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April 10, 2019

### **Memorandum of Opposition**

A.7010 (Jacobson) / S.3844 (Stavisky)

The Commission on Independent Colleges and Universities (CICU) opposes A.7010/ S.3844 which would create unnecessary reporting requirements and redundant standards for study abroad programs. These additional administrative burdens will only increase the costs borne by our students. CICU represents more than 100 private, not-for-profit colleges and universities in New York State who educate almost 500,000 students annually.

Student safety is the primary concern for New York's private, not-for-profit colleges and universities. Campuses devote resources to student safety both at home and at campuses abroad. When a student studies abroad they are able to avail themselves of institutional support around the world, receive counseling prior to their departure, and work with qualified staff on their home campus and abroad to make the most of their education. Colleges and universities routinely work with national groups like NAFSA, Association of International Educators, to make sure they are operating programs according to best practices and national standards. Colleges provide health and safety information and are routinely updated by their home campus or study abroad provider about risks abroad. There is no evidence to suggest that the proposed legislation will provide meaningful protections beyond the considerable precautions that are already in place.

This legislation would require study abroad providers, including colleges and universities, to annually report information for the previous decade relating to a number of metrics. The reports will be costly to compile and will be submitted to an entity (the New York State Department of Education) that has neither the capacity nor expertise to use the information in a meaningful way. Aside from the redundant nature of this reporting, this will increase program costs, raising the price of international education for New York students. These metrics, without appropriate context, could lead to misinformation and misconceptions about the safety of study abroad programs.

Upon request, colleges and universities with study abroad programs would be required to make information collected available to the public. As consumers, those interested in study abroad programs have the ability to request information about the program, and information is regularly made available to students. In-depth information about study abroad programs, including multiple student reviews, are available online and through outside study abroad providers. Campuses are also required to respond to requests for information from the State Education Department. Requiring colleges to respond to each and every public request would be an incredibly expensive, time-consuming process.

For these reasons the Commission on Independent Colleges and Universities opposes this legislation.