

NATIONAL ASSOCIATION OF SCHOOLS OF MUSIC
101st Annual Meeting
November 21–25, 2025

Report of the Executive Director

Now having begun the 2025-2026 academic year, we are in many ways relieved to watch aspects of 2024-2025 disappear in the rear-view mirror. However, we are well aware that existing challenges remain with us, and that new challenges abound. Finding this to be true, there exists a continuing need for music units and institutions, their administrators, and faculty and staff members to face, manage, and address a broad and growing swath of issues. In addition, and with regard to new directives, there is a necessity to seek definitive information so that clear understandings are in hand and used to inform institutional considerations and decision-making. As a community, music administrators have faced challenges before, and with fortitude and intention, have come together to work problems, consider issues, explore options, and develop perspectives that enable them to advance the cause of music and the education and training of students—a vital part of the engine that serves as a catalyst for the advancement of the field. The result of our collective efforts cannot be underestimated or forgotten. Although challenges remain in abundance today, the fortitude and spirit of the members of NASM have without question been unwavering—in short, they have served as beacons of hope and possibility. In the face of challenges, the members of NASM have remained true to their missions, unwavering in their commitment to educate to the highest level students enrolled in music study. NASM applauds the unflinching and enduring efforts of its members and appreciates the efforts of each and every individual involved in this noble pursuit. As we advance through the 2025-2026 academic year, efforts to support and advance music as a profession, as a critical and indispensable aspect of collegiate study, and as an integral part of our nation’s fiber—a fiber that has the power to bind us together—remain a central focus of NASM. The effectiveness of NASM’s work in various areas, including accreditation, professional development, research, and policy analysis pertaining to higher education and the arts, continues to be reviewed, discussed, improved, and enhanced. As NASM serves an ever-growing and diverse membership, its projects in accreditation and beyond continue to broaden and evolve. The Association’s principal activities during the past year and issues of note are presented below.

Accreditation Standards and Procedures

Much of the yearly work of NASM involves accreditation. This includes preparation for the meetings of the Commission on Accreditation and the Commission on Community College Accreditation, scheduling accreditation visits, arranging consultations for member and potential member institutions, communicating with institutions preparing accreditation materials, receiving and reviewing accreditation materials, conducting the meetings of the Commissions, and reviewing and developing standards and guidelines that articulate the rigors of music study as well as expectations for those enrolled. The individuals involved in these activities—institutional representatives, music administrators, faculty and staff members, the members of the NASM Commissions, visiting evaluators, consultants, Annual Meeting presenters/moderators/recorders—work tirelessly to support each other and the efforts of NASM, and in doing so through these efforts, whether wittingly or not, assume a large role in advancing the cause of music as an essential and invaluable aspect of human life.

Maintaining the responsibility to review accreditation applications, the important work of the Commission on Accreditation and the Commission on Community College Accreditation continues each year without pause or interruption, aided in large part by the dedication of its members. The NASM Commissions review applications for accreditation, renewal of accreditation, Responses, Progress Reports, Plan Approval and Final Approval for Listing applications, requests for Substantive Change, and the like. The work of the Commissions is assisted significantly by the work of the NASM corps of visiting evaluators. NASM continues to take steps to expand the breadth and depth of its pool of visiting evaluators. To this end, during this Annual Meeting, NASM will offer training sessions for new and experienced evaluators, and a briefing for the entire evaluator corps. NASM deeply appreciates the service of those assuming this important role, and the assistance evaluators and consultants provide to applicant institutions. It is strongly recommended that representatives from accredited institutional members consider serving as evaluators. In addition to the wealth of information these sessions provide to participants regarding the work of NASM, service as an evaluator assists institutions and their students, and can be an invaluable opportunity which assists to broaden the perspectives of music administrators.

The NASM *Handbook* includes all current national standards and guidelines for degree- and non-degree-granting institutions offering programs of study in music, as well as the Association's Constitution, Bylaws, Code of Ethics, and Rules of Practice and Procedure. NASM continually reviews the information in the *Handbook* and conducts annual as well as multi-year comprehensive reviews of the entire *Handbook*. Such reviews provide to NASM an opportunity to focus on all standards. Though the most recent comprehensive review process began in 2015 and concluded in 2019, the standards as a whole remain open for comment. NASM welcomes feedback at any time. Following its commitment to proactively review in detail all standards in the *Handbook* on a scheduled basis, the next comprehensive review process is slated to begin in 2026. An amended *Handbook* typically is released following each Annual Meeting. The NASM *Handbook 2025-26* will be published later this fall. It will include current standards and guidelines as well as those approved by a vote conducted via electronic means in October 2025. Each accredited member is asked to remain cognizant of and in compliance with NASM standards and guidelines as they apply to your institution and its curricular offerings in music. Please consult the *Handbook* regularly, whether preparing for an NASM comprehensive review, planning institutional initiatives, and/or designing new curricular programs.

A comprehensive review of the Association's *Procedures* documents began during the 2022-2023 academic year. Revised editions of these documents were released in September of 2025. Institutions initiating applications that will be submitted for future Commission review (such as comprehensive reviews, Plan Approval, Final Approval for Listing, and the like) should use the September 2025 editions. Institutions that have already begun to prepare their applications should continue with the editions in hand when their preparations began.

All current accreditation-related documents, standards, and procedures are available for download from the Association's website located at <https://nasm.arts-accredit.org>. Institutions are reminded that the standards are set in a framework which allows for flexibility and creativity in approach. Should representatives wish to explore the depth, breadth, and latitude inherent in the standards, which can be invaluable when addressing local conditions, realities, and aspirations, contact with the NASM National Office staff is recommended.

The Association continues to encourage consideration of the use of the NASM review process and/or materials, particularly the national standards, in other review contexts. Consolidating reviews may assist

institutions to conserve resources and realize economies of scale. Many institutions are finding efficiencies by combining required NASM comprehensive reviews with internal and/or other external reviews. The Association is willing to work with institutions and programs interested in exploring options in this regard and to assemble NASM reviews that are thorough, rigorous, efficient, and suitably dovetailed with other internal and external efforts.

The Association is cognizant of the many hours devoted by member and applicant institutions to research, study, consider, prepare, and present accreditation materials for review by the Commissions. NASM is deeply grateful for these efforts extended on behalf of the field of music and congratulates the institutions and their representatives for their many accomplishments and successes resulting from their work.

Annual Meeting

The NASM Annual Meeting provides an opportunity for individuals to come together in community, to connect, to communicate, and to consider issues important to those who guide and participate in the work of music units and institutions. The Annual Meeting provides to music administrators a space and place where they can share and receive information which can broaden and hone understandings, particularly with regard to current and salient issues, and which can assist administrators to address local and national realities. As well, the Annual Meeting serves as a venue which enables the Association to conduct its business. NASM is pleased to gather in community on-site in Orlando in 2025 and looks forward to connecting with returning participants and welcoming new registrants.

Annual Meeting content is centered on the education and training of students enrolled in music study, driven largely by the feedback offered by member institutions and Annual Meeting attendees, and is informed by current issues faced by administrators responsible for guiding and leading collegiate programs in music. NASM welcomes your thoughts, ideas, and suggestions, and stresses the importance of your feedback. NASM offers to all registrants an opportunity to provide comment through the use of the Annual Meeting app. In addition to the app, and subsequent to the Annual Meeting, NASM circulates a questionnaire to all members and Annual Meeting attendees requesting feedback. Please consider taking a moment to participate in these initiatives and/or to merely communicate directly with the NASM staff.

Availability of Informative Materials

NASM maintains a robust library of material focused on topics such as accreditation, professional development, policy analysis, and research. These materials are intended to assist accredited institutional members to navigate the constantly changing higher education landscape. Particularly salient at this time is an extensive web-based resource entitled, *Leadership: Navigating Difficult Situations and Conditions* (see <https://nasm.arts-accredit.org/leadership/>). Offering a wealth of information, the *Leadership* site is divided into six sections: *Facts, Principles, Considerations: Important Reminders; Strategic Thinking—An Intellectual Endeavor: Developing an Abiding Approach; Informed Decision-Making: The Importance of Distillation and Synthesis; Frequently Asked Questions (FAQs); The Long View: The Place of Reasonableness; and Concluding Thoughts: Support and Appreciation*. This and many other published resources found on the NASM website may help to assist music executives as they are called upon to articulate the benefits of and necessity for music study. Whether looking for rationales or assistance when developing talking points, NASM publications are an invaluable source of support, assistance, and information. It is recommended that representatives of member institutions

visit and review the site's content often and as needed, as well as the extensive list of publications available within the "Publications" section of the website (see <https://nasm.arts-accredit.org/publications/>).

Financial Planning

As offered in the Treasurer's Report presented during the 2025 Annual Meeting, the Association's Managed Assets account is weathering well the movements of the market, as indicated by the current balance of funds in the account, and the account's slow and steady growth. The solid base now in place is intended to support NASM's work to advance its objectives and ensure its future, and therefore its ongoing contributions to its members and the field.

Projects

NASM participates in the Council of Arts Accrediting Associations (CAAA) with NASAD (art and design), NASD (dance), and NAST (theatre). The Council is concerned with issues that affect all four disciplines and their accreditation efforts. The NASM President (Tayloe Harding) and Vice President (James B. Forger) are the music Trustees of the Council and represented NASM during CAAA meetings, which were held in Arlington, VA in January of 2025. CAAA sponsors the Accrediting Commission for Community and Precollegiate Arts Schools (ACCPAS), which reviews arts-focused schools at the K–12 level. Currently, there are 16 institutions accredited by ACCPAS. This undertaking is valuable in that it assists to connect precollegiate and higher education efforts. Peter T. Witte of the University of the Pacific is the music member appointee.

NASM will once again offer to attendees of the 2025 Annual Meeting information through the use of a meeting app. This app provides access to current Annual Meeting, hotel, and venue information. Noting the functionality of the app to provide Annual Meeting logistics and information, NASM is no longer providing hardcopy Annual Meeting materials. NASM welcomes your feedback regarding the use of the app.

During the 2021-2022 academic year, the National Office staff, in partnership with an external third-party vendor, began work to design and implement an accreditation data management system using *Salesforce* software that will eventually enable institutions to submit accreditation materials and the Commission to review these submissions electronically. In addition to these features, institutions will also receive information such as visiting evaluator slates, Visitors' Reports, and Commission Action Reports through the new platform. Eventually, this tool will enable NASM to sunset its requirement for hardcopy accreditation submissions. Work to complete this project is ongoing. During the summer of 2024, NASM migrated all information from its existing database to the new platform. At this time, NASM staff continues to verify the migrated data for accuracy and test the functionality of the new platform. The platform will be launched by section as related to operational function—the first release of which occurred last summer in that NASM is now storing data collected through the 2023-2024 and 2024-2025 HEADS Data Surveys in the *Salesforce* platform. The second release occurred this past summer with the offer of availability of the HEADS Navigable Dashboards pertaining to Enrollment and Faculty. Information addressing the use of the system will be provided by the NASM staff as aspects become operational. Helpful and informative sessions regarding the system will be offered during this and future NASM Annual Meetings.

In addition to the initiatives outlined above regarding the Annual Meeting app and the electronic collection and provision of accreditation information, NASM, in conjunction with NASAD, NASD, and NAST began work in the fall of 2020 to upgrade the HEADS Data Services Project, moving it to a new platform. The newly designed system is intended to mimic the existing features of the HEADS Data Survey and to combine the features of the previous HEADS Data Summaries and HEADS Special Reports into Navigable Dashboards which offer users the ability to create user-defined single- and multi-year reports populated by historical data collected through use of the survey tool.

The 2023-2024 HEADS Data Survey was launched for electronic entry on August 21, 2024. The deadline for submission of data was November 30, 2024. In an effort to return the project to its original schedule, the 2024-2025 HEADS Data Survey was launched on November 1, 2024. The deadline for submission of data was January 31, 2025. NASM offers appreciation to the members for their efforts to complete two Data Surveys within the same academic year.

The 2025-2026 HEADS Data Survey was released on November 1, 2025. The deadline for submission of required data is January 31, 2026. Accredited institutional members are reminded that completion of the HEADS Data Survey is a requirement of accredited institutional membership and that each Self-Study must include copies of the three most recent HEADS Data Surveys. For institutions conducting comprehensive reviews prior to January 31, 2026, this includes Data Surveys for 2022-2023, 2023-2024, and 2024-2025. For institutions conducting comprehensive reviews after January 31, 2026, this includes Data Surveys for 2023-2024, 2024-2025, and 2025-2026.

Access to data collected using the HEADS Data Survey is made available in the new online institution portal through Navigable Dashboards. The Navigable Dashboards pertaining to Enrollment and Faculty were released to members on August 5, 2025. Access to the Navigable Dashboards is a service provided to accredited institutional members. Navigable Dashboards include data collected between 2016-2017 and 2024-2025. Each successive year's data will be added to the Navigable Dashboards shortly after the collection deadline (January 31).

Navigable Dashboards currently under construction include those pertaining to: Executives/Administrative Staff, Expenses/Sources of Income, Demographic Survey of Doctoral Students, Ethnic Characteristics of Faculty and Students, Ratio Tables, and Institutions Reporting New Construction and/or Renovation. The Expenses/Sources of Income Dashboards are anticipated to be released in the coming weeks.

HEADS extends once again deepest appreciation for the kind patience and continuing support offered as work to implement and maintain these new systems continues. Should questions arise regarding these technological advancements, please contact Tracy Maraney (Salesforce) (tmaraney@arts-accredit.org); Nora Hamme (HEADS Data Survey) (nhamme@arts-accredit.org); and/or Angie Elkins (Navigable Dashboards) (aelkins@arts-accredit.org).

Policy

The federal landscape associated with higher education is in flux. Laws are being introduced, regulations are being negotiated, guidance statements are being issued, and Executive Orders are being announced. Although a challenge given the breadth of activity, it is recommended that members and colleagues remain abreast of unfolding activities, study federal writings, and provide feedback as it pertains to federal requests and proposed regulations applicable to issues which may affect collegiate study and the

education and training of students enrolled in music programs as deemed appropriate by the institution. To assist in this important responsibility, NASM provides the information below, which outlines initiatives pertinent to higher education that have either been completed, are ongoing at this time, or anticipated. If you are not directly involved with federal and state policy on your campus, you are welcome to share this information with those who may be.

As a point of departure, it is important to keep in mind that concerted effort is needed to ensure that neither law, nor regulation that follows, restrict postsecondary institutions from designing, implementing, and maintaining effective programs of study in the arts. As well, it is important to study issues carefully, separating fact from conjecture, and to understand the established duties and powers assigned to each branch of government and the limits of the same. Protecting and maintaining institutional autonomy and freedoms vital to the success of our educational system, as well as our pursuit of creative and innovative undertakings, remains paramount.

Leadership of Congressional Education Committees

The 119th Congress convened in January 2025, welcoming new chairs of both Congressional committees with purview over education related issues. The House Committee on Education and the Workforce is chaired by Tim Walberg (R-MI); Bobby Scott (D-VA) is the ranking member. The Senate Committee on Health, Education, Labor, and Pensions (HELP) is chaired at this time by Bill Cassidy (R-LA), with Bernie Sanders (I-VT) serving as the ranking member.

Each member of Congress listed above has served for some time on the respective House and Senate committees. The only individual new to committee leadership is Representative Walberg—his current position is his first time serving in a leadership role, although he did serve as the ranking member of the Health, Employment, Labor, and Pensions subcommittee in the 116th Congress. Representative Scott, Senator Cassidy, and Senator Sanders have previously served as either chair or ranking member of their respective committees.

Higher Education Act of 1965, as amended (HEA)

The Association continues to follow and monitor carefully various federal and state initiatives and issues—one of particular import is the Higher Education Act (HEA). Bear in mind that while the HEA does not directly govern institutions, it does govern the flow of federal funding to institutions and the conditions institutions must meet to receive this funding. This Act was last reauthorized in August 2008 and expired December 31, 2013. Although in recent years there have been attempts to re-energize the reauthorization process, to date, a comprehensive reauthorization has yet to begin in earnest. Lack of timely reauthorization (expected every five years to align with typical rulemaking timelines) has resulted in concerted efforts to re-regulate existing law (HEA). Although regulations (often referred to as “final rules”) are intended to clarify existing law, continued re-regulation of the same law can and often does lead to new interpretations and therefore confusion. Consider, for example, the number of times Title IX and Gainful Employment have been re-regulated since 2014. As a result, institutions of higher education participating in Federal financial aid programs are guided to study the landscape and remain abreast of ongoing activity, paying careful attention to ongoing federal and state initiatives. Legal challenges to regulation have become increasingly common in recent years. The Supreme Court’s decision last summer to overturn the “*Chevron* doctrine” and limit nationwide injunctions, discussed in greater detail

below, are expected to increase the success rate of litigation. If realized, these conditions will contribute greatly to the already shifting landscape.

While a comprehensive reauthorization remains unlikely in the foreseeable future, H.R.1. (colloquially referred to as the “One Big Beautiful Bill Act”) did make substantive changes to the statutory provisions of the HEA. This bill was signed into law on July 4, 2025. NASM provided a summary of the higher education provisions of the law on July 21, 2025, and a more detailed overview of the law’s programmatic accountability measures on September 30, 2025. Both summaries are available on the NASM website under “Current Notices” (see <https://nasm.arts-accredit.org/about/current-notices/2025-budget-reconciliation-bill/>) and (<https://nasm.arts-accredit.org/about/current-notices/federal-update-accountability-measure-hr1/>).

Department of Education

With shifting priorities at USDE and the increasing frequency of court challenges to regulation, it is important to keep in mind that many final rules published in recent years remain either entirely intact and in force, or partially so. It is not uncommon with a change in party majority for previously implemented rules to be replaced with versions negotiated to align with the priorities of the administration in place at any given time (i.e., Gainful Employment, Title IX).

Recently Published Final Rules in Effect:

Ability to Benefit (published October 31, 2023/effective July 1, 2024)—Amends regulations regarding state-defined processes to assess a student’s “ability to benefit” from an educational program if said student does not have a high school diploma or its equivalent, and processes for verifying whether an institution offers an eligible career pathway program.

Administrative Capacity (published October 31, 2023/effective July 1, 2024)—Amends regulations detailing the administrative capability that must be achieved by institutions participating in Title IV programs.

Changes in Ownership and Control (CIO) (published October 28, 2022/corrected March 28, 2023/effective July 1, 2023)—Amends regulations regarding institution and program eligibility for Title IV programs when there is a change in ownership resulting in a change in control.

Factors of Financial Responsibility (published October 31, 2023/effective July 1, 2024)—Amends regulations defining the level of financial responsibility an institution must maintain in order to be eligible to participate in Title IV programs.

Federal Education Assistance Funds Received by Institutions of Higher Education (90/10) (October 28, 2022/effective July 1, 2023)—Requires proprietary institutions to receive at least 10 percent of their revenue from sources other than federal education assistance funds and veterans benefits.

Financial Value Transparency* (published October 10, 2023/effective July 1, 2024, reporting requirements delayed to September 30, 2025)—Amends regulations pertaining to institutional reporting of information about financial costs and benefits to students regarding nearly all academic programs at postsecondary institutions that are eligible to participate in Title IV of the HEA (*Related to Gainful Employment).

Gainful Employment (published October 10, 2023/effective July 1, 2024, upheld by court order October 2, 2025)—Amends regulations which are meant to ascertain whether post-secondary educational programs prepare students for gainful employment in recognized occupations, and the conditions under which institutions and programs remain eligible for student financial

assistance programs under Title IV of the HEA. This rule pertains to all programs at for-profit institutions and all non-degree programs at public and private non-profit institutions.

Modernizing H-1B Requirements (published December 18, 2023/effective January 15, 2025)—Amends the definition of “specialty occupation” to clarify that while sponsoring employers may accept a range of qualifying degree fields when considering candidates for such occupations, the field must be directly related to the duties of the job to meet the specialty occupation requirement.

Public Service Loan Forgiveness (published November 1, 2022/effective July 1, 2023)—Enables borrowers to receive loan forgiveness after ten years of qualifying payments on qualifying loans while engaging in public service.

Recently Published Proposed Rule:

Public Service Loan Forgiveness (PSLF) (published October 31, 2025/effective July 1, 2026)—Amends regulations pertaining to the PSLF program to exclude employers that engage in activities that have “a substantial illegal purpose,” thereby excluding employees of those organizations from the program. Activities with “a substantial illegal purpose” are defined in the rule, as is the process by which the Secretary will determine organizational ineligibility under the rule.

Recently Published Final Rules Subject to a Regulatory Freeze Outlined in a Memorandum dated January 20, 2025:

Distance Education (published January 3, 2025/effective July 1, 2026)—Adds a definition for a “distance education course” and requires institutions to report attendance in distance education or correspondence courses for students receiving Title IV aid.

Return of Title IV, HEA Funds (published January 3, 2025/effective July 1, 2026)—Clarifies the conditions under which an institution is required to return Title IV funds, particularly regarding student withdrawals during a payment period or period of enrollment.

Recently Published Final Rules Partially or Entirely Blocked by Court Order:

Certification Procedures (published October 31, 2023/effective July 1, 2024, partially blocked by injunction)—Reassessment of provisionally certified institutions that have significant consumer protection concerns by the end of their second year of receiving certification. The case is currently stayed through January of 2026, as USDE has stated its intent to reconsider the challenged rule in negotiated rulemaking.

Defining and Delimiting the Exemptions for Executive, Administrative, Professional, Outside Sales, and Computer Employees (published April 26, 2024/effective July 1, 2024 and January 1, 2025, blocked nationally by injunction)—Raised the minimum salary required for certain employees to qualify for the so-called “white-collar exemptions” from \$35,568 to \$43,888 (effective July 1, 2024) and then to \$55,068 per year (effective January 1, 2025), and required that this threshold be re-evaluated every three years based upon current data. As of December 2024, the rule is currently blocked nationwide; the \$35,568 threshold remains in effect. The Department of Labor appealed the December 2024 ruling in February of 2025. The case remains ongoing.

Income Driven Repayment (published July 10, 2023/effective July 1, 2024, implemented early on October 23, 2023, blocked nationally by injunction)—Streamlines and standardizes loan

repayment regulations and amends the income-driven Revised Pay-As-You-Earn plan (REPAYE) into the Saving on a Valuable Education plan (SAVE) to allow for expanded debt relief for certain borrowers. These regulations were implemented early, and some borrowers did receive relief under the SAVE plan. In August of 2024, the regulations were blocked by a federal court until further order of either that court or the Supreme Court. With the signing of H.R.1. into law, the new statutory changes to the student loan repayment system will have an impact on the future of this case.

Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance (published April 29, 2024/effective August 1, 2024, blocked nationally by injunction)—Amends regulations regarding the scope and application of Title IX of the Education Amendments of 1972 and the obligations of recipients of federal financial assistance from the Department to provide an educational environment free from discrimination on the basis of sex, including through responding to incidents of sex discrimination. The population of students covered by this rule is expanded from previous Title IX regulations. After many states challenged these regulations in court, the rule was vacated in its entirety in January of 2025. As a result, institutions must revert to the 2020 Final Rule regarding Title IX (see Guidance/Dear Colleague Communications below).

Negotiated Rulemaking:

Negotiated rulemaking is the process through which Executive Branch agencies craft and finalize regulations as they pertain to current laws. USDE is required by law to initiate the negotiated rulemaking process for regulations pertaining to topics regarding higher education.

Two committees have been convened with the intention to develop regulations to implement provisions included in H.R.1. (see Higher Education Act of 1965 above):

Reimagining and Improving Student Education (RISE) Committee (meetings in September, October, and November of 2025)—Topics to include the phase-out of graduate and professional PLUS Loans, annual loan limits and lifetime borrowing caps, simplification of loan repayment options, institutional flexibility to implement loan limits for selected programs, and modification to loan rehabilitation.

Accountability in Higher Education and Access Through Demand-Driven Workforce Pell (AHEAD) Committee (meetings in December of 2025 and January of 2026)—Topics to include institutional and programmatic accountability measures, program eligibility for workforce Pell grants, and exclusion of Pell eligibility for students meeting certain criteria.

An issue which received considerable discussion during the first session of the RISE Committee was the definition of graduate programs and professional programs. Recall that under H.R.1., borrowing will be capped at \$100,000 for graduate programs and \$200,000 for professional programs. The definitions included in the yet to be published proposed and final rule will have a significant impact on graduate programs, as they will dictate the amount of federal financial aid eligible to be applied toward tuition for such programs. A key issue to be addressed by the AHEAD Committee will be specifics related to the mechanics of the statutory programmatic accountability measures included in H.R.1.

The RISE committee recently concluded its work, resulting in the Final Rule regarding PSLF discussed above.

Public Service Loan Forgiveness (concluded July 2, 2025)—A committee met from June 30–July 2, 2025 to develop new regulations regarding PSLF. Consensus was not reached at the conclusion of these negotiated rulemaking sessions. As a result, the writing of the rule fell to the staff of USDE.

USDE recently released its Spring 2025 agenda of regulatory and deregulatory actions, highlighting topics under consideration for negotiated rulemaking. While a schedule for any potential negotiated rulemaking sessions is not known at this time, anticipated topics include accreditation, Title IV eligibility, reporting of foreign gifts and funding sources, elimination of disparate impact theory under Title VI of the 1964 Civil Rights Act, and procedures for investigations and enforcement of Title VI violations.

Guidance from the Department of Education and Other Executive Branch Agencies Issued in the Form of “Dear Colleague” Letters and Other Electronic Announcements:

Of Note: “Dear Colleague” letters offer guidance from the staff of the United States Department of Education (USDE) as it pertains to both current Higher Education law and regulation.

- [Fact Sheet: Restoring Public Service Loan Forgiveness to Its Statutory Purpose](#) (USDE, October 30, 2025)
- [\(GEN-25-09\) Reminder Regarding Prohibited Use of Federal Grants Funds for Lobbying and Allowable Membership Costs](#) (USDE, September 30, 2025)
- [\(GEN-25-05\) Updated Requirements for Distribution of Voter Registration Forms and Federal Work Study Allowable Uses of Funds](#) (USDE/OPE, August 19, 2025) (Rescinds GEN-22-05 and GEN 24-03)
- [Attorney General Memorandum: Guidance for Recipients of Federal Funding Regarding Unlawful Discrimination](#) (DOJ, July 29, 2025)
- [\(GEN-25-04\) Federal Student Loan Program Provisions Effective Upon Enactment Under the One Big Beautiful Bill Act](#) (USDE/FSA, July 18, 2025)
- [\(GEN-25-03\) Changes to the Approval Process for Changing Accrediting Agencies](#) (USDE/OPE, May 1, 2025)
- [Financial Value Transparency and Gainful Employment Information: Compilation of Federal Register Notices, Dear Colleague Letters, and Electronic Announcements](#) (USDE/FSA, ongoing compilation of guidance)
- [*Frequently Asked Questions About Racial Preferences and Stereotypes Under Title VI of the Civil Rights Act](#) (USDE/OCR, February 28, 2025) (*Blocked by court ruling, August 14, 2025)
- [*Dear Colleague Letter: Title VI of the Civil Rights Act in Light of Students for Fair Admissions v. Harvard](#) (USDE/OCR, February 15, 2025) (*Blocked by court ruling, August 14, 2025)
- [Dear Colleague Letter: Title IX Enforcement Directive](#) (USDE/OCR, February 4, 2025)
- [\(GEN-25-01\) Dear Colleague Letter: Notice of interpretation regarding misrepresentations by third-party service providers engaged by an institution of higher education](#) (USDE, January 16, 2025)

- [\(GENERAL-25-03\) Frequently Asked Questions on Administrative Capability, Financial Responsibility and Program Integrity](#) (USDE/OPE, January 8, 2025)
- [\(GENERAL-24-136\) Change in Ownership Documentation, Reporting, and Requirements](#) (USDE/FSA, November 21, 2024)
- [\(GEN-24-07\) Implementation of Regulations Related to Financial Responsibility, Administrative Capability, Certification Procedures, and Ability to Benefit \(ATB\)](#) (USDE/OPE, May 16, 2024, updated August 23, 2024)
- [\(GENERAL-24-54\) 90-Day CIO Notification Electronic Announcement Updated Guidance](#) (USDE/FSA, May 6, 2024)
- [\(GEN-23-77\) Compliance with the Change in Ownership 90-Day Advance Notification](#) (USDE/FSA, September 1, 2023, updated October 20, 2023 and November 7, 2023 in GEN-23-86)
- [\(GEN-23-31\) Additional 90/10 Questions and Answers](#) (USDE/OPE, May 25, 2023)
- [\(GEN-23-14\) Regulations Governing the Recognition of Accrediting Agencies, Institutional Eligibility, and Arbitration](#) (USDE/OPE, November 3, 2023, updated December 5, 2023)
- [Fact Sheet: Regulations on Accountability, Transparency and Financial Value for Postsecondary Students](#) (USDE/OPE, October 31, 2023)
- [Fact Sheet: Regulations on Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit](#) (USDE/OPE, October 24, 2023)
- [Dear Colleague Letter: U.S. Supreme Court decision regarding race in admissions](#) (USDE/DOJ, August 14, 2023)
- [Questions and Answers Regarding the Supreme Court's Decision in *Students for Fair Admission, Inc. v. Harvard College and University of North Carolina*](#) (USDE/DOJ, August 14, 2023)
- [Guidance for Ensuring Complaint Procedures for Accrediting Agencies are Fair, Timely, and Equitable](#) (USDE/OPE, August 7, 2023)
- [\(GEN-23-09\) Accreditation and Eligibility Requirements for Distance Education](#) (May 18, 2023)
- [\(GEN-22-70\) Updated Guidance and Procedures for Change in Ownership](#) (September 15, 2022)
- [Memorandum: Changes of Ownership](#) (USDE/OPE, February 2, 2023)
- [\(GEN-22-11\) Procedures for Institutions Seeking Approval of a Request to Change or Add Accrediting Agencies](#) (USDE/OPE, July 19, 2022; Updated September 26, 2022)
- [\(GEN-22-10\) Guidance for Institutions Seeking to Change or Add Accrediting Agencies](#) (USDE/OPE, July 19, 2022)
- [Letter to Institutional Accrediting Agencies Regarding Voluntary Membership](#) (USDE/OPE, July 16, 2022)

Other USDE Activity

While much has been made of recent efforts to eliminate the Department of Education, it is important to recall that the USDE was formed by an act of Congress, and elimination would only be possible with an additional Congressional act. USDE has recently begun to partner more closely with other Executive Branch agencies to carry out some functions: the Department of Justice (DOJ) for investigations of institutions and the Department of Labor (DOL) for administration of workforce-related programs. USDE has focused increasingly on ending discretionary grant programs which do not align with current priorities, the most recent being several Minority-Serving-Institutions (MSI)

grants, following a determination by the U.S. Solicitor General that such grants violate the equal-protection clause of the Fifth Amendment to the Constitution. Legal challenges are expected in this area.

Other Initiatives

Accreditation

Increased Attention (ongoing)—In recent months, accreditation has received a higher than typical level of attention, as has the field of higher education. Regulations released in November of 2019 telegraphed a potential shift in the landscape regarding accreditation and the Secretary’s recognition process for accrediting agencies, such the removal of geographic boundaries for regional accreditation bodies, and an openness to the consideration and implementation of new accrediting bodies. An Executive Order released April 23, 2025 directs USDE to resume recognition of new accrediting agencies. At this time, there are two new accreditors which publicize different approaches to accreditation: The Postsecondary Commission publicizes a focus on economic returns for students, transparency regarding results, accountability for wage gain provided to students, and innovation; The American Academy for Liberal Education publicizes a focus on liberal arts education. Lists of institutional and programmatic accrediting agencies recognized by the Secretary of Education can be found on the USDE website.

Recognition of new institutional accreditors would increase the number of accreditors eligible to serve as Title IV HEA program participation gatekeepers. Of concern is the possibility that new accreditors would be offered a streamlined and less rigorous path to recognition than that now required of current gatekeepers. For many reasons, it is important to ensure that any new accreditor intended to serve a gatekeeping function is reviewed by USDE in the same manner and with the same rigor as that applied to currently recognized accreditors. Two additional issues of note include the outcome of laws passed by states that require public institutions to change accrediting agencies prior to their next comprehensive review (see Florida and North Carolina under “States” below), and an action by the governing board of the State University System of Florida to form a new accreditor focused on public universities (the Commission for Public Higher Education). This collaborative effort among state university systems in Georgia, North Carolina, South Carolina, Tennessee, and Texas deserves our ongoing attention.

Carnegie Foundation for the Advancement of Teaching/American Council on Education (ACE)

Changes to the Long-Standing Carnegie Classifications (announced February 13, 2025)—New for this edition of the Carnegie Classifications is a separation of the Research Activity Designations from the Basic Classification, and a renaming of the Basic Classification to “Institutional Classification” in addition to updated methodologies for both. The previous Social and Economic Mobility Classification has been renamed as the Student Access and Earnings Classification. Institutions can now apply for newly created Elective Classifications.

Department of Homeland Security (DHS) and State Department

Deferred Action for Childhood Arrivals (DACA)—On September 13, 2023, the U.S. District Court for the Southern District of Texas issued a decision finding the *Deferred Action for Childhood*

Arrivals (DACA) Final Rule unlawful and expanding the original July 16, 2021 injunction and order of vacatur to cover the Final Rule published by the DHS on August 24, 2022. In general, the final rule codified existing policies and included limited amendments intended to preserve and fortify DACA. A May 2024 Senate Judiciary Committee hearing highlighted the need for action by Congress on this matter.

International Students—In May of 2025, DHS revoked Harvard University’s Student Exchange and Visitor Program (SEVP) certification, resulting in the loss of Harvard’s ability to sponsor certain visas. Harvard challenged this revocation on the grounds that DHS’s actions are in violation of the First Amendment, Due Process Clause, and the Administrative Procedures Act and subsequently received a temporary restraining order, which allows Harvard to continue to enroll international students while the case proceeds. Further substantive action in the case is not expected until late 2025. This case can reasonably be seen as a test of this method for limiting the number of international students an institution of higher education can enroll.

International Student Visas—The State Department has recently increased the frequency with which student visas are revoked and has added social media vetting as part of the interview process for new student visas.

H-1B Visa Fee—Responding to a Presidential proclamation published on September 19, 2025 titled “Restriction on Entry of Certain Nonimmigrant Workers,” U.S. Citizenship and Immigration Services (USCIS) has implemented a \$100,000 fee to accompany any H-1B visa petitions filed after September 21, 2025. Higher education groups have lobbied for an exception to this fee, citing the fact that the sector had previously been granted a waiver on H-1B visa caps, and the detrimental impact the fee would have on institutions. The fee was challenged in court by the U.S. Chamber of Commerce on October 16, 2025.

Net Neutrality

Restoration and Subsequent Injunction—Net neutrality is one of many factors that impacts individual access to education and educational resources that require access to the Internet. Following a vote by the Federal Communications Commission in April of 2024, net neutrality regulations were restored. These regulations prohibit service providers from treating websites and services differently by prioritizing some and deprioritizing others. On January 2, 2025, aided by the recent Supreme Court decision to overturn the “*Chevron Doctrine*” (see “Supreme Court” below), the U.S. Court of Appeals for the Sixth Circuit struck down the FCC Net Neutrality rules, finding that the FCC lacked the authority to reinstate net neutrality regulations.

National Advisory Committee on Institutional Quality and Integrity (NACIQI, an advisory body to the Secretary of Education)

Committee Makeup—NACIQI is comprised of eighteen members—each member appointed for a six-year term. Six members are appointed by the Secretary of Education, six by the House of Representatives (three by the majority leader, three by the minority leader), and six by the Senate (three by the majority leader, three by the minority leader). The August 2025 meeting was postponed until October of 2025, and subsequently postponed until December of 2025 due to the lapse in government appropriations which began on October 1, 2025. The December 2025 meeting will see six new members appointed to the committee, all appointed by the Secretary of Education.

Areas Recommended for USDE Review, Consideration, Re-regulation (Summer 2023 Regulatory Subcommittee Report)—This, the most recent policy report from NACIQI, speaks to

and outlines concerns and suggestions regarding issues such as institution and accreditor complaint policies, outcomes/student achievement standards, public input into the recognition process, changes to the recruitment of public members, and substantive change.

States (see also “Accreditation” above)

Florida and North Carolina—Florida Senate Bill 7044 (passed May 2022) and North Carolina HB 8 (passed October 2023) require all public educational institutions in the respective states to change postsecondary institutional accreditor (Federal gatekeeper) prior to the commencement of each new review cycle.

Legacy Admissions—To date, five states have passed legislation banning the practice of legacy admissions: California (public and private universities); Colorado (public universities); Illinois (public colleges and universities); Maryland (all colleges and universities); Virginia (public universities). Many other states are considering similar proposals.

Supreme Court

Race in Admissions—With regard to its consideration of two cases pertaining to race in admissions, on June 29, 2023, the Supreme Court ruled the practice of race-conscious admissions to be unconstitutional. In early 2024, the Court declined to hear a case challenging admissions practices at the Thomas Jefferson High School for Science and Technology, continuing a pattern of declining to hear cases that may present an opportunity to clarify legal questions left by the June 29, 2023 ruling.

On December 6, 2024, a federal judge upheld the U.S. Naval Academy’s race-conscious admissions policies in their ruling in a separate case challenging admissions practices.

Regulatory Authority—The Court in its *Loper Bright v. Raimondo* and *Relentless Inc. v. Department of Commerce* rulings on June 28, 2024, overturned the “*Chevron* doctrine.” *Chevron* held that courts were to defer to the expertise of agencies that crafted rules and regulations based on their statutory authority when laws are ambiguous or silent. While the decision to overturn *Chevron* does not prohibit executive branch agencies from crafting and enforcing regulation or voiding existing regulation, courts are no longer required to defer to the agency’s regulation if that regulation is challenged. The full effect of this ruling is not known at this time; however, it does allow for all manner of regulation to be challenged in court (see for example, “Net Neutrality” above).

Nationwide Injunctions—The Supreme Court limited the authority of district court judges to issue nationwide injunctions providing relief to those who are not plaintiffs in the case being heard. Many of the regulations discussed above and noted as blocked by court order, are blocked as a result of a nationwide injunction issued by a court lower than the Supreme Court. Coupled with the overturn of the “*Chevron* doctrine” discussed immediately above, the higher education legal landscape is much different now than in previous years. These decisions will impact the types and scope of rulings in cases involving the field of higher education.

The White House

Since January 20, 2025, a number of Executive Orders have been signed and released, some of which impact the field of higher education. Many Executive Orders have been challenged in the courts, resulting in a degree of uncertainty regarding which Executive Orders are in effect at any given time.

Select Executive Orders impacting higher education include:

Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (January 20, 2025)

Ending Illegal Discrimination and Restoring Merit-Based Opportunity (January 21, 2025)

Additional Measures to Combat Anti-Semitism (January 29, 2025)

Restoring Public Service Loan Forgiveness (March 7, 2025)

Improving Educational Outcomes by Empowering Parents, States, and Communities (March 20, 2025)

Transparency Regarding Foreign Influence at American Universities (April 23, 2025)

Reforming Accreditation to Strengthen Higher Education (April 23, 2025)

Ensuring Transparency in Higher Education Admissions (August 7, 2025, with an accompanying memorandum from the Secretary of Education to the leadership of the Institute of Education Sciences, the office which oversees the Integrated Postsecondary Education Data System (IPEDS))

Improving Oversight of Federal Grantmaking (August 7, 2025)

It is important to note that Executive Orders do not change existing law or regulation but do provide insight into an administration's priorities and interpretation of existing law and regulation. The White House has increased its scrutiny of Executive Branch agencies and has made efforts to shrink the size of the workforce of these agencies. As these efforts are fast-moving and, in some cases, subject to current legal challenges, the full effect on the operation of these agencies is unknowable at this time. It is widely expected that the work of Executive branch agencies will slow as a result of reduction in force efforts.

The White House has recently directed DHS to restrict approvals of new H-1B visas which are not accompanied by a \$100,000 payment, beginning with the February 2026 lottery cycle. Many institutions rely on the H-1B program to hire faculty and post-doctorate researchers from other countries, and these institutions will be impacted by this new directive. Legal challenges are expected.

NASM will continue to monitor these conversations, providing salient information to its members as it may become available.

It is of note that in addition to regular communications, NASM publishes advisories that describe regulations associated with the 2008 reauthorization of the HEA. These *Advisories on Federal Issues* may be found within the "Publications" section of the NASM website and are intended to provide helpful summary information. The advisory regarding misrepresentation found with the set of *Advisories on Federal Issues* was updated in May of 2024. A review of this advisory and the others found within the set is recommended.

In addition to policy areas mentioned above, the Association remains concerned about implications of tax policy, intellectual property rights, the preponderance of data collection absent useful purpose and associated issues of privacy and confidentiality, copyright and public domain, the disparity in educational opportunity at the K-12 level, and the pace of cultural changes enabled by technological advances and their impact. Many contextual issues that affect NASM institutions grow out of large social forces that can be understood but not influenced significantly. Economic cycles and downturns have a

profound effect, but no single person or entity controls them. NASM continues to monitor policy discussions regarding deductions for charitable contributions on federal income tax returns. Increasing personal philanthropy is a critically important element in future support for education and the arts, particularly in fluctuating economic times. As well, NASM keeps a watchful eye on proposals that would bring increased federal involvement in the activities of and control over non-profit organizations and philanthropies.

NASM will continue to monitor ongoing events, engage in the conversations that address such issues, assist to provide detailed and thorough information, and keep the membership informed as issues and initiatives progress.

National Office

The NASM National Office is located in Reston, a Virginia suburb of Washington, D.C., and a stop on Metro's Silver Line. The office is about eight miles east of Dulles International Airport, and approximately 20 miles from downtown Washington, D.C. The NASM National Office staff has been working both in-person and remotely since March 17, 2020. Should your travels bring you to the area and you wish to visit the National Office, please feel free to schedule an appointment with a staff member.

The primary purpose of the National Office is to operate the Association under rules and policies established by the membership, the Board of Directors, and the Commission on Accreditation and Commission on Community College Accreditation. Its strength rests in its peer governance operations and its peer review efforts. The work of the Association is carried out by many volunteers—elected officials, evaluators, and meeting participants—all willing to donate their valuable time and expertise, all holding and exhibiting unwavering commitment to the field. Noting that the availability of each member's time is precious, NASM continues to seek volunteers and enlist their assistance in the work of the Association. Such acts of support and volunteerism in NASM are a testament to the extraordinary spirit and dedication of its members. The work of our visiting evaluators and members of the Commissions is an exemplary expression of our collective commitment to our field and faith in its future.

This outstanding corps of volunteers is joined by a dedicated and capable National Office staff: Benjamin Bradshaw, Stephen Cannistraci, Jane Creagan, Angie K Elkins, Nora R. Hamme, Jenny Rebecca G. Kuhlmann, Tracy L. Maraney, Stacy A. McMahon, Justin Medlen, Lisa A. Ostrich, Kaitlin Quinn, Jacob Rushlow, and

Ann B. Stutes. To support the work of accredited institutional members, the work of the staff and the services provided to accredited institutional members have grown over the years. Staff is focused on carrying out the daily work of the Association, developing new practices, creating new and refining established systems, assisting institutions seeking accreditation for the first time, and consulting with institutions seeking renewal of Membership. The staff is diligent in its efforts to assist and serve institutions, and to carry out the responsibilities of NASM effectively.

As a staff, we are able to see on a daily basis the great foundational strength of NASM. Fundamental to this foundation is wisdom about the need to remain informed, communicate, and work together to continue to build music in higher education as a whole, as well as in each member and applicant institution. NASM has realized great success in maintaining its focus on issues of importance to institutions and the field, and in working to address these issues. It promotes collegial connections and centers its work on concepts, conditions, and resources necessary for competence and creativity. This

foundation, now strongly in place, will serve NASM well as it faces changing and challenging times ahead.

The staff joins me in expressing appreciation for the support, cooperation, assistance, and kindness extended by the NASM membership. It is an honor and a privilege to have the opportunity to serve NASM, its member institutions, and its constituencies. We hope you will always feel free to contact the staff whenever you think we may provide assistance. We look forward to continuing our efforts together.

Please accept our heartfelt appreciation and best wishes as you advance the work of music in higher education.

Respectfully submitted,

Karen P. Moynahan
Executive Director