

## Workforce Pell Standards & Definitions Brief: HIGH-WAGE

In March 2026, the Department of Education (ED) released [draft Workforce Pell regulations](#), giving governors flexibility to define a number of key standards. This brief is part of a series on key implementation terms, focused on quality. **Final details and these draft recommendations may change when ED issues final regulations this spring.**

### WORKFORCE PELL REQUIREMENT

An eligible program “[...] provides an education aligned with the requirements of high-skill, **high-wage** (as identified by the State pursuant to section 122 of the Carl D. Perkins Career and Technical Education Act (20 U.S.C. 2342)), or in-demand industry sectors or occupations; [...]” [Perkins V](#) gives states the [responsibility](#) to set the definition of **high-wage**; about [half](#) of states have done so. Governors may want to use the Workforce Pell process to align this standard with Perkins V and WIOA. New [guidance](#) from ED simplifies states’ ability to update their Perkins V definitions.

### ED’S PROPOSED REGULATION

States create a process for an institution to request a determination for whether a program meets this standard (among other requirements). That process includes the criteria, including the methodology and periodic review (at least every two years alongside WIOA plan creation and modification). [*§ 690.93, p.18*]

### WHERE TO FIND AND ALIGN EXISTING DEFINITION(S) ACROSS WORKFORCE FUNDING

Existing definitions may already exist under [Perkins V state plans](#) or [associated documents](#); eligibility criteria for [free community college](#) or financial aid programs; [quality non-degree credential definitions](#); [critical occupations lists](#); [statewide goals](#); [WIOA state plans](#) (or [associated documents](#)); [intermediaries](#) working with the state; and [state funding formulas](#).

### KEY CONSIDERATIONS/OPTIONS FOR HIGH-QUALITY IMPLEMENTATION

- **Set a benchmark or wage threshold.** A state’s benchmark could link to the median annual wage in the state, the approach [taken by many states](#) in setting Perkins V definitions, or to the living wage threshold for a single adult, using the [MIT Living Wage Calculator](#) or similar measure. The latter approach would capture more occupations, but may align less closely to the key term: “high.”
- **Determine what will be measured against the benchmark.** A Governor could determine whether a program is connected to a **high-wage** occupation by measuring whether graduates earn the benchmark wage using program outcomes data [based on](#) administrative wage records. This is the most precise measure of alignment to a **high-wage** occupation, but requires appropriate linkages between program participation and wage outcomes. If states lack program data, they can benchmark against the median wage in the state for workers in that occupation. This approach may be less precise because Standard Occupational Classification (SOC) codes often include a wide range of occupations that may vary from the occupation a student is training for in a particular program.
- **Improve consumer/state oversight information.** Governors could report on disaggregated wage outcomes for BA holders, wage outcomes beyond the required 3 years, earnings growth after program completion, and programs with wages close to the threshold.
- **Consider interactions with other terms.** The law requires programs to align with requirements of a **high-wage**, high-skill, OR in-demand sector or occupation. A Governor focused on ensuring that all graduates earn a living wage could build in aligned wage thresholds across all three measures.