

IR PRACTICE

The One Big Beautiful Bill Act

What your institution should know, and how we can help

What to know

- **Accountability shifted to outcomes.** Federal loan eligibility now depends on whether a program's graduates out-earn a comparison group. Fail in two of three years and the program loses Direct Loans.
- **The risk can escalate.** If failing programs exceed half of an institution's Title IV recipients or dollars, all aid, including Pell, is at stake for those students.
- **Borrowing has tightened.** Grad PLUS is eliminated, new caps apply, loans are prorated for part-time enrollment, and Pell has new cutoffs.
- **There is upside, too.** Workforce Pell opens aid to qualifying short-term programs in 2026-27. The endowment tax reaches only a few wealthy privates.

How we can help

- **Screen every program now.** Estimate which programs pass, sit near the line, or fall short, using proxy data, a year or more before official results.
- **Model the exposure.** Quantify the enrollment and net tuition revenue at stake in flagged programs, and monitor the institution-level threshold.
- **Ready the reporting.** Prepare the fall 2026 transparency reporting and strengthen the CIP and completer-cohort data governance beneath it.
- **Plan enrollment and opportunity.** Stress-test graduate and professional enrollment against the new limits, and assess Workforce Pell opportunities.

THE TIMELINE GIVES YOU ROOM TO ACT

2026 framework effective and fall reporting decision.

2027 first official earnings results.

2028 earliest a program could lose eligibility.

Our approach

We work from primary regulatory text, document our methodology so results are transparent and repeatable, and present findings as planning signals rather than verdicts. A typical engagement starts with a focused scoping review and ends with a leadership briefing that turns findings into next steps.

Contact us to schedule an OBBBA Readiness Assessment.