



National Association of
Independent Colleges and
Universities

1025 Connecticut Ave. N.W.
Suite 700
Washington, DC 20036-5405

Tel: (202)785-8866
www.naicu.edu

March 20, 2020

The Honorable Teresa Lubbers
Chair
National Council for
State Authorization Reciprocity Agreements
3005 Center Green Drive
Suite 130
Boulder, CO 80301

Dr. Edward Ray
Vice Chair
National Council for
State Authorization Reciprocity Agreements
3005 Center Green Drive
Suite 130
Boulder, CO 80301

Dear Chair Lubbers and Vice Chair Ray:

We write to ask the National Council for State Authorization Reciprocity Agreements (NC-SARA) to temporarily suspend its policy (Section 2.5(c)) requiring private nonprofit colleges and universities to maintain a baseline federal financial responsibility composite score of 1.5 or greater for unrestricted participation or a 1.0 score or greater for any participation in SARA. We believe that a three year suspension of the policy will provide adequate long-term certainty for independent colleges and universities as they adapt to adverse financial conditions.

During this time of economic upheaval, private nonprofit colleges and universities are taking unprecedented steps to protect the health and safety of their entire campus communities. As a result, independent institutions of higher education are shifting the bulk or the entirety of their curriculum to distance education. We fear that the NC-SARA policy on federal financial responsibility composite scores could make colleges and universities ineligible for participation in SARA at a time when distance education is needed more than ever.

In the long-term, the near total loss of auxiliary revenue at many institutions of higher education could force leaders at independent colleges and universities to consider extraordinary financial decisions immediately regarding employment, student services, or other essential functions in order to make passing scores for the end of the fiscal year (June 30). Many private nonprofit colleges and universities are expending significant resources and do not have the institutional reserves necessary to weather the current economic storm without a significant impact to their institutional composite score. We hope that if NC-SARA eases the policy on baseline financial responsibility composite scores that campus leaders can turn their attention to more pressing issues than long-term SARA eligibility.

We deeply appreciate your attention to this pressing issue, and we hope to continue to work together to find common ground to protect students and institutions.

Sincerely,

Barbara K. Mistick, D.M.
President



On behalf of:

Alabama Association of Independent Colleges and Universities (AAICU)
American Association of Presidents of Independent Colleges and Universities
Appalachian College Association
The Association for Biblical Higher Education
Association of Catholic Colleges and Universities
Association of Chiropractic Colleges
Association of Independent California Colleges and Universities
Association of Independent Colleges and Universities in Massachusetts
Association of Independent Colleges and Universities of Ohio
Association of Independent Colleges and Universities of Pennsylvania
Association of Independent Colleges and Universities of Rhode Island
Association of Independent Colleges of Art & Design
Association of Independent Kentucky Colleges and Universities
Association of Jesuit Colleges and Universities
The Association of Private Colleges and Universities of Puerto Rico
Blue Mountain College
Commission on Independent Colleges and Universities in New York
Connecticut College of Independent Colleges
Consortium of Universities of the Washington Metropolitan Area
Council for Christian Colleges & Universities
Conference for Mercy Higher Education
Council of Independent Colleges
Council of Independent Colleges in Virginia
Council of Independent Nebraska Colleges
Georgia Independent College Association
Great Lakes Colleges Association
Independent Colleges and Universities of Missouri
Independent Colleges and Universities of Texas
Independent Colleges of Indiana
Independent Colleges of Washington
Iowa Association of Independent Colleges and Universities
Kansas Independent College Association
Louisiana Association of Independent Colleges and Universities
Maine Independent College Association
Maryland Independent College and University Association
Michigan Independent Colleges and Universities
Minnesota Private College Council
National Association of Schools and Colleges of the United Methodist Church (NASCUMC)
Network of ELCA Colleges and Universities
North Carolina Independent Colleges and Universities
Oregon Alliance of Independent Colleges & Universities
South Carolina Independent Colleges and Universities
Tennessee Independent College and University Association
United Negro College Fund (UNCF)
West Virginia Independent Colleges and Universities
Wisconsin Association of Independent Colleges and Universities