

## Workforce Pell Standards & Definitions Brief: STACKABLE

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

States must have a process for institutions to request a determination as to whether a program meets this requirement. This includes 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

[Perkins V state plans or associated documents](#); [state workforce development board materials](#); [career pathways](#); [WIOA state plans](#); ["Credential of Value" policies](#); and [financial aid programs](#). Some states may simply [refer](#) to a definition provided by ED in [memos](#) or [reports](#).

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

Commonly-cited [DOL guidance](#) describes **stackable** as part of a "sequence of credentials that can be accumulated over time" to move individuals along a career path. Governors can build on this description and demonstrate how to measure and provide accountability as to whether a program is truly **stackable**. To do this, state leaders can consider how to identify where each credential fits within a structured career pathway, including relevant occupations, skills, and credentials (which may require expanded data collection), and could consider a range of ways to measure stackability, including whether a credential:

- **Transfers seamlessly to postsecondary work** through acceptance for credit or hours in required program courses at an institution of higher ed (e.g., through a documented articulation agreement). To the extent possible, the same amount of credit is transferable across all institutions.
- **Counts toward hours in an aligned Registered Apprenticeship (RA) program**, or, in the case of a preapprenticeship, prepares for entry into an RA program (e.g., through a documented agreement).
- **Is part of a prescribed sequence of industry-recognized credentials** that shows progressive skill development and qualifies credential earners for advancement in their industry, as long as that sequence has been formally adopted by the state and explicitly includes the short-term credential.
- **Results in a significant share of graduates obtaining related credentials and sustained earnings increases**. While this will vary by credential and state, governors could consider setting a target share of completers who obtain further credentials and the time it takes most completers to reach the state's living wage threshold. This would allow governors to identify and mitigate the challenge of a short-term program being **stackable** in theory, but not in practice)