



NAICU

# ANNUAL IMPACT REPORT

The Power and Value of Private,  
Nonprofit Higher Education

The 118th Congress began with Democrats in the White House and leading the Senate, and Republicans in charge of the House of Representatives. Two years later, the 119th Congress will operate with a Republican in the White House and Republican majorities in both congressional chambers.

Through the rollercoaster of last year's regulatory and legislative environments and the 2024 election cycle, NAICU's policy priorities remained true to its core mission and fundamental objectives of working to:



## PRESERVE

institutional independence



## ENSURE

the equitable treatment of  
private, nonprofit institutions



## PRESERVE & PROTECT

student aid funding



## DEFEND

the tax-exempt status of private,  
nonprofit colleges and universities



## SEEK

appropriate accountability  
and regulatory parameters



## SUPPORT

autonomy in setting  
institutional policies

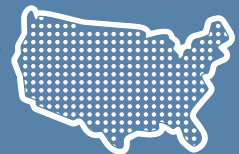
This demanded an unwavering commitment, a clear sense of purpose, and the resilience to ensure policymakers not only heard our concerns but also recognized and prioritized the critical needs of our sector.

That commitment, from our members, state executive and Secretariat networks, and our staff, resulted in victories both large and small that helped support students and institutions.

We all bear a responsibility to step forward as advocates for access to higher education, and we will need this same level of enthusiasm to carry our momentum forward.

**This is not the time to be quiet.**

## NATIONAL NETWORK



Nearly **900** colleges and universities

**38** state associations, along with  
the District of Columbia and Puerto Rico

**26** Secretariat members, representing many  
regional and special-purpose independent  
college and university associations

Independent colleges and universities in  
**393** Congressional Districts

# ADVOCACY IN ACTION

Every day, whether participating in a negotiated rulemaking session, analyzing proposed legislation and regulations and assessing their impact, meeting with Members of Congress, or engaging with policymakers in the executive branch, the NAICU team, along with its membership, is tirelessly advocating for private, nonprofit higher education and the more than 5 million students we serve.



Franciscan Missionaries of Our Lady University President & CEO Dr. Tina Holland meets with Speaker Mike Johnson (R-LA).



## ENSURE the Equitable Treatment of Private, Nonprofit Colleges & Universities

The College Cost Reduction Act (CCRA) imposes student loan risk-sharing penalties on institutions, making them liable for federal student loan costs. NAICU's extensive analysis of the formulas found that the proposal would unduly impact the private, nonprofit

sector because these institutions do not get tuition support from state governments like public colleges. This analysis paved the way for determining an estimate of the financial impact the CCRA would have on member institutions.

The NAICU network's advocacy helped prevent the current form of the CCRA from passing the House in the 118th Congress.



## PRESERVE & PROTECT Student Aid Funding

In December, President Biden signed the FAFSA Deadline Act requiring the Department of Education to make the FAFSA available each year on October 1, instead of January 1. This move came at the end of a tumultuous year for the Department and the implementation of the new FAFSA.

To provide a clear picture of the impact the FAFSA delays had on colleges and

universities, the NAICU membership responded in record numbers to complete our surveys, the findings of which had considerable impact on Capitol Hill, in the Administration, and in the media.

Throughout the crisis, NAICU's staff participated in weekly calls with the


Department sharing information about the impact the agency's actions were having on campus and, in turn, receiving status updates to relay to our members.



The Department of Education's Jeremy Singer, FAFSA executive advisor, and Melanie Storey, director, policy implementation and oversight, answered questions from the NAICU membership about the FAFSA delay.

The collective engagement from NAICU members kept pressure on the Department and pushed the agency to provide more resources to help students, families, and institutions, navigate the crisis.

Along with its own efforts, NAICU joined with other associations and networks to advocate for issues on behalf of private, nonprofit higher education. With coalitions of the higher education community and our state executive and Secretariat networks, NAICU regularly sent letters and comments to the Administration and policy makers on a range of issues, including: **student aid funding, FAFSA concerns, the College Cost Reduction Act, the overtime regulations, financial value transparency reporting requirements, campus hazing, education and free speech, treating athletes as employees, state authorization, distance education, immigration, and more.**



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March 28, 2024

Dear Member of Congress:

Accountability is a two-way street paved with a mutual obligation.

On March 14, I, along with 56 of our member associations of independent colleges and universities, sent a letter to Secretary Cardona asking that the July 1, 2024, implementation date for the Financial Value Transparency/Gainful Employment and related regulatory packages be delayed by one year. This request was made primarily because of the incredible pressure institutions are under as a result of the continuing delays in implementing the new Free Application for Federal Student Aid (FAFSA). This is particularly true of financial aid officers.

Accountability is a two-way street paved with mutual obligation.

Adding to the pressure of the FAFSA delay is a continuing series of mistakes that are causing many of the informational student information records (SIRs) institutions are receiving to be incorrect and the news that it will take weeks for the Department to provide corrections.

Time has run out. It is not hyperbole to say that the domino effect of these series of errors and decisions by the Department could have a generational impact on low-income students. Therefore, I ask Congress to pass emergency legislation that will do two things:

1) Guarantee student aid funding at last year's level for any continuing student. Allow institutions to guarantee continuing students at least the same amount of federal student aid they received last year. This would instantly allow the majority of student aid recipients to receive a base level of funding assurance. If the delays continue, Congress should consider giving financial aid officers the discretion to guarantee aid awards to incoming students as well.

2) Delay the July 1, 2024, implementation date for the Financial Value Transparency/Gainful Employment and related regulatory packages (issued on October 10 and



## SEEK Appropriate Accountability and Regulatory Parameters

Early in 2024, the Department of Education announced that it was going to implement a July 1, 2024 reporting deadline for the financial value transparency and gainful employment regulations. This timeline would have been extremely burdensome for institutions at a time when they were also dealing with the FAFSA delays.

**The energetic and committed advocacy of the NAICU network resulted in a more than 6-month extension in the reporting deadline for these regulations.**

NAICU also participated in, intervened on behalf of independent higher education, and tracked lengthy and varied regulatory processes on state authorization, cash management, accreditation, distance education, and return to Title IV.

**The actions of NAICU and its national network helped improve, reverse, or halt these problematic proposals.**



## SEEK Appropriate Accountability and Regulatory Parameters

The efforts of the NAICU membership to minimize the impact of the Department of Labor's proposed rule on overtime pay for nonprofit and corporate employers paid off when a federal judge in the Eastern District of Texas determined that the Biden Administration's final rule exceeded the agency's authority under the Fair Labor Standards Act and the Administrative Procedures Act.

**The court's decision, which followed a summary judgement hearing, effectively nullified the overtime rule in its entirety.**

## MEMBER ENGAGEMENT

NAICU's advocacy efforts are bolstered by the work of our institutional membership and our state executive and Secretariat networks. There was significant engagement at all levels that positively positioned our issues and priorities.

### Congressional Independent Colleges Caucus

The CICC celebrates and advances the diversity of the nation's independent colleges and is a vital conduit to Members of Congress and their staff.



*Brad Johnson, president of College of the Ozarks, meets with congressional staff after a CICC briefing focused on successfully mapping campus to career opportunities for students.*



*New CICC co-chair Deborah Ross (D-NC) speaks to Capitol Hill staff during a CICC briefing on the impact of FAFSA delays on fall 2024 enrollment, along with Rider University President Greg Dell'Omo and NAICU's Justin Monk and Suzanne Vieth.*



*CICC members Reps. James McGovern (D-MA) and Glenn Grothman (R-WI) are recognized as CICC Members in the Spotlight.*



*Congressional staff attend and participate in a CICC Capitol Hill briefing.*

### Advocacy Mindset

- Advocacy is important to drive change through legislative engagement at all levels of government. Advocacy is how we solve problems.
- It should be an essential part of every president's portfolio. What will your legacy be for your institution, for our sector, and for the nation's students?



## 2024 Annual Meeting BY THE NUMBERS



**450** Attendees



**300** Number of Capitol Hill meetings



**70** Percent of Congress covered by the Capitol Hill meetings



**39** Number of states, DC, and Puerto Rico covered by the Capitol Hill meetings



Members from Oregon meet with Rep. Cliff Bentz (R-OR).



Members from Rhode Island meet with Sen. Sheldon Whitehouse (D-RI).



Members from Connecticut meet with Rep. Jahana Hayes (D-CT).



NAICU members head to Capitol Hill for Advocacy Day meetings with their congressional delegations.

## YOUR PARTNER IN WASHINGTON, DC

### NAICU

- Works regularly with Congress, the White House, and federal agencies
- Tracks, analyzes, and summarizes policy, legislation, and regulations to help members understand the implications for institutions and students
- Creates and provides tools, resources, and legislative alerts to make the case for independent higher education
- Serves as a convener and coalition builder

### NAICU members get exclusive access to

- Key Congressional and Administration leaders and staff
- Experts in government relations, federal higher education policy, advocacy, research and public affairs
- In-depth analysis of the impact of legislative and regulatory policies and proposals
- Tailored advocacy training
- Weekly *Washington Update*, timely issue-specific webinars, and monthly government relations briefings



NAICU proudly represents all 1,700 independent colleges and universities and more than 5 million students and is honored to serve as your partner in Washington, DC.

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