

**U.S. Department of Education**  
**Negotiated Rulemaking for Higher Education**  
**2026 Program Performance Data Description**

This document describes the 2026 Program Performance Data (“PPD:2026”) file containing program-level data the Department is making available to the public as part of the Accountability in Higher Education and Access through Demand-driven Workforce Pell (AHEAD) negotiated rulemaking.

The Department believes these data on student outcomes, institutional characteristics, and Title IV loan and grant disbursements can help inform the negotiated rulemaking and provide information about the likely effects of the proposed rule implementing the One Big Beautiful Bill Act (OBBBA) and changes to the Gainful Employment (GE) rule. However, be advised that these data are not the final data that will be used to implement the proposed rule; these data are for informational purposes only.

#### Overview of PPD:2026

The unit of analysis for the PPD:2026 file is the unique combination of institutional ID (*opeid6*), credential level (*credlev*), and classification of instructional program code at a four-digit level (*cip4*).

Due to file size limits, the PPD:2026 data are uploaded as six separate data files. The individual files, listed below, can be merged one-to-one using the *opeid6*, *credlev*, and *cip4* variables:

- ppd2026\_institution\_characteristics\_and\_completions\_privacy\_suppressed
- ppd2026\_enrollment\_privacy\_suppressed
- ppd2026\_financial\_aid\_part1\_privacy\_suppressed
- ppd2026\_financial\_aid\_part2\_privacy\_suppressed
- ppd2026\_financial\_aid\_part3\_privacy\_suppressed
- ppd2026\_debt\_earnings\_and\_earnings\_test\_metrics\_privacy\_suppressed

The universe of programs in PPD:2026 includes all Title IV, HEA aid programs with at least one Title IV enrollee reported to the National Student Loan Data System (NSLDS) in award years 2023-24 or 2024-25. The program universe excludes a very small number of programs that:

- Have a four-digit CIP codes that do not appear in the 2010 or 2020 CIP code taxonomy;
- Are at a US colleges located in other countries (programs at colleges in US territories and freely associated states are included); and

- Were offered in a highly-uncommon programs, defined as programs where there are fewer than 100 programs in a 2-digit CIP across all credential levels, nationally.

These three restrictions drop fewer than 0.01%, 4.5%, and 0.15% of programs included in the final dataset, respectively. These restrictions were made for completeness, accuracy, and comparability with US Census data. Such exclusions do not meaningfully change the composition of programs in the final universe.

In total, PPD:2026 includes information for 209,321 unique programs offered at 5,096 unique higher education institutions. Approximately 20.6 million Title IV students enrolled at these programs during the 2024-25 award year. This includes about 3.6 million Title IV enrollments in 49,000 unique GE Programs (certificate programs at all institution types, and degree programs at proprietary institutions), and about 17 million enrollments in 160,000 unique non-GE Programs (degree programs at public and private not-for-profit institutions).

Consistent with the proposed regulations, the Department computed and reported the earnings thresholds using data from the US Census Bureau consistent with the definitions and methods the Department proposes for implementing the earnings test in OBBBA and GE.

### Types of Data Included in PPD:2026

PPD:2026 data include data on the following characteristics:

- *Program and institution information.* Identifying information about each program and institution, such as whether it is a GE program, institutional control, Classification of Instructional Programs (CIP) code, credential level, predominant award type of the institution, location;
- *Performance metrics.* These include program earnings data and earnings thresholds that programs must pass the OBBBA earnings test and the GE test. Earnings thresholds are computed using data from the American Community Survey. Program-level earnings data include the following:
  - The 4-year median earnings of working, not enrolled Title IV program completers from the pooled 2017-18 and 2018-19 completer cohorts;
  - The 4-year median earnings of working, not enrolled Title IV program completers from the pooled 2014-15 and 2015-16 completer cohorts; and
  - The 3-year median earnings of not enrolled Title IV program completers from the pooled 2014-15 and 2015-16 completer cohorts.

A flag for whether the program passes or fails those the OBBB and GE tests are included, using program-level earnings data for the most-recently available cohorts (the 2017-18 and 2018-19 completer cohorts). All program-level earnings data are adjusted to 2024 dollars using the CPI-U.

- *Enrollment, completions, and aid volume.* The number of Title IV enrollees, Title IV certificate/degree completers, and Federal student aid volume disbursed to the program.
- *Debt amounts.* Median amount borrowed in Title IV loans among Title IV borrowers for borrowers who completed during the pooled 2017-2018 and 2018-19 cohorts. Debt amounts are measured in 2019 nominal dollars. Note that this metric differs from the debt metrics used in the current GE rule, which is the median debt of borrowers and nonborrowers.
- *Student characteristics.* Share of all program completers (not just Title IV recipients) by gender and race/ethnicity from the Integrated Postsecondary Education Data System (IPEDS).

### Privacy Protocols

To protect student privacy, the Department applied certain protocols to the public version of PPD:2026. This public dataset differs somewhat from the PPD:2026 the Department uses for its analyses of the proposed rule and results may therefore differ when compared with the public PPD:2026 data. The privacy protocols are standard practice for the Department when releasing data derived from administrative student records held by the Department.

The privacy protocols include the following steps. First, any variables that are derived using data from nine or fewer students are privacy suppressed. For example, if the number of Pell Grant recipients in a program is nine or fewer during a particular award year, that value is privacy suppressed, along with the aggregate amount of Pell Grant Disbursements to the program during the corresponding award year.

Second, any variables where student counts are between ten and 19 students are set to the midpoint value of 15. For example, if a program has 12 non-completers during a particular award year, that value is adjusted to 15. Furthermore, any percentage derived using an adjusted value is based on the adjusted value, not the original value. Using this example, this means that the noncompletion rate variable is calculated using the adjusted value of 15 in the numerator, not the original value of 12.

These privacy protocols do not apply to variables derived using publicly available IPEDS data, which are not adjusted for privacy in the public version. Because these data are already public, we do not modify them based on the above privacy protocols.

Earnings data from the IRS have different privacy protocols. First, any variables that are derived using data from 15 or fewer students are privacy suppressed (set to missing). Second, the IRS adds statistical noise to perturb the median earnings of programs. This perturbation method ensures that no individual's tax record is actually being released through this process. On average, the statistical noise equates to zero. Further, if the process for adding statistical noise resulted in moving the median earnings for a program by more than 9%, that earnings value is also suppressed.

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