

Aggregating Cohorts for Small Programs

January 5, 2026



U.S. Department of Education

Overview

Four objectives:

- Description of the Cohort Aggregation Method
- How Often Cohort Aggregation is Needed
- How Much Cohort Aggregation is Needed
- What Share of Programs & Students Will be Covered through Cohort Aggregation



**The following presentation contains preliminary analysis
from the Office of the Chief Economist.**

**Unless otherwise noted, the Department's analysis on
postsecondary students is limited to Title IV aid recipients.**



(1) Cohort Aggregation Method

For small programs ($N < 30$ Title IV Completers), for up to four prior award years following the fourth award year prior to the year the most recent earnings data is available:

1. Aggregate Title IV completers from prior award years from the same OPEID6, Credential Level, and 6-digit CIP code;
2. If a statistically reliable cohort size is not achieved, aggregate Title IV completers from prior award years from the same OPEID6, Credential Level, and 4-digit CIP code;
3. If a statistically reliable cohort size is not achieved, aggregate Title IV completers from prior award years from the same OPEID6, Credential Level, and 2-digit CIP code.

If at least 30 Title IV completers is still not achieved after following steps #1, #2, and #3, the program is exempt from the earnings test.



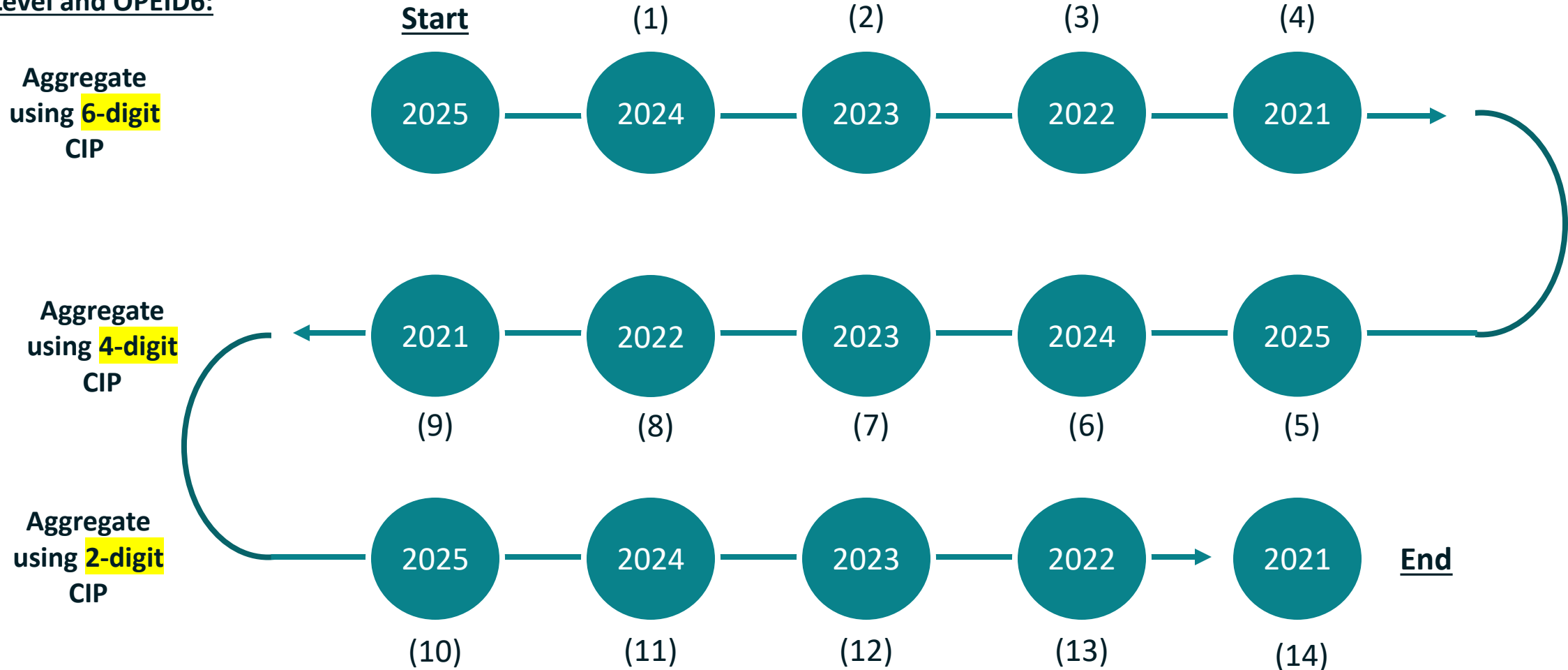
A “Statistically Reliable” Cohort Size of Title IV Completers

- We have deliberately not specified what it means to achieve a “statistically reliable” cohort size.
- This is because we are still in the process for determining how, exactly, the data transfer will work with the Federal agency with earnings data.
- We do not want to commit to a threshold now if we later learn what we promise is not feasible given privacy protocols.
- We anticipate that the threshold could be **around 30 to 50** Title IV completers – but this is not yet finalized.



Illustrative Example of Cohort Aggregation

Using the same Credential Level and OPEID6:



Illustrative Example of Cohort Aggregation

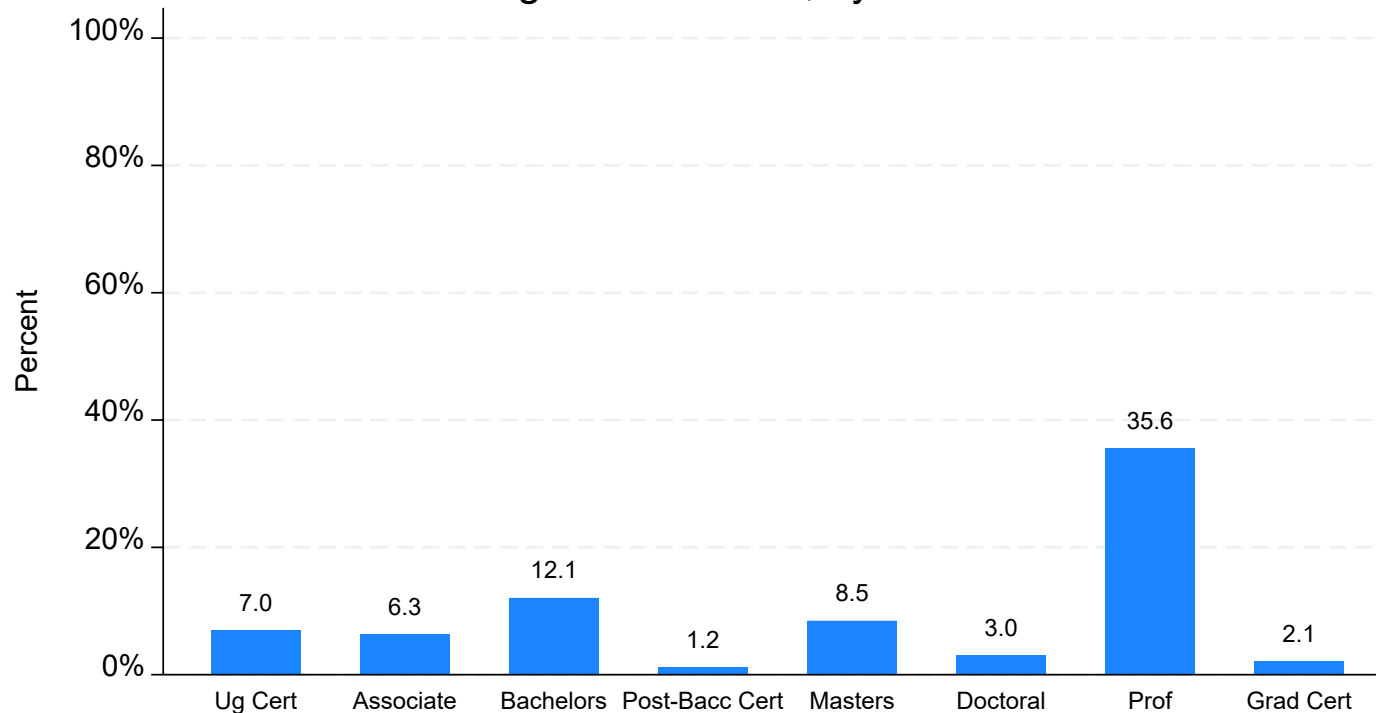
OPEID6	Credential Level	6-Digit CIP	Aggregation Period	Award Year	Lookback Year	Aggregation Level	Title IV Completers	Aggregate Total of Title IV Completers
1234	Undergrad Cert	110401	0	2025	0	6-digit CIP	5	5
1234	Undergrad Cert	110401	1	2024	1	6-digit CIP	9	14
1234	Undergrad Cert	110401	2	2023	2	6-digit CIP	11	25
1234	Undergrad Cert	110401	3	2022	3	6-digit CIP	12	37
1234	Undergrad Cert	110401	4	2021	4	6-digit CIP	10	47
1234	Undergrad Cert	110401	5	2025	0	4-digit CIP	0	47
1234	Undergrad Cert	110401	6	2024	1	4-digit CIP	0	47
1234	Undergrad Cert	110401	7	2023	2	4-digit CIP	0	47
1234	Undergrad Cert	110401	8	2022	3	4-digit CIP	0	47
1234	Undergrad Cert	110401	9	2021	4	4-digit CIP	0	47
1234	Undergrad Cert	110401	10	2025	0	2-digit CIP	3	50
1234	Undergrad Cert	110401	11	2024	1	2-digit CIP	5	55
1234	Undergrad Cert	110401	12	2023	2	2-digit CIP	8	63
1234	Undergrad Cert	110401	13	2022	3	2-digit CIP	10	73
1234	Undergrad Cert	110401	14	2021	4	2-digit CIP	24	97

If 50 is the threshold to achieve a statistically reliable cohort size, then the aggregation would stop at **Step 10.**



(2) Cohort Aggregation Will Be Common

Share of Programs (CIP6) with More Than 30 Title IV Completers in a Single Award Year, by Credential Level

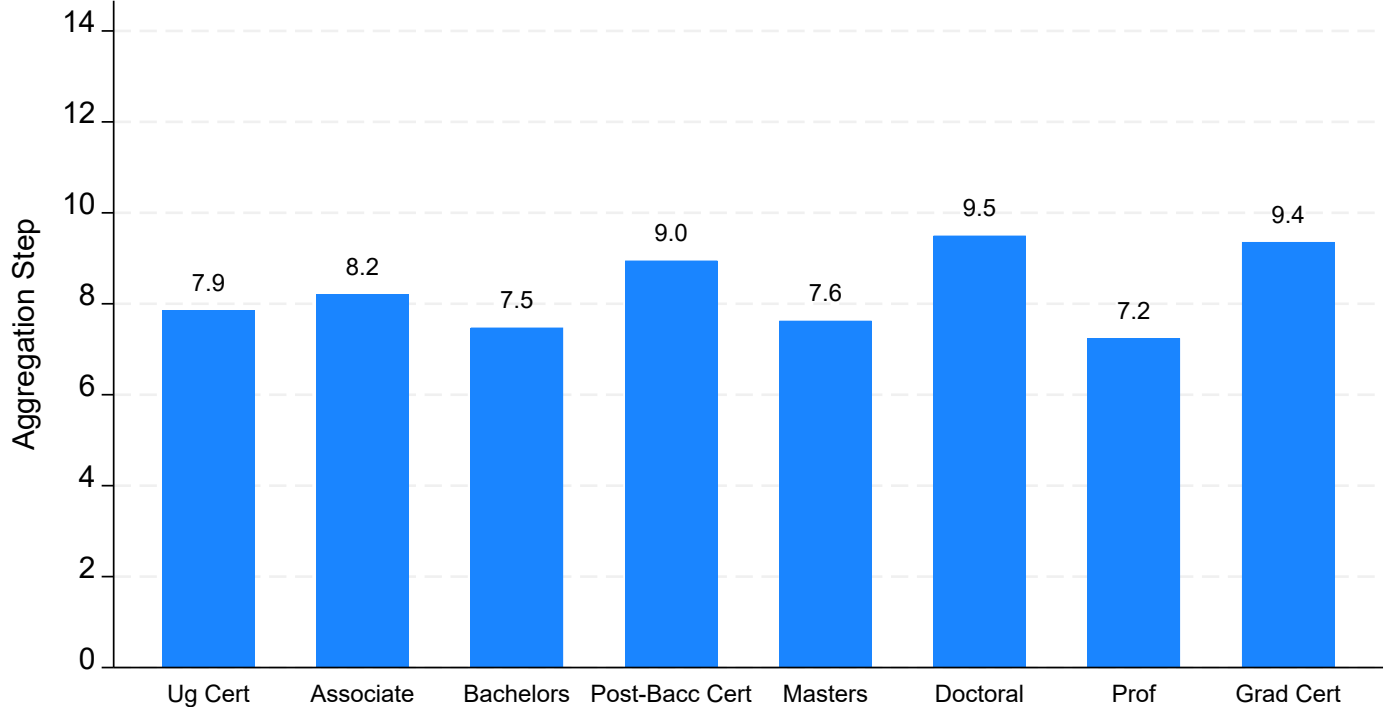


- Overall, only **9%** of programs have greater than 30 Title IV completers in a single award year
- This means **91%** of programs will need to be aggregated with prior cohorts



(3) Cohort Aggregation Will Require Using Numerous Prior Cohorts

Average Number of Aggregation Steps Needed to Achieve a Sufficient Sample Size

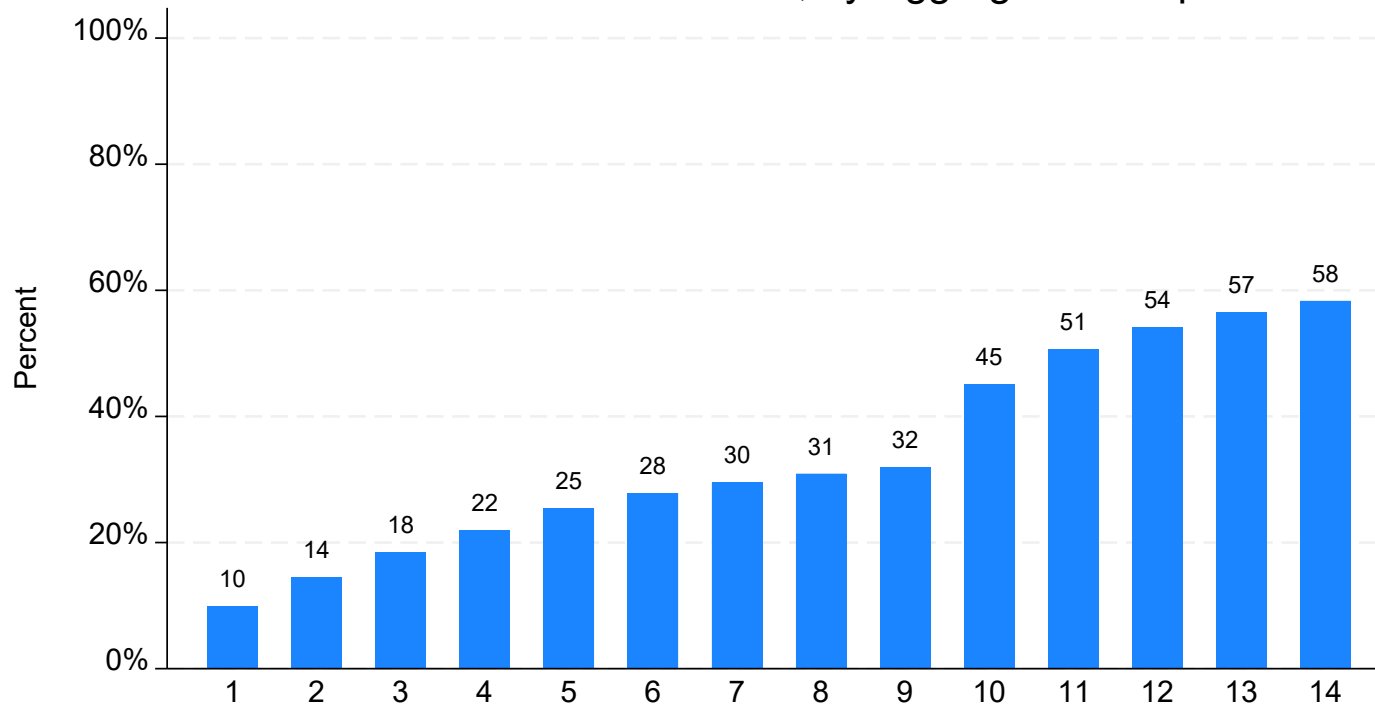


- On average, to achieve a statistically reliable cohort size, aggregated programs will need **between 7 and 10** aggregation steps.



(4) Share of Programs Covered by the Aggregation Method

Cumulative Share of Programs (CIP6) that Achieve a Sufficient Cohort Size, by Aggregation Step

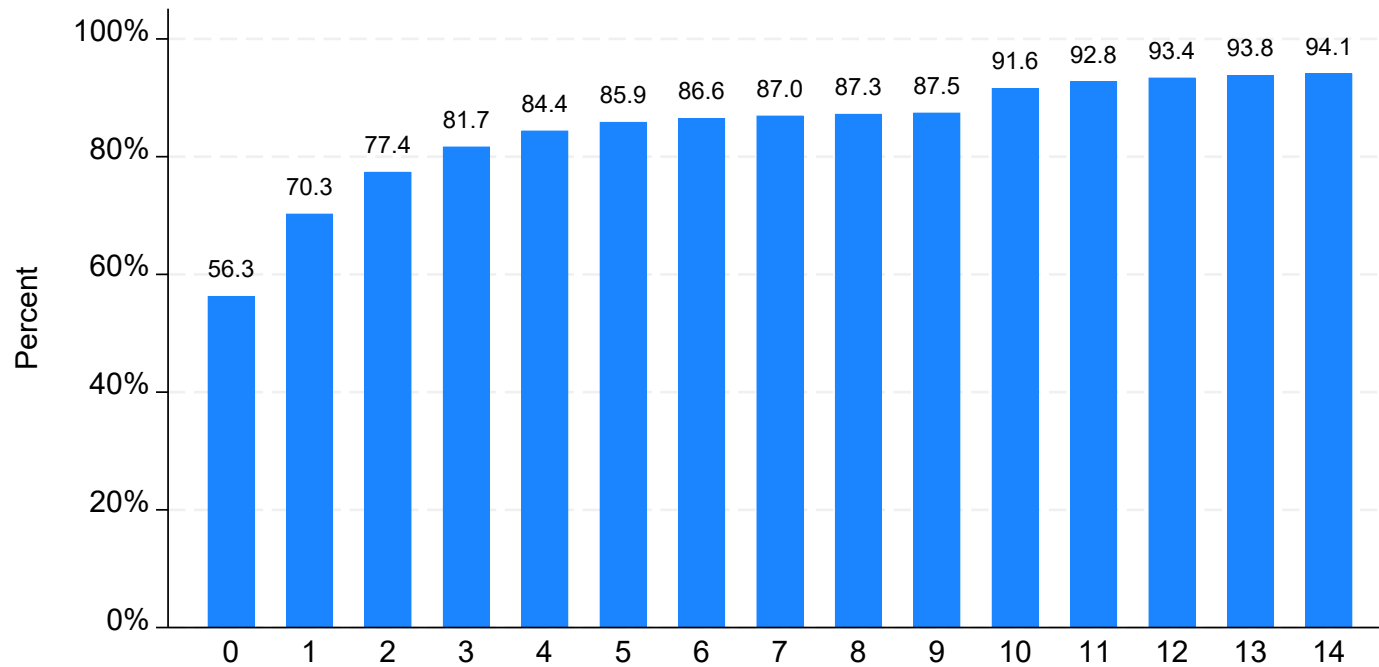


- A quarter (**25%**) of all programs will achieve a statistically reliable cohort size by the fifth aggregation step.
- Half (**51%**) of all programs will achieve a statistically reliable cohort size by the eleventh aggregation step.
- **58%** of programs achieve a statistically reliable cohort size after implementing the full aggregation method (i.e., all 14 steps).



Share of Title IV Completers Covered by the Aggregation Method

Cumulative Share of Title IV Completers from Programs (CIP6) that Achieve a Sufficient Cohort Size, by Aggregation Step



- Half (**56%**) of all Title IV completers are in programs that achieve a statistically reliable cohort size without any aggregation.
- Three-quarters (**77%**) of all Title IV completers are in programs that achieve a statistically reliable cohort size by the second aggregation step.
- **94%** of all Title IV completers are in programs that achieve a statistically reliable cohort size after implementing the full aggregation method (i.e., all 14 steps).



Summary

- Remember these results are *estimates*, not the actual results:
 - About **9 out of 10 programs** will require some amount of cohort aggregation.
 - On average, programs that achieve a statistically reliable cohort size will typically need **7-10 aggregation steps**.
 - Approximately **6 out of 10 programs** will achieve a statistically reliable cohort size through the proposed cohort aggregation method. These programs cover **94%** of all Title IV Completers.
 - Only approximately **6%** of Title IV completers are from programs that will not achieve a statistically reliable cohort size through the proposed cohort aggregation method.

