



July 8, 2026

Russell T. Vought  
Director  
Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

RE: Proposed Rule on Regulation for Federal Financial Assistance, Docket No. OMB-2026-0034

Dear Mr. Vought:

Throughout our nation's history, the partnership between the federal government and colleges and universities has built American higher education into an engine of national progress and prosperity. Aided by federal financial assistance, America's colleges and universities have seeded the technologies that underpin our national and global economy, combatted illness and disease to improve public and global health, and deepened our understanding of how humans and societies learn, grow, and flourish. Support for programs at our institutions has dramatically increased the number of students earning a postsecondary education and thereby lifted them economically, grown partnerships with communities, and driven economic growth for our regions and the nation.

The American Council on Education (ACE) and the undersigned higher education associations represent our nation's colleges and universities and the communities they serve. We write to express our strong objections to key elements of the Office of Management and Budget's (OMB) proposed rule, *Regulation for Federal Financial Assistance*,<sup>1</sup> which would change existing "uniform guidance" into a far-reaching regulatory grant framework that would have historic negative consequences and establish a precedent that would last far beyond the administration.

The longstanding partnership between the federal government and colleges and universities has been built upon a strong foundation of generally predictable, long-term financial investments and merit-based decision making, paired with a clear respect for institutional autonomy and freedom of inquiry. The federal government has long recognized these as core principles that must underlie government support for scientific research and education to ensure its effectiveness.<sup>2</sup> Year after year, Congress has strengthened this foundation through its annual research and education funding and has reinforced the necessity of rigorous scientific review in its grant design and regularity in a series of programs that support students. Further, the courts have repeatedly

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<sup>1</sup> Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>2</sup> Bush, V. (1945). *Science, the endless frontier: A report to the President on a program for postwar scientific research* (75th anniversary ed.). National Science Foundation. [https://nsf.gov-resources.nsf.gov/2023-04/EndlessFrontier75th\\_w.pdf](https://nsf.gov-resources.nsf.gov/2023-04/EndlessFrontier75th_w.pdf).

affirmed the principles of institutional autonomy and freedom of inquiry through their decisions over the decades.

The proposed rule states the new regulations would “...ensure that American tax dollars are ultimately used to serve the needs of the American public.” However, rather than support the American public, the proposed regulations would instead dramatically weaken the foundation of this partnership, creating structural and financial risks and adding significant instability to the ecosystem of colleges and universities that comprise American higher education. When viewed as a whole, the proposed changes would:

- undermine fairness and proven evaluation processes in the awarding of federal funds;
- create significant risks for long-term research and infrastructure investment;
- stifle scientific progress and the pace of discovery;
- undermine America’s economic power, global engagement, and influence;
- transform existing legal requirements into instruments for partisan purposes; and
- introduce systemic risk and uncertainty for all federal financial assistance.

We have heard these concerns across the higher education community—from community colleges to research institutions, regional colleges and universities to liberal arts schools, nonprofit partners to civil rights and religiously affiliated groups—as well as from our partners in business and local communities and in the tens of thousands of public comments already submitted to the OMB. While the comments below represent higher education’s broad concerns, we also fully endorse the more specific issues addressed in public comments submitted by other higher education groups, including COGR, the Association of Public and Land-grant Universities, and the Association of American Universities.

Consequently, we urge the OMB to withdraw and reconsider this deeply flawed proposed rule, which, in addition to its substantive shortcomings, exceeds the administration’s statutory authority in numerous areas. The administration should take this opportunity to partner with the higher education community and many other impacted stakeholder groups to craft regulations for disbursing federal financial assistance in a manner that truly improves effectiveness, transparency, accountability, and fair and responsible stewardship of federal funds. Aspects of the regulation represent a legitimate, and in some cases effective, effort to improve the administration of federal funds. However, these changes pale in comparison to the damage that the regulation would do.

With this in mind, we offer the following comments.

**1. Replacing merit review in federal grantmaking with political control would undermine fairness and proven evaluation processes in the awarding of federal funds.**

*[§ 200.205 and § 200.206]*

The vast majority of discretionary federal grants are awarded based upon a system of merit-based review, conducted by qualified experts in relevant fields of study. For decades, the process of peer review has guided the federal government to award federal financial assistance based on the strength, promise, and merit of the submitted proposals, and in many cases is required by the statutes authorizing such programs. The peer review process has helped to promote effective, ethical, and impactful research that advances the national interest and is the global standard for

merit review, often imitated and copied by other nations seeking to grow their R&D infrastructures. For hundreds of other programs, merit review has ensured that federal dollars are spent efficiently and effectively, consistent with the goals outlined by Congress. Merit review has the added benefit of conferring a strong element of “fair play” to the grantmaking process, which in turn encourages institutions to devote the considerable time and resources that are necessary to generate applications for funding. This is particularly important for hundreds of relatively low-resourced institutions located in communities across the nation.

The OMB proposal would erode the merit review process, stating that it would be “advisory” rather than the central component of grant decisions.<sup>3</sup> Instead, across all federal grantmaking agencies, the proposed regulations would require political appointees—who often lack relevant subject matter expertise as well as in-role experience and perspective developed over a period of years—to award funds based on an administration's political priorities, politicizing a process that previously has been driven first by merit and peer review. The credibility of the current federal system hinges on the fact that proposals are evaluated in terms of their quality, rigor, and potential impact, rather than political alignment. Overt political control over federal grantmaking would compromise the quality and potential impact of funded projects, undermine research independence and integrity, and call into question the fairness of federal funding decisions.

Under the proposed rule, political appointees would also have wider latitude to scrutinize applicants themselves for perceived political misalignment using vague and undefined criteria such as whether they have a history of “questionable practices” or membership or affiliation with organizations that “violated Federal laws” or “undermine public safety or national security.”<sup>4</sup> This review would create significant uncertainty for potential applicants, particularly during transitions in political leadership. This type of uncertainty was widespread early in the tenure of the current administration. Regarding national security concerns, it is unclear why this additional political element and authority has been added when existing provisions across the federal agencies already address national security concerns, including export control rules and the regularly updated banned-entities list.<sup>5</sup> Further, federal science agencies actively perform risk management in the awarding of grants to ensure the protection of national security, such as the U.S. Department of Defense (DoD) and the National Science Foundation (NSF).<sup>6</sup>

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<sup>3</sup> See § 200.205—Federal agency review of merit of proposals; Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>4</sup> See § 200.206—Federal agency review of risk posed by applicants: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>5</sup> Bureau of Industry and Security. (n.d.). *U.S. export controls*. U.S. Department of Commerce. <https://www.trade.gov/us-export-controls>; Bureau of Industry and Security. (2025, Sep 30). *Entity list*: 15 C.F.R. § 744.16. U.S. Department of Commerce. <https://www.bis.gov/regulations/ear/744#section-744.16>.

<sup>6</sup> Department of War. (2026, Mar 09). *Department of War (DoW) component decision matrix to inform fundamental research proposal mitigation decisions*. <https://basicresearch.defense.gov/Portals/61/Documents/Academic%20Research%20Security%20Page/20>

The proposed rule would also require political appointees to ensure that no federal funds are used to “promote, encourage, subsidize, or facilitate” activities related to unlawful diversity, equity, and inclusion policies, principles, or practices; disparate-impact theory; “gender ideology”; or initiatives that compromise public safety or promote anti-American values.<sup>7</sup> None of the efforts by the executive branch over the past 18 months to imprint these vaguely defined terms into legal obligations across higher education have led to clearly understood, lawful directives. Many of those efforts are the subject of pending litigation. Codifying these ambiguous and imprecise prohibitions in regulation at this time would exacerbate confusion and assure new challenges, legal and otherwise. Moreover, it would be at odds with the statutory requirements for many grants as authorized by the U.S. Congress.<sup>8</sup> The administration should also recognize that colleges are already aware of their legal and related responsibilities under a variety of constitutional and legislative requirements.

## **2. Enacting broad permissions for termination and suspension of federal grants for arbitrary political reasons would create significant risks for long-term research and infrastructure investment.**

*[§ 200.340, § 200.341, § 200.342, and § 200.343]*

Education and research are long-term processes, with investments often made over years, often decades. Grants and projects often require new hiring and staffing, infrastructure investments, and other long-term spending commitments. This work is enhanced when it is based on the expectation of stable funding, stipulating that federal support is earned and not an entitlement. Currently agencies can terminate grants or make administrative changes to the grant for mismanagement of funds or misconduct,<sup>9</sup> but there are procedural guardrails in place to ensure the process is fair and transparent.

The OMB proposal would introduce instability into longstanding foundations for federal financial assistance, expanding agency authority to arbitrarily suspend or terminate awards based on shifting priorities, program goals, or political determinations, while removing the appeals process for such terminations and trampling basic due process considerations.<sup>10</sup> Throughout 2025, the

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26%20DoW%20Component%20Decision%20Matrix%20to%20Inform%20Fundamental%20Research%20Proposal%20Mitigation%20Decisions.pdf; U.S. National Science Foundation. (2025, Nov 24). *Important notice no.149: updates to the NSF research security policies*. <https://www.nsf.gov/notices/important/important-notice-no-149-updates-nsf-research-security/in149>.

<sup>7</sup> See § 200.300-Statutory and national policy requirements: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>8</sup> For example, the undergraduate STEM education program created in Sec. 10312 of the CHIPS and Science Act: Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act of 2022, Pub. L. No. 117-167, 136 Stat. 1366 (2022). <https://www.congress.gov/117/bills/hr4346/BILLS-117hr4346enr.pdf>.

<sup>9</sup> See, for example: U.S. National Science Foundation. (2024). *A. Suspension and termination procedures*. PAPPG 24-1. <https://www.nsf.gov/policies/pappg/24-1/ch-12-disputes-misconduct>.

<sup>10</sup> See § 200.340-Termination and suspension, § 200.341-Notification of termination requirement, § 200.342-Opportunities to object, hearings, and appeals, and § 200.343-Effects of suspension and termination: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*,

abrupt terminations and holds put on federal funding for political reasons previewed the negative impact this proposal could have on the U.S. economy, the scientific pipeline,<sup>11</sup> and the national research enterprise. Research has shown that every dollar invested by the National Institutes of Health (NIH) generates roughly \$2.56 in broader economic activity. The \$2.45 billion in rescinded awards translates to an estimated \$6.29 billion in unrealized economic growth.<sup>12</sup> A variety of other federal expenditures on our campuses helps us attain our goal of ensuring that individuals across American society can benefit from higher education.

This proposal would also create a means for political appointees across federal agencies to bypass existing procedural requirements for funding termination following alleged violations of Title VI of the Civil Rights Act of 1964 and Title IX of the Educational Amendments of 1972, including the requirement to provide an opportunity for a formal hearing. Of course, the federal government plays a critical role in protecting the civil rights of all individuals, and colleges and universities are committed to upholding our nation’s civil rights laws. For decades, the federal government has focused on resolving Title VI and Title IX complaints without terminating funding, with the clear understanding that termination of funds would often negatively impact the population that may have in fact filed the complaint. At minimum, the OMB should clarify that this process will not be used as a first response in civil rights investigations.

### **3. Changing the structure of grant funding and prohibiting necessary research costs from federal financial assistance would stifle scientific progress and the pace of discovery and increase administrative burden.**

*[§ 200.333, § 200.201(b)(4), § 200.461, and § 200.454]*

In 2014, fixed-amount awards were added to the uniform guidance with the specific goal of reducing administrative burden for grant programs. For many of these fixed-amount grants, the award is paid based on the achievement of agreed-upon grant outcomes, rather than accounting for line-item expenditures. In other instances, the awards are so small that the expense associated with accounting for “incurred costs” would exceed the benefits of accounting for each line-item expenditure.

In a major change to how federally funded grants operated, the OMB proposal would eliminate “fixed amount” awards and subawards, instead requiring all federal grantees to submit “incurred costs” for their award, with a stated goal of providing transparency and to ensure the intended use of federal funding.<sup>13</sup> However, this ill-advised change will increase administrative burdens for both

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91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>11</sup> Jaramillo, J., & Harkness, A. (2026). Patterns and implications of 2025 NIH-F31 grant terminations for the predoctoral training pipeline. *Health affairs scholar*, 4(3), qxag065. <https://pmc.ncbi.nlm.nih.gov/articles/PMC13032874/>.

<sup>12</sup> Oliveira, D. F. M., Huang, Q., Woodruff, T. K., & Uzzi, B. (2026). How the 2025 NIH grant terminations varied by researchers' demographic groups. *Proceedings of the National Academy of Sciences of the United States of America*, 123(13), e2527755123. <https://pubmed.ncbi.nlm.nih.gov/41871241/>.

<sup>13</sup> See § 200.333- Fixed amount subawards and § 200.201(b)(4)-Applicability: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

federal agencies and grant recipients, without a commensurate benefit in enhancing accountability. By requiring the submission of paperwork for any incurred cost, this would increase the overall cost of federal research, both for the government and institutions. This new requirement is also redundant, as there are currently procedures in place at every level of the federal government to audit grantees to ensure that they properly spend federal dollars. For example, the U.S. Department of Education Office of the Inspector General (OIG) informs grantees and taxpayers of the ability of the agency and process to carry out “single audits” or financial and compliance audits of organizations receiving federal funding.<sup>14</sup> The sudden shift from fixed-amount grants to a cost-reimbursable framework will have major adverse consequences for the federal government and those receiving federal grants, causing major slowdowns of the research enterprise without enhancing transparency.

Further, a critical component of advancing research and scholarship includes communicating findings to the scientific community and the American people. Publication in professional journal publications and other peer-reviewed publications, dissemination through professional organizations, and discussion of findings through meetings and conferences helps distribute new knowledge and accelerate the pace of discovery. Additionally, under federal “open access” rules,<sup>15</sup> researchers and institutions are required to make scholarly publications and other findings made from federally funded research immediately free and available to the general public. To comply with this federal open access requirement, research publication is generally supported by grant funds.

The OMB proposed regulation would restrict the payment of publication costs, running counter to existing federal requirements to share the results of federally funded research more widely.<sup>16</sup> The proposal would also disallow a range of other necessary research costs, including subscriptions to business, professional, academic, and technical periodicals; most costs associated with membership in professional organizations; and conference attendance, unless expressly approved by the agency.<sup>17</sup> This severely undercuts the efficacy and impact of government-funded research, impeding the free flow of information. We urge the final regulation to remove these prohibitions, which would run counter to the “gold standard” science efforts of the administration to advance and undermine the promotion and funding of research that is transparent, collaborative, and interdisciplinary.<sup>18</sup>

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<sup>14</sup> Office of Inspector General. (2026, April 13). *Single audits process*. U.S. Department of Education. <https://oig.ed.gov/non-federal-audits/single-audits>.

<sup>15</sup> SPARC. (2022, August 25). *U.S. federal open access policies*. <https://sparcopen.org/our-work/2022-updated-ostp-policy-guidance/>.

<sup>16</sup> See § 200.461-Publications and printing costs: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>17</sup> See § 200.454-Memberships, subscriptions, and professional activity costs: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>18</sup> May 2025 Executive Order, “Restoring Gold Standard Science”: <https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/>.

#### **4. Restricting international collaboration and partnership would undermine America’s economic power, global engagement, and influence.**

*[§200.220]*

Currently, as the OMB proposed regulation notes, federal agencies maintain various lists of banned entities, countries of concern, and risk assessment matrices to address foreign collaborations of concern.<sup>19</sup> Unfortunately, the proposed regulation goes well beyond that precedent to establish “a government-wide baseline rule prohibiting recipients and subrecipients from using Federal funds to support bilateral or multilateral collaborations, agreements, programs, or activities with covered foreign countries or covered foreign entities, unless expressly authorized by Federal statute.” This newly proposed regulatory text would inappropriately expand the “Wolf amendment,” included since 2011 as a policy rider in the annual Commerce-Justice-Science appropriation bills, to all federal agencies.

Congress has voted many times over multiple appropriations cycles to apply the Wolf amendment exclusively to the National Aeronautics and Space Administration (NASA), restricting the agency from all partnerships, as well as any funded activity, with China specifically. The proposed rule would go well beyond the statutory authority to apply this narrow amendment to every federal agency. This regulatory action would effectively stop any partnerships with China, including those considered important to national priorities, as well as student and language exchange programs which allow U.S. students to study in China. As a policy, it is simply too broad, even if it manifestly addresses a very real concern. It goes well beyond the current federal efforts to address foreign collaboration in targeted ways that continue to allow for collaborations which support and serve U.S. priorities.

#### **5. Incorporating existing legal requirements into regulations for all federal financial assistance may transform them into instruments for partisan purposes.**

*[§ 200.450 and § 200.206]*

The OMB proposed regulation would duplicate a series of requirements already included in law, and their inclusion in this new regulatory proposal raises serious concerns that they may become inappropriately politicized. The proposed rule would expand existing prohibitions on the use of federal funding on lobbying to include restrictions against “voter registration campaigns, drives, or related activities.”<sup>20</sup> Existing federal statute bars federal funding from being used to influence members of Congress or federal agencies, and this expanded language may go beyond statutory authority.<sup>21</sup> It also conflicts with provisions in the Higher Education Act that require institutions of

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<sup>19</sup> See § 200.220-Prohibition of using federal funds for covered foreign collaborations: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>20</sup> See § 200.450-Lobbying: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>21</sup> 31 U.S.C. § 1352 (2018). *Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions*.

higher education to distribute voter registration forms as a condition of Title IV student aid eligibility.<sup>22</sup>

The proposed regulations would also dramatically expand current language that requires institutions of higher education to report foreign gifts and contracts.<sup>23</sup> The applicable statute (Section 117 of the *Higher Education Act*) is incorporated into Title IV program participation agreements that apply to all institutions. Congress never intended for this provision to be broadly extended to all federal funding, and it is unclear why this would be applied government-wide. For many years, the U.S. Department of Education has provided insufficient, confusing guidance regarding Section 117 compliance, while also making efforts to extend Section 117 beyond the statutory language.<sup>24</sup> In addition, the agency has carried out multiyear investigations regarding Section 117 compliance,<sup>25</sup> making it unclear if a multiyear investigation or compliance issue from decades ago would be used to justify rejection or termination of broader grant funding.

#### **6. Codifying unified regulatory policy without an appropriate implementation timeline would introduce systemic risk and uncertainty for all federal financial assistance.**

Many stakeholders have submitted requests to the OMB to extend the comment period for this proposed rule, including several of the undersigned higher education associations. With the breadth, complexity, and far-reaching impacts of the proposed rule, the current 45-day comment period has not provided impacted stakeholders with the time needed to fully understand the implications of the proposed changes and their full impact on education, student support, and research. Commenters have asked for a minimum of 90 to 120 days to conduct a careful review and provide high-quality feedback. Granting a brief extension of the submission deadline would greatly enhance the feedback that the administration is seeking in this required public comment process.

The proposed rule sets an intended implementation date of October 1, 2026—less than one hundred days after the proposal was first submitted for public inspection in the Federal Register. With the public comment period closing on July 13, 2026, the OMB has allotted fewer than 50 days to finalize the legally required substantive review of more than 90,000 public comments, adequately consider and respond to that public feedback, and then publish a final rule. This unwarranted and rushed implementation timeline introduces needless systemic risk and uncertainty for all recipients of federal financial assistance. As of this date, many impacted

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<sup>22</sup> 20 U.S.C. § 1094 (2018). *Program participation agreements*.

<sup>23</sup> See § 200.206-Federal agency review of risk posed by applicants: Office of Management and Budget. (2026, May 29). Regulation for federal financial assistance. *Federal Register*, 91(103), 32198–32305. <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>.

<sup>24</sup> American Council on Education. (2026, June 15). *Comments to U.S. Department of Education on Docket No: ED-2026-SCC-1354, Agency Information Collection Activities; Comment Request; Foreign Gifts and Contracts Disclosure*. <https://www.acenet.edu/Documents/Letter-ED-Sec117-ICR-061526.pdf>.

<sup>25</sup> See, for example, open Section 117 compliance reviews: U.S. Department of Education, Federal Student Aid. (n.d.). *Notices of compliance review and records requests*. Knowledge Center. <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting/resources/notices-compliance-review-and-records-requests>.

stakeholders may still not be aware of the proposal or the potential profound impact on their grant awards and subawards.

Further, the OMB has clarified that moving forward, any further changes to its “Uniform Grants Regulation” will have an immediate effective date across all federal grantmaking agencies from the date it is finalized. If future rulemakings follow a similar timeline, it will set a course for significant regulatory whiplash government-wide for all federal financial assistance during every political transition.

We understand that requests for an extension to the comment period have been denied by the OMB, despite the clear need for greater deliberation. Again, we urge the OMB to withdraw and reconsider this proposed rule and partner with the higher education community and other impacted stakeholder groups to craft a rule that truly improves effectiveness, transparency, accountability, and fair and responsible stewardship of federal funds.

Sincerely,



Ted Mitchell,

President

On behalf of:

AACTE–American Association of Colleges for Teacher Education  
ACPA–College Student Educators International  
Alliance for International Exchange  
American Association of Colleges and Universities  
American Association of Colleges of Nursing  
American Association of Collegiate Registrars and Admissions Officers  
American Association of Community Colleges  
American Association of State Colleges and Universities  
American Association of University Professors  
American Association of Veterinary Medical Colleges  
American College Health Association  
American Council on Education  
American Indian Higher Education Consortium  
American Psychological Association  
Association for Institutional Research  
Association of Community College Trustees  
Association of Governing Boards  
Association of Independent California Colleges and Universities  
Association of Jesuit Colleges and Universities  
Association of Public and Land-grant Universities  
Association of Research Libraries

Association of Schools and Colleges of Optometry  
Campus Compact  
Coalition for International Education  
Commission on Independent Colleges and Universities in New York  
Complete College America  
Council for Advancement and Support of Education  
Council for Higher Education Accreditation  
Council for Opportunity in Education  
Council of Graduate Schools  
Council of Independent Colleges  
Educational Testing Service  
EDUCAUSE  
Higher Learning Commission  
Hispanic Association of Colleges and Universities  
Independent Colleges of Washington  
LEARN Coalition  
Maryland Independent College and University Association  
Michigan Independent Colleges and Universities  
Middle States Commission on Higher Education  
NAFSA: Association of International Educators  
National Association for College Admission Counseling  
National Association of College and University Business Officers  
National Association of Diversity Officers in Higher Education  
National Association of Independent Colleges and Universities  
National Council for Community and Education Partnerships  
National Council of University Research Administrators  
Phi Beta Kappa Society  
UPCEA—the Online and Professional Education Association