Implementing the Do No Harm Earnings Provision

Key Issues for Negotiated Rulemaking

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On July 4, 2025, the One Big Beautiful Bill Act (OBBBA) was signed into law. Among the changes to higher education policy contained in the legislation was the establishment of an earnings-based accountability measure: the "do no harm" (DNH) provision. This provision creates an earnings premium test to assess whether the typical graduate is financially worse off after completing a postsecondary program.

Although the DNH provision outlines the broad structure of this accountability system, many critical implementation details remain undefined. These details must be established by the US Department of Education through negotiated rulemaking.[1]

To inform that process, the Urban Institute and the Institute for Higher Education Policy convened a group of higher education policy experts to discuss key definitional and technical challenges associated with implementing the DNH provision. Participants included policy researchers from think tanks and advocacy organizations, as well as current and former staff members from the Department of Education and Congress.

The goal of the convening was not to reach consensus on implementation choices but to provide a forum for experts to identify challenges and propose potential solutions. Accordingly, this brief is not a summary of the convening discussions. Instead, it is informed by those discussions and organized around some of the major themes that emerged.

The Do No Harm Earnings Provision

The DNH earnings provision is designed to ensure that federally aided graduates of higher education programs have earnings that are equal to, or higher than, what they might have earned if they did not pursue the credential. The provision applies to all programs, except undergraduate certificate programs, in Title IV institutions (i.e., institutions that provide federal financial aid).[2] Programs that consistently do not meet the earnings threshold will lose the ability to provide federal loans to their enrolled students.

For undergraduate degree programs, the median earnings of federally aided program completers must meet or exceed the median earnings of young adult high school graduates. For graduate certificates and degree programs, median earnings of federally aided program completers must meet or exceed typical earnings for bachelor's degree recipients (either overall or in the same field of study as the graduate program). A program fails the earnings premium test if it does not meet the applicable benchmark in two out of three years.

The DNH provision is the most substantial higher education accountability proposal Congress has enacted in recent years.[3] Prior congressional proposals to improve higher education accountability—such as the College Cost Reduction Act[4]—faced substantial political obstacles and design challenges (Delisle, Cook, and Colin 2023). These challenges, in part, led the Obama-Biden administration to rely on executive authority to establish the gainful employment (GE) rule,[5] subsequently reestablished in regulations by the Biden-Harris administration alongside the financial value transparency (FVT) framework. The GE rule holds a select group of programs—nondegree programs in any sector and all credentials offered by for-profit institutions—accountable for their graduates' earnings and debt-to-earnings outcomes of their graduates. FVT further ensured these metrics would be calculated for all programs, regardless of the institution's control or credential level, and disclosed to prospective and enrolled students.

With GE and FVT providing a regulatory model for earnings-based accountability and the Streamlining Accountability and Value in Education (SAVE) for Students Act[6] offering a legislative framework, Congress ultimately enacted a statutory earnings accountability measure through the OBBBA.

Although the DNH provision defines many components of the measurement and accountability thresholds for programs, the Department of Education, through a negotiated rulemaking process, must make several implementation choices. The Urban Institute working group identified the following issues that need further regulation to support implementation.

Small Programmatic Cohorts

Broadly, the program-level earnings accountability measure compares the median earnings of federally aided, employed program completers four years after completion with the median earnings of working adults ages 25 to 34 who hold only a high school diploma (for undergraduate programs) or a bachelor's degree (for graduate programs).

If an academic program has fewer than 30 federally aided completers, the Department of Education is required to aggregate program-level data across additional cohort years. If the cohort still includes fewer than 30 individuals, the department must further aggregate data across educational programs of equivalent length until the cohort reaches at least 30 individuals.

What the DNH provision does not specify—and what will likely be determined through negotiated rulemaking—is how many additional cohort years should be aggregated before the Department of Education begins combining programs of equivalent length and how (or whether) programs of equivalent length should be defined and aggregated. GE, for instance, aggregated programs across two years (or four years for small programs); the rules did not combine programs if the cohorts were still too small.[7]

Aggregating Additional Cohort Years of Programmatic Data

Several considerations arise when attempting to aggregate multiple years of cohort data to reach a minimum cohort size of 30 individuals. One concern is determining when aggregated cohorts cease to reflect the outcomes of the program as currently offered. Postsecondary programs frequently undergo changes, including curriculum redesigns, shifts in instructional modality, and enrollment growth or decline. Imagine that a program must use five years of cohort data (e.g., cohorts with four-year earnings measured in 2021, 2022, 2023, 2024, and 2025) to obtain a sample of at least 30 federally aided graduates with reported earnings. The four-year earnings of the earliest cohort, those measured in 2021, reflect program and institutional decisions about financial aid and instruction that stretch back to 2013 or earlier if it is a four-year program, when members of the cohort were likely first admitted. Thus, as more cohort years are aggregated, earnings outcomes may increasingly reflect historical program conditions rather than current program quality. And recent improvements in program outcomes might not meaningfully move the median value over a single year. On the other hand, aggregation across years may add some stability to the measure, ensuring there is not significant year-to-year variation because the median earnings reflect only a relatively small number of graduates.

When aggregating data across years, earnings from earlier cohorts will need to be adjusted for inflation as a part of the aggregate cohort development. But the DNH provision requires that cohorts be aggregated until a group of at least 30 individuals is achieved. If negotiators take this to mean that a large program may be assessed on a single year of data while a small program could combine multiple years of data, the relative influence of program changes and labor market conditions could vary substantially across programs of different sizes. A small program's measure would be more insulated from a new economic shock, such as a recession, but the earnings cohort that was affected by the recession would be included in the measurement group for several years. And a larger program that revises its instruction to generate better earnings outcomes would see the effects of their intervention much sooner than a smaller program.

One option for simplifying this process is to establish a predetermined number of cohort years to aggregate for all programs or for programs that initially fall below the 30-student threshold. Under the existing GE regulations, for example, the Department of Education aggregates four years of cohort data

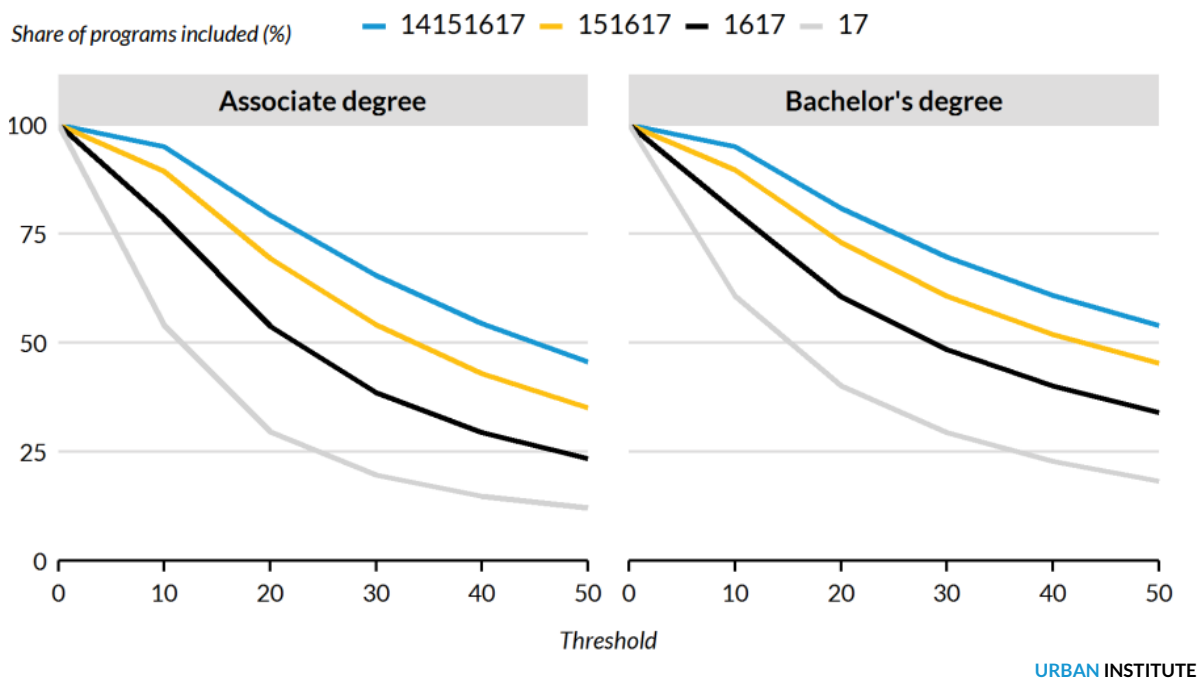
to calculate debt-to-earnings and earnings premium measures when a program has fewer than 30 completers in a two-year window but does not conduct further cohort aggregation.[8] GE starts with a pooled two-year cohort for these calculations, which does not appear allowable under DNH.

Empirical analyses suggest that most graduates would be covered by the aggregation of four years of cohort data, though a substantial number of very small programs would not have reportable results. One study found that although 30 percent of bachelor's degree programs and 34 percent of associate's degree programs would be excluded for having fewer than 30 completers after four cohorts are aggregated together, only 4 percent of bachelor's and associate's degree graduates would be excluded (figure 1).[9] Similar analyses conducted by the Department of Education found comparable differences between program-level and student-level coverage under GE.[10] The department's conclusion that maximizing student coverage was more important than achieving higher levels of program coverage suggests that a similar approach may be reasonable for implementing the DNH provision.

FIGURE 1

Share of Programs, by Rule, for Each Credential Level

Six-digit CIP codes



Source: Integrated Postsecondary Education Data System completions data.
Notes: CIP = Classification of Instructional Programs.

Using a fixed number of cohort years would also reduce administrative complexity by eliminating the need for the Department of Education to repeatedly add single years of data until reaching a cohort of 30. Instead, the department could clearly define how many years are aggregated before proceeding

to aggregate programs of similar length for those programs that still fall below the 30-individual threshold.

Aggregating Programmatic Data for Educational Programs of Similar Length

If the Department of Education cannot achieve the required cohort size after aggregating additional years of data, the DNH provision directs the department to aggregate data across educational programs of "equivalent length." But the provision does not define what constitutes "equivalent length."

Program length can be measured in multiple ways, including expected time to completion (e.g., four years for a bachelor's degree or two years for an associate's degree), credential level, and/or credit hours. Regardless of the metric used, programs in the same credential category can vary in length, and program length overall can differ substantially across institutions. For example, three-year bachelor's degrees are increasingly common,[11] and graduate programs—particularly at the master's and doctoral levels—vary widely in both duration and required credits.

In addition to defining program length, the Department of Education must determine how programs of equivalent length should be aggregated. Although the DNH provision does not specify an aggregation method, it is likely that the Classification of Instructional Programs (CIP)[12] will be used to support program aggregation, as it currently serves this function under GE and FVT.

A key unresolved question is whether aggregation should occur at the two-digit, four-digit, or six-digit CIP code level or through some other aggregation scheme. The six-digit CIP code level sometimes combines similar programs (or versions of a program) an institution offers but is the most granular federal designation and is used to identify specific instructional programs. The six-digit CIP code is also used in the current definition of a program under federal regulations. Under GE and FVT, both GE and non-GE programs are defined in part as "the program's six-digit-CIP as assigned by the institution."[13] Given that this definition was guided by previous negotiated rulemaking for GE and codified in the rules, the Department of Education would need a compelling rationale to shift course.

Small cohort sizes are also most prevalent at the six-digit CIP code level. Aggregating at the two-digit level increases the likelihood of meeting the 30-student threshold but risks combining substantively different programs—for example, economics (45.06) and criminology (45.04) both fall under social sciences (CIP 45).

Aggregation at the four-digit CIP code level may offer a reasonable compromise. One study found that 76 percent of six-digit CIP programs in GE data were the only programs within their corresponding four-digit CIP categories.[14] In addition, among four-digit CIP categories containing multiple six-digit programs, most had consistent outcomes across programs—either all passing or all failing GE measures. Only 10 percent of these four-digit categories included a mix of passing and failing programs. Although this represents a relatively small share of programs, it raises an important concern. Programs that would otherwise pass the DNH provision's earnings measure could fail if aggregated with lower-performing programs, and conversely, failing programs could pass when combined with higher-performing ones.

But the Department of Education estimates suggest that aggregating from the six-digit to the four-digit CIP code level may yield only modest improvements in coverage. For GE programs, student coverage increased from 75 percent to 79 percent, and program coverage increased from 15 percent to 18 percent.[15] For non-GE programs, student coverage increased from 69 percent to 74 percent, and program coverage increased from 19 percent to 23 percent.

There will inevitably be some programs for which data are not available, even with aggregation. In those cases, the Department of Education will need to consider whether programs without data will pass the DNH standard, as is the case with GE.

Notably, for instance, these analyses focus exclusively on undergraduate programs. At the graduate level—particularly for doctoral programs—cohort sizes well below 30 students are common. Even with four years of pooled data, meeting the threshold at either the six-digit or the four-digit CIP code level may be difficult. Other efforts to measure doctoral program outcomes, such as the Post-Secondary Employment Outcomes (PSEO)[16] project, rely on two-digit CIP codes because of persistent small cell sizes at more granular levels, and may still not encompass all programs or students.

Fields of Study for Graduate and Professional Programs

Under the DNH provision, a graduate or professional program is deemed low earning and potentially subject to sanction if its median earnings fall below the lowest of three benchmarks likely measured using data from the American Community Survey: (1) the median earnings of working young adults (ages 25 to 34) with a bachelor's degree in the state where the institution is located; (2) the median earnings of young adults with a bachelor's degree in the same field of study—as defined by the secretary of education—within that state; or (3) the median earnings of young adults with a bachelor's degree in the same field of study nationwide.[17]

Two of these benchmarks require comparing graduate and professional program completers with working bachelor's degree holders in the same field of study. In principle, this involves aligning graduate and professional CIP codes with corresponding undergraduate fields. In practice, however, not all graduate and professional programs have direct undergraduate equivalents. Programs such as law (22.01), dentistry (51.04), and medicine (51.12) do not clearly align with undergraduate CIP codes. An additional challenge is that some small fields of study (defined by the two-digit CIP code) and some smaller states will have too small a sample size in the American Community Survey to establish reliable estimates of thresholds—or to produce any estimated threshold at all. There may be statistical approaches the Department of Education could explore that may be able to generate more reliable estimates.

One possible approach for aligning graduate and professional programs with undergraduate fields of study is to use data from the National Survey of College Graduates.[18] These data can identify the most common undergraduate majors that feed into graduate programs at the two-digit CIP code level. But because the DNH provision explicitly defines the benchmark for graduate and professional programs as a "bachelor's degree in the same field of study," it is unclear whether the Department of

Education has statutory authority to use the most common CIP codes feeding into a graduate or professional program if those codes do not represent the same field of study.

Appeals Process

The DNH provision prohibits a program from losing eligibility unless the institution is first given an opportunity to appeal the determination of the program's median earnings for federally aided graduates who are working and not enrolled, through a process to be established by the secretary of education. Beyond this requirement, the DNH provision provides no guidance on the structure or scope of an appeals process.

Under GE, institutions may appeal only if they believe the Department of Education made an error in calculating a program's debt-to-earnings rates or earnings premium, and challenges to program ineligibility are limited to those calculation errors. Institutions are also given the opportunity to review and correct the lists of graduating students used to calculate the median earnings. But the department's experience with appeals in past GE rules suggest that institutions submitted much less accurate earnings information when given the opportunity, and the process was unsustainably burdensome for the department to manage—likely even more so now after substantial staffing reductions. To that end, the department could adopt a similar appeals framework for the DNH provision.

Another question is whether institutions should be allowed to use nonfederal, administrative earnings data—such as state unemployment insurance wage records—as part of an appeal. The DNH provision does not explicitly state the source of earnings data for program completers, but the Department of Education relies on data from the Internal Revenue Service (IRS) for GE and would likely do so here as well.[19] Allowing nonfederal data in appeals would be relying on less accurate information than the IRS has access to, particularly because federal earnings data are generally more comprehensive than nonfederal data. For example, unemployment insurance wage data, while covering approximately 96 percent of the civilian workforce across the country, are limited to taxable earnings from covered employment and therefore exclude self-employment, informal work, most federal employment, and seasonal employment (Metcalf 2025). Measures of UI wages produced by states will also generally exclude graduates who move out of state.

Another appeals-related concern involves cohort aggregation. Should an institution with a program that would pass the earnings threshold on its own be allowed to appeal if the program fails solely because it was aggregated with lower-performing programs? This situation would not occur with GE because it does not aggregate across program. One possible alternative would be to allow institutions to challenge the construction of aggregated cohorts.

Addressing Puerto Rico and US Territories

The DNH provision does not mention any exemption for Puerto Rico, US territories, or freely associated states, suggesting that programs in these jurisdictions are subject to the earnings accountability

measure. The Department of Education previously identified significant data limitations affecting the application of GE to programs in Puerto Rico, US territories, and freely associated states. Most territories lack reliable earnings data to measure high school earnings, and alternative thresholds—such as 150 percent of the federal poverty level—proved inappropriate based on limited available data. Even in Puerto Rico, earnings data coverage is substantially lower than in the mainland United States.[20] As a result, the department exempted programs in these jurisdictions from most GE and FVT requirements.

The department could invest in further research to explore options for including these jurisdictions in the DNH provision. But absent resolution of the underlying data challenges, the department could choose to follow the GE model and exempt these areas. Foreign institutions could still be measured against the US nationwide earnings threshold, as with any institution that has most of its students coming from out of state.

One concern with exempting these jurisdictions is the potential for institutions to place programs in Puerto Rico or the US territories to avoid DNH accountability. One possible safeguard would be to include a provision stating that programs would remain subject to the DNH provision if a specified share of enrolled students resides outside the territory.

Determining Whether 50 Percent of Students Reside in the Institution's State

Under the DNH provision, the median earnings of working young adults are calculated using data from the state in which the institution is located, unless fewer than 50 percent of the institution's students reside in that state, in which case national median earnings are used. The statute does not specify how student residency should be determined or define the term "reside."

In education policy, "residency" typically refers to a student's permanent address (e.g., a dependent student's parents' address), while "location" refers to a student's current address (e.g., a campus address). For example, the Department of Education uses "locate" for the purpose of state authorization.[21] Because the DNH provision uses the term "reside," the department should adopt definitions consistent with the state authorization language and other existing regulatory frameworks.

Potential data sources for determining residency have notable limitations. For example, the Free Application for Federal Student Aid (FAFSA) data require students to report a permanent address. But the DNH language on the share of an institution's students that reside in the same state as the institution is not limited to students who submit a FAFSA. This suggests the Department of Education would have to require new institutional reporting of all students' state of residence. Separate from this issue, students may update their permanent address in subsequent FAFSA submissions to reflect a campus location rather than their original permanent residence. This potentially complicates residency determinations, as it will not be clear whether the updated campus address reflects a temporary location or a new permanent residence. The department could ultimately choose to use the address students report the first time they file a FAFSA.

It should be noted the Integrated Postsecondary Education Data System (IPEDS) collects student state of residence data for individuals who submit a FAFSA and for those who do not. But these data are collected only for first-time, first-year undergraduate students and are required only in alternating years, meaning IPEDS it is not likely a viable option.

Future Role of Gainful Employment and Financial Value Transparency

The GE rule—and the complementary FVT framework—were created under executive authority. With the passage of the DNH provision, questions arise regarding the future role of GE and FVT.

There is a strong case for maintaining both policies. Notably, the DNH provision does not apply to undergraduate certificate programs, and Senate Republicans on the Senate Health, Education, Labor, and Pension Committee have confirmed those programs would be covered by GE (Senate HELP 2025). Recent analysis indicates that fewer than 5 percent of students across most credential levels are enrolled in programs that fall below the DNH provision's earnings threshold. Undergraduate certificate programs, however, are a significant exception: approximately 24 percent of students in these programs earn less than high school graduates four years after completion. This finding suggests that some version of GE, which serves as an accountability metric for all programs that do not lead to a degree, remains important for holding these certificate programs accountable.

Although FVT is a disclosure framework rather than an accountability mechanism, it continues to serve an important role by providing information on program-level costs, student aid, and outcomes that are not available elsewhere. For example, the GE and FVT data collection includes a new collection on private student loan information, providing a better understanding of the full costs that students bear when enrolling in a given program. This is especially important because of new graduate loan limits, which will likely prompt more students to seek out private student loans. Further, because the DNH provision does not account for student debt—and because GE's debt-to-earnings measures apply only to nondegree programs at public and nonprofit institutions—FVT remains the sole source of program-level debt-to-earnings information for many students.

That said, institutions have faced challenges reporting both GE and FVT data. If the Department of Education elects to retain one or both frameworks alongside the DNH provision, it will be important to work with colleges and universities to continue to improve data collection.

Conclusion

The do no harm earnings provision of the One Big Beautiful Bill Act represents a significant shift in federal higher education accountability by establishing statutory earnings-based oversight to all degree programs. Although the statute establishes clear goals and broad parameters, its effectiveness will ultimately depend on how the Department of Education resolves a series of complex technical and

definitional questions through negotiated rulemaking. Decisions about cohort aggregation, program grouping, field-of-study alignment, appeals, territorial applicability, and the interaction with existing frameworks such as gainful employment and financial value transparency will shape not only which programs are held accountable but the fairness, accuracy, and legitimacy of the accountability system as a whole.

The issues outlined in this brief highlight numerous trade-offs inherent in implementing a statutory earnings measure at scale. As the Department of Education moves forward, careful attention to data limitations, legal constraints, and institutional capacity will be essential. Thoughtful regulatory choices—grounded in empirical evidence and informed by prior experience with GE and FVT—can help ensure that the DNH provision advances its central aim: protecting students and taxpayers while promoting meaningful, equitable postsecondary opportunities.

Notes

[1] Negotiated rulemaking is a process in which a federal agency brings together stakeholders to work toward consensus on the text of a proposed rule, with the aim of improving implementation and reducing litigation risk. The Negotiated Rulemaking Act of 1990 affirms agencies' authority to use this approach, encourages its use, and establishes procedures for doing so. See Carey (2021).

[2] Such programs may be covered by a separate, but related, earnings standard under the gainful employment rule.

[3] Previously, Congress passed the cohort default rate, which removes eligibility for financial aid from institutions whose students have a high student loan default rate. Other accountability and information approaches, such as the College Scorecard and GE and FVT, have been developed by the Department of Education.

[4] College Cost Reduction Act, H.R. 6951, 118th Cong. (2023).

[5] Financial Value Transparency and Gainful Employment, 88 Fed. Reg. 70004 (Oct. 10, 2023).

[6] Streamlining Accountability and Value in Education for Students Act, S. 1971, 118th Cong. (2023).

[7] "Frequently Asked Questions," US Department of Education, Office of Federal Student Aid, last updated February 6, 2025, https://fsapartners.ed.gov/knowledge-center/topics/financial-value-transparency-and-gainful-employment-information/frequently-asked-questions#:~:text=For%20programs%20using%20transitional%20rates,potential%20consequences%20under%20the%20regulation.

[8] "Frequently Asked Questions," US Department of Education, Office of Federal Student Aid.

[9] See Blagg et al. (2021; the authors look only at graduates, not at Title IV aid recipients with earnings data). Although the DNH provision includes only students who receive Title IV financial aid, this study includes all completers, those who receive federal aid and those that do not, in the analysis.

[10] Financial Value Transparency and Gainful Employment, 88 Fed. Reg. 70004 (Oct. 10, 2023).

[11] Johanna Alonso, "Is the 3-Year Degree Dream Becoming a Reality?" *Inside Higher Ed*, July 28, 2025, https://www.insidehighered.com/news/students/academics/2025/07/28/colleges-accreditors-and-states-embrace-3-year-degrees.

[12] The Classification of Instructional Programs is a taxonomic coding system used to organize, collect, and report information on fields of study and program completions. See NCES (n.d.).

[13] Financial Value Transparency and Gainful Employment, 88 Fed. Reg. 70004 (Oct. 10, 2023).

[14] Erica Blom, Robert Kelchen, Carina Chien, and Kristin Blagg, "How to Make Gainful Employment More Inclusive," *Urban Wire*, Urban Institute, March 31, 2021, https://www.urban.org/urban-wire/how-make-gainful-employment-more-inclusive.

[15] Financial Value Transparency and Gainful Employment, 88 Fed. Reg. 70004 (Oct. 10, 2023).

[16] PSEO data are experimental tabulations developed by researchers at the US Census Bureau. PSEO data provide earnings and employment outcomes for college and university graduates by degree level, degree major, postsecondary institution, and state of institution. These statistics are generated by matching university transcript data with a national database of jobs, using state-of-the-art confidentiality protection mechanisms to protect the underlying data. See "Post-Secondary Employment Outcomes (PSEO)," US Census Bureau, accessed December 22, 2025, https://lehd.ces.census.gov/data/pseo_experimental.html.

[17] If fewer than half of an institution's students reside in the state where it is located, the benchmark shifts to national earnings, using the lower of either (1) median earnings of all working adults nationwide or (2) median earnings of working adults nationwide in the same field of study.

[18] The National Survey of College Graduates is a long-running survey sponsored by the National Center for Science and Engineering Statistics within the National Science Foundation and administered by the US Census Bureau. Conducted every two to three years since the 1970s, it collects data on the size and characteristics of the US population with a bachelor's degree or higher. See "National Survey of College Graduates (NSCG)," US Census Bureau, last updated August 27, 2025, https://www.census.gov/programs-surveys/nscg.html.

[19] The Department of Education originally planned to use data from the Internal Revenue Service to calculate earnings for GE and FVT. See "(GEN-24-04) Regulatory Requirements for Financial Value Transparency and Gainful Employment (Updated Sept. 16, 2024)," US Department of Education, Office of Financial Student Aid, last updated September 16, 2024, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2024-03-29/regulatory-requirements-financial-value-transparency-and-gainful-employment-updated-sept-16-2024

[20] Financial Value Transparency and Gainful Employment, 88 Fed. Reg. 70004 (Oct. 10, 2023).

[21] State Authorization, 34 Fed. Reg. 600.9 (c) (Dec. 22, 2025).

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