

Workforce Pell Standards & Definitions Brief: HIGH-SKILL

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; [...].”* Governors may want to use this process to align this standard for Workforce Pell, Perkins V, and Workforce Innovation and Opportunity Act (WIOA) programs. New [guidance](#) from ED simplifies states’ ability to update their Perkins V definitions.

ED’S PROPOSED REGULATION

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

WHERE TO FIND EXISTING DEFINITION(S) ACROSS WORKFORCE FUNDING

States may already have defined **high-skill** under their [Perkins V state plan](#), [CNLA](#), or associated documents. The term may also be referenced in other materials (and may or may not be defined), including a [WIOA state plan](#) (or [associated documents](#)), and plans from [intermediaries](#) working with the state. Note: a state’s financial aid program may define or reference **high-skill** (or use similar terms such as “[middle-skill jobs](#)”).

KEY CONSIDERATIONS/OPTIONS FOR HIGH-QUALITY IMPLEMENTATION

Many existing state definitions of **high-skill** are written primarily for K-12 programs looking to qualify for Perkins funds. On the other extreme, some state definitions may define level of skill by the length of a program (for example, one that requires a higher level degree), an interpretation that would not be relevant to Workforce Pell programs. And because **high-skill** can be subjective, many existing state definitions are written in a way that makes it difficult to rigorously measure, creating the potential to inadvertently provide an easy loophole for lower quality programs to qualify for access to funds. Governors may consider:

- **Incorporating a wage threshold** of a [living wage](#), to help ensure consistency across these terms. Otherwise, because a program must only show that it is “**high-skill**, high-wage, OR in-demand,” a program may meet looser **high-skill** standards without showing real labor market returns.
- **Clear and measurable ways to capture exceptional skill needs**, such as a credential that has exceptionally high-demand or demand/supply misalignment that goes beyond the “in-demand requirement” (signaling an elevated need for particular skills), a state licensure connected to strategic priorities for economic development, or a Registered Apprenticeship. Doing so would help states avoid opening up a “loophole” through a loose interpretation of this term, and can also be applied across workforce funding streams.