise be available or allowable under an individual grant or funding source. Therefore, it is not acceptable to leverage resources that would result in co-enrollment in other H-1B-funded grant programs that are providing the same or similar services. Specifically, grantees may not co-enroll participants in more than one H-1B Skills Training Grant program (for example, enrollment in multiple DOL Nursing Expansion grants or both a Nursing Expansion grant and an H-1B Rural Healthcare grant) as a strategy to facilitate the attainment of grantee target enrollment levels and performance outcomes across multiple H-1B job training programs. Grantees who are both a lead and a partner in two or more DOL Nursing Expansion grants may not simultaneously count the same individuals as grant participants.

Co-enrollment with non-H-1B-Funded Programs

ETA encourages H-1B Skills Training program grantees to maximize the use of their resources and minimize the duplication of efforts through partnership building, system alignment, and leveraging of other federal and non-federal funding sources. As programs braid funds together to increase impact, they have the opportunity to show integration in the form of participant co-enrollment, provided this co-enrollment aligns with eligibility criteria and allowable activities for each grant and meets the criteria below.

For Nursing Expansion grant activities, leveraging resources may include co-enrolling participants in programs such as:

- The Workforce Innovation and Opportunity Act (WIOA) Title I programs;
- Appropriated apprenticeship funds, such as State Apprenticeship Expansion (SAE) formula grants, and State Apprenticeship Expansion, Equity, and Innovation (SAEEI) grants;
- Other federally-funded programs; and/or

- Non-federal programs.

Grantees may co-enroll DOL Nursing Expansion participants in non-H-1B grant programs only if they satisfy each of the following conditions:

- Participants are determined eligible for each grant based on the grantee's Statement of Work (SOW). Every program has very specific and distinct eligibility requirements.
- Participants are enrolled in allowable, non-duplicated grant activities, as the program's activities pertain to each program.
- The grantee adheres to cost allocation, if appropriate. For example, if a participant is enrolled in a training program, of which the classroom and instructor salary are paid with Nursing Expansion grant funds and the cost of participant training/tuition is covered by a WIOA program, the grantee would need to ensure that the cost of training/tuition billed to the WIOA program did not include any costs or fees paid for by Nursing Expansion grant funds.
- The grantee reports on leveraged resources (both federal and non-federal funded) on the ETA-9130 financial report form and Quarterly Narrative Reports (QNRs), as appropriate for both grants.
- Fiscal and Performance Reporting policy and practice are in keeping with the Uniform Guidance (appropriate cost allocation, etc.), and National Program Office reporting guidelines for the grant, contract, or cooperative agreement.
- The grantee reports on performance outcomes in accordance with the performance reporting requirements for each co-enrolled program, as appropriate.
 - Grantees can report on all outcomes and other deliverables that result from activities and services funded with both leveraged resources and grant funds in the Quarterly Performance Report (QPR) and QNRs for each co-enrolled grant program. As an example, for a Nursing Expansion grant, the grantee may report any outcomes achieved as a result of a leveraged WIOA program, the Nursing Expansion grant, or a combination of both.
 - Guidance related to co-enrollment does not prevent grantees from leveraging tools, materials, curricula, or other resources that other DOL-funded training programs, including other H-1B Skills Training Grant programs, developed, provided these activities do not result in co-enrollment.

Documenting Eligibility for Incumbent Workers

The FOA “requires that establishing and documenting incumbent worker eligibility is the responsibility of the grantee or a designated grant partner and not of the participating employer. Grantees or their designated grant partner must establish and document the eligibility of all incumbent worker participants and maintain the necessary records to support grant monitoring.”

The FOA does not provide guidance on how the appropriate selection of the incumbent worker participants is determined, only who is responsible for verifying and maintaining the documentation of eligibility for grant purposes. It is expected that the program design, as well as the Memoranda of Understanding or letters of commitment with employer partners, would describe the process for identifying and recruiting incumbent worker participants. Note that the grantee, as the lead applicant, would be responsible for verifying and documenting eligibility of incumbent worker participants of all required participating employer partners in the grant program.

Documenting a Participant’s Legal Status for Employment

For the purposes of eligibility to participate in this grant program, H1-B Skills Training Grants require that participants be available to work (See FOA Section III.C.3) in the United States. Grantees have the discretion to develop policies and procedures on how they verify and ensure their participants are available to work.

Employment Status at Entry

As part of the eligibility determination process, grantees are required to determine an individual’s employment status at the time they become program participants. Every participant will be either unemployed, underemployed, or an incumbent worker, as defined in the DOL Nursing Expansion FOA:

Unemployed Worker

An individual who is without a job and is available to work.

Examples: full-time students who are not currently working, retired nurses, or recent high school graduates without a job.

Underemployed Worker

An individual who is not currently connected to a full-time job commensurate with the individual’s level of education, skills, or wage/ salary earned previously, or who have obtained only episodic, short-term, or part-time employment.

Examples: nurses who are working part-time but desire a full-time position; adjunct faculty qualified for and/or who desire a tenure-track faculty position; individuals in any occupation who are not working at a skill and/or pay level commensurate with their level of education, skill, or previous pay.

Incumbent Worker

An individual already employed, either with an employer partner or another employer, at program enrollment, but who need training to upgrade their skills to secure full-time employment, advance in their careers, or retain their current positions in H-1B-related occupations and industries. The training provided to incumbent workers is either 1) developed in collaboration with an employer partner with which the individual is employed, or 2) for individuals who are employed at the time of enrollment by a non-partner employer, but who need additional skill training to improve their opportunities for middle- and high-skilled jobs in H-1B-related industries or occupations.

Examples: currently employed LPNs who want to advance to an RN or other higher position; currently employed nurses who want to transition to nurse education/instruction; currently employed nurses taking preceptor training; or other full-time workers who are not nurses, or not in the healthcare field, but want to transition into a nurse or nurse educator career.

Please note that the examples provided are not exhaustive categorizations of employment situations. Although a participant's employment status might change while they are a grant participant, grantees should not revise the employment status at entry recorded for that participant since it is documented only *at program entry*.

Individuals Served with Leveraged Resources

Individuals Served with BOTH Leveraged Resources and Grant and/or Match Funds

Individuals who receive services through a DOL Nursing Expansion grant project funded with both leveraged resources and grant/match funds are considered grant participants. Grantees must report on all outcomes and other deliverables that result from activities and services funded with both leveraged resources and grant funds in the Quarterly Performance Report (QPR) Form ETA-9173, as appropriate. Grantees must also report on leveraged resources that have been provided to support their grant in both the grant's Quarterly Narrative Report (QNR) Form ETA-9179 and in their Quarterly Financial Report Form ETA-9130.

Individuals Served with ONLY Leveraged Resources

Individuals who receive services through a Nursing Expansion grant project funded solely with leveraged resources (i.e., no services are provided with grant funds or match funds) are not considered grant participants. Grantees must **not** report on outcomes for individuals funded solely with leveraged resources on their required QPR.

Please see the below section, *Budget Requirements and Allowable Expenditures*, for further guidance on match and leveraged funds.

Populations Eligible to be Served

As stated in the DOL Nursing Expansion FOA, “[e]ligible participants served through this grant program must be at least 17 years old and not currently enrolled in secondary school within a local educational agency.”

Selective Service Registration Requirements

ETA affirms the requirement for covered individuals to register for the Selective Service in accordance with their individual legal responsibility. However, DOL Nursing Expansion grants are authorized under Section 414(c) of the American Competitiveness and Workforce Improvement Act (ACWIA) of 1998, which does not require that a determination of Selective Service registration be made prior to enrollment, or in determining eligibility to participate in the Nursing Expansion grant program. *Note that other employment and training programs, such as Workforce Innovation and Opportunity Act (WIOA)-funded programs, require Selective Service registration as part of program eligibility and that the legal requirements related generally to selective service registration are not waived for H-1B Skills Training Grants.*

Target Populations

Within the three employment statuses at entry (unemployed, underemployed, and incumbent worker), grantees may design programs to address the needs of specific populations, such as veterans, military spouses, transitioning service members, and historically marginalized and underrepresented populations within their service areas. This may include targeting recruitment and enrollment of women, people of color, justice-impacted individuals, individuals with disabilities, and other populations with employment barriers that hinder movement into middle- to high-skilled nurse education professional and nursing occupations.

Budget Requirements and Allowable Expenditures

Capacity Building Activities

Capacity building describes the efforts to set and meet organizational goals so that stakeholders can lead sustained and scaled improvements over time. Capacity building may focus on infrastructure, operational functions, and/or individual capabilities within organizations and systems, so that organizations can generate positive change in opportunities and outcomes on behalf of wage earners. Capacity building efforts benefit the organization or institution as a whole to increase program capacity of the institution rather than individual participants. H-1B grants are participant-focused job training grants. Within reason and in alignment with Uniform Guidance policies for allowable costs, a limited amount of grant funds may be spent on capacity building activities that support the grant's training focus.

Construction

Construction costs are not allowed under this grant program. Minor alterations to adjust an existing space for grant activities (such as a classroom alteration) may be allowable and are not considered construction. Approval must be granted by DOL prior to making any building alterations.

Use of Contracts and Subawards

Grantees must abide by the following definitions of contract, contractor, subaward, and subrecipient.

Contract

Contract means a legal instrument by which a non-federal entity (defined as a state or local government, Indian tribe, institution of higher education (IHE), non-profit organization, for-profit entity, foreign public entity, or a foreign organization that carries out a federal award as a recipient or subrecipient) purchases property or services needed to carry out the project or program under a federal award. The term as used in the Nursing Expansion FOA does not include a legal instrument, even if the non-federal entity considers it a contract when the substance of the transaction meets the definition of a federal award or subaward (see definition of **Subaward** below).

Contractor

Contractor means an entity that receives a contract as defined above in Contract.

Subaward

Subaward means an award provided by a pass-through entity (defined as a non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program) to a subrecipient for the subrecipient to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient

Subrecipient means a non-federal entity that receives a subaward from a pass-through entity to carry out part of a federal program but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.

Grantees must follow the provisions at 2 CFR 200.330-.332 regarding subrecipient monitoring and management. Also see 2 CFR Part 200.308(c)(6) regarding prior approval requirements for subawards. When awarding subawards, you are required to comply with provisions on government-wide suspension and debarment found at 2 CFR Part 180 and codified at 2 Part CFR Part 2998.

Incentive Payments

The FOA states that Nursing Expansion grantees may use up to 1.5 percent of grant funds for the provision of gift cards or other payments to participants for providing information on grant outcomes (such as credential attainment, preceptor placement, or employer status). Incentive payments must be tied to the goals of the project and may only be used to collect information necessary to report on grant outcomes to DOL.

The use of incentive payments to obtain information needed to report grant outcomes is considered appropriate when other grant processes and procedures are not sufficient to capture the information. Information about participant services and training progress or milestones that occur during the participants' enrollment period are collected through default institutional processes necessary to operate the grant program. However, incentive payments may be a valid strategy for collecting additional longer-term outcome information from participants after program exit. Nursing Expansion grantees may also use incentive payments to collect necessary information about nursing professionals who are placed into a preceptor role to report this outcome to DOL. Grantees must have policies and procedures in place governing the awarding of incentive payments to participants, and any incentive payments provided under this grant must comply with these organizational policies.

The use of grant funds for incentive payments other than to collect participant information on grant outcomes is not allowed.

Incumbent Worker Salaries

Subsidizing incumbent worker wages for any reason is not an allowable use of grant funds. This restriction includes the payment of stipends or wages to supplement or replace wages earned in their current employment or for work-based learning activities. The FOA states, "[u]nder this Announcement, on-the-job training (OJT) is available only for unemployed and underemployed individuals. Incumbent workers are not eligible for OJT under this FOA, and grantees are specifically prohibited from spending grant funds on payment of wages of incumbent workers." **The FOA further**

prohibits incumbent workers from participating in paid work experiences or paid internships with grant or match funds. See **Employment Status at Entry** for the policy definition of “incumbent worker.”

Match and Leveraged Funds

This grant program **requires** cost sharing or matching funds. Such funds may be in the form of cash or in-kind contributions and must be equal to 20 percent of the total Federal share of costs.

To be allowable as part of match, an expenditure must be an allowable charge for Federal grant funds and considered necessary and reasonable to accomplish the project or program objectives. DOL will make determinations of allowable costs in accordance with the applicable Federal Cost Principles, found in the Office of Management and Budget’s Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 CFR Part 200 and at 2 CFR Part 2900 (Uniform Guidance-DOL specific).

DOL encourages grantees to leverage additional resources beyond the required match to supplement grant activities. Any resources contributed to the project in addition to cost sharing or matching funds must be counted and documented as leveraged resources.

Paid Wages for Employees vs. Incumbent Workers

The Nursing Expansion grant program makes a distinction between participants whose training involves paid work-based learning and individuals who are program employees hired or contracted to provide training to participants (but are not participants in training themselves).

Grant funds can be used to pay nurses or nursing professionals (or individuals in any other relevant role) who are not participants in the grant training to perform work on behalf of the grant. However, individuals who are participants in the grant and employed when they enroll in training (or are expected to become employed at the point of training) are not eligible to participate in paid work experiences or paid internships because of their designation as incumbent workers. **Incumbent workers cannot be paid wages by the grant.** See **Employment Status at Entry** for the policy definition of “incumbent worker” to ensure the use of grant funds for paid work experiences is allowable.

Grantees are encouraged to work with their employer partners to create incentives for incumbent workers who cannot be paid with grant funds for their time in training, such as providing paid release time for them to attend training. Grantees may also use leveraged funds to pay the employed participants who enroll in work-based learning.

Please note that an individual cannot simultaneously be both an employee of the grant program and a grant participant.

Paid Work-Based Learning Components

The FOA specifies the funding restrictions associated with on-the-job training, Registered Apprenticeship Programs, work experience and internships, and incumbent worker salaries.

For the purposes of grants awarded under the DOL Nursing Expansion Grant Program FOA, the following will apply:

On-the-Job (OJT) Training

Under this grant, OJT is available only for unemployed and underemployed individuals. Incumbent workers are not eligible for OJT under this FOA, and grantees are specifically prohibited from spending grant funds on payment of wages of incumbent workers. OJT is provided under a contract with an employer in the private nonprofit or private for-profit sector.

Under the OJT contract, the employer pays wages to the participant, and occupational training is provided for the participant in exchange for the reimbursement to the employer of a percentage of the participant's wage rate to compensate for the employer's extraordinary costs of training the individual (subject to the policy exceptions described below).

The OJT contract may not be with an employer who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work. The OJT contract must be limited to the period required for a participant to become proficient in the occupation for which the training is being provided. Funds provided to employers for OJT must not be used to directly or indirectly assist, promote, or deter union organizing.

The following are additional restrictions for OJT:

- i. Eligible participants cannot be currently employed by the employer.
- ii. Participant placements may only occur in private for-profit and nonprofit sectors (i.e., the grant does not allow for public sector OJT placements).
- iii. No placement may be made through staffing agencies providing workers on a temporary basis to employers for which the agency receives compensation from an employer.
- iv. The period of reimbursement should be an adequate length to ensure the participant has acquired the technical skills needed for employment, but no longer than 12 months. Individuals may not be co-enrolled in other programs for the purpose of extending OJT

employer reimbursement beyond 12 months. Twelve months exceeds the average length of time for current OJT activities; therefore, grantees should negotiate contracts with employers that lead transitioning participants to permanent employment as soon as possible. Grantees may establish contracts that will be longer than 12 months for multiple participants; however, the reimbursement for each individual that participates in OJT cannot be longer than 12 months.

Typically, the negotiated reimbursement percentage for OJT may be as high as 50 percent of the participant's hourly wage. However, for grants awarded under this Announcement, the negotiated reimbursement percentage may be as high as 90 percent of the participant's hourly wage based on employer size, as follows:

- up to 90 percent of the participant's wage rate for employers with 50 or fewer employees;
- up to 75 percent of the participant's wage rate for employers with 51-250 employees; and
- up to 50 percent for employers with more than 250 employees.

Registered Apprenticeship Programs (RAPs)

Organizations may use grant funds awarded under the DOL Nursing Expansion FOA to reimburse a portion of the registered apprentice's work-based learning costs to employers.

For grants awarded under this FOA, the negotiated reimbursement percentage of an apprentice's work-based learning costs may be as high as 50 percent of the participant's hourly wage.

We also encourage grantees to negotiate lower rates or variable rates (such as starting at the maximum allowable reimbursement rate and reducing the subsidy over time), where possible, to ensure that the maximum number of apprentices will be served by the grant project. The following are additional restrictions for use of grant funds for work-based learning registered apprenticeships:

- i. Participant placements may occur only in private for-profit and nonprofit sectors (e.g., the grant does not allow for public sector placements); and
- ii. No placement may be made in staffing agencies providing workers on a temporary basis to employers for which the agency receives compensation from an employer.

Work Experience and Internships

Work experience and internships are both planned, structured learning experiences that take place in a workplace for a limited period and, for the purposes of the grants under the DOL Nursing Expansion Grant Program FOA, must be paid. Wages and stipends may be paid either directly to participants or to

the employer partner for the purposes of reimbursing participant wages. Fair wage and labor standards apply where an employee/employer relationship exists, as defined by the Fair Labor Standards Act (FLSA). For more information on the FLSA, grantees may visit <http://www.dol.gov/whd/>.

For a work experience or internship that supports training, grantees will need to document how the work experience or internship is connected to and supports the education and training activities included in the grant. Grantees have flexibility in the design and implementation of work experience and internships, but such opportunities must meet the following parameters:

- i. Provide an individual with monitored or supervised work or service experience in their expected career field where the individual has prescribed learning goals and reflects actively on what they are learning throughout the experience. These learning goals may include: (a) academic learning, career development, and skill development; and (b) the attainment of credentials in the individual's expected career field;
- ii. Are part of structured programs where the grantee established the criteria for determining who will participate in these programs; and
- iii. Are for a set period.

Leveraging WIOA funds for the purposes of providing paid work experience is also encouraged. Grantees may refer to [Training and Employment Guidance Letter \(TEGL\) 21-16: Third Workforce Innovation and Opportunity Act \(WIOA\) Title I Youth Formula Program Guidance](#) for additional technical assistance guidance on policies and procedures for work experience and internships.

Note that unpaid work experiences or internships are not allowable.

Paid Work-Based Learning for Incumbent Workers

The FOA requires work-based learning experiences to be paid. Because subsidizing incumbent worker wages for any reason is not an allowable use of grant funds, incumbent workers are prohibited from participating in paid work experiences or paid internships funded in whole or in part with grant or match funds.

Preceptor Activities Paid for with Grant Funds

All training programs offered with Nursing Expansion grant funds must result in a recognized postsecondary credential and lead to middle- to high-skilled jobs in H-1B healthcare occupations. DOL does not anticipate that training experienced nurses to become preceptors meets this requirement.

Grant funds cannot be spent to provide standalone professional development or continuing education credits that do not result in an industry-recognized postsecondary credential or certification to any participant, including preceptors (see **Preceptor Training** for further information).

To incentivize nurses to become preceptors or meet any preceptor training needs, grantees are encouraged to do so by “leveraging employer-funded financial incentives or other types of non-monetary incentives provided by the employer; and reducing additional administrative barriers, including ensuring access to desired training to attain appropriate certificates and credentials, if necessary” (FOA, p. 16).

Activities, such as preceptor training, that are not allowable may be paid for with leveraged funds.

Stipends

Stipends can be provided to participants in two situations, as described in the FOA.

1. Stipends are allowable when they are provided as payment for paid work experience either directly to participants or to the employer partner for the purposes of reimbursing participant wages (FOA, p. 55). Note that grant funds may not be used to pay wages or stipends for incumbent workers, as they are not eligible to participate in paid work experience.
2. Stipends are allowable when they are provided as a supportive service to a participant who demonstrates need for these services to participate in the training. As stated in the FOA, “[w]here stipends for supportive services are provided, the stipend amount must be for costs of a specific supportive service (e.g., childcare), rather than simply based on an unidentified need” (p. 56).

Stipends cannot be provided to participants for training costs or as incentives to participate in training. (See **Use of Grant Funds for Tuition** for information about how grant funds can be used to pay for participant training.)

Supportive Services Requirement

A robust supportive services strategy is **required** by the FOA for projects funded under the DOL Nursing Expansion grant. The FOA defines supportive services as “[t]hose necessary to enable an individual to participate in education and training activities funded through this grant program.”

Examples of such services include, but are not limited to, childcare, dependent care, transportation, mental health counseling, books, academic fees, supplies, parking, printing, tutoring, licensing exam fees, professional dues, housing, and needs-related payments that are necessary to enable an individual to participate in education and training activities. Grantees must document their policies for

administering a supportive service needs assessment to all participants and their procedures for the provision of supportive services for participants who need them. Up to 15 percent of grant funds may be used to provide supportive services to training participants, and supportive services may also be provided through leveraged resources.

Grantees may fund supportive services through various means, including providing the actual supportive service (e.g., childcare), providing participants with a voucher for the service (e.g., public transportation cards or tokens), or providing a stipend directly to the participant. Where stipends for supportive services are provided, the stipend amount must be for costs of a specific supportive service (e.g., childcare), rather than simply based on an unidentified need. For the purposes of this FOA, grantees may use grant funds, up to the percentage specified above, to provide supportive services only to individuals who are participating in education and training activities provided through the grant when such services are necessary to enable individuals to participate in education and training activities under the grant.

Grantees may establish additional limits on the provision of supportive services or provide their sub-recipients with the authority to establish such limits, including a maximum amount of funding and maximum length of time for supportive services to be available to participants. Grantees must ensure that their use of grant funds for supportive services is consistent with their organization's established written policy on the provision of supportive services. The costs must also be reasonable, necessary, allowable, and allocable to the ETA grant award.

ETA strongly encourages grantees to leverage other sources of funding for supportive services such as WIOA, human services programs, and other community partners. When a participant is eligible for supportive services through other programs, we recommend reserving grant funds for those participants that need support but are not eligible for other assistance.

Supportive Services vs. Training Activities

Training costs are those which pay for necessary activities that are directly associated with a participant's training (such as exam fees, tuition, books, and other training-related activities). They must be distributed uniformly to all participants in training. There is no limitation on the amount of funds that may be spent on training costs as a budget item.

Supportive services are needs-based and grantees cannot allocate more than 15% of the grant award amount to supportive services. The FOA states that, "Grantees may use grant funds, up to the percentage specified above, to provide supportive services **only to individuals who are participating in education and training activities provided through the grant when such services are necessary to enable individuals to participate** in education and training activities under the grant." Because supportive services are needs-based, grantees should not anticipate providing supportive services to every participant.

Please note that an activity cannot be both a supportive service and a training activity. To determine whether an activity is a supportive service or a training activity, grantees should consider the intended recipients of the activity. If an activity is expected to be provided to only a subset of participants, it must be based on need and is considered a supportive service. If all participants will receive the activity, it is not a supportive service and is not subject to the 15% cap.

Grantees paying for training costs should ensure that they have budgeted funds to pay them for all grant participants that are expected to enroll and not just a sub-set of participants.

Tuition

Grantees may use grant funds for tuition reimbursement for participants. To be allowable, grantees can either provide payments for the cost of tuition directly to students as a reimbursement for out-of-pocket costs or pay the tuition costs directly to the education/training provider through a Memorandum of Understanding (MOU) or other agreement. **Cash payments provided to participants with the intent of paying tuition costs are not allowable. Scholarships and student loan reimbursement/forgiveness are not allowable activities under this grant.**

In addition, tuition assistance or loan reimbursements offered by employers cannot be provided in exchange for participant commitments or contracts that obligate them to work for the employer.

Allowable Training Activities

Continuing Education Credits, Workshops, Conferences, and Other Standalone Training Activities

The goal of the Nursing Expansion grant program is to provide training programs that lead to postsecondary credentials necessary to advance along a nursing career pathway to middle- to high-skilled nursing and nursing education occupations during the period of performance. Continuing education credits, workshops, conferences, and other training activities that do not independently result in a recognized postsecondary credential as defined in [TEN 25-19](#) are not allowable as standalone training activities.

Exam Preparation Courses

Exam preparation courses may be allowable when included as part of a larger training program that leads to a recognized postsecondary credential. Training that prepares participants to take an exam is generally unallowable when:

- It is provided to individuals who already have credentials that qualify them for the occupation (e.g., individuals with advanced degrees who are eligible to be hired as nurse educators and instructors);
- It consists of a course that prepares individuals to take the exam and does not include occupational skills training that leads to an industry-recognized postsecondary credential;
- It does not result in an industry-recognized postsecondary credential upon completion of the training. Training that results only in the eligibility to take an exam for certification does not qualify;
- It consists of work experience as standalone training; and/or
- It provides wage payments or reimbursement for incumbent workers who take the training.

Preceptor Training

The FOA defines qualified preceptors as “experienced nursing professionals who have one-on-one relationships with nursing students, novice nurses, and experienced nurses, to prepare them for working in a clinical setting” (p. 3), and the purpose of incorporating preceptors into the training design is to “mentor and prepare a new generation of nurses” (p. 6). The use of preceptors differs by training track.

Preceptors are a requirement for Track 2 (Nursing Career Pathways), where the intent of the track is to “train participants as frontline healthcare professionals and paraprofessionals, including direct care workers, to advance along a career pathway and attain postsecondary credentials needed for middle-

to high-skilled nursing occupations during the grant period of performance” (FOA, p. 2). Preceptors must be incorporated into the project design to provide support to participants who are in training to obtain healthcare postsecondary credentials.

Preceptors *may* have a role to play in Track 1. The intent of Track 1 is to “increase the number of nursing instructors and educators (including classroom and vocational/clinical instruction) by training new or upskilling experienced current or former nurses (including retired nurses) into advanced postsecondary credentialing necessary for nurses to become nursing instructors and educators” (FOA, p. 2). Preceptors may play a necessary or beneficial role for participants who receive nursing instruction *as part of their training to become nurse educators or instructors*. Preceptorship is not a requirement in Track 1, however.

It is anticipated that training that is focused on preparing experienced nurses to become preceptors is not typically training that leads to a postsecondary credential that will enable the experienced nurses to advance along a career pathway to middle- to high-skilled jobs. Grant funds cannot be spent to provide standalone professional development or continuing education credits that do not result in an industry-recognized postsecondary credential or certification to any participant, including preceptors.

Prerequisites or Pre-Nursing Programs

Grant funds cannot be used to provide financial support for prerequisite training or to pre-nursing students before they are formally pursuing a nursing degree. On page 6, the FOA states, “[t]he DOL Nursing Expansion Grant Program will expand the pipeline of nursing professionals by providing nursing career pathways training and employment programs to train participants as frontline healthcare professionals and paraprofessionals, including direct care workers, seeking to advance to quality jobs along the nursing career pathway.” Supporting pre-nursing students, who may or may not continue into a nursing degree program, does not align with the intent of the FOA to support people in nursing programs who are committed to completing a nursing degree.

Further, “pre-nursing” as a pre-professional path of study is not a recognized postsecondary credential. The FOA emphasizes training that leads to recognized postsecondary credentials. For example, page 10 of the FOA states that career pathways programs must lead “to attainment of recognized postsecondary credentials.”

Recognized Postsecondary Credentials

Grantees are required to incorporate a career pathways approach in their training programs, which offer a clear sequence, or pathway, of education coursework and/or training credentials aligned with employer-validated work readiness standards and competencies and integrate academic and occupational skills training.

Career pathways programs must incorporate the needs and hiring opportunities of employers and provide planned and sequenced coursework, training, and/or work experience that leads to attainment of recognized postsecondary credentials. Although there may be instances when a training program leads to employment for individual participants independent of a credential (e.g., due to timelines imposed by licensure exams, etc.), all training programs should include the opportunity to earn postsecondary credentials. Guidelines for determining the validity of a postsecondary credential can be found in [Training and Employment Notice \(TEN\) 25-19: Understanding Postsecondary Credentials in the Public Workforce System](#).

Signed Commitments Between Participants and Employers

Grant- or match-funded training models that include tuition assistance or loan reimbursement to participants only in exchange for participants committing to work for employer partners are prohibited. This prohibition includes signed agreements, implied arrangements, institutional pressure, or other agreements or arrangements that hinder job mobility and employment choice for participants.

Projects developed with Nursing Expansion grant funds must provide opportunities for career advancement in quality jobs for underserved populations that have been unable traditionally to afford the training costs for such jobs. As described in the FOA, “applicants are encouraged to propose training strategies that use a combination of both H-1B grant funds and match funds, as well as other leveraged funding sources, to help defray grant participant tuition costs, in order to maximize the reach and impact of the grant” (pg. 15-16). Project designs that encourage or require participants to take on loans or pay tuition up front and then sign agreements with employer partners for tuition or loan reimbursement that contain penalty clauses for breaking them, as the method for reducing or eliminating a participant's training debt conflicts with a key purpose of this grant program to reduce the financial burden on participants.

In addition, a core requirement of this grant program is to provide a worker-centered sector strategy approach to training and employment by “embed[ding] job quality into [the grantees’] program design to ensure meaningful impact on, and benefit to, the nursing workforce” (FOA, p. 12). Providing a worker-centered and quality jobs approach includes worker choice and voice in their employer and terms of employment.

Training Activities for Currently Employed Workers (i.e., Incumbent Workers)

Participants who are employed at program entry, but not underemployed, are considered incumbent workers under the definition in the FOA and are subject to the incumbent worker training restrictions. Please see Participant Eligibility and Target Populations for the definitions of the terms “underemployed” and “incumbent worker” in the Nursing Expansion FOA.

Incumbent workers cannot participate in paid work experiences, such as OJT, paid internships, and other work experiences. Incumbent workers can participate in Registered Apprenticeship Programs (RAPs); however, grant funds may not be used to reimburse the employer for any incumbent worker wages, even during time as an apprentice. Paying any portion of wages for incumbent workers is an unallowable cost with grant or match funds.

Employers using a Registered Apprenticeship Program model may have other costs for training incumbent workers that can be reimbursed, such as the costs of administration and monitoring apprentices. The grant funds can also pay for the Related Technical Instruction (RTI) portion of the RAP for incumbent workers.

Training Along a Nursing Career Pathway

The intent of Track 2 is to “expand the pipeline of nursing professionals by *providing nursing career pathways training* and employment programs to train participants as frontline healthcare professionals and paraprofessionals...” (FOA, p. 6). Nursing Expansion Grantees must develop program designs that include strategies for participants to “advance along a career pathway and attain postsecondary credentials needed for middle- to high-skilled nursing occupations **during the grant period of performance**” (FOA, p. 2). “On-ramps” to nursing credentials or healthcare training programs that do not lead to opportunities to advance into a middle- to high-skill nursing career during the grant are not allowable.

Participant Tracking and Reporting

Documentation and Records

WIPS is not a case management system. It is the responsibility of the grantee to maintain all participant records in accordance with the requirements of the FOA. Grantees should manage their case files in the way that is best suited to meet their needs and that ensures Personally Identifiable Information (PII) is protected. Case files will need to be accessible to Federal Project Officers (FPO) during monitoring reviews.

Enrollment During the Fifth Year of the Grant Period of Performance

The grant period of performance is 60 months (five years). Grantees are prohibited from enrolling any new participants after the end of the fourth year of the period of performance. The final 12 months of the period of performance must be spent ensuring participants who began training during the first 48 months of the grant complete their training programs and capturing program completion outcomes such as credential attainment and employment placements. Grantees are expected to meet the total enrollment target by the end of year 4, and all other targets set for all performance measures during the period of performance.

Grantee Reporting Requirements

Each quarter, grantees will certify and submit a Quarterly Performance Report (QPR) and a Quarterly Narrative Report (QNR) in the Employment and Training Administration's (ETA's) reporting system for grantees, the Workforce Integrated Performance System (WIPS).

To generate a QPR, grantees upload a participant data file each quarter containing the applicable code values for grant participants on the data elements that have been identified in the current version of the H-1B Participant Individual Record Layout (PIRL). The data file must be uploaded in WIPS before the Grant Authorizing Official (AO) can certify the QPR and officially submit it to DOL/ETA.

Grantees also submit their QNR in WIPS. Attaching a copy of the QNR without reporting the information directing into the WIPS QNR form is not acceptable for meeting the QNR reporting requirement.

Making Changes to a Data File

If a data file is incorrect, you can upload revised data files for the reporting quarter until the data is error-free. Once an H-1B QPR form has been generated and certified, contact NursingExpansion@dol.gov for instructions about how to proceed. In general, revisions should not be made to a certified file. If an H-1B QPR form has been generated and certified but later found to have errors, grantees should make corrections in the data file that is submitted in the subsequent quarter.

Re-Enrolling Participants

Participants who have not received a training or service for 90 days must be exited from your grant program. If a participant who has been exited returns to take additional training, grantees should report that individual as a new participant when they are re-enrolled.

Reporting an Individual as a Participant

An individual becomes a grant participant when they receive a grant-funded service or training beyond a determination of eligibility. Grantees should not report an individual in their data file until they receive their first grant-funded service or training. Each person who receives grant-funded services or training must be tracked and reported.

Requirement to Collect Social Security Numbers (SSNs)

As part of performance reporting requirements, grantees are required to request and collect participant Social Security Numbers (SSNs) and provide these to DOL/ETA as part of the quarterly reporting process. SSNs are required for the employment-based WIOA primary indicators of performance, as H-1B program grantees do not generally have access to the state Unemployment Insurance wage records needed to track and report exit-based employment rates and median earnings. Therefore, DOL/ETA will match wage records on behalf of grantees, in order to capture these specific employment-based outcomes for participants.

To ensure that the WIOA primary indicators of performance are calculated and reported consistently across all discretionary program grantees, all grantees are required to submit the collected participant SSNs regardless of whether the grantee may have the ability to report outcomes based on wage records. Therefore, while grantees should ensure that they are collecting this information from participants, they should inform the participants of the reason for requesting SSNs. **Please note, grantees are required to ask participants for their SSN, but if a participant chooses not to disclose this information, they cannot be denied services. Participants should not be pressured into providing personally identifiable information if they are not comfortable doing so.**

Track 1 only – Reporting Measurable Skills Gains

Grantees in the Nurse Education Professional track were required to provide a target for the following outcome measure: **Total Number of Participants Who Began Receiving Education/Job Training Activities and Achieved a Measurable Skills Gain.** This performance outcome measure is defined as the total number of participants who are enrolled in an education or training program that leads to a recognized postsecondary credential or employment and who achieve a measurable skills gain, which is defined as a documented academic, technical, occupational, or other form of progress towards such a credential or employment.

Examples of measurable skills gains include, but are not limited to, completion of on-the-job training, completion of one year of an apprenticeship program, or successful completion of a required occupational exam. Track 1 grantees report whether measurable skills gains were achieved by participants in their QPR data files using the PIRL data element 1809: Date of Most Recent Measurable Skill Gains: Training Milestone or PIRL data element 1810: Date of Most Recent Measurable Skill Gains: Skills Progression, depending on the type of measurable skills gain. More information on the type of measurable skills gains can be found in the H-1B Grants Performance & WIPS Guidance Handbook located on the [Key Reporting Resources web page](#) for Nursing Expansion.

Track 2 only – Reporting on the Number of Nurses Placed into a Preceptor Role

Nursing Career Pathways Track grantees were required to provide a target for the following outcome measure: **Total Number of Experienced Nursing Professionals Who Were Placed into a Preceptor Role**. This outcome measure should be interpreted as the number of experienced nursing professionals who begin actively performing preceptor duties, which are explained in the FOA as “having one-on-one relationships with nursing students, novice nurses, and experienced nurses, to prepare them for working in a clinical setting” (p. 6). Each quarter, Track 2 grantees should report the cumulative number of preceptors who were placed into a preceptor role as a result of the grant using their Quarterly Narrative Report (QNR), Section XI.C. *Additional Information*.

Other Policies and Requirements

Grant Amendments to the Statement of Work

Requests for Adding Employer Partners

Nursing Expansion grantees may expand their employer partners to ensure continuity of employment and training programming in the healthcare industry within the grantee's proposed geographic scope.

The FOA states that grantees are required to have “[a] minimum of four (4) employer partners who are committed to concrete hiring into quality jobs participants trained through the grant. An applicant may meet this employer partnership requirement through establishing a partnership with one hospital system with at least four (4) departments or specialties included to meet the employer partner threshold; or an industry/trade association that represents at least four (4) employers who are committed to hiring participants trained through the grant” (p. 24).

DOL anticipates some situations in which grantees may add employer partners without submitting a grant amendment. However, adding an employer partner may require an amendment under certain circumstances, including (but not limited to) the following:

- The grantee is adding an employer partner to replace a partner that was originally included in its SOW in order to meet the FOA requirements for number of employer partners;
- The new employer partner will provide match or leveraged funds; and/or
- The new employer partner is playing a significant role in meeting the grant's performance outcomes.

Please discuss the addition of new employer partners with your FPO to determine if a grant amendment is necessary.

Requests for Changes to Grant Service Area

The Nursing Expansion partnership service areas in each grant that were identified by grantees in their applications were part of the scoring criteria in the Nursing Expansion grant application. The National Program Office will not typically consider a service area change unless there is a compelling reason, such as a major economic event in the service area that changes the ability to implement the grant in the designated area. To consider a service area change, the National Program Office would need a strong justification for how a change to the service area aligns with the current workforce partnership, per the definition in the FOA.

Additionally, changing the service area may require the grantee to expand their workforce partnership to include the workforce agencies and other partners, including the requisite employer commitments,

in those additional areas; and grantees would need to provide documentation that those partnerships are in place, or there is a commitment by the required partners in those areas that they will actively participate in the grant.

If a grantee's request to change the service area is due to recruitment challenges in the current service area, it may be more effective for the grantee to work with their FPO on assessing and modifying their current outreach/recruitment strategies within the current service area.

Grant Profit

For all grant recipients and sub-recipients, the earning of profit is not an allowable activity. Earnings above actual costs incurred are to be treated as program income. Any program income earned must be used for program purposes. See 2 CFR 200.307 for further guidance.

Intellectual Property Rights

DOL Nursing Expansion grantees are required to make works created with the support of the grant available and public under a Creative Commons Attribution 4.0 (CC BY) license or other open license site. Work that must be licensed includes both new content created with the grant funds and pre-existing, grantee-owned content that is modified using grant funds. This is described in Section IV.E of the FOA.

For general information on open license requirements, please visit: [Open Licensing / Open Educational Resources \(OER\) – Technical Assistance for ETA Grants](#).

Recording and Transcribing DOL-Sponsored Events

It is the policy of the Department of Labor (DOL) to ensure that electronic communications that are presented by DOL or other parties representing the agency be conducted with full transparency. The Nursing Expansion Program Office will always inform attendees if a DOL-sponsored event is being recorded. **The Department does not endorse or support the unauthorized recording or transcription of its sponsored events, including office hours, peer-to-peer events, meetings, or any other virtual events conducted by DOL. Bots are also not permitted in DOL-sponsored events and DOL reserves the right to refuse entry to any unverified participants in DOL-sponsored or supported events.** If you need accommodations to participate in a DOL event, please let us know by sending an email to NursingExpansion@dol.gov at least 24 hours before the event launch.

Please be aware that DOL cannot fully monitor recording activities by external parties. If you are concerned about your privacy, you may opt for audio-only participation in events by disabling your video.

Other Important Policy Resources

Grantees are encouraged to review additional policy documents available from DOL/ETA. Key policy resources include:

- [Nursing Expansion FOA](#)
- [Grantee Handbook](#) on the goals and expectations for managing an ETA competitively-awarded grant
- [SMART eLearning](#) on monitoring, accountability, risk mitigation, and transparency
- [Uniform Guidance 2019 Overview Online Training](#), which covers the administrative requirements, cost principles, and audit requirements for federal awards (note that there have been recent changes to the Uniform Guidance, which take effect on October 1, 2024, and which can be viewed at the [Uniform Guidance website](#))
- [Core Monitoring Guide](#), which is used by federal staff to review grant recipients' core activities
- [H-1B Grants Performance Reporting and WIPS Guidance Handbook](#) for Track 1 and Track 2, which provides instructions for grant reporting

Note that this list of policy resources is not exhaustive and grantees should consult with their FPOs about other policy resources, as appropriate.