

IN-DEPTH DEPARTMENTAL BRIEF

OBBBA & the Registrar

Detailed guidance for the registrar & academic records

Why this matters now

OBBBA's accountability regime runs on data the Registrar owns — program definitions, CIP coding, and completion records — and creates new short-term program structures to build and track. When a program's aid eligibility can hinge on its earnings metric, the accuracy and reproducibility of program-completer data become mission-critical.

The changes in detail

- **Program-level accountability.** Earnings are measured by program (credential level and field of study), so program and CIP coding, and the identification of completers, directly determine which cohorts are measured and how.
- **Workforce Pell program structures.** Short-term programs are defined in clock hours (150–599 hours over 8 to under 15 weeks) and require articulation agreements to related certificate/degree programs plus completion tracking.
- **Loan & Pell interactions.** New loan limits, Pell exclusions, and repayment status intersect with enrollment status and satisfactory academic progress in ways that must be reflected correctly in the SIS.

OPERATIONAL IMPACT

- Program and CIP coding must be accurate and current — errors here misdirect earnings metrics and aid eligibility.
- Completer/graduation records must be complete and defensible, since they define the measured cohort.
- New clock-hour program types, articulation tracking, and completion monitoring must be configured for any Workforce Pell offerings.

RISKS & WATCH-ITEMS

- Miscoded programs or incomplete completer data producing an inaccurate — and possibly damaging — earnings result.
- Inability to reproduce or defend program-level data if a program is flagged.
- SIS configuration gaps around new loan/Pell/SAP interactions.

Action plan

Immediate (0–3 months)

- Audit and standardize program definitions and CIP coding; assess completeness of completer/graduation records.
- Join the institutional OBBBA working group with Financial Aid, IR, and IT.

Near-term

- Partner with IR on readiness for earnings-accountability reporting; reconcile program-completer data across systems.
- Configure clock-hour program structures and articulation/completion tracking for Workforce Pell.

Ongoing

- Maintain documented, reproducible program-level data and a clear data lineage that can be defended.



What good looks like



Clean, standardized program/CIP coding and complete completer records feeding the earnings metrics.



Reproducible program-level data with documented methodology and lineage.



Workforce Pell programs correctly structured and tracked from day one.

How CampusWorks & Dynamic Campus can help

We help audit and standardize program and CIP coding, establish reproducible program-completer data and lineage, prepare your systems for the new accountability reporting, and configure the structures needed to offer Workforce Pell programs.

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