

Proposal to Adjust the High School Earnings Benchmark to 85% of Actual for Female-Dominated Certificate Programs Under the Median Earnings Test

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Summary and Purpose

This proposal recommends adjusting the high school earnings benchmark portion of the Median Earnings Test (MET) to 85% of the actual median value for certificate programs where more than 75% of completers are female, based on IPEDS data. This downward adjustment to the benchmark (rather than an upward multiplier on program earnings) accounts for systemic gender wage gaps in labor markets.

This change is vital to protect certificate programs in female-dominated fields like medical assisting, dental support, and beauty. Without it, these economically essential programs—serving students and filling workforce gaps—risk unfair sanctions, limiting access for underserved populations.

Rationale

Certificate programs in female-dominated fields are penalized by MET's unadjusted high school earnings benchmarks, which are skewed toward male earners and fail to reflect the gender wage gap. Women high school graduates earn approximately 76-83 cents for every dollar earned by men, as documented in sources like the BLS Usual Weekly Earnings report (women earn 76.1% of men at the high school level, \$834 vs. \$1,096 weekly) and the IWPR 2024 Gender Wage Gap Fact Sheet (82.7 cents overall for full-time women workers).

As proposed in a 2022 Forbes article titled “Gainful Employment Could Shut Down Good Programs—Here’s How To Fix It”, adjusting the benchmark to 85% of the actual median addresses this bias, making comparisons fairer without overreach. In this article, Cooper argues this fix would allow valuable female-dominated certificate programs (e.g., medical assisting, 90% female) to pass GE/MET while still sanctioning low-value ones. The Urban Institute Report echoes this by showing students prioritize higher-paying jobs but also personal fulfillment, underscoring the non-financial value of these programs. The Equal Rights Advocates' analysis of 2024 Census data reinforces the worsening gaps (81 cents full-time, 76 cents overall), calling for policy changes to address inequities.

Proposed Language

For certificate programs where more than 75% of completers are female (based on institutional IPEDS data), the earnings threshold calculated under paragraph (d)(1) shall be adjusted to 85% of the actual median value to account for documented gender wage gaps.

References

1. U.S. Bureau of Labor Statistics, "Usual Weekly Earnings of Wage and Salary Workers, Third Quarter 2025": <https://www.bls.gov/news.release/pdf/wkyeng.pdf>
2. Institute for Women's Policy Research, "Gender and Racial Wage Gaps Worsened in 2023 and Pay Equity Still Decades Away" (2024): <https://iwpr.org/wp-content/uploads/2024/09/IWPR-National-Wage-Gap-Fact-Sheet-2024.pdf>
3. Preston Cooper, "'Gainful Employment' Could Shut Down Good Programs—Here's How To Fix It," Forbes (October 18, 2022): <https://www.forbes.com/sites/prestoncooper2/2022/10/18/gainful-employment-could-shut-down-good-programs-heres-how-to-fix-it/>
4. Equal Rights Advocates, "New Census Bureau Numbers Shed Light on Worsening Pay Gaps for Women" (2024): <https://www.equalrights.org/news/new-census-bureau-numbers-shed-light-on-continuing-pay-gaps-for-women-2/>