



## 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>1</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>1</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/10.3102/01623737251360029>

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

| Category            | Element                                 | Essential or Important / Regulatory or Other Source Reference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employment Outcomes | 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>2</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                            | <b>Important:</b> 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                         | <b>Important:</b> 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>2</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.                                                                                                                                                                                                                                                                                           |
| Pathway Outcomes | Subsequent Program Enrollment    | <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. |
|                  | Subsequent Credential Attainment |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |