

IN-DEPTH DEPARTMENTAL BRIEF

OBBBA & Career Services

Detailed guidance for career services & development

Why this matters now

OBBBA ties federal aid eligibility to graduates' earnings for the first time at this scale. Beginning with a framework effective July 1, 2026 (first results ~2027, penalties as early as 2028), programs whose graduates do not out-earn a benchmark can lose federal Direct Loan eligibility. Career Services moves from a support function to a strategic partner in protecting programs — through the outcomes it helps produce and the data it collects.

The changes in detail

- **Program earnings accountability.** Graduate earnings are measured roughly four years after completion. Undergraduate programs must exceed the median earnings of a high-school graduate (ages 25–34) in the state; graduate programs must exceed the median bachelor's-degree holder (state or field median, whichever is lower). Institutions with >50% out-of-state students are measured against national medians.
- **Consequences.** A program that fails in two of three years becomes a low-earning outcome program and loses Direct Loan eligibility for two years. If failing programs represent 50%+ of an institution's federal aid, the whole institution is at risk.
- **Workforce Pell outcome tests.** Short-term Workforce Pell programs must achieve a 70% completion rate, a 70% job-placement rate (second quarter after completion), and a value-added earnings threshold, and align to occupations the governor designates high-skill, high-wage, or in-demand.

WHY THIS LANDS ON CAREER SERVICES

Two things you own — employment outcomes and the data that measures them — now carry Title IV consequences. Placement rates, wage trajectories, and reliable first-destination data become institutionally important, and Career Services is central to both moving the numbers and documenting them.

RISKS & WATCH-ITEMS

- Programs sitting just below the earnings benchmark, where a modest outcomes improvement changes eligibility.
- Weak or incomplete first-destination and earnings data that cannot substantiate a program's outcomes if challenged.
- Workforce Pell programs that cannot demonstrate the 70% placement requirement.

Action plan

Immediate (0–3 months)

- Partner with IR to identify which programs are near the earnings benchmarks and would benefit most from intervention.
- Audit your first-destination and earnings-outcome data for coverage and reliability.

Near-term

- Concentrate employer partnerships, internships, and co-ops on at-risk programs to raise graduate earnings and placement.
- Build wage-forward advising that connects students to higher-earning and in-demand roles.

Ongoing

- Feed placement and earnings evidence into program review and accreditation; own the 70% placement metric for any Workforce Pell offerings.



What good looks like



High-coverage, reliable first-destination and earnings data by program.



Rising placement and wage outcomes in programs previously near the threshold.



Career Services embedded in program-level accountability planning, not consulted after the fact.

How CampusWorks & Dynamic Campus can help

We help connect your outcomes data to the OBBBA benchmarks, prioritize the programs where intervention matters most, strengthen employer-partnership and outcomes-tracking capacity, and build the placement and earnings evidence base that protects program eligibility.

CAMPUSWORKS +  Dynamic Campus