EXECUTIVE ACTION CHECKLIST

OBBBA Readiness Checklist

A comprehensive action checklist for presidents, cabinets, and boards

Key dates

DATE	WHAT HAPPENS
Jan 1, 2026	Revised endowment excise tax applies (tax years beginning after 12/31/2025)
Jul 1, 2026	Loan caps, Grad PLUS elimination, RAP & Standard repayment, Pell changes, Workforce Pell, and the earnings-accountability framework take effect
~Jul 1, 2027	First program earnings-accountability results published
Jul 1, 2028	Existing borrowers must transition off legacy income-driven plans (auto-enroll in RAP); earliest accountability penalties

HOW TO USE THIS CHECKLIST: This checklist gives presidents, cabinets, and boards a concrete way to drive OBBBA readiness. Assign an executive owner and an operational lead to each workstream, set target dates on every action, and review progress on a standing cadence. Aim to complete the immediate actions within the first quarter and to be operationally ready well before the 2026–27 cycle.

Accountability model

WORKSTREAM	EXECUTIVE OWNER	OPERATIONAL LEAD
Financial aid & systems readiness	VP Enrollment / CFO	Financial Aid Director
Program accountability & outcomes	Provost	IR + Deans
Enrollment & family communications	VP Enrollment	Admissions + Financial Aid
Data integrity & governance	CIO / Provost	IR + Registrar + IT
Finance, tax & board reporting	CFO	Controller
Overall coordination & oversight	President / Cabinet	OBBBA working group chair

Quick readiness self-check

A fast pulse for leadership — mark each Yes / No / Unsure. Any "No" or "Unsure" is a priority.

READINESS QUESTION	Y / N / ?
We know which programs are near the earnings-accountability benchmarks.	
Financial aid packaging is being reconfigured and tested for 2026–27.	
We have confirmed whether the endowment tax applies to us.	
We could reproduce and defend our program-level data if flagged.	
There is a named owner and a cross-functional readiness plan.	
The board has seen our OBBBA exposure.	
Staffing & capacity	

Immediate actions (0–3 months)

DONE	ACTION	OWNER / TIMING
	Charter a cross-functional OBBBA working group with a chair and cadence.	President / Cabinet
	Commission an institutional impact assessment (program, financing, tax exposure).	Provost / CFO
	Identify programs near the earnings-accountability benchmarks.	IR / Provost
	Confirm whether the endowment excise tax applies.	CFO
	Inventory where loan, Pell, and repayment rules live in systems and communications.	Financial Aid
	Brief the board on preliminary exposure and the readiness plan.	President

Near-term actions (before the 2026–27 cycle)

DONE	ACTION	OWNER / TIMING
	Reconfigure and test aid packaging, loan limits, and Pell eligibility.	Financial Aid / IT
	Launch student and family communications on financing changes.	Financial Aid / Enrollment
	Train admissions and aid staff on the new financing landscape.	Enrollment
	Audit and standardize program/CIP coding and completer records.	Registrar / IR
	Strengthen first-destination and earnings-outcome tracking.	Career Services / IR
	Evaluate a Workforce Pell and high-wage program strategy.	Provost / Cabinet
	Model graduate/professional net-revenue exposure.	CFO / IR

Ongoing / strategic actions

DONE	ACTION	OWNER / TIMING
	Invest in outcomes and placement for programs near the threshold.	Provost / Career Services
	Establish data governance to defend program-level metrics.	IR / IT
	Support borrowers through the RAP transition (deadline July 1, 2028).	Financial Aid
	Monitor final ED regulations; update the plan and re-brief the board.	Cabinet / IR
	Reassess program portfolio in light of accountability results.	Provost / Board

Top risks & mitigations

RISK	MITIGATION
A program loses loan eligibility after being flagged	Identify at-risk programs now; improve outcomes; defend the data
Awarding on outdated rules in 2026–27	Reconfigure and test packaging well before the cycle
Families surprised by financing gaps	Proactive, early communications with clear alternatives
Program data can't be reproduced if challenged	Stand up governance, documentation, and reconciliation
Readiness stalls behind day-to-day work	Name an accountable owner and report to the board

Communications plan

DONE	ACTION	OWNER / TIMING
	Notify continuing graduate/professional students about Grad PLUS and loan caps.	**Financial Aid**
	Communicate Parent PLUS caps to affected families.	**Financial Aid / Enrollment**
	Update net-price, financing, and counselor messaging.	**Enrollment / Marketing**
	Notify students who become Pell-ineligible under the new rules.	**Financial Aid**
	Brief faculty/deans in programs at accountability risk.	**Provost**

Board reporting cadence

Report OBBBA readiness to the board at least quarterly through 2026 — covering program-accountability exposure, financial and enrollment impact, tax applicability, and progress against this checklist — and immediately if a program-level risk materializes.

REMINDER: The effective dates are fixed even as regulations are finalized. Institutions that assign ownership now — rather than waiting for final rules — enter 2026 ready rather than reacting.