

## Workforce Pell Standards & Definitions Brief: ALIGNED TO EMPLOYER NEED

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

*“(iii) the Governor of a State, after consultation with the State board, determines that the program— (I) 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; (II) **meets the hiring requirements of potential employers in the sectors or occupations** described in subclause (I); [...]*”

### ED’S PROPOSED REGULATION

Requires states to create a process for an institution to request determination of whether a program meets requirements. This includes the criteria, including the methodology and periodic review (at least every two years alongside WIOA plan creation and modification) of whether a program meets the hiring requirements of potential employers (among other requirements). The written policy must:

- Consider whether expected competencies align with the competencies needed in such high-skill, high-wage, or in-demand sectors and occupations; and
- Incorporate direct input from employers, which may be secured from the state board and local workforce development boards, industry or sector partnerships, sponsors of Registered Apprenticeship programs, joint labor-management partnerships, or through other methodologies established by the State. [*§ 690.93, p.19-21*]

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

State documents/programs that may use this or a similar term (such as “industry-driven,” “responsive to **employer needs**,” or “aligned to the labor market”) include: [Perkins V plans](#) and [associated documents](#); [WIOA State Plan](#); [financial aid scholarship programs](#); [initiatives or programs partnering with industry](#); and [state workforce investments](#).

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

Governors have significant ability to make this standard meaningful and to address potential quality gaps. For example, governors could:

- **Request program-specific attestations:** Consider asking for institutions to submit documentation that one or more employers helped develop curriculum for the specific program at issue, have previously hired from the program, or are committing to interview or hire from the program.
- **Build in requirements to help fill in potential quality gaps:** If governors do not require each program to submit full documentation from employers and instead relies on board or sector validation, they may still consider requiring certain programs that provide weaker evidence of employer connection under other requirements to demonstrate hiring or interview commitments from employers — particularly if programs are new or where occupational data is lacking.
- **Consider other indicators for transparency or added review, such as:**
  - Mapping and verifying skills and competencies provided in programs against real-time labor market data available through job postings.
  - Whether participants remain in the intended occupation/progress along the career pathway.
  - Whether wages increase over time, showing that hiring needs are met in the long-run.