

## The One Big Beautiful Bill: Accountability Framework Planning & Implementation Checklist

The One Big Beautiful Bill Act (OBBBA) makes significant changes to federal student aid, including institutional accountability for program completers' earnings, which becomes effective for enrollment periods beginning on or after July 1, 2026. Use this implementation checklist to plan institutional policy changes, systems updates, and communication plans.



Task	Institutional Targeted Completion Date	✓
<b>Financial Aid Staff:</b> Ensure that financial aid staff are familiar with new regulations, know where to find ED and NASFAA resources, and are trained on institutional policies related to changes.		
<b>Staff &amp; Campus Partners:</b> Facilitate cross-functional strategy sessions with the registrar's office, institutional research, bursar/student accounts, IT, and other applicable teams to align on changes to the accountability framework, including deciding which department is responsible for reporting requirements.		
<b>Policy &amp; Procedure Manual:</b> Revise Policy & Procedure manuals to reflect new processes related to the accountability framework, such as reporting requirements, timelines, and due dates.		
<b>FAMS/Coding:</b> Collaborate with student information system (SIS) and financial aid management system (FAMS) vendors/IT to configure, test, and implement system updates required for new reporting requirements.		
<b>Student Communication:</b> Review and update any written communications (e.g., financial aid website, consumer information pages, disclosures) that reference prior gainful employment/financial value transparency requirements to ensure alignment with the new accountability framework.		
<b>Model Program-level Outcomes:</b> Using <u>completion and earnings data</u> , model program-level outcomes to identify programs at risk of failing new accountability metrics. Be sure to model whether > 50% of Title IV recipients or dollars would come from failing programs, since those programs would lose all Title IV eligibility, not just Direct Loan eligibility.		
<b>Institutional Response for At-Risk Programs:</b> Based on modeling results, work with campus partners and leadership to evaluate options for at-risk programs, including potential program modifications to improve outcomes, operating without Direct Loan eligibility, teach-out strategies, or program closure decisions.		
<b>Consider Orderly Program Closure:</b> Discuss with campus leadership the possibility of using the orderly program closure option for programs that fail after the first year metrics are issued.		