



**WORKFORCE PELL**  
DATA COLLABORATIVE

# Model Workforce Pell Data Framework

March 2026

[WorkforcePellData.org](http://WorkforcePellData.org)

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## Model Workforce Pell Data Framework: Recommended Elements for State Agencies and Education Institutions

The organizations identified in Appendix 1 have collaborated on this Model Workforce Pell (WFP) Data Framework to guide data collection at both the institutional and state levels. The data elements in this framework draw on the proposed WFP regulatory text issued by the U.S. Department of Education following negotiated rulemaking through the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) committee (the “WFP Proposed Rules”). The model framework also incorporates data elements and best practices from many federal and nationally leading data frameworks and taxonomies, including those listed in Appendix 2. Where the framework includes a regulatory reference, the citation is to the Code of Federal Regulations as proposed for amendment by the WFP Proposed Rules. As the WFP Proposed Rules are modified through public comment and adopted, this model framework will be updated.

This framework is intended for state agencies, Governors’ offices, state workforce boards, and Title IV–eligible postsecondary institutions responsible for implementing and overseeing WFP–eligible programs. It is designed to support state policy development, data system planning, and program approval and accountability processes under the WFP Proposed Rules. The framework enables states and postsecondary institutions to meet regulatory requirements while maximizing the reuse and value of WFP data to support WIOA alignment, credential transparency, consumer information, and longitudinal outcomes analysis.

The framework organizes data elements into four “pillars” that support WFP program approval, reporting, accountability, and transparency:

 <p><b>Employer Alignment</b></p>	<p>Information on labor market and employer needs to ensure WFP programs are aligned to the requirements of high-skill, high-wage, or in-demand sectors and occupations, and otherwise address employer hiring requirements. Generally, Employer Alignment information will be established at the state-level.</p>
 <p><b>Program-level</b></p>	<p>Information on the provider of the program, the program characteristics (such as length and delivery mode), and how the program stacks into other postsecondary education programs. Program-level information will be reported by the WFP provider to the state, who will then use this information for various approval and compliance purposes.</p>
 <p><b>Participant-level</b></p>	<p>Information on the individual participants in WFP programs needed for compliance with regulatory requirements and outcomes analysis. Similar to Program-level elements, Participant-level information will be reported by the WFP provider to the state, who will then use this information for various approval and compliance purposes.</p>
 <p><b>Employment &amp; Pathway Outcomes</b></p>	<p>Information on employment, earnings, and educational advancement outcomes. Employment and Pathway Outcomes will be calculated by the federal government and the state. State calculations will use Program- and Participant-level data along with administrative records, such as wage records collected for the unemployment insurance (UI) program.</p>

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Within each pillar, data elements are categorized as either **Essential** or *Important*.

- **Essential** elements are those needed to support compliance with the WFP Proposed Rules, including Governor determinations, required federal submissions, and required outcomes calculations.
- *Important* elements support state policy analysis, consumer information, and program and system improvement. While a state should consider these elements for all of its nondegree data collections, these elements are not necessary for WFP compliance and may be phased in over time.

The framework is not prescriptive; rather, it provides a common reference and best practice guidance for identifying data elements that support regulatory compliance, cross-program alignment (including with WIOA), consumer information, and longer-term analysis of program outcomes and employment and education pathways. Depending on the state context, additional elements may be needed to support specific policy objectives or to meet the requirements of state funding streams. Additionally, a state may elect to use a smaller subset of these elements for noncredit and microcredential reporting by programs that are not seeking WFP eligibility.

When implementing this framework, no state or institution is starting from scratch—many of these elements already exist within current education and workforce data systems and can be aligned or extended to support this framework. States and institutions should consider a phased approach that includes:

1. Mapping the framework against existing collections and determining responsibilities across agencies and institutions
2. Prioritizing Essential elements needed for initial program approval (within the Employer Alignment and Program-level pillars)
3. Implementing Participant-level data collection systems that are necessary for critical compliance and outcomes determinations
4. Layering in Important elements aligned to state priorities and capacity

In general, all data elements should be managed and collected at the record-level using [structured, linked](#), and [interoperable](#) data formats (aligned to national standards where feasible) to ensure they are machine-readable, searchable, and able to integrate with other education and employment datasets. Additionally, states should plan to publish aggregate, privacy-protective participant and outcomes information as [open data files](#) and [interactive resources](#) to ensure maximum data access and usability.



## I. EMPLOYER ALIGNMENT PILLAR

Category	Essential or Important / Regulatory or Other Source Reference	Implementation & Timing
<p><b>High-skill, High-wage, or In-demand:</b> Methodology, definitions, and listing of high-skill, high-wage, or in-demand (HHI) industry sectors or occupations.</p>	<p><b>Essential:</b> The Governor must determine that a program provides an education aligned with the requirements of high-skill, high-wage, or in-demand industry sectors or occupations (34 CFR 690.91(1); 690.93(a)(1)).<sup>1</sup></p>	<p>(i) The methodology and listing of HHI sectors or occupations must be done not less than every two years concurrent with development and modification of the WIOA State Plan (34 CFR 690.93(b)(1)(i)). The WFP Proposed Rules provide flexibility for more frequent updates, and/or states establishing more targeted priorities (e.g., aligned to economic development goals, or requiring programs to be high-wage <i>and</i> in-demand).</p> <p>(ii) Governor’s program approval process must determine that each program provides an education aligned with requirements of HHI sectors or occupations (34 CFR 690.93(a)(1)).</p> <p>(iii) States should reconsider HHI alignment as part of the Governor’s continued approval process prior to the expiration of an institution’s Program Participation Agreement<sup>2</sup> (34 CFR 690.93(f)).<sup>3</sup></p>

<sup>1</sup> “High-wage” under WFP is the same as identified by the State pursuant to section 122 of the Perkins Act (690.93(a)(1)).

<sup>2</sup> An institution’s Title IV Program Participation Agreement (PPA) is typically for a six-year period (34 CFR § 668.13(b)(1)). States may have institutional PPAs expiring in any year, meaning Governors must establish continued approval processes as soon as the year after initial program approval.

<sup>3</sup> A Governor’s process to provide a certification of continued approval is to be “determined by the Secretary.” The requirements for this process have not yet been proposed by ED.

Category	Essential or Important / Regulatory or Other Source Reference	Implementation & Timing
<p><b>Employer Hiring Requirements:</b> Methodology for determining and description of the hiring requirements of potential employers in the HHI sectors or occupations.</p>	<p><b>Essential:</b> The Governor must determine that a program meets the hiring requirements of multiple potential employers, with a written policy that considers expected competencies (see following element) and incorporates direct input from employers (34 CFR 690.93(a)(2); (b)(1)(ii)). If the program prepares students for employment in an occupation for which there is only one recognized postsecondary credential, the program must provide students with such a credential upon completion (34 CFR 690.93(a)(3)).</p>	<p>(i) The Governor’s program approval process must include a written policy describing how this determination will be made (34 CFR 690.93(b)(1)(ii)). The WFP Proposed Rules provide flexibility regarding how employer input is obtained. Input could be at the sector or occupational level, not necessarily program-by-program. Input should include direct employer engagement; not overreliance on proxy labor market information.</p> <p>(ii) The Governor’s program approval process must determine if <i>each program</i> provides an education aligned with the hiring requirements of employers in the HHI sectors or occupations (34 CFR 690.93(a)(2)).</p> <p>(iii) States should reconsider alignment to employer hiring requirements as part of the Governor’s continued approval process.</p>
<p><b>Competencies:</b> Methodology for determining the expected competencies for which a program’s credential intends, and the competencies needed for HHI sectors or occupations.</p>	<p><b>Essential:</b> In determining whether a program meets employer hiring requirements, the Governor must consider the alignment of the competencies validated by the program’s credential with those needed in HHI sectors or occupations (34 CFR 690.93(a)(2)); (b)(1)(ii)(A)).</p>	<p>(i) The Governor’s program approval process must include a written policy for how the state will determine competency alignment (34 CFR 690.93(b)(1)(ii)). The WFP Proposed Rules provide flexibility for how competencies are defined and how alignment is determined.</p> <p>(ii) The Governor’s program approval process must determine each program provides an education aligned with the hiring requirements of employers in the HHI sectors or occupations that considers the expected competencies for which the program’s recognized credential intends (690.93(a)(2)).</p> <p>(iii) Competency alignment should be reassessed during the Governor’s continued approval process.</p>
<p><i>* Note on Registered Apprenticeship-related technical instruction (RTI):</i></p>		<p>Under the WFP Proposed Rules, RTI is deemed to meet the above Employer Alignment requirements as RTI has already been employer-validated. However, the RTI must independently meet other WFP regulatory requirements (length, leading to a recognized postsecondary credential, employment outcomes, etc.).</p>



## II. PROGRAM-LEVEL PILLAR

### Reporting Entity:

Postsecondary institutions report program-level data to a state entity designated by the Governor. The state entity maintains and uses this information for Governor approval and continued approval processes and for submission to the U.S. Department of Education. States may also use program-level data to populate a centralized credential registry or other consumer information tools.

### Reporting Timing:

- Initial institutional reporting: Prior to Governor approval of an eligible workforce program
- Updated institutional reporting:
  - Update any material program change on an annual basis
  - Require resubmission and updates prior to Title IV Program Participation Agreement (PPA) renewal

### Record Structure:

- One record per eligible workforce program, identified by a state-issued program identifier
- Program records may be versioned over time to reflect approval status changes or updates

Category	Element	Essential or Important / Regulatory or Other Source Reference
<b>Provider Identification</b>	Provider OPEID	<b>Essential:</b> The 8-digit OPEID allows postsecondary institutions and campuses to be accurately and consistently linked across multiple education, workforce, and federal datasets.
	Provider PPA Expiration Date	<b>Essential:</b> The Governor’s certification of continued approval must occur prior to the expiration of an institution’s Title IV Program Participation Agreement (34 CFR 690.93(a)).
	Provider Accrediting Body	<b>Essential:</b> While individual programs are not required to be accredited, institutional accreditation is required for Title IV participation and is necessary to establish institutional eligibility (34 CFR 600.4(a)(5); 690.90).
	Provider Type	<i>Important:</i> Capturing the organizational type of the provider (community college, four-year institution, private provider, labor agency, etc.) enables analysis of participation and outcomes by provider type.

Category	Element	Essential or Important / Regulatory or Other Source Reference
	Provider EIN	<i>Important:</i> The provider EIN supports integration with the <a href="#">Harvard Workforce Almanac</a> for a nationally comprehensive mapping of workforce training providers.
	State Provider ID	<i>Important:</i> A state-issued provider ID allows WFP program data to be linked to other datasets using that same ID. Use of a provider <a href="#">Credential Transparency Identifier (CTID)</a> represents good practice to support publication in the <a href="#">Credential Registry</a> and linkage to other datasets.
<b>Program Identification</b>	State Program ID	<b>Essential:</b> A state-issued program ID provides a consistent, authoritative identifier that allows WFP program data to be accurately tracked and linked. Use of a program <a href="#">CTID</a> represents good practice to support publication in the <a href="#">Credential Registry</a> and linkage to other datasets.
	Program Name	<b>Essential:</b> The Governor must submit the program name to the Secretary (34 CFR 690.93(d)(1)).
	Program Implementation Date	<b>Essential:</b> The date on which the program was first offered in alignment with the requirements described in 34 CFR 690.93(a). The Governor must certify to the Secretary that the program meets, and has met, these requirements for the 12 months immediately preceding the certification (34 CFR 690.93(d)(4)).
	Program Approval Date	<b>Essential:</b> The date the program was initially approved by the Governor. The program approval date must be submitted by the Governor to the Secretary (34 CFR 690.93(d)(5)).
	Related Instruction for Registered Apprenticeship Program (if applicable)	<b>Essential:</b> Programs serving as the related instruction component of a Registered Apprenticeship Program are deemed to satisfy certain employer-alignment requirements for Governor approval (34 CFR 690.93(g)).
	Outsourcing (if applicable)	<b>Essential:</b> The percentage of the program offered by an institution or program other than the Provider. Under the WFP Proposed Rules, no more than 25% of the program can be offered by an institution or organization ineligible for Title IV (34 CFR 668.5).

Category	Element	Essential or Important / Regulatory or Other Source Reference
	Bilateral State Approval (if applicable)	<b>Essential:</b> Identifies programs operating under a bilateral agreement allowing cross-state enrollment, thereby flagging the need for coordination on determining HHI and Employer Hiring requirements (from the Employer Alignment pillar) and data sharing for completion and placement outcomes (34 CFR 690.93(h)).
	Program Status	<b>Essential:</b> Indicates whether a program is currently approved and enrolling students, temporarily inactive, or permanently superseded or discontinued.
	WIOA ETPL Program ID (if applicable)	<i>Important:</i> The WIOA ETPL Program ID supports WIOA reporting and enables states to identify overlap and alignment between WFP-eligible programs and WIOA-funded training.
<b>Resulting Recognized Postsecondary Credential:</b> <i>What credential do participants earn upon successful completion of the program?</i>	Resulting Credential Name	<b>Essential:</b> Specifies the official name of the recognized postsecondary credential awarded upon successful completion of the program (34 CFR 690.93(a)(3)).
	Resulting Credential Type	<b>Essential:</b> The resulting credential must be one of the following credential types: an industry-recognized certificate, industry-recognized certification, certificate of completion of a registered apprenticeship, license, or degree (34 CFR 690.92(d)).
	Resulting Credential Competencies	<b>Essential:</b> Describes the competencies or skills validated by the resulting credential, which, as part of the Governor’s approval, must be determined to align with employer hiring requirements of HHI sectors or occupations (34 CFR 690.93(b)(1)(ii)(A)). While a state could use various forms of evidence to document competencies, collecting structured competency data using <a href="#">CASE</a> or <a href="#">CTDL Achievement Standard Network</a> formats allows competency information to be reused across verified digital credentials, consumer information systems, and employer alignment analyses, ensuring that skills validated by a program are machine-readable, comparable, and usable beyond a single institutional or program context. States should consider a phased approach to structured competency data requirements to ensure high quality and usability.
	Program-to-	<b>Essential:</b> Defines how program completion leads directly to resulting credential attainment (34 CFR 690.93(a)(3)). <a href="#">Credential Transparency Description Language (CTDL)</a> elements can be used to document this

Category	Element	Essential or Important / Regulatory or Other Source Reference
	Credential Relationship	relationship, including whether the program <i>is required for, prepares learners for, or results in</i> attainment of the credential.
	Resulting Credential ID	<i>Important:</i> Use of a unique credential <a href="#">CTID</a> represents good practice to support linkage to information about that credential in the <a href="#">Credential Registry</a> .
<b>Program Characteristics</b>	CIP Code	<b>Essential:</b> The primary 6–digit CIP Code must be submitted by the Governor to the Secretary (34 CFR 690.93(d)(2)).
	SOC Code(s)	<b>Essential:</b> The SOC code(s) for which the program prepares individuals for employment must be submitted by the Governor to the Secretary (34 CFR 690.93(d)(2)).
	Program Length (weeks)	<b>Essential:</b> The program must require a minimum of 8 weeks, but less than 15 weeks, of instruction (34 CFR 690.92(a)).
	Program Length (contact hours or credit hours)	<b>Essential:</b> The program must be: (i) at least 150 clock hours but less than 600 clock hours; (ii) at least 4 but less than 16 semester or trimester hours; or (iii) at least 6 but less than 24 quarter hours (34 CFR 690.92(b)). Credit hour collection should specify semester, trimester, or quarter hours.
	Delivery Modes Available	<b>Essential:</b> Programs may be offered in person, online, or hybrid but may not be correspondence courses or direct assessment programs (34 CFR 690.92(c)). Documenting available delivery modes also supports consumer information by enabling prospective participants to understand how instruction is delivered.
	Accreditation or Recognition	<i>Important:</i> Under the Proposed WFP Rules, programs are not required to be accredited, only the provider. However, a provider may choose to demonstrate the quality of their program by seeking program accreditation or recognition by an industry association. <sup>4</sup>
	Embedded Learning Opportunities	<i>Important:</i> Enables analysis of course and microcredential structures within programs.

<sup>4</sup> An example of a program standard is the National Institute for Automotive Service Excellence (ASE) Education Foundation program accreditation standards for automotive service technician training programs.

Category	Element	Essential or Important / Regulatory or Other Source Reference
	Program Webpage	<i>Important:</i> A program webpage provides important information for consumers and is required for publication to the <a href="#">Credential Registry</a> .
	Program Description	<i>Important:</i> A program description provides important information for consumers and is required for publication to the <a href="#">Credential Registry</a> .
	Common Conditions	<i>Important:</i> Common conditions, such as minimum age or valid driver's license, describe any entry constraints, prerequisites, or requirements. They are important consumer information useful in analyzing program characteristics and correlation to outcomes. They are also recommended for publication to the <a href="#">Credential Registry</a> .
	Work-based Learning Opportunities	<i>Important:</i> This field is important consumer information recommended for publication to the <a href="#">Credential Registry</a> and important for analyzing program characteristics and correlation to outcomes. Work-based learning should be disaggregated by type, and could include internships, apprenticeships, cooperative education, and practicum/clinical hours.
	Student Services Availability	<i>Important:</i> This field is important consumer information recommended for publication to the <a href="#">Credential Registry</a> and important for analyzing program characteristics and correlation to outcomes. Student services should be disaggregated by support type, and could include career advising, academic advising, childcare, disability services, or other support services.
	Issued as Verified Digital Credential	<i>Important:</i> This field supports assessment of progress of institutional issuance of digital credentials that empower individuals to use their own verified education achievements to unlock opportunity.
<b>Stackability &amp; Articulation:</b> <i>What program(s) accept the resulting credential for academic credit?</i>	Providing Institution OPEID of Related Certificate or Degree Program(s)	<b>Essential:</b> Identifies the institution or institutions offering certificate or degree programs that accept the resulting workforce credential for academic credit. This enables verification that the program prepares students for continued education at one or more eligible institutions (34 CFR 690.93(a)(4)).
	Related Certificate or Degree Program(s) Name(s)	<b>Essential:</b> Specifies the name(s) of the certificate or degree program(s) into which academic credit from the program is accepted. This information demonstrates that the program supports postsecondary advancement and

Category	Element	Essential or Important / Regulatory or Other Source Reference
		credential stackability as required by the WFP Proposed Rules (34 CFR 690.93(a)(4)).
	Method for Award of Academic Credit	<b>Essential:</b> Describes the formal mechanism through which a student earns academic credit toward a certificate or degree program upon successful completion of the WFP program, whether through articulation agreement, transfer-of-credit agreement, consortium or partnership agreement, credit for prior learning, or other mechanism (34 CFR 690.93(b)(1)(iv)).
	Related Certificate or Degree Program(s) ID	<i>Important:</i> Use of a unique <a href="#">CTID</a> for the certificate or degree represents good practice to support linkage to information on that certificate or degree in the <a href="#">Credential Registry</a> .
<b>Cost</b>	Tuition	<b>Essential:</b> Tuition and fees must not exceed the program’s value-added earnings and must be reported annually (34 CFR 690.94(b)(2); 690.95(a), (d)).
	Fees	
	Total Tuition and Fees	
	Other Costs	<i>Important:</i> Captures information on costs such as books and supplies and is important for consumer information and affordability analyses.
	Total Costs (Tuition + Fees + Other)	



### III. PARTICIPANT-LEVEL PILLAR

#### Reporting Entity:

Postsecondary institutions report participant-level data to a state entity designated by the Governor. The state entity links participant records to administrative datasets (e.g., postsecondary unit record systems and UI wage records) for outcomes calculation and federal certification. The state may collect additional elements (e.g., demographics) to support specific policy objectives and also use the information for other education-to-employment research and analytics.

#### Reporting Timing:

- As census submission, aligned with other institution-to-state reporting timeframes: Identifiers, Enrollment, Financial Assistance, Residence (if applicable), Demographics (if applicable)
- As end-of-term submission, aligned with other institution-to-state reporting timeframes: Updates to Financial Assistance, Withdrawal, Completion
- Post-exit updates: As required to resolve audits, appeals, or data corrections in accordance with institution and state data governance policies

#### Record Structure:

- One record per participant per program enrollment
- Records must support longitudinal linkage across award years and outcomes periods

Category	Element	Essential or Important / Regulatory or Other Source Reference
Identifiers	Social Security Number	<b>Essential:</b> Institutions must submit data to the state necessary for it to calculate employment outcomes using administrative data (34 CFR 690.93(b)(2)). SSN is the most common identifier states use for matching to unemployment insurance (UI) wage records but may not be the only available method.
	First Name	<b>Essential:</b> First name, last name, and date of birth are key identifiers supporting employment outcomes analysis when SSNs are not available, or not valid, in state administrative datasets. Additionally, states must determine whether a credential is stackable and portable considering, if available, data showing whether students have obtained additional credentials through career pathways (34 CFR 690.93(b)(1)(iii)). To
	Last Name	
	Date of Birth	

Category	Element	Essential or Important / Regulatory or Other Source Reference
		support this determination, states will need identifiers such as first name, last name, and date of birth to link to datasets that may have no, or limited, SSNs for linkage.
	Unique Provider-issued Student ID	<i>Important:</i> The unique provider-issued student identifier supports master data management/entity resolution at the state level.
<b>Enrollment</b>	Award Year	<b>Essential:</b> Award years serve as the basis for calculating various outcomes under the WFP Proposed Rules (see, e.g., 34 CFR 690.91).
	State Program ID	<b>Essential:</b> State Program ID is necessary to uniquely identify each student’s enrollments.
	Date Entered Program	<b>Essential:</b> This date is necessary to determine timing for completion and placement calculations (34 CFR 690.91; 690.94(a)).
	Highest Education at Enrollment	<b>Essential:</b> Necessary for determining WFP eligibility and for segmentation of outcomes evaluation by differing education levels: current high school student*, high school diploma, some college no credential, associates, bachelor’s, graduate program enrollment or acceptance for enrollment*, graduate credential*) [* <i>Not eligible for WFP</i> ] (34 CFR 668.32(2)(B)).
	Delivery Mode for Enrollment	<i>Important:</i> Enables analysis of outcomes based on the modality used by the participant, if the program is offered in more than one modality (such as both in person and online).
<b>Financial Assistance</b>	Workforce Pell Recipient	<b>Essential:</b> A state should assess enrollment and outcomes information for all participants but will need to segment out WFP recipients for certain outcomes calculations. Additionally, necessary to ensure a student is not enrolled in multiple WFP programs (34 CFR 690.11(b)).
	Outside Financial Assistance	<b>Essential:</b> A state should capture the amount of scholarship or grant funding from non-Federal sources, as WFP funding is only available to the extent a student has not received grant or scholarship assistance from non-Federal sources that covers the full cost of attendance (34 CFR 690.5; 690.80(d)).
	WIOA Co-enrolled	<i>Important.</i> Reported by the institution if the individual’s participation is funded through an Individual Training Account (ITA); allows identification of overlapping participants

Category	Element	Essential or Important / Regulatory or Other Source Reference
		across federal funding streams, facilitating joint accountability reporting and integrated service delivery.
	Employer Paid or Sponsored	<i>Important:</i> Enables assessment of extent of employer contributions to the state’s workforce development system.
<b>Residence</b>	State of Residence	<b>Essential:</b> Necessary to identify out-of-state individuals subject to bilateral agreement data reporting.
	County of Residence	<i>Important:</i> Supports regional mobility and commuting analyses. By using a 5-digit county Federal Information Processing Standards ( <a href="#">FIPS</a> ) code, both state and county residential information can be captured.
	Zip Code of Residence	<i>Important:</i> Supports regional mobility and commuting analyses at a more granular level than county.
<b>Demographics</b>	Race/Ethnicity	<i>Important.</i> Enables disaggregated outcomes analysis and reporting.
	Military or Veteran Status	<i>Important.</i> Enables disaggregated outcomes analysis and reporting.
	First Generation Status	<i>Important.</i> Enables disaggregated outcomes analysis and reporting.
	Disability Status	<i>Important.</i> Enables disaggregated outcomes analysis and reporting.
<b>Withdrawal</b> [conditional, if applicable]	Last Date of Attendance	<b>Essential:</b> Provides accurate data for calculating completion and placement metrics and aligns with WIOA exit-based performance measures.
	Basis for Withdrawal	<b>Essential:</b> Identifies the reason a participant withdrew, including circumstances such as death, medical condition, military service, or incarceration. Certain withdrawal reasons exclude the participant from WFP completion and placement rates (34 CFR 690.94(e)).
	Tuition Refund	<b>Essential:</b> Determines whether an individual who withdrew, dropped out, or was expelled actually received in a timely manner a refund of 100% of tuition and fees, which is necessary for calculation of completion rate (34 CFR 668.8(f); incorporated into the Proposed WFP Rules at 34 CFR 690.94(a)(2)(ii)).

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Category	Element	Essential or Important / Regulatory or Other Source Reference
<b>Completion</b>	Date Completed Program	<b>Essential:</b> This date determines inclusion in completion cohorts and triggers the earnings measurement period (34 CFR 690.94(a)(2)).
	Resulting Recognized Postsecondary Credential Attained	<b>Essential:</b> Indicates whether the participant earned the recognized postsecondary credential associated with the program upon completion (34 CFR 690.93(a)(3)).
	Date Resulting Credential Attained	<b>Essential:</b> This date can be used to confirm successful completion and align outcomes measurements (34 CFR 690.94(a)).
	<i>[For credit programs only]</i> Number of Credits Awarded	<i>Important:</i> Enables analysis of outcomes variances in credit program structures.



## IV. EMPLOYMENT & PATHWAY OUTCOMES PILLAR

### Reporting Entity:

The State and Federal Government calculate employment and pathway outcomes using provider-reported program- and participant-level data combined with administrative records. Institutions are not required to report employment or pathways outcomes directly. States may need to establish new individual-level administrative collections, such as adding occupational enhancements to UI wage records, in order to calculate certain outcomes and should plan for the multi-year lead times necessary to implement wage record changes.

### Reporting Timing:

- Employment outcomes: Calculated for the second quarter after program exit or completion. States may optionally report employment outcomes for additional periods (e.g., 1 through 5 years after completion), thereby aligning to research demonstrating that more significant wage gains from short-term credentials may emerge several years after completion of the training.<sup>5</sup>
- Value-added earnings: Calculated and published annually by the U.S. Department of Education for the upcoming award year
- Pathway Outcomes: Although not specified in the WFP Proposed Rules, the following timeframes are recommended:
  - *Subsequent program enrollment*: Measured at six months after program exit or completion, aligned with the WFP job placement measure (employment in the second quarter after exit to support consistent post-program pathway and labor market analyses)
  - *Short-term subsequent credential attainment*: Measured within two to three years after completion of the eligible workforce program to capture attainment of related certificates, licenses, or stackable credentials commonly pursued shortly after initial workforce training
  - *Intermediate credential attainment (associate degree)*: Measured within four years after completion, reflecting typical timeframes for progression into and through associate degree programs that accept academic credit from eligible workforce programs
  - *Longer-term credential attainment (baccalaureate degree)*: Measured within six years after completion, consistent with standard federal postsecondary completion reporting windows and expected timelines for upward credential progressions
  - *Ongoing updates*: Pathway outcomes should be refreshed annually using administrative enrollment and credential records to support longitudinal analysis and policy evaluation

### Record Structure:

- One record per program per cohort year for completion and placement rates
- Aggregated outcome records, not student-level wage records, are used for reporting and publication. States may elect to disaggregate outcomes by age, residence geography, or other demographic segmentation criteria important for state policy.

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<sup>5</sup> Bahr, P. R., & Columbus, R. (2025). *Labor market returns to community college noncredit occupational education*. *Educational Evaluation and Policy Analysis* (prepublished November 18, 2025). <https://doi.org/10.3102/O1623737251360029>

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- Individual-level earnings data remain confidential and are never disclosed.

Category	Element	Essential or Important / Regulatory or Other Source Reference
<b>Employment Outcomes</b>	Job Placement	<b>Essential:</b> Under the WFP Proposed Rules, the Governor must certify to the Secretary, based on analysis using administrative data, that the program achieves a job placement rate of at least 70% (calculated as the percent employed during the second quarter after exiting the program) (34 CFR 690.94(a)(2)(i)(B)).
	Earnings/Estimated Value-Added Earnings	<b>Essential:</b> The Governor must take into consideration the cost of the program and the anticipated wages of the industry or occupation prior to the availability of value-added earnings (34 CFR 690.93(d)(9)). Earnings data from UI wage records or other verified sources will support higher quality earnings calculations than using labor market information that estimates occupational wages.
	Occupation	<b>Essential:</b> For the 2029–30 award year and beyond, the job placement rate is calculated as the percent employed in the occupation(s) for which the program prepares students (as determined by the SOC code(s) in the Program-level data collection) or a comparable high-skill, high-wage, or in-demand occupation (calculated as the percent employed during the second quarter after exiting the program), based on analysis using available administrative data including wage records (34 CFR 690.94(a)(2)(ii)(B)). <sup>6</sup> Early in WFP planning, states should establish realistic timelines for implementing wage record enhancements, including time periods needed for piloting and verifying data for use in WFP compliance decisions.
	Hours Worked	<i>Important:</i> By collecting hours worked through wage records, states can assess and report whether programs are leading to full- or part-time employment, the median number of hours worked, and whether the median hourly pay rate of a program’s WFP completers meets any state living wage benchmarks.
	Worker Location	<i>Important:</i> By collecting worker location through wage records, states can assess and report differences in outcomes across in-state geography and whether WFP completers are working in the same county, region, or workforce board area as the program.

<sup>6</sup> The WFP Proposed Rules permit the Secretary to approve an additional award year extension if the Secretary determines that the Governor is making progress but needs additional time for implementation (34 CFR 690.94(c)(2)).

Category	Element	Essential or Important / Regulatory or Other Source Reference
	Time to Employment	<i>Important:</i> Time to employment adds context to earnings and placement outcomes by showing how quickly learners secure work, offering valuable insight into access to opportunity and the immediacy of economic returns. To calculate time to employment at a cadence more frequent than quarterly, states must integrate with state Directory of New Hires data.
<b>Pathway Outcomes</b>	Subsequent Program Enrollment Subsequent Credential Attainment	<b>Essential:</b> A state’s policy for determining whether a credential is stackable and portable must consider, if available, data showing whether students have obtained additional credentials through career pathways (34 CFR 690.93(b)(1)(iii)). To support this determination, states must understand not only subsequent program enrollment in postsecondary education certificate or degree programs, but also subsequent attainment of industry-recognized credentials and occupational licenses, which often represent the primary or intermediate form of advancement in workforce pathways and may occur outside of formal postsecondary enrollment.



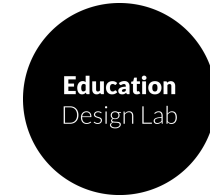
## TABLE OF ACRONYMS USED

Acronym	Full Name
AHEAD	Accountability in Higher Education and Access through Demand-driven Workforce Pell (negotiated rulemaking committee)
CASE	Competencies and Academic Standards Exchange
CFR	Code of Federal Regulations
CIP	Classification of Instructional Programs
CTDL	Credential Transparency Description Language
CTID	Credential Transparency Identifier
EIN	Employer Identification Number
ETPL	Eligible Training Provider List
FIPS	Federal Information Processing Standards
HHI	High-skill, High-wage, or In-demand (industry sectors or occupations)
ITA	Individual Training Account
OPEID	Office of Postsecondary Education Identification Number
PPA	Program Participation Agreement
RTI	Related Technical Instruction (for registered apprenticeships)
SOC	Standard Occupational Classification
SSN	Social Security Number
UI	Unemployment Insurance
WFP	Workforce Pell
WIOA	Workforce Innovation and Opportunity Act

March 2026



## APPENDIX 1 – COLLABORATING ORGANIZATIONS



The Institutional Research  
Collaborative of Iowa



State Noncredit Data  
Project

The Project on  
Workforce  
at Harvard University





## APPENDIX 2 – REFERENCE FRAMEWORKS

Author / Sponsoring Organization	Reference Framework / Model	Weblink (Authoritative Resource)
U.S. Department of Labor	Participant Individual Record Layout – standardized data layout for performance reporting for workforce programs.	<a href="https://www.dol.gov/agencies/eta/performance/reporting">https://www.dol.gov/agencies/eta/performance/reporting</a>
Rutgers Education & Employment Research Center	State Noncredit Data Project taxonomy – common taxonomy and data element guide for noncredit and non-degree credential data.	<a href="https://sites.rutgers.edu/state-noncredit-data/">https://sites.rutgers.edu/state-noncredit-data/</a>
Credential Engine	Credential Transparency Description Language – open data schema for describing credentials and related information.	<a href="https://credreg.net/">https://credreg.net/</a>
The Project on Workforce at Harvard University	Workforce Almanac – integrated dataset and portal mapping U.S. workforce training providers.	<a href="https://workforcealmanac.com/">https://workforcealmanac.com/</a>
U.S. Census Bureau	Post-Secondary Employment Outcomes – data on earnings and employment outcomes for college graduates.	<a href="https://lehd.ces.census.gov/data/pseo_experimental.html">https://lehd.ces.census.gov/data/pseo_experimental.html</a>
U.S. Congress / National Center for Education Statistics	College Transparency Act – proposed federal law to establish a secure, privacy-protected national postsecondary student-level data system.	<a href="https://www.collegetransparencyact.org/">https://www.collegetransparencyact.org/</a>
National Center for Education Statistics / CEDS Stakeholder Group	Common Education Data Standards – voluntary national data standards for K-20W education data elements.	<a href="https://ceds.ed.gov/">https://ceds.ed.gov/</a>