

## Workforce Pell Standards & Definitions Brief: PORTABLE

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

A program is eligible only if the Governor of a State, after consultation with the State board, determines that the program either leads to a stackable and **portable** (across more than one employer) recognized postsecondary credential, or prepares students for an occupation with only one recognized credential and awards that credential upon completion.

### ED'S PROPOSED REGULATION

Requires states to have a process for an institution to request a determination as to whether a program meets this requirement, including having a written policy for determining if a credential is stackable and **portable** that establishes “documented connections to additional credentials, considers, if available, data showing whether students have obtained additional credentials through career pathways, real-time labor market information, and includes a process for employer validation.” [*§ 690.93, p. 20-21*]

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

Possible sources may include: [Perkins V state plans](#); [WIOA State Plans](#); [state workforce development board materials](#) and [related materials](#); [evaluation of non-degree credentials](#); [“credential of value” policies](#) ; [approval policies for new academic programs](#); [state financial aid programs](#); and [state code](#).

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

Existing [DOL guidance](#) suggests looking at whether a credential is recognized in other settings (geographic, institutional, or business), and governors will need to determine how to measure this recognition.

Governors may want to consider:

- **Measuring portability across employers related to the field of study:** Governors could consider whether a significant share of individuals are working in the intended target occupation at more than one employer (to avoid very customized programs where completers are not using their credential). This would also align with the eventual requirement for 70% job placement in-field. States still building occupational data through administrative records may need to rely on a manual process and could focus on verifying portability of credentials at greatest risk of not being portable (e.g., those offered to only a few workers or at a single location).
- **Portability across regions:** Whether individuals with the credential are employed in the target occupation across multiple counties within a state or in other states (to the extent data is available—especially neighboring states where residents may work).
- **Portability across educational institutions:** Governors can work with institutions of higher education to help align credentials to enable transferability of the same amount of credit across all institutions. (See also: stackable.)
- **Incorporating employer validation:** Governors may consider supplementing key measurements by reviewing whether a credential has been endorsed by a national industry association or other relevant organization, or by surveying select employers to certify that more than one employer considers the credential a valid indicator that a worker has skills and competencies required for the intended occupation.