EAB

INSIGHT BRIEF

Outpacing the New **Federal Earnings Mandate**

Four Strategies to Boost Student Success and Protect Your Institution from Future Policy

WHAT'S INSIDE

- The One Big Beautiful Bill (OBBB) signals to colleges that earnings-based accountability is accelerating, putting access to financial aid at risk.
- Use today's lenient rules as a brief grace period to lift graduates' outcomes and protect federal student aid before politicians raise the bar.
- Four strategies—retroactive credentials, stop-out reenrollment, credential ladders, and career placement—can boost earnings without curriculum changes, enabled by a governed data warehouse and student success CRM. Strategy guides and implementation tools can be found at the end of this report.

TABLE OF CONTENTS

INTRODUCTION

Why All Higher Education Leaders Should Read This Paper

On July 4, 2025, President Donald Trump signed into law the budget reconciliation package known as the **One Big Beautiful Bill (OBBB)**.[1,2] Among its higher education provisions is a rule that prohibits federal student loans from being used to finance programs that fail to deliver an earnings boost for their graduates.[3] Far from an abrupt change, this step represents the continuation of more than a decade of bipartisan momentum, beginning with the Obama administration's launch of the College Scorecard.[4]

This new policy lands at a time of eroding public confidence in the return on investment (ROI) of college. As tuition costs rise and outcomes become less predictable, nearly one-third of American adults now say a degree is not worth the cost, while almost half believe it pays off only if students graduate debt-free.[5] Policymakers from both parties have responded by advancing measures that tie federal aid to student outcomes, particularly post-college earnings.[6,7]

Nearly one-third of American adults say a degree is not worth the cost

Almost half of American adults say a degree pays off only if students graduate debt-free

For the moment, the OBBB's standards are relatively forgiving. Early analyses suggest that most programs will clear the threshold, which requires graduates' median earnings to exceed those of individuals with the prior credential level (for instance, high school graduates for associate's and bachelor's programs or bachelor's graduates for master's programs).[8,9]

Last-minute Senate amendments made the law more lenient by excluding non-completers from the calculation.[10] Had these students been included, median earnings would have dropped sharply, putting tens of thousands of programs at risk of losing access to federal loans.

Yet this reprieve may prove temporary. The political trajectory points toward stricter versions of earnings accountability that could include non-completers or student debt in the formula.[11] Certificate programs were excluded from the OBBB but might not be in future legislation.[12] Penalties could expand beyond access to federal loans to cover Pell Grants and other financial aid sources. States may also adopt their own versions, layering additional risks. There are also political consequences, as earnings outcomes could be weaponized by politicians to justify additional political interference in curriculum or governance in a sensitive political climate.

This challenge, however, can also be reframed as an opportunity. Retention and graduation rates tell us a lot about student success when students are enrolled but say nothing about what happens to students after graduation. By contrast, earnings metrics offer a quantifiable proxy for socioeconomic mobility. Rising median earnings reflect not just higher salaries but more stable employment, fewer disruptive life events, and a stronger foundation for upward mobility. Tracking median earnings can help colleges identify and close gaps that leave former students behind as they enter their careers.

> The purpose of this paper is to examine the rise of earnings-based accountability in U.S. higher education, explain how these measures function, and **present strategies that leaders can adopt to thrive under the new student success mandate**.

The time to act is now. Colleges should view today's relatively lenient framework as a grace period to strengthen student outcomes before stricter accountability regimes arrive. Investments that raise graduates' earnings also increase completion, reduce underemployment, and help students launch stable careers. These goals are central to the mission of higher education—and responding proactively to accountability demands is not only prudent but also profoundly consistent with that mission.[13]

PART ONE

The Rise of **Earnings Accountability**

HISTORICAL CONTEXT

The Slow March Toward Post-College Earnings Accountability

For more than a decade, policymakers have advanced efforts to hold colleges accountable for the economic outcomes of their graduates. During the Obama administration, federal leaders began exploring how to link institutional funding and aid eligibility to measures such as graduate earnings and debt repayment. President Obama initially proposed a federal college rating system designed to reward "value," but the plan stalled amid political opposition. Nevertheless, his administration succeeded in launching the College Scorecard in 2015, which gave the public unprecedented access to post-college earnings data drawn from IRS and Social Security records.[14] For the first time, families could comprehensively compare institutions and programs based on the earnings outcomes of graduates.

This emphasis on transparency laid the groundwork for future accountability efforts. The Obama-era Gainful Employment regulations sought to cut off access to federal financial aid to vocational programs with poor debt-to-earnings results.[15] Although enforcement was delayed and the rule was rescinded in 2019,[16] the Biden administration revived and expanded the concept in 2023.[17] The updated framework applied explicit earnings thresholds to career-oriented programs by which graduates had to outearn typical high school graduates to maintain eligibility.[18, 19] Although a relatively small number of programs were affected, the clear signal was that graduate earnings were moving to the center of higher education accountability.

States moved in parallel. By 2022, at least 32 states had adopted performance-based funding models that rewarded public colleges not only for enrollment but also for outcomes such as employment and wages.[20] Florida's formula, for example, factors in the median earnings of bachelor's graduates one year after graduation.[21] State governments could potentially use earnings metrics to put scholarship and free college grant programs at risk.

The 2025 Turning Point: "One Big Beautiful Bill"

Among its many provisions, the OBBB broadened the Obama and Biden era Gainful Employment framework into a comprehensive accountability system that links every college and university's access to federal student loans directly to the earnings outcomes of its graduates.[22]

Under the law, undergraduate programs lose loan eligibility if their graduates' median earnings fall below the median salary of working adults in the same state with only a high school diploma. Graduate and professional programs must exceed the median earnings of workers with a bachelor's degree in the same field and state.[23] Roughly 35 percent of all undergraduates take out federal student loans.[24] If programs lose access to federal lending, many institutions, especially those serving lower-income students, will struggle to remain open. This marked a dramatic expansion of federal oversight as earnings became applied to all degree programs rather than only for-profit or vocational offerings.[25]

- **Undergraduate programs:** Graduates' median earnings must exceed the state median for working adults 25–34 with only a high school degree.
- **Graduate/professional programs:** Graduates' median earnings must exceed a comparable bachelor's degree, typically in the same field/state.

HOW EARNINGS ACCOUNTABILITY WORKS

Understanding the Basic Methodology

Most earnings accountability systems compare the median earnings of a defined cohort of students against a relevant benchmark, flagging programs that fall short. In the OBBB framework and similar proposals, graduate earnings are measured a few years after completion and compared to the median wages of a baseline population (for example, adults in the same state with only a high school diploma).[26] Programs whose graduates earn less than the benchmark are deemed low-performing. Most systems focus on early earnings in the years immediately following college and do not take into account long-term earnings growth over the course of a career.

The impact of the system depends heavily on how the cohort is defined. The OBBB includes only graduates in its calculations, producing a relatively lenient test.[27] Other proposals include all former students, including non-completers, which lowers medians substantially since adults with "some college, no degree" often earn wages close to those of high school graduates.[28] Definitions of the comparison group and adjustments for regional labor market conditions also shift results.[29]

What Factors Drive-Post College Earnings?

Many assume that graduate earnings are driven primarily or exclusively by field of study—engineers outearning humanities majors, for example. And indeed, there are significant early career differences: Technical and high-demand disciplines such as engineering, computer science, and health professions typically deliver higher starting salaries than many liberal arts fields.[30] Over time, however, these gaps narrow as liberal arts graduates make up considerable ground in their 30s, demonstrating that earnings trajectories are more dynamic than static snapshots suggest.[31]

Still, program choice explains only part of the story. Institution-wide medians are often more sensitive to three other factors: non-completion, underemployment, and unemployment.

Non-Completion

Students who leave without a credential see little wage benefit. In 2023, adults with "some college, no credential" earned about $992 per week versus $899 for high school graduates.[32]

Underemployment

Roughly half of bachelor's graduates are underemployed in their first year, and those in jobs that do not require college degrees earn only about 25 percent more than high school graduates.[33]

Unemployment

Many earnings formulas exclude nonworking graduates, including the College Scorecard used by the OBBB.[34] That said, working graduates who go through periods of unemployment have lower total annual earnings and potentially drive down medians.

Many colleges could improve their earnings metrics far more effectively by **helping more students complete their degrees and connect to solid career pathways** than by attempting to shift students into higher-paying majors.

The immediate strategic focus in response to the threat posed by the OBBB and similar systems should therefore be on supporting students to graduation and into good jobs, thereby boosting the outcomes of all programs, including those in lower-paying fields.[35]

ASSESSING INSTITUTIONAL RISK

Projected Impact of the "One Big Beautiful Bill"

Early reads of the OBBB's earnings test suggest it is comparatively easy to clear. Urban Institute estimates that roughly 3 percent of master's borrowers, 1 percent of bachelor's borrowers, and 12 percent of associate's level borrowers are enrolled in programs likely to fail under the OBBB's standard.[36] However, because many community college students borrow little or not at all, the impact of being cut off from federal loans is muted.[37] American University's PEER Center reaches an even more modest conclusion: Fewer than 0.5 percent of bachelor's students and about 2 percent of associate's degree students are in programs that would fail.[38] By contrast, the American Enterprise Institute (AEI) projects higher failure rates—about 8 percent of master's programs, 3 percent of bachelor's programs, and roughly 20 percent of associate's programs.[39]

Figure 1: Estimated Impact of the One Big Beautiful Bill

Source	Unit of Analysis	Master's Programs	Bachelor's Programs	Associate's Programs
Urban Institute	Borrowers	3%	1%	12%
PEER Center	Students	n/a	<0.5%	2%
AEI	Programs	8%	3%	20%

Note: Units differ by study (borrowers, students, or programs), and percentages reflect the share of that unit that is likely to fail the OBBB's earnings threshold.

The OBBB's immediate shock to federal loan eligibility looks modest in the aggregate; however, institutions will still need to address vulnerabilities in specific academic fields. AEI's program-level analysis shows that while most programs clear the OBBB's earnings bar, specific disciplines face widespread ineligibility. At the bachelor's level, for example, an estimated 76 percent of drama programs and 73 percent of dance programs will not clear the bar.[40] At the master's level, exposure is even more pronounced. Entire fields, such as alternative medicine, are projected to lose eligibility (100 percent of programs), while high shares of programs in mental and social health services (84 percent), music (82 percent), fine arts (75 percent), and English literature (67 percent) also fall short.[41]

The earnings accountability provision that ultimately reached the President's desk was softened at the last moment when the Senate revised it to measure only the earnings of graduates. Earlier drafts would have applied the standard to all former students who borrowed, including non-completers. That single change dramatically reduced the number of programs at risk of losing access to federal student loans.[42]

Having survived this brush with disaster, the higher education community should not assume that future policymakers will remain so lenient. Loans to non-completers rarely generate a positive economic return; instead, they often harm borrowers by depressing wages through incomplete credentials while adding a significant monthly expense and raising the risk of default. It is only a matter of time before one or both parties prioritize this issue, potentially placing a far larger set of programs under scrutiny. **Prudent institutional leaders should therefore treat the OBBB not as the ceiling of accountability but as the floor.**

What sort of future should colleges and universities prepare for—and which institutions will be most at risk? The next section examines a new classification that simulates a stricter regime, one that evaluates outcomes based on the earnings of all students, not just graduates.

The "Student Access and Earnings Classification" Gives Us a Look at a Stricter Standard

In 2025, the American Council on Education (ACE) and the Carnegie Foundation introduced a new analytic framework that colleges can use to gauge their success in promoting students' economic mobility.[43, 44] This Student Access and Earnings Classification (SAEC) was created as a parallel to the well-known Carnegie research university classifications. It aims to recognize institutions that excel in enrolling diverse students and helping them achieve good post-college earnings. ACE has designated 479 institutions as "Opportunity Colleges and Universities," meaning they have both high student access (serving large shares of disadvantaged students) and high earnings outcomes for those students. Earning the Opportunity College label is a notable point of pride—it's an achievement colleges are touting in press releases and marketing, and it signals segment leadership to philanthropies and policymakers interested in student success. While the SAEC includes an "access" dimension, the focus here is on the earnings dimension of the classification.

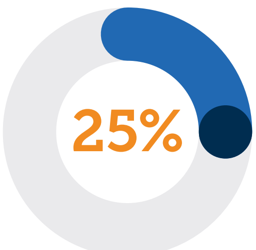
The earnings metric in the SAEC provides revealing similarities and contrasts to the OBBB law's approach. SAEC draws on the same data source (the College Scorecard, which uses tax records to track earnings of former students who received federal aid) and examines outcomes at a similar point in time post-enrollment, which for traditionally aged students roughly corresponds to their mid 20s.[45, 46]

However, while the methodologies are similar, the SAEC establishes a substantially higher bar in two critical ways: First, SAEC includes non-completers in its earnings calculation.[47] College dropouts tend to lower the overall median, since former students who leave without a credential generally earn wages much closer to those of high school graduates.[48] Second, SAEC raises the benchmark itself by comparing outcomes to the earnings of all workers, including those with college credentials. This dual difference—lowering the institutional median and raising the comparison—makes SAEC a far more demanding accountability test.

How Many Programs Might Ultimately Be at Risk?

For colleges concerned about future accountability, the SAEC earnings classification functions as a valuable diagnostic tool. It offers a preview of how institutions might fare under a stricter regime—one that counts all students, not just graduates. Institutions that perform poorly on SAEC should view the results as a clear warning sign that they are especially vulnerable if policymakers move toward an "all students" earnings standard.

SAEC groups institutions into three tiers based on how their former students' median earnings compare to local labor market benchmarks eight years after entry.[49]

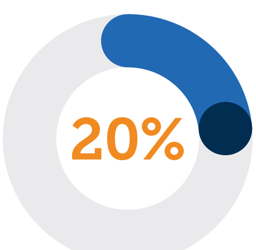


High Earnings Institutions

Roughly one quarter of colleges earned a "high earnings" classification, with former student median earnings at least 1.5 times the benchmark earnings of their comparison groups. At such institutions, most programs would likely clear even a rigorous accountability test, apart from a few lower-earning programs (e.g., performing arts). Many well-resourced research universities fall into this category.

Medium Earnings Institutions

Many four-year institutions fall into the "medium earnings" tier, with alumni earning between 1.0 and 1.5 times their comparison populations. Regional public universities, tuition-dependent privates, and liberal arts colleges make up much of this group. Numerous programs at these colleges and universities could be at risk, especially in arts and sciences, education, and social services.



Low Earnings Institutions

About one fifth of colleges fall into the "low earnings" category, with median former student earnings below the benchmark. Some of the programs at these institutions are already at risk under the OBBB, and a more aggressive system would significantly expand this total.

The SAEC demonstrates how fragile many institutions' positions would become under a more demanding accountability system. By considering the earnings of all students, not only graduates, and benchmarking against college-educated workers, it reveals risks that the OBBB framework largely masks. Institutions that struggle to clear the bar under SAEC should treat it as an early warning system, using the results to double down on completion, career preparation, and equitable student success before policymakers move the accountability goalposts yet again.

What can leaders do now to protect their institutions in this shifting landscape?

Part Two presents four actionable strategies to meet the earnings accountability challenge.

PART TWO

A Playbook for **Meeting the Earnings Accountability Challenge**

In this section, we outline four strategies that colleges can adopt to strengthen their median earnings under current and future accountability regimes. Our focus is deliberately practical. While reshaping academic offerings or launching new programs may influence earnings in the long run, such efforts take years to bear fruit. Institutions facing imminent accountability pressure cannot afford to wait. Instead, leaders must look to interventions that support students already enrolled—or who have recently left without a degree—and that can yield measurable improvements in earnings outcomes within the time frame policymakers are tracking.

The playbook presents **four near-term strategies** that institutions can deploy to improve earnings outcomes quickly—without waiting years for academic program changes to take effect. We also have included three useful tools: scripting tips for leaders, a summary of data and technology requirements necessary to execute the strategies, and a diagnostic to get you started.

Figure 2: The Four Strategies at a Glance

1 Retroactive Credentials

OBJECTIVE: Increase earnings potential by retroactively awarding earned credentials

STRATEGY IN BRIEF: Search academic records for students who are eligible for a credential but left without one

2 Stop-Out Reenrollment

OBJECTIVE: Boost completion and raise earnings for students who leave without degrees

STRATEGY IN BRIEF: Simplify readmission and provide personalized advising to remove roadblocks to completion

3 Credential Ladders

OBJECTIVE: Assist with transfer and grad school entry to keep students progressing

STRATEGY IN BRIEF: Strengthen the advising connection between partner institutions to smooth the handoff

4 Career Placement

OBJECTIVE: Improve early-career outcomes by helping students secure well-paying jobs

STRATEGY IN BRIEF: Proactively provide agency-style career placement services for graduates seeking entry-level jobs

STRATEGY 1: Retroactive Credentials

Many students who leave before finishing their chosen bachelor's program have completed enough credits for some other credential. Students with 120+ credits may be able to graduate with a BA if they switch to a different major such as Liberal Studies. Those with 60+ credits may qualify for a reverse associate's degree or certificate. Colleges can find and award eligible students through regular sweeps of academic records cross-referenced to graduation requirements in the degree audit system. By retroactively awarding these credentials, colleges can improve their median earnings performance in any accountability system that includes all former students.[50]

Providing these students with a recognized credential can cause an automatic pay bump or open new career opportunities that boost their earnings, but they also can create an on-ramp to completion of a bachelor's degree. Pairing degree conferral with career counseling or reenrollment options maximizes impact.

As you design your strategy, be mindful of any unintentional consequences of retroactively awarding credentials, especially as they pertain to student eligibility for financial aid in the future.

Focus Population

Former students who have completed the credits and course requirements for a credential without being awarded one

Best Practices

- Eligibility audit team
- Policies for retroactive credentialing
- Community college partnerships
- Career guidance for new AA graduates
- Pathway to bachelor's completion

Key Performance Indicators (KPIs)

- Credentials awarded
- Improvement in earnings
- Stop-out reenrollment rate
- Subsequent bachelor's completion rate

STRATEGY 2: Stop-Out Reenrollment

The "some college, no credential" population now includes more than 43 million Americans, with 2 million more joining annually.[51] Institutions that are judged by the median earnings of all former students can improve by streamlining pathways back to enrollment for non-completers. This involves simplifying admission and administrative processes, providing flexible formats, clearing financial balances, offering incentives, and providing concierge-style advising to guide students to completion. Take care to avoid the perverse incentive of reenrolling students who take on additional costs but have a relatively low likelihood of completing even with assistance.

Every year, millions of students leave college without a credential, despite being within reach of completion. Helping even a fraction of these students return and finish their degrees can significantly raise institutional earnings metrics and also improve life outcomes for individuals who have already invested heavily in higher education.

Focus Population

Students from the past three years who are in good academic and financial standing, within 30 credits of completion, and currently unenrolled

Best Practices

- Near-completer audit
- Proactive outreach campaign
- Streamlined reentry
- Financial barrier removal
- Completion advising
- Flexible options

Key Performance Indicators (KPIs)

- Reenrollment rate
- Subsequent bachelor's completion rate

STRATEGY 3: Credential Ladders

Many students intend to advance their education beyond the level of their current program. Traditionally, this means moving from an associate's degree to a bachelor's program or from a bachelor's degree to graduate school. More recently, a wide range of alternative credentials have emerged that allow students to stack additional skills and certifications onto what they have already earned.

Students who plan to make degree transitions but stall out before enrolling in the next rung of the ladder can negatively impact the median earnings of their prior program. They may be unemployed or working in lower-paying jobs while waiting to restart their education, which too often does not happen. Cross-institutional partnerships and Guided Pathways practices can smooth these transitions, reducing friction and helping prevent students from falling behind.

Students who are actively enrolled in a subsequent program are typically exempt from earnings formulas applied to their prior program.[52] Therefore, institutions can potentially strengthen their median earnings outcomes by reengaging stalled students and assisting them in enrolling at their next educational destination. Moreover, the earnings gains from stacking additional credentials also enhance the reported outcomes of the original degree program.

Focus Population

- Associate's degree students transferring to four-year programs
- Bachelor's graduates bound for graduate/ professional school

Best Practices

- Transition advising team
- Advising partnerships and MOUs
- Dedicated support for transfer processes
- Graduate school advising
- Tracking of transfer student outcomes

Key Performance Indicators (KPIs)

- Successful matriculation at receiving institution/ program
- Persistence at receiving program
- Eventual attainment of the secondary degree
- Exclusion from "not working/not enrolled" calculation windows

STRATEGY 4: Career Placement

Helping students secure strong first jobs has become one of the most direct levers institutions can pull to influence earnings outcomes. Career placement represents the fastest way to boost institutional performance under any accountability system. By ensuring that more students transition smoothly into well-paying roles, colleges not only strengthen their own standing but also deliver immediate, tangible benefits to students regardless of their discipline.

By providing intensive, concierge-style career services, institutions can flag students nearing graduation who lack a concrete career plan, connect them with alumni or employer networks, and track post-graduation outcomes. These services can be extended to reengage underemployed or unemployed alumni. Career placement is especially critical for graduating international students seeking employment to support visa status.

Focus Population

- Final-year students without job offers
- Recent graduates in low-paying jobs
- Programs and fields with higher unemployment

Best Practices

- Dedicated agency-style placement team
- Proactive services for students without jobs
- Employer and alumni partnerships
- Tracking of outcomes for recent grads
- Interventions for underemployed grads

Key Performance Indicators (KPIs)

- Graduates placed into degree-requiring roles within specified time frames
- Median starting pay
- Institution/program underemployment rate
- Time to students getting their first offer
- Repeat hires at same employer

TOOL

Five Tips for Leaders When Talking About Earnings Accountability

Higher education is moving inexorably toward outcome transparency. The One Big Beautiful Bill has accelerated this momentum by tying accountability more directly to student outcomes and making earnings part of the broader student success conversation.

Discussing these changes with your team can be difficult for higher education leaders. Faculty and staff see their mission as preparing students for a lifetime of contribution, and talking about the value of college in terms of dollars can feel reductive. Leaders need to thread a delicate needle when communicating how earnings accountability is here but can be channeled in such a way as to improve student success.

Below are five common pushbacks we hear paired with suggested responses you can use with faculty, deans, and boards.

1 "**Accountability reduces our mission to a number** and will marginalize the liberal arts."

"Earnings certainly don't measure the full value of college, and I can reassure you that all the serious voices in this debate understand that. However, earnings are a meaningful proxy for socioeconomic mobility. Tracking them helps us demonstrate how our programs change students' life trajectories, while we continue to value the broader educational mission."

2 "Graduate earnings **aren't really under our control.**"

"Colleges cannot control the economy, but we can control how well we support students. Earnings improve when we graduate more students and help them move into jobs or further studies. Median earnings demonstrate that we are helping our students succeed—even in a tough economy—and we should want that number to rise."

3 "**Earnings are an unfair metric;** early-career salaries vary by major and region, and some programs serve the public good but pay less."

"Our first priority for improving earnings is to help more students complete their degrees and then ensure underemployed graduates find work aligned with their education. Most accountability mechanisms already take geography into account to some degree, and it is my job to ensure we get a fair look. We recognize that not every program leads directly to higher pay, but all provide value for society—and serious voices in this debate understand that, despite the headlines."

4 "We don't have the staff or technology capacity; **this feels like an unfunded mandate.**"

"Our first step is to take better advantage of resources we already have before making big, new investments. We can build gradually and show progress without overwhelming teams. We may still need to invest, but we'll do so transparently and in line with our strategy."

5 "Accountability will create perverse incentives and **equity will suffer.**"

"That risk is real in many accountability systems. Our job is to negotiate frameworks that strengthen access and support all students—and to implement them in ways that align with our mission, improve earnings fairly, and ensure we advance both equity and outcomes."

TOOL

Data and Technology Needs

DATA WAREHOUSE

Before acting on earnings-accountability strategies, student success teams should consolidate critical student data in a centralized warehouse. Two categories matter: (1) student records such as transcripts and contact information and (2) external career outcomes data showing post-college employment and earnings. Together these sources provide a clear scoreboard for performance under an earnings-accountability framework.

Integrating these datasets lets student success teams use the same system to access advising records, audit degree progress, and retrieve up-to-date contact information. Student records can be integrated with outcomes data to prioritize and target outreach to students in the workforce who have the most to gain from additional support. Strategically combining student characteristics and behaviors with outcomes enables deeper analysis of which college experiences most affect employment and earnings. The combined view supports program- and population-level analyses and guides continuous improvement.

Sources of **student data**

Core sources that collect and store data about students, including academic records and contact info:

- FAFSA and financial aid records
- Academic records (enrollments, grades)
- Degree-audit results
- Advising/case-management notes
- LMS activity data
- Alumni contact and engagement information

Sources of **career outcomes data**

Student-reported and third-party sources that provide income data or estimated income for individuals:

- Career services records (internships, employer interactions)
- First-destination surveys (e.g., NACE)
- State unemployment insurance (UI) wage records
- State Wage Interchange System (SWIS)
- Credit-bureau earnings estimates (Equifax, Experian, TransUnion)
- Household income modeled by consumer data vendors

TECHNOLOGY STACK

To execute these strategies and measure their impact, institutions need a robust technology foundation. Two components are essential: a governed data warehouse and a student success CRM, tightly integrated to enable a rapid transition from signal to action.

Student Success CRM

A cross-functional student success CRM (such as Navigate360, see page 23 for an overview) serves as the backbone of the communications and records system needed to engage and guide students. It enables coordinated advising across academic, financial aid, and career services; generates risk alerts for stop-out propensity and likelihood of underemployment; prioritizes near-graduates without job offers as well as recent stop-outs who are close to completion; and orchestrates targeted outreach and employer engagement campaigns.

Governed Data Warehouse

Student information is often fragmented across multiple systems. To address this, IT, academic affairs, and student affairs should jointly centralize these data sources into a single, governed warehouse (such as Edify, see page 24). Such a warehouse supports shared definitions, identity resolution, role-based access, and high-quality dashboards/APIs that enable timely outreach. Without integrating these datasets, student success teams will be hampered in their ability to reach and advise the right students.

Working in tandem, data from the warehouse flows seamlessly into the CRM, where staff can act upon it. The tools within the CRM become more powerful as they gain access to a broader range of information. With richer datasets, staff can identify students with greater precision and provide more informed guidance on the best pathways forward. Looking ahead, data-hungry AI tools will increasingly be deployed to support this work, and they will require a strong, reliable data foundation to operate effectively.

TOOL
Earnings Accountability Strategic Diagnostic

Instructions: Use the checklist below to assess your institution's readiness across four key strategies from the Post-College Earnings Accountability Playbook. For each strategy, evaluate the degree to which each area is ready to support your chosen strategies from 1 to 5 (where 1 = Not at all and 5 = Fully ready). This diagnostic will help identify gaps and suggest first steps as you implement your post-college earnings strategy.

Prioritize closing gaps in lower-scoring areas. By shoring up these four strategy areas, institutions will be better prepared to raise graduates' earnings and meet emerging federal benchmarks while also improving student outcomes.

RETROACTIVE CREDENTIALS	RATING 1–5
Eligibility audit systems Student academic records are regularly audited with degree audit software or scripts to identify former students who earned sufficient credits and meet all the criteria for a credential.	
Policies for retroactive credentialing Clear policies/procedures exist to confer credentials retroactively, including obtaining student consent if required and ensuring all academic requirements are verified.	
Community college partnerships If the institution cannot grant associate's degrees, partnerships or MOUs with community colleges are in place to award the credential for eligible students (with data-sharing to facilitate this).	
Career guidance for new AA graduates Students who receive a retroactive credential are offered career counseling or job placement support to help them leverage the new credential in the workforce.	
Pathway to bachelor's completion There is outreach or advising to encourage and enable credential recipients to continue on and complete their bachelor's degree (e.g., simplified reenrollment into a finishing program).	

STOP-OUT REENROLLMENT	RATING 1–5
Data to identify near-completers The institution can pinpoint stop-outs who are close to finishing (e.g., students with ≥ 75% of credits completed) using student records and analytics.	
Proactive outreach campaign A coordinated outreach plan to contact eligible stop-outs and encourage their return, using up-to-date contact information, personalized messaging, and multiple channels is in place.	
Streamlined reentry process Policies and processes make returning easy (e.g., simplified readmission application, one-stop readmission support, and cross-department coordination to resolve holds or paperwork).	
Financial barrier removal The institution reduces or waives obstacles such as small unpaid balances or reenrollment fees and offers reentry incentives (scholarships, payment plans) to lower financial hurdles.	

Dedicated completion advisor
Each returning student is assigned a "completion concierge" or advisor to provide concierge-style guidance from reenrollment through graduation.

Flexible completion options
Academic offerings accommodate returning students (e.g., evening/online courses, accelerated terms, credit for prior learning) so stop-outs can finish their degree as they also fulfill work or family obligations.

CREDENTIAL LADDERS — RATING 1–5

Assigned staff ownership
A specific office or staff role (e.g., transfer success coordinator or graduate pathways advisor) is accountable for coordinating transfer and graduate transition initiatives across departments.

Advising partnerships and MOUs
Formal agreements (MOUs) exist with key transfer destination institutions and/or graduate programs to provide joint advising and share data on student progress.

Dedicated transfer process support
Advisors (at your institution or in partnership) guide outgoing students through transfer logistics—application, credit transfer, financial aid, registration, and onboarding at the new institution.

Graduate school advising
Your institution offers dedicated advising for students aiming for graduate/professional schools, helping with graduate program selection, application preparation, and transition into enrollment.

Tracking of transfer student outcomes
Mechanisms are in place to track the progress and completion of students who transfer out or enroll in graduate school (e.g., data-sharing systems or National Student Clearinghouse reports).

CAREER PLACEMENT READINESS FACTORS — RATING 1–5

Dedicated career placement team
A team of career advisors/coaches is in place to provide intensive, concierge-style career services for final-year students and recent alumni.

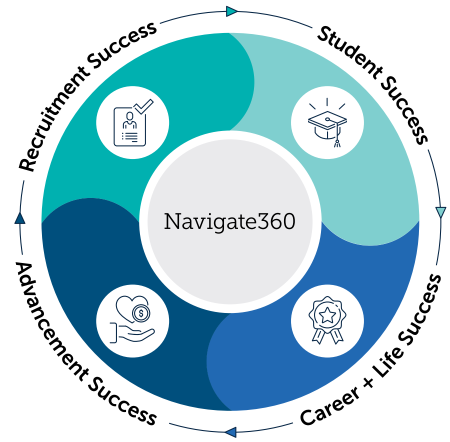
Early identification of at-risk graduates
Systems (e.g., flags or alerts) identify students nearing graduation who have no job offer or clear career plan, triggering targeted coaching before they leave.

Employer and alumni partnerships
Strong relationships with employers and alumni are leveraged to create job pipelines, internships, and mentorship opportunities for students (e.g., regular recruiting events, alumni referrals).

Tracking of outcomes and follow-up
Processes exist to track graduates' employment outcomes (e.g., first-destination surveys or earnings data) and to reengage underemployed or unemployed alumni with career support.

About Navigate360

Recruit, Retain, and Empower Students in College and Beyond

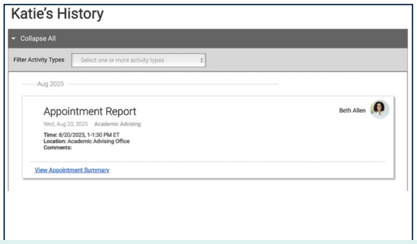


Navigate360 is the leading student CRM for community colleges, a powerful technology that unites administrators, faculty, staff, and students in a collaborative network that supports the entire student experience, from recruitment to career. Navigate360 is powered by more than a decade of student success research gleaned from billions of student interactions—and now, it's also amplified by AI.

Staff Workflow and Automation

Empower staff to proactively engage with prospective and current students

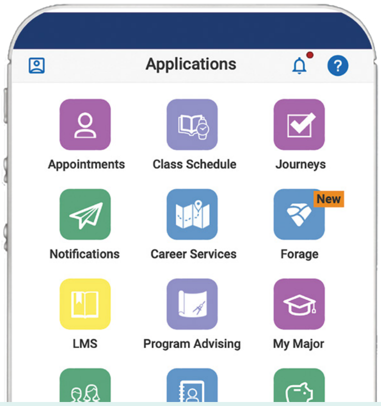
- AI Content, Campaign, and Student Insights Agents
- Complete Student Profile
- Coordinated Care Network
- Cases and Referrals
- Automated Alerts and Messaging
- Two-Way SMS
- Campaigns and Template Library
- To-Dos
- Appointments and Surveys
- Events
- Notes and Attachments
- Faculty Progress Reports
- Prospect Application Management



Student Engagement Hub

Provide your students with a one-stop shop for self-service resources

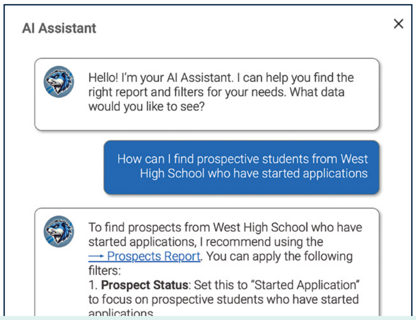
- AI Course Planning and Knowledge Agents
- iOS and Android Apps
- Student Success Network
- Campus Resources
- Appointment Scheduling
- Class Schedule
- In-App Messaging, Notifications, and Surveys
- Career Match and Journeys
- Study Buddies
- Financial Planner
- Prospect Portal



Reporting and Analytics

Proactively identify opportunities for better student support

- AI Report Agent
- Advanced Query Builder
- Data Visualizer
- Templated and Scheduled Reports
- Automated Workflow from Reports
- Population Health Analytics
- Activity Analytics
- Intervention Effectiveness Analytics
- Historical Analytics
- Predictive Model
- Analytics Data Exports



OUR PARTNERS

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Partner Institutions

10M+
Students Served

OUR IMPACT

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Typical improvement in graduation rate

5:1
ROI based on 500 partner value stories

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University of Montana

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CONCLUSION

The rise of earnings accountability signals a new era in higher education. Going forward, colleges and universities must prove that their students are getting an economic return on their investment. While the current federal mandate as embodied in the OBBB is relatively forgiving, future policies could be tightened by holding institutions accountable for all students' success, not just that of graduates.

Earnings outcomes reflect whether students obtained real economic value from their education. No single metric is perfect—earnings vary by region, occupation, and personal choice—and higher education confers many nonmonetary benefits that matter for mission and public value. Still, it would be misguiding to ignore the fact that earnings are a clear, quantifiable indicator of baseline economic security, even as we acknowledge that not all worthwhile programs lead to high salaries.

The Student Access and Earnings Classification (SAEC) developed by the ACE and the Carnegie Foundation is a useful bellwether. As a stricter yardstick than any current government system, it suggests that many institutions have room to improve. Colleges seeking to safeguard themselves against future earnings-based mandates should use SAEC or comparable data to gauge risk and identify exemplary institutions to emulate. If your institution already clears the SAEC earnings test, you have a positive story to tell; if your outcomes fall near the danger zone, the time to act is now.

The strategies outlined in this paper offer a playbook to **boost completion and post-college success** in the near term.

These strategies—retroactive credentials, stop-out reenrollment, credential ladders, and career placement—are not new. They have always been the right things to do for students but too often have been under-resourced amid competing priorities. The new earnings mandate brings an overdue focus on work that advances both student welfare and institutional resilience.

Even if accountability requirements are never tightened beyond their current state, implementing these strategies yields tangible benefits: more students graduating and more graduates launching into good jobs and careers. That is the core mission of student success. Earnings accountability should be understood not as a burden or mere compliance exercise but as a prompt to double down on what matters most. In the long run, meeting this challenge will benefit students, institutions, and the public—protecting colleges under evolving policy and fulfilling higher education's promise as a springboard to a better life.

Endnotes

1. U.S. Senate Committee on Health, Education, Labor, and Pensions (Republicans). HELP Committee Provisions of the Senate's One Big Beautiful Bill Act: Section-by-Section. June 30, 2025.
2. Matthew Arrojas, "Colleges' Access to Federal Financial Aid Is Now Tied to Students' Earnings. Here's How It Could Impact Popular Degrees," BestColleges, updated July 8, 2025.
3. Preston Cooper, "An Analysis of the One Big Beautiful Bill Act's Effect on Student Loans," American Enterprise Institute, July 16, 2025.
4. Michelle Dimino, "Crossing the (Earnings) Threshold: Post College Earnings as a Measure of ROI," Third Way, November 3, 2023
5. Pew Research Center, "Is a College Degree Worth It in 2024?," May 23, 2024.
6. Michelle Dimino, "Crossing the (Earnings) Threshold: Post College Earnings as a Measure of ROI," Third Way, November 3, 2023.
7. Third Way. "Q&A: What's in the New Gainful Employment Rule?" March 2023.
8. U.S. Senate Committee on Health, Education, Labor, and Pensions (Republicans). HELP Committee Provisions of the Senate's One Big Beautiful Bill Act: Section-by-Section. June 30, 2025.
9. Jason Cohn, Higher Education Accountability in the Budget Reconciliation Bill (Washington, DC: Urban Institute, June 2025).
10. Blake, Jessica. 2025. "4 Updates to 'Big Beautiful Bill' Ahead of Final Vote." Inside Higher Ed, June 30, 2025.
11. Tia Caldwell, Jordan Matsudaira, and Clare McCann, Accountability for All Programs: The Senate's Proposal Needs Change (Washington, DC: American University, PEER Center, July 2025).
12. Tia Caldwell, Jordan Matsudaira, and Clare McCann, Accountability for All Programs: The Senate's Proposal Needs Change (Washington, DC: American University, PEER Center, July 2025).
13. Anthony P. Carnevale, Ban Cheah, and Andrew R. Hanson, The Economic Value of College Majors (Washington, DC: Georgetown University Center on Education and the Workforce, 2015).
14. The White House, "Fact Sheet: Empowering Students to Choose the College That Is Right for Them," September 12, 2015.
15. U.S. Department of Education, "Program Integrity: Gainful Employment," Federal Register 79, no. 211 (October 31, 2014).
16. U.S. Department of Education, "Program Integrity: Gainful Employment; Rescission," Federal Register 84, no. 171 (August 14, 2019).
17. Third Way. "Q&A: What's in the New Gainful Employment Rule?" March 2023.
18. U.S. Department of Education, "Financial Value Transparency and Gainful Employment (Final Rule)," Federal Register 88, no. 206 (October 10, 2023).
19. American Council on Education, "ED Releases Final Gainful Employment and Financial Value Transparency Rules," October 10, 2023.
20. National Conference of State Legislatures (NCSL), "Performance Based Funding for Higher Education," 2022 (and updates).
21. State University System of Florida, Board of Governors, "Performance Based Funding—Metric 2: Median Wages One Year After Graduation," methodology and overview (2023–2025).
22. U.S. Senate Committee on Health, Education, Labor, and Pensions (Republicans). HELP Committee Provisions of the Senate's One Big Beautiful Bill Act: Section-by-Section. June 30, 2025.
23. National Center for Education Statistics (NCES), "Fast Facts: Financial Aid (1209)—In 2019–20, 72 percent of all undergraduates received some type of financial aid," August 1, 2023.
24. National Center for Education Statistics (NCES). "National Postsecondary Student Aid Study, 2019–20 (NPSAS:20)." Table on percentage of undergraduates receiving federal loans.
25. National Center for Education Statistics (NCES), "National Postsecondary Student Aid Study—Overview (NPSAS:20): What percentage of undergraduates received any federal aid? 55 percent," 2023.
26. U.S. Senate Committee on Health, Education, Labor, and Pensions (Republicans), HELP Committee Provisions of the Senate's One Big Beautiful Bill Act: Section by Section, June 30, 2025, Subtitle E, §84001.
27. U.S. Senate Committee on Health, Education, Labor, and Pensions (Republicans). HELP Committee Provisions of the Senate's One Big Beautiful Bill Act: Section-by-Section. June 30, 2025.
28. Preston Cooper, "An Analysis of the One Big Beautiful Bill Act's Effect on Student Loans," American Enterprise Institute, July 16, 2025.
29. Tia Caldwell, Jordan Matsudaira, and Clare McCann, Accountability for All Programs: The Senate's Proposal Needs Change (Washington, DC: American University, PEER Center, July 2025).
30. Carnevale, Anthony P., Ban Cheah, and Andrew R. Hanson. The Economic Value of College Majors. Washington, DC: Georgetown University Center on Education and the Workforce, 2015.
31. Startz, Dick. 2024. "Don't Knock the Economic Value of Majoring in the Liberal Arts." Brookings Institution.
32. U.S. Bureau of Labor Statistics, "Education Pays, 2023," Career Outlook, April 2024.
33. Strada Education Foundation and Burning Glass Institute, Talent Disrupted: College Graduates, Underemployment, and the Way Forward, February 21, 2024.
34. College Scorecard. Technical Documentation: Institution-Level Data. June 2024.
35. EAB, "What the OBBB and the New Carnegie Classification Could Mean for Higher Education Accountability," June 2025.
36. Jason Cohn, Higher Education Accountability in the Budget Reconciliation Bill (Washington, DC: Urban Institute, June 2025).
37. U.S. Department of Education, Office of Career, Technical, and Adult Education, "Community College Facts at a Glance," January 23, 2025.
38. Tia Caldwell, Jordan Matsudaira, and Clare McCann, Accountability for All Programs: The Senate's Proposal Needs Change (Washington, DC: American University, PEER Center, July 2025).
39. Preston Cooper, "An Analysis of the One Big Beautiful Bill Act's Effect on Student Loans," American Enterprise Institute, July 16, 2025.
40. Preston Cooper, "An Analysis of the One Big Beautiful Bill Act's Effect on Student Loans," American Enterprise Institute, July 16, 2025.
41. Preston Cooper, "An Analysis of the One Big Beautiful Bill Act's Effect on Student Loans," American Enterprise Institute, July 16, 2025.
42. EAB, "What the OBBB and the New Carnegie Classification Could Mean for Higher Education Accountability," June 2025.
43. American Council on Education and Carnegie Foundation, "Carnegie Classifications Redesign Better Reflects the Higher Education Landscape and Recognizes Student Success," news release, April 24, 2025. Miriam Porras and Emily Schwartz, "Examining the New Carnegie Student Access and Earnings Classification at Four Year Colleges and Universities," Ithaka S+R (blog), May 5, 2025.
44. College Scorecard. Technical Documentation: Institution-Level Data. June 2024.
45. American Council on Education and Carnegie Foundation. "Carnegie Classifications Redesign Better Reflects the Higher Education Landscape and Recognizes Student Success." News release, April 24, 2025.
46. American Council on Education and Carnegie Foundation. "Carnegie Classifications Redesign Better Reflects the Higher Education Landscape and Recognizes Student Success." News release, April 24, 2025.
47. U.S. Bureau of Labor Statistics. "Education Pays, 2023." Career Outlook, April 2024.
48. American Council on Education and Carnegie Foundation. "Carnegie Classifications Redesign Better Reflects the Higher Education Landscape and Recognizes Student Success." News release, April 24, 2025.
49. American Association of Community Colleges. "Reverse Transfer." Policy resource page, 2023.
50. J. Causey, A. Gardner, A. Pevitz, M. Ryu, and D. Shapiro, Some College, No Credential (SCNC) Student Outcomes: Annual Progress Report (2025), National Student Clearinghouse Research Center, June 3, 2025.
51. College Scorecard. Technical Documentation: Institution-Level Data. June 2024.

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