

Use the 60th Percentile of Completer Earnings for Certificate Programs

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- A clean, simpler way to mitigate many of the concerns with the proposed methodology.

Certificate completers frequently enter the labor market in entry-level roles, work part-time or variable schedules, transition into self-employment, or experience delayed earnings growth as they complete licensure requirements, build clientele, or accumulate experience. These features are inherent to the design and labor-market function of short-term workforce programs.

Reliance solely on median earnings for certificate program completers compared to the high school wages of 25-34 year old adults can therefore misrepresent typical program outcomes by overweighting early-career wage suppression, regional labor-market effects, and temporary employment patterns that are common in short-term workforce programs. This is particularly true for low-cost, low-debt programs designed for rapid workforce entry, where earnings growth often occurs shortly after the measurement window.

For certificate programs, using the 60th percentile of completer earnings, rather than the median, would provide a more accurate and stable measure of program performance while preserving rigorous accountability. This approach does not alter the comparison benchmark, the timing of earnings measurement, or the statutory structure of the earnings premium test. It simply refines how program-level earnings are summarized to better mitigate and reflect the distributional characteristics of short-term credential outcomes.

This refinement improves measurement accuracy, reduces false negative determinations driven by known statistical distortions, and remains fully consistent with the accountability objectives of the One Big Beautiful Bill Act.

Regulatory text would need to be modified to replace 'median' with '60th percentile' for certificate programs where applicable.