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The Federal Accountability Readiness Brief

A checklist for presidents and cabinets navigating the 2026–2027 accountability window.

Three federal changes are converging on mission-driven institutions at once. Workforce Pell takes effect in 2026. The Department of Education's earnings-accountability framework begins producing program-level calculations in 2027. Accreditation reform is moving through negotiated rulemaking. This brief is a practical readiness check — a set of questions a cabinet can answer in one sitting to see where the institution actually stands before the stakes arrive. It is a condensed version of the monthly Federal Accountability Memo I write for the institutions I work with.

I. WORKFORCE PELL ELIGIBILITY

☐ Have you identified which of your programs fall in the 150–599 clock-hour, 8–15 week range that Workforce Pell covers?

☐ Do you know which of those programs meet your state's program-eligibility and earnings requirements?

☐ Have you mapped your eligible programs to the CIP-SOC crosswalk that determines occupational alignment?

☐ Can you document the value-added earnings outcomes your programs will be measured against?

☐ Have you assigned a clear owner — financial aid, academic affairs, or institutional research — for the eligibility process?

II. EARNINGS ACCOUNTABILITY

☐ Do you know which of your programs are most exposed under an earnings-premium test?

☐ Have you reviewed program-level completer earnings against the threshold your programs will face?

☐ Do you have a plan for programs that fall short — restructure, teach-out, or strengthen — before the first calculations land?

☐ Is your board briefed on which programs carry the most risk, and why?

III. ACCREDITATION & GOVERNANCE

☐ Are you tracking the accreditation reforms in negotiated rulemaking, and what they would change for your institution?

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☐ Can you state, in one page, where your institution genuinely stands — what it can defend and what it cannot?

☐ Does your leadership share one evidence-based read of the institution’s position, or are there competing assumptions?

WHAT YOUR ANSWERS MEAN

If you answered “no” or “not sure” to more than a few of these, the institution is carrying federal exposure it has not yet sized — and the window to act is the next two to three quarters, not after the first letters and calculations arrive. The work is sequenceable and defensible. It begins with an honest read of the ground beneath you.

To go deeper — a program-by-program read of your institution’s exposure, or the monthly Federal Accountability Memo written for your cabinet — reach me directly.