



National Association of  
Independent Colleges and  
Universities

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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