National Association of Independent Colleges and Universities
1025 Connecticut Ave. N.W.
Suite 700
Washington, DC 20036-5405
Tel: (202)785-8866
Fax: (202)835-0003
www.naicu.edu

September 21, 2026

Aaron Washington
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave. SW, Washington, DC 20202

Re: Docket ID: ED-2025-OPE-1042

Dear Mr. Washington:

On behalf of the National Association of Independent Colleges and Universities (NAICU), which serves as the unified voice for the 1,700 private, nonprofit colleges and universities in our nation, and the undersigned associations, I submit these comment on the Department of Education's August 20, 2026 notice of proposed rulemaking (NPRM) entitled "Accreditation, Innovation, and Modernization: The Secretary's Recognition of Accrediting Agencies: Institutional Eligibility Under the Higher Education Act of 1965, as Amended, Student Assistance General Provisions."

NAICU's member institutions share the Department's interest in a robust, independent accreditation system that is both sufficiently rigorous to ensure quality educational outcomes and sufficiently flexible to allow a broad range of institutions of higher education to flourish. We commend several features of the proposed rule, including the effort to minimize institutional burden, facilitate innovation in higher education, and increase competition among accreditors (so long as the latter can be accomplished without reducing rigor). NAICU also appreciates the Department's general openness during negotiated rulemaking to consider feedback from a wide range of stakeholders, and we believe that its willingness to make corresponding adjustments to the draft regulations has resulted in a significantly improved NPRM.

At the same time, however, several elements of the proposed rule depart from the statute, distract from the core goals of the accreditation process, or raise other policy concerns and the potential for unintended consequences. Consistent with the principle that accreditation should remain focused on ensuring that institutions provide a quality education to students, we urge the Department to consider making the changes described below before issuing a final rule.

Recommendations

1. **Remove or revise the transfer of credit provisions in § 602.24 and § 668.43 in light of the following legal and policy concerns.**

While transfer of credit policies have meaningfully improved over the last several decades, NAICU agrees with the Department that further steps can and should be taken to reduce barriers that can impede postsecondary completion. We sincerely appreciate the Department's willingness to work with the negotiators for the private, nonprofit sector and believe that the transfer of credit language in the NPRM reflects a significant improvement over the original draft language.

However, NAICU continues to have broad legal and policy concerns about the changes that the Department is making to transfer of credit.

Legal Concerns: NAICU is deeply concerned that the transfer of credit provisions in the NPRM violate the Higher Education Act (HEA), which clearly and explicitly places strict limits on the Secretary's authority to establish any additional requirements regarding transfer of credit:

> 20 U.S.C. § 1092(h). Transfer of credit policies
>
> (1) Disclosure
>
> Each institution of higher education participating in any program under this subchapter shall publicly disclose, in a readable and comprehensible manner, the transfer of credit policies established by the institution which shall include a statement of the institution's current transfer of credit policies that includes, at a minimum-
>
> (A) any established criteria the institution uses regarding the transfer of credit earned at another institution of higher education; and
>
> (B) a list of institutions of higher education with which the institution has established an articulation agreement.
>
> (2) Rule of construction
>
> Nothing in this subsection shall be construed to-
>
> (A) authorize the Secretary or the National Advisory Committee on Institutional Quality and Integrity to require particular policies, procedures, or practices by institutions of higher education with respect to transfer of credit….

The plain language of this statutory provision is clear on its face: institutions must maintain transfer of credit policies that explain their requirements and describe articulation agreements, but the content of those policies is at the institution's discretion and cannot be dictated by the Secretary in any way. In other words, Congress has plainly and explicitly prohibited the Department from regulating on transfer of credit. As a result, the transfer of credit provisions that the Department is proposing to add to § 602.24 and § 668.43 violate the statute and should be removed.

Policy Concerns: Transfer of credit is a process that is frequently misunderstood by both policymakers and the public, and the discussion around the negotiating table reflected some of the many misperceptions that persist. The prevailing narrative among negotiators was that institutions routinely refuse to accept transfer credits as an institutional strategy to accumulate additional Title IV dollars. This narrative overlooks the fact that not all credits are created equally.

In reality, there are a significant number of legitimate reasons why receiving institutions may not accept all credits from another institution. All transfer decisions must, at a minimum, account for curricular and mission alignment, course equivalency and sequencing, and program standards. Thus, for example, institutions may be unable to accept credit because they do not offer comparable courses or programs of study and therefore are unlikely to have accreditor approval

to offer those courses or award credit or degrees in that discipline. Other reasons for credit non-transferability may include remedial or non-college-level classes, poor grades, or older credits that may not reflect current learning. Ultimately, institutions have a legal obligation under Title IV to maintain the integrity of their programs and therefore must retain the autonomy to determine whether credits meet both their academic and mission-based standards and curricular requirements.

In addition, transfer outcomes depend on more than the receiving institution's decision. A rule that places the full obligation on the receiving institutions addresses only one part of that picture, and that part may not be the one with the greatest effect on student outcomes.

For example, sending institutions must also bear responsibility for ensuring the quality of the credits they produce. An April 19, 2026, article in *The Washington Post* described students completing bachelor's degrees at the University of Maine at Presque Isle in a matter of months, a clear indication of a potential lack of rigor in the underlying educational programs. The episode illustrates why the receiving institution's academic judgment matters and suggests that its review of incoming credit functions as a safeguard for students and taxpayers, not simply as an obstacle to completion.

Moreover, in an era in which the vast majority of institutions identify and publicize transfer pathways, establish articulation agreements, and publish equivalency tables, students also have a responsibility to make informed academic choices. Students who anticipate transferring should consult available resources, seek advising, and, to the extent possible, select coursework that is appropriately rigorous and relevant to the requirements of the program they intend to pursue. Institutions cannot reasonably be expected to award credit toward a degree for coursework that lacks sufficient academic rigor, does not align with the receiving institution’s curriculum, or does not apply to the student’s chosen program.

During negotiations and in the preamble to the NPRM, the Department made references to the concept that there should be a presumption of transferability. While NAICU appreciates this aspiration, we worry that a blanket presumption not only risks misleading students into believing that all their credits will be accepted but also implies that institutions should not have the authority to determine whether transfer credits adequately prepare those students for continued success in their curriculum. It is essential that institutions retain this authority. To do otherwise could undermine completion goals, heighten the risk of wasted Title IV dollars, and conflict with recent federal efforts to hold institutions accountable for improved student outcomes.

In addition, a strict presumption of transferability – especially if paired with detailed, course-by-course justification requirements – adds additional burdens on registrars and faculty and risks slowing or preventing timely admissions decisions. To understand why, it is important to note that transfer of credit determinations often involve a highly individualized and labor-intensive review conducted by curricular experts on a case-by-case basis. At a minimum, these reviews involve a detailed examination of course content, including syllabi and reading material, as well as learning

outcomes and alignment with curricular and accreditation standards for each and every transfer credit requested. Independent colleges and universities take this responsibility seriously.

Depending on the number of transfer students applying to an institution, such reviews can consume hundreds of staff hours, even before adding a requirement for individualized academic rationales for large volumes of non-transferring credits (a costly task omitted from the Department's regulatory impact analysis). Notification and transparency regarding transfer determinations is important but should not be so overwhelming that they divert institutional resources to meeting bureaucratic requirements instead of fulfilling their core educational mission, especially when there are many rational reasons why transfer credits may be denied. Such an approach could be counterproductive at a time when the Department is seeking to reduce burdens on institutions and institutions are under pressure to reduce administrative spending and costs for students.

NAICU also has concerns about the timing aspects of the notification requirements. Because institutions must inform prospective students about transfer of credit determinations as soon as one of the triggers – enrollment, registration, or a nonrefundable financial commitment – occurs, the institution will be required to devote significant resources to preparing credit transfer determinations for numerous students who choose not to attend the institution.

Ultimately, NAICU supports the Department's goal of improving credit transferability. However, for the legal and policy reasons cited above, NAICU recommends that these provisions be removed. If the Department declines to do so, we alternatively request that the Department:

- Replace the proposed presumption of transferability with a presumption of individualized consideration. Under this approach, an institution could not refuse to consider coursework solely because of the identity of the sending institution or the recognized agency that accredits it. Instead, the institution would evaluate the coursework under its publicly disclosed transfer-of-credit policies. The institution would retain authority to determine whether the coursework is comparable, applicable to the student's program, consistent with appropriate academic and programmatic standards, and sufficient to satisfy its curricular, sequencing, accreditation, and mission-based requirements.

- Revise § 668.43(c)(4) to require a concise explanation of the basis for the institution's determination rather than a separate written rationale specific to each course. Institutions should be permitted to identify the applicable provision of their published policy or use standardized categories, such as insufficient content comparability, differences in learning outcomes, grade requirements, expiration of prior coursework, sequencing, lack of applicability to the student's program, specialized accreditation requirements, or institutional mission and curricular requirements. Where multiple courses are not accepted for the same reason, the institution should be permitted to provide a consolidated explanation.

- Amend § 668.43(c)(5) to require institutions to provide transfer of credit decisions post-deposit but pre-enrollment. Such a requirement would allow institutions to conduct the detailed transfer analyses required in the NPRM only for students who have signaled they will attend the institution. If advisable, such a requirement could be coupled with an additional requirement that institutions provide a good-faith preliminary credit evaluation to accepted students. Such an approach would strike an appropriate balance between conserving institutional resources for educational purposes while ensuring that accepted transfer students have sufficient information to make decisions about which institution to attend.

- Incorporate language into the preamble of the final rule that articulates the policy complexities of credit transfer described above.

2. Revise § 602.17 to make new requirements regarding application of accreditation standards permissive, not mandatory.

As with transfer of credit, NAICU has broad legal and policy concerns about the changes that the Department is making to accreditation standards.

Legal Concerns: NAICU is concerned that the changes to the accreditation standards appear to violate the HEA, which places two strict limitations on the Secretary of Education's regulatory authority with respect to accreditation:

- "Nothing in this chapter shall be construed to permit the Secretary to establish criteria for accrediting agencies or associations that are not required by this section. Nothing in this chapter shall be construed to prohibit or limit any accrediting agency or association from adopting additional standards not provided for in this section. Nothing in this section shall be construed to permit the Secretary to establish any criteria that specifies, defines, or prescribes the standards that accrediting agencies or associations shall use to assess any institution's success with respect to student achievement." (20 U.S.C. § 1099b(g)).

- "Notwithstanding any other provision of law, the Secretary shall not promulgate any regulation with respect to the standards of an accreditation agency or association described in subsection (a)(5)." (20 U.S.C. § 1099b(o)).

The Department's initial draft regulations clearly recognized the limitations imposed by the statute. In that document, most of the now-mandatory provisions on accreditation standards in § 602.17 (application of standards in reaching accreditation decisions) appeared in § 602.16 (accreditation and preaccreditation standards) in permissive form. During negotiations, however, those provisions were moved to § 602.17 and became institutional mandates that agencies must verify, despite objections from several negotiators.

The Department's response to these objections appears to be that, in moving the provisions from § 602.16 to § 602.17, it is not violating the statute because it is merely directing how accreditation standards must be applied. Such an argument relies on a distinction without a difference. By mandating how standards must be applied, the Department is indeed "establishing criteria," "specifying, defining, or prescribing the standards" that agencies must use, and "promulgating regulations" with respect to the statutory accreditation standards, all in violation of the statute.

In light of these prohibitions, many of the regulatory changes that the Department is proposing to make in § 602.17 violate the statute and should be modified or removed.

Policy Concerns: NAICU is concerned about the Department's effort to specify numerous new requirements that accrediting agencies must enforce when applying their standards. Such an approach risks undermining the role of the program integrity triad, which delineates specific roles and responsibilities for accrediting agencies, states, and the federal Department of Education. Each member of the triad has distinct responsibilities for overseeing the federal student aid programs, with accreditors focusing on academic quality, the states on consumer protection, and the Department on compliance. The delicate balance of the program integrity triad contained in the HEA dates to the early 1990s and has survived as a core element of academic quality and integrity ever since. These roles should remain unblurred, and accreditors should not be assigned duties that they are neither designed nor equipped to handle, such as enforcing compliance with federal standards that are outside the scope of their expertise, as the proposed regulations would direct them to do.

For example, the NPRM would require accreditors to, among other things, evaluate whether institutions maintain academic freedom protections that are clearly articulated and "applied consistently," employ "consistently applied" policies that protect the First Amendment for public institutions and any similar policies for private institutions, maintain policies designed to support, promote, and appropriately prioritize intellectual diversity and the free exchange of ideas among faculty, and have policies to protect civil rights.

We agree that it is best practice for institutions to maintain consistently applied policies on these issues – and an already existing legal requirement in many cases. However, because accreditors are neither legal experts nor federal compliance officers, we question whether accreditation is the appropriate mechanism for establishing such requirements.

Despite these concerns, we recognize that the Department is unlikely to eliminate these requirements entirely. We also sincerely appreciate the Department's awareness of the complexity of this issue and willingness during negotiations to make modifications to these requirements by, for example, shifting from a requirement that agencies evaluate whether institutions "fulfill their obligations" under these policies to one in which agencies evaluate whether institutions "maintain" these policies. Nevertheless, if the Department intends to retain these requirements, we recommend that it, at a minimum, delete the phrases "applied

consistently" and "consistently applied," given that agencies lack both the legal expertise and powers that would allow them to make such determinations.

In addition, we have deep reservations about the policy implications of requiring accrediting agencies to review an institution's success with respect to student achievement at both the institutional and program levels, including minimum expectations, by assessing economic returns relative to the total cost of attendance. Put simply, economic outcomes do not necessarily indicate academic quality. There are many factors beyond the quality of a program that affect economic outcomes, including, but are not limited to, general economic and labor market trends, as well as the student's socioeconomic status, race, gender, geographic location, choice of major, and career pathway.

This provision also presents practical problems. For example, what happens when accreditors are unable to access the relevant data, as will likely be the case for smaller programs or for privacy-protected state Unemployment Insurance data? What exactly constitutes "other reliable earnings data?"

For these reasons, NAICU recommends that the Department eliminate the requirements related to economic returns. Alternatively, if the Department chooses to retain the language, it should, at a minimum, exclude programs that fall below the reporting threshold under 34 CFR 668 Subpart Q, remove Unemployment Insurance records as a source of data or explain how accreditors would be able to access that data, and define what constitutes "reliable earnings data" in order to ensure consistency. The Department should also amend the economic returns provision by striking "relative to the total cost of attendance" and replacing it with "net price." Requiring accreditors to rely on cost of attendance instead of net price unfairly and counterproductively penalizes schools that provide significant amounts of institutional aid to their students.

NAICU strongly urges the Department to address these policy and legal concerns by making the specific changes suggested above and by modifying the new requirements regarding application of accreditation standards to make those provisions permissive, not mandatory.

3. Clarify both the preamble and the regulations with regard to cost/benefit analysis.

During negotiated rulemaking, the negotiators, including the Department, agreed that accreditors would be responsible for evaluating whether an institution has conducted a cost/benefit analysis of its decisions regarding facilities, equipment, and supplies and student support services. Throughout the preamble, however, the Department repeatedly states that accrediting agencies must conduct a cost/benefit analysis when reviewing institutions' compliance with standards on those factors.

The transcripts of the negotiated rulemaking clearly demonstrate that the preamble is in error. For example, the transcript of the April 14 afternoon session, beginning on page 32, reflects a discussion that assumes institutions will be conducting a cost/benefit analysis and that

accreditors will review that analysis. The discussion concludes on pages 36-37 with Jake Lallo, the Department's attorney, stating:

> We want the accreditors to basically make sure that their institutions are at least considering the cost benefit. You know, it may make sense that a school needs to build a new dorm. It might not make sense that that dorm is gold plated. So that's kind of what we're asking here. We're not asking them to police them. We're not asking them to audit them. We're just asking that they require their institutions to, you know, at least engage in some cost-benefit analysis and demonstrate that to their accreditor. And as Jeff said, that basically the accreditor considers that as a factor as to whether or not they are living up to the expectations that the accreditor puts on them.

Other transcript excerpts from later sessions confirm that both the Department and the negotiators understood – and reached consensus on – the fact that it would be institutions performing the cost/benefit analysis, not the accrediting agencies. (See, for example, pages 60-62 of the May 20 afternoon transcript for an extended discussion between David Eubanks, negotiator for the private, nonprofit sector, and the Department and pages 70-71 of that same transcript where Jeff Andrade, the negotiator for the Department, confirms that the cost/benefit analysis is conducted by the institution.)

While some of the other misstatements in the preamble are clearly incorrect (see recommendation 7 below) when compared to the proposed regulatory text, the provision governing the cost/benefit analysis – § 602.17(a)(3) – appears to be missing words that would clarify the matter. In its current form, the provision states:

> When applying its standards according to § 602.16(a)(1)(iv) and (vi):
>
> (i) A cost/benefit analysis, which means a review by the agency of the institution's budget, resource utilization and allocation, and, if existing, its business/strategic plan, continuous improvement strategic plan, and review of whether the institution considers whether the expected benefits of the institution's activities justify the associated financial, administrative, and opportunity costs and the impact of capital expenditures on future operating expenses….

We recommend that, consistent with the consensus vote and as confirmed by the transcripts, the Department amend this provision to read as follows:

> When applying its standards according to § 602.16(a)(1)(iv) and (vi):
>
> (i) *the agency evaluates whether an institution has conducted* a cost/benefit analysis, which means a review by the agency of the institution's budget, resource utilization and allocation, and, if existing, its business/strategic plan, continuous improvement strategic plan, and review of whether the institution considers whether the expected benefits of the institution's activities justify the associated

financial, administrative, and opportunity costs and the impact of capital expenditures on future operating expenses….

This approach would strike the appropriate balance between ensuring that institutions maintain the authority to make independent determinations over resource allocation while enabling accrediting agencies to verify that those decisions are sound. The alternative – requiring agencies to conduct the cost/benefit analyses – could lead to unnecessary duplication of effort or overly intrusive second-guessing of routine institutional decision-making regarding operations and expenditures.

4. Revise the "separate and independent" requirements in § 602.15 to modify provisions that will increase compliance costs without addressing conflicts of interest.

NAICU has long supported the HEA provisions and corresponding regulations that require accrediting agencies to be separate and independent of related trade associations. These provisions fulfill an important function by ensuring that accrediting agencies do not become captured by the institutions they are overseeing. We support the Department's goals of strengthening the existing firewall and appreciate that the Department modified its original proposal by permitting institutional representatives to share their expertise with agencies – a critically important input to the accreditation process – in a manner that does not create a conflict of interest when setting of standards or policies. However, NAICU is concerned that § 602.15(e)(4), which disallows shared resources, goes too far.

While NAICU agrees that accrediting agencies and their related trade associations should not share professional personnel, we believe that it is ill-advised to ban the sharing of equipment, facilities, or information technology. It is difficult to imagine, for example, how sharing a fax machine, an Adobe subscription, or office space in the same building presents a conflict of interest. From our perspective, this provision does not appear to be designed to serve students or improve educational quality but rather seems to serve as a method of establishing costly compliance requirements for accrediting agencies with the intent of incentivizing them to withdraw from federal recognition in service of the Department's bottom line. As a result, we recommend that this provision be modified to limit the prohibition to shared professional personnel only.

5. Amend the requirement in § 602.17(g) prohibiting accreditors from maintaining standards that would violate state law.

Section 602.17 prohibits accrediting agencies from having "standards that encourage, direct, or otherwise require institutions or programs to violate Federal or State law, including by having policies that provide any preferences on the basis of race." While NAICU understands the Department's intent in adding this provision, we believe that the sheer breadth of this new requirement could lead to unwelcome and unintended consequences and that it should be revised.

Because state laws vary widely, this new requirement could lead to circumstances in which agencies are compelled to apply their standards differently, depending on the state laws where their institutional members are located. Such a requirement could also incentivize some states to pass laws that further politicize the accreditation process.

In order to avoid creating inconsistencies in the application of accreditation standards and political interference in the quality assurance process, NAICU recommends that the Department amend the language in § 602.17(g) to read as follows: "The agency may not have standards that encourage, direct, or otherwise require institutions or programs to violate Federal law." Such an approach would also eliminate the prohibition against "having policies that provide any preferences on the basis of race," given that this requirement is already incorporated by virtue of the reference to federal law.

6. Burden and cost estimates

NAICU is appreciative of the Department's interest in reducing some of the unnecessary burdens that institutions face during the accreditation process, which is often a complex, costly, and time-consuming endeavor. While accreditation standards must remain rigorous to guard against abuse, we welcome the effort to reduce red tape in a way that allows accreditation to become a more nimble process that can accommodate innovation and flexibility while still ensuring academic quality and protecting students' investment in their education.

Unfortunately, while we are grateful for the regulatory amendments that would reduce burden, NAICU is deeply concerned that the overall effect of the NPRM will achieve the opposite, particularly in light of the sheer breadth and number of new requirements that the Department proposes to add. As described above, the regulations directly impose a vast number of new requirements regarding how accreditors must apply their standards, which will inevitably impose significate burdens on institutions that must demonstrate compliance with those standards. Notably, many of these compliance costs are not adequately accounted for in the Department's regulatory impact analysis – or are overlooked entirely.

Under the NPRM, institutions would have to meet new requirements regarding transfer of credit, speech policies, research policies, surveys on viewpoint diversity, cost/benefit analyses, faculty policies, economic returns, and more. These prescriptive requirements go well beyond the current regulations, and the burdens they will add will far exceed any hypothetical regulatory relief available via the addition of generalized regulatory provisions on reducing burden. In addition, these requirements will impose substantial compliance costs on agencies, and these costs will inevitably be passed on to institutions in the form of increased accreditation fees. In accordance with recommendation two and with the Department's own stated goal of reducing burden, we therefore urge the Department to make those mandatory provisions optional or eliminate them entirely.

7. Make technical corrections to errors contained in the preamble of the NPRM.

We appreciate that the Department is under a tight timetable to publish final rules by its stated goal of November 1. Unfortunately, that time pressure appears to have resulted in several errors in the preamble to the NPRM. In the discussion of § 602.17, for example, there are multiple places institutional responsibilities are inaccurately imputed to the accreditor, including, but not limited to, the following:

- The preamble incorrectly states that "the accrediting agency would be required to maintain academic freedom protections…." Under § 602.17(a)(2)(iii), an accrediting agency must evaluate "whether an institution maintains… academic freedom protections…," and, under § 602.17(a)(2)(vii), whether institutional policies include such protections.

- The preamble incorrectly states that "the agency would be required to consistently apply policies that protect the First Amendment…." Under § 602.17(a)(2)(v) and (vii), an accrediting agency must evaluate whether institutions maintain a policy to protect First Amendment or other free speech rights and whether those policies are consistently applied.

- The preamble incorrectly states that "the agency would also be required to maintain policies regarding the integrity of scholarly activity…." Under § 602.17(a)(2)(vi), the agency must evaluate whether institutions maintain such policies.

- The preamble incorrectly states that "we proposed to require a recognized accrediting agency to establish a policy that is designed to support, promote, and appropriately prioritize intellectual diversity…." Under § 602.17(a)(2)(viii), the accrediting agency must evaluate whether institutions maintain such policies.

We recommend that the Department carefully review the NPRM preamble for similar examples and make technical corrections to the record when it issues final regulations.

Likewise, there are also several instances where the preamble inaccurately indicates that accrediting agencies would be required to verify compliance with federal and/or state law. (E.g., "Accrediting agencies recognized by the Secretary would be required to confirm that institutions and programs they accredit comply with all Federal and State laws.") The regulatory text clearly contradicts such statements. For example, 34 C.F.R. § 602.23(h) requires agencies to ensure that their policies do not require institutions or programs to violate federal or state law but does not require agencies to ensure compliance with such laws (see also, § 602.17(g) and (h)).

A search of the NPRM for "Federal and State" and "Federal or State" reveals several examples of similar errors. Again, we recommend that the Department make technical corrections to the record when it publishes final regulations.

Founded in 1976, NAICU is the only national membership organization solely focused on representing private, nonprofit higher education on public policy issues in Washington, DC. NAICU's membership reflects the spectrum of private, nonprofit higher education in the U.S. NAICU's member institutions include major research universities, faith-based colleges, Historically Black Colleges and Universities, Hispanic-Serving Institutions and other Minority-Serving Institutions, art and design colleges, conservatories of music, traditional liberal arts and science institutions, women's colleges, work colleges, two-year colleges and schools of law, medicine, engineering, business and other professions.

Thank you for the opportunity to offer comments as the Department considers making changes to the accreditation process. NAICU looks forward to continuing to work with the Department as it moves forward.

Sincerely,



Barbara K. Mistick
President

On behalf of:

Alabama Association of Independent Colleges and Universities
Association of Independent California Colleges and Universities
Association of Independent Colleges & Universities in Massachusetts
Association of Independent Colleges and Universities in Pennsylvania
Association of Independent Colleges and Universities of Rhode Island
Association of Independent Colleges of Art & Design
Association of Independent Kentucky Colleges and Universities (AIKCU)
Association of Jesuit Colleges and Universities
Association of Presbyterian Colleges and Universities
Association of Vermont Independent Colleges
Commission on Independent Colleges & Universities
Conference for Mercy Higher Education
Connecticut Conference of Independent Colleges
Council for Christian Colleges & Universities
Council of Independent Colleges
Council of Independent Colleges in Virginia, Inc.
GICA
Independent Colleges and Universities of Florida
Independent Colleges and Universities of Missouri
Independent Colleges and Universities of New Jersey

Independent Colleges and Universities of Texas (ICUT)
Independent Colleges of Indiana
Independent Colleges of Washington
International Association of Baptist Colleges and Universities
Kansas Independent College Association
Louisiana Association of Independent Colleges & Universities
Maryland Independent College and University Association
Michigan Independent Colleges & Universities
Minnesota Private College Council
North Carolina Independent Colleges and Universities
Oregon Alliance of Independent Colleges and Universities
Tennessee Independent Colleges & Universities Association
West Virginia Independent Colleges and Universities
Wisconsin Association of Independent Colleges and Universities