Earnings Accountability Thresholds and Program Screen: Methodology

Data and methods behind the earnings accountability threshold table and the state program screen · opportunitydata.org · November 2026 · version 2026-11-06

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1. The rule

Section 84001 of Public Law 119-21 added section 454(c) to the Higher Education Act: a program loses Direct Loan eligibility when its completers' median earnings fall below the median earnings of a comparison group of working adults aged 25 to 34 in two of three consecutive years. The Department of Education's final rule of July 1, 2026 (91 FR 40136, effective July 1, 2027) defines the comparison as the "earnings threshold" in 34 CFR 668.2 (91 FR 40281) and applies the same measure to gainful employment programs, which brings undergraduate certificates inside the test.

Table 5.5 of the rule's impact analysis (91 FR 40213) assigns the threshold by credential level. Undergraduate certificates, associate's degrees, bachelor's degrees, and post-baccalaureate certificates are measured against the high-school median for the institution's state, or the national high-school median when half or more of the institution's students are from other states. Master's, doctoral, and professional degrees and graduate certificates are measured against the lowest of the same-state same-field bachelor's median, the same-state bachelor's median, and the national same-field bachelor's median, or the lowest of the national same-field and national bachelor's medians for institutions drawing half or more of their students from other states. The table gives no dollar values.

2. Sources and vintages

Program earnings: College Scorecard field-of-study file of October 15, 2026 (EARN_MDN_4YR: median earnings four years after completion for federally aided completers of award years 2017-18 and 2018-19 who were working and not enrolled, measured in calendar years 2022 and 2023 and adjusted to 2024 dollars, per the Scorecard's field-of-study cohort map). Thresholds: the definition in 34 CFR 668.2 counts people who worked and were not enrolled "during the year of the associated measured earnings." The primary thresholds therefore use the American Community Survey 2019 to 2023 5-year Public Use Microdata Sample, whose final year is 2023, converted to 2024 dollars with the annual-average CPI-U (313.689 / 304.702). The 2020 to 2024 file, which the College Scorecard institution file has displayed since October 15, 2026 (EARN_THR_STATE, EARN_THR_NAT; data update of November 2, 2026), fits earnings measured in 2024 and is carried as a comparison. Both through the Census Bureau API; Puerto Rico from the Puerto Rico Community Survey file of the same years. Exposure: Title IV completers in award year 2024-25 (PPD:2026, t4completers_2025) and Stafford and Grad PLUS borrowing of 2022-23 and 2023-24 completers (Scorecard DEBT_ALL_STGP_ANY_N times DEBT_ALL_STGP_ANY_MEAN). Final rule text and tables from govinfo.gov, FR Doc. 2026-13286.

3. Threshold computation

Universe: persons aged 25 to 34 whose highest attainment is a regular high school diploma or a GED or alternative credential (high-school thresholds) or a bachelor's degree (bachelor's thresholds), not enrolled in school in the last three months. Working: wage and salary income plus self-employment income, each adjusted to 2024 dollars with the file's adjustment factor, greater than zero. This is the definition in the rule's impact analysis (91 FR 40212, footnote 58; 91 FR 40214, footnote 59). Statistic: the person-weighted median (sort by earnings, accumulate person weights, take the first person at or past half the total; where the running weight equals exactly half, average that person and the next), rounded half up to the dollar, then multiplied by the dollar factor and rounded again. The national figures pool the 50 states and the District of Columbia; Puerto Rico is excluded from every national figure, as in the Department's national high-school threshold.

Field of study: the ACS general degree field (the first two digits of the field-of-degree code) mapped to a 2-digit CIP code with the Department's own crosswalk, Appendix Table 1 of the PPD:2026 technical appendix (37 degree fields). The rule groups fields at the 2-digit CIP level (91 FR 40161).

Differences from the January 2026 data file. The Department's PPD:2026 benchmarks use the 2023 ACS 5-year estimates, count a person as working only if in the labor force, employed, and with positive earnings, suppress a benchmark below 30 respondents, and use Puerto Rico figures for territories without Census data (technical appendix, Earnings Benchmark Data). The final rule counts positive earnings alone, sets the same-state same-field threshold to one dollar below 16 respondents, and assigns one dollar where Census data are not available. The tables here follow the final rule. The employed-at-survey medians are carried in the files as the _employed columns for reconciliation with the Department's January file.

One-dollar rule: where fewer than 16 individuals meet the criteria for the same-state same-field cell, the rule sets that threshold to one dollar. The 16-respondent cutoff is the Department's reading in the preamble (91 FR 40159, 40174) of paragraph (3) of the definition, which assigns one dollar where the Census data needed for a threshold are not available (91 FR 40281); combinations with no respondents at all take one dollar on the same reading. Territories and Freely Associated States with no Census earnings data receive one dollar under the same paragraph (91 FR 40174). The smallest state samples behind a statewide median are 287 respondents for the high-school threshold and 521 for the bachelor's.

4. Validation

Against the Department, 2020 to 2024. Run on the 2020 to 2024 file, the code reproduces 52 of 52 high-school thresholds published in the College Scorecard institution file to the dollar: every state, the District of Columbia, and the national figure of $35,678. The bachelor's thresholds use the same code path with the attainment filter changed.

Against PEER Center, 2019 to 2023. PEER Center published its own 2019 to 2023 thresholds and Stata code on November 6, 2026 (The Fine Print: A Guide to Calculating Earnings Thresholds; data CC BY 4.0). Cell by cell, the two agree within one dollar for 53 of 53 high-school thresholds, including the national figure of $35,442, and for 1,810 of 2,014 graduate thresholds. 204 of the remaining graduate thresholds match once Puerto Rico is added to the national bachelor's medians, which PEER does and this computation does not. The two computations also differ in one detail: PEER excludes bachelor's holders attending college or graduate school, this computation anyone attending school. Since every cell agrees within a dollar once Puerto Rico is accounted for, that difference changes no threshold.

Against the Department's January 2026 file. The PPD:2026 benchmarks, on the 2019 to 2023 file, do not reproduce to the dollar: the computation matches 0 of the Department's 51 state high-school benchmarks; the Department's figures average 0.991 times the positive-earnings computation and 0.946 times the employed-at-survey computation that its technical appendix describes; its national figures are $34,808 for high school and $60,112 for bachelor's. PEER Center reports that this file used an IPUMS version of the 2019 to 2023 data posted before IPUMS corrected its inflation adjustment on March 18, 2026; that error lowers the figures, the direction of the gap.

5. Program screen

Programs are rows of the Scorecard field-of-study file at the main campus of each six-digit OPEID, by 4-digit CIP code and credential level, excluding foreign institutions: 207,297 programs, of which 49,660 have published four-year median earnings. Each program with published earnings is compared with the threshold Table 5.5 assigns to its credential level, once with the state column and once with the national column, because the share of an institution's students from its state is determined by the Department from FAFSA addresses; the pages apply the flag the Department used in its own estimates (PPD:2026, outstate_flag, 2017-18 and 2018-19 enrollees) to choose one column per institution: 3,158 programs are below the applied threshold (3,303 on the 2020 to 2024 figures). Institutions are located by the Scorecard institution file and, where it lacks the institution, by PPD:2026; 539 programs at institutions found in neither, nearly all closed, are excluded. A program is below the threshold when its median is strictly less than the threshold. Programs in the 4-digit families that contain the 20 tipped-field codes of Table 5.22 (91 FR 40236) are flagged; the cosmetology (12.04) and massage (51.35) families are covered almost entirely (12.04 also holds the unlisted 12.0410), the casino family (12.06) has no programs in the file, and culinary (12.05) and hospitality administration (52.09) contain one listed code each.

Exposure. Programs below the threshold had at least 180,160 Title IV completers in 2024-25 and their 2022-23 and 2023-24 completers borrowed $3.01 billion in federal loans. Completer counts are available for 37,495 of 49,660 screened programs and loan figures for 21,982; suppressed values count as zero, so both totals are lower bounds. Both describe recent students, not the earlier cohorts whose earnings are measured.

The screen is one snapshot. It is not the official measure, which uses the fourth tax year after completion starting with 2020-21 completers, pools cohorts below 30 completers across years and then across programs, and requires two years below the threshold in three.

6. Sensitivity checks

Check	Result
Survey years. The 2020 to 2024 file the Scorecard displays in place of the 2019 to 2023 file.	3,303 programs below instead of 3,158. Agreement with the Department's January result is 99.35 percent on the 2019 to 2023 figures and 99.10 percent on the 2020 to 2024 figures.
Working definition. Requiring employment at the survey date in addition to positive earnings.	Raises the state high-school median in every state, by $1,677 on average and by $565 to $3,667 (2019 to 2023). On the 2020 to 2024 file it reproduces 0 of 51 published values, against 51 of 51 for the rule's definition.
Respondent cutoff for the same-state same-field cell. 16 in the regulatory discussion, 30 in the impact analysis.	448 of 1,808 observed cells fall below 16 and 643 below 30. With the 116 state-and-field combinations that have no respondents, 564 of 1,924 combinations take the one-dollar threshold.
State column or national column.	3,133 programs with published earnings are below the threshold under the state column, 3,993 under the national column, and 3,158 under the column the Department's flag selects; 1,456 programs change result between the state and national columns, 1,038 of them undergraduate.
Department's own result. PPD:2026 mstr_obbb_fail_cip2_wageb for the same programs.	Available for 49,264 screened programs; the screen and the Department agree on 99.35 percent. The screen places 306 below the threshold that the Department passes, and 14 the other way. Earnings are the same in both files, so the differences come from the thresholds.
Threshold level. All thresholds moved down 5 percent and up 5 percent (state column, programs with a threshold above one dollar).	2,353 programs below at 95 percent of the threshold, 3,133 at the threshold, 4,152 at 105 percent.
Field crosswalk. The Department's general-field crosswalk against a detailed crosswalk of 174 field-of-degree codes.	116 of the 1,767 cells with a value under both crosswalks differ; 41 cells have no value under the detailed crosswalk.
One-dollar fields. Graduate programs with published earnings measured against a one-dollar threshold.	162 graduate programs nationally, under the column the Department's flag selects.
Tipped-field delay.	998 of the 3,133 programs below the state-column threshold are in the cosmetology and massage families, whose listed codes have their first countable year delayed by at least one year (91 FR 40154).
External consistency. Undergraduate certificate, associate's, and bachelor's programs with published earnings.	93.1 percent clear the state threshold (35,430 of 38,060). The Institute for Higher Education Policy reported 93 percent of 42,392 undergraduate programs in October 2026.
Rounding and exact halves. Half up against half to even; averaging at an exact half against taking the lower record.	Half to even moves Tennessee's 2020 to 2024 value by one dollar; half up matches the published value. Averaging at an exact half, adopted in this build, changes no state value on the 2020 to 2024 file and 33 small field cells.
Puerto Rico in the national bachelor's medians. Excluded here; PEER Center includes it.	National bachelor's median $62,167 excluded, lower when included (see earnings_thresholds_ba_national_with_pr_diagnostic). 204 graduate thresholds differ from PEER's for this reason.

7. Limits

The bachelor's thresholds are computed, not official, and differ by a few percent from the Department's January 2026 benchmarks, which do not reproduce to the dollar; they agree with PEER Center's independent computation. The thresholds follow the years of the published earnings (2019 to 2023); the Department's first calculation in 2027 measures tax year 2025 earnings and will use a later file. The screen covers only programs with published earnings, about a quarter of programs in the file; the Department's pooled cohorts will produce results for programs that have none here. The published earnings are for cohorts that completed two to three years before the first official cohort. Scorecard earnings include privacy noise. State-law sections quote the enacted text; the Indiana section quotes Senate Enrolled Act 199. The boundary case of an institution with exactly half its students from the state follows the regulatory text (fewer than 50 percent from the state means the national column); the rule's Table 5.5 labels it differently.

8. Data files and reproduction

Dated files, never overwritten, in data/earnings-accountability: earnings_thresholds_by_state_20261106_acs2023.csv and earnings_thresholds_ba_by_state_field_20261106_acs2023.csv (primary); earnings_thresholds_by_state_20261106.csv and earnings_thresholds_ba_by_state_field_20261106.csv (2020 to 2024); program_screen_20261106.csv; state_screen_summary_20261106.csv; threshold_comparison_peer_20261106.csv. Code, free: build_earnings_thresholds.py (thresholds, about six minutes per file, Census API key required; run with --year 2023 --inflate 1.0294943912412784 --tag _acs2023 for the primary file), build_earnings_accountability_screen.py (program screen), compare_thresholds_peer.py (PEER comparison). Department files used: PPD:2026 earnings-test metrics and institution characteristics, downloaded November 5, 2026. The next validation is the draft and final earnings data the Department has said it will publish in 2027.

Cite as: Opportunity Data, "Earnings Accountability Thresholds and Program Screen: Methodology," November 2026. · Benazir Rowe, Ph.D. · opportunitydata.org