



National Council for State Authorization Reciprocity Agreements

A voluntary, regional approach to state oversight of distance education

Establishing SARA, the **S**tate **A**uthorization **R**eciprocity **A**greement

SREB Electronic Campus Committee

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Presenters



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What's the problem?



- States and territories regulate higher education within their borders, with varying requirements for out-of-state institutions that want to do business in the state.
- Cross-state online education offered by colleges and universities is expanding dramatically.
- At present there is no alternative to each institution separately pursuing any needed approvals (state authorization) in each state and territory where it enrolls students.
- Consequently, thousands of institutions are required to contact and work through as many as 54 states and territories, and, sometimes, with multiple regulatory agencies in those states.
- That process is inefficient, costly, and not effective in supporting access to high quality distance education throughout the country.

Goals



SARA establishes a **state-level reciprocity** process that will support the nation in its efforts to increase the educational attainment of its people by making state authorization:

- **more efficient, effective, and uniform** in regard to necessary and reasonable standards of practice that could span states;
- **more effective** in dealing with quality and integrity issues that have arisen in some online/distance education offerings; and
- **less costly** for states and institutions and, thereby, the students they serve.

Key points



- State laws, rules, and regulation, are remarkably diverse and the *reasons* for that diversity vary from state to state.
- An effective means of dealing with these issues requires a **comprehensive national model** that will serve all interested states, accommodate all sectors of higher education, and support quality.
- Efforts to facilitate good practice must also maintain the ability to deal with poor institutional behavior. In particular, **states must be able to trust other states** to carry out their responsibilities and deal with problems.

Who has been involved in crafting SARA?



SARA was developed with input from:

- A broad advisory committee.
- Regional higher education compacts (MHEC, NEBHE, SREB, WICHE).
- State regulators.
- State Higher Education Executive Officers.
- Accrediting organizations.
- U.S. Department of Education.
- Institutional leaders representing all sectors of higher education.

The evolution of SARA



- *Lumina Foundation* provided funding to the *Presidents' Forum*, working with the *Council of State Governments (CSG)*, to develop a **Model State Authorization Reciprocity Agreement (SARA)** that states could adopt to acknowledge other states' work and decisions in regard to institutional authorization.
- Building upon the work of the *Presidents' Forum* and *CSG*, the *Western Interstate Commission for Higher Education (WICHE)* advanced **"W-SARA"** in collaboration with the regional higher education compacts (*SREB*, *MHEC*, *NEBHE*).
- Combining all prior efforts and input from all stakeholders, the *Commission on the Regulation of Postsecondary Distance Education*, founded by *SHEEO* and *APLU*, and chaired by former Secretary of Education *Richard W. Riley*, issued its report: **"Advancing Access through Regulatory Reform: Findings, Principles, and Recommendations for the State Authorization Reciprocity Agreement (SARA)."**
- Funding for national and regional implementation provided by *Lumina Foundation*.

Essential principles of SARA



- **Voluntary** for states and institutions.
- Acknowledges the **traditional roles within higher education's "accountability triad"**: federal government, states, and accrediting bodies recognized by the U.S. Department of Education.
- Lays out a **framework for state-level reciprocity**, including a governance structure, implementation by the four regional higher education compacts (MHEC, NEBHE, SREB, WICHE), a National Council for SARA to ensure comprehensive national coverage, and a financial plan to support operations.

Essential principles of SARA ...



- Requires states to approve their in-state institutions for SARA participation (based upon institutional accreditation and financial stability) and resolve student complaints.
- SARA states agree to impose no additional (non-SARA) requirements on institutions from other SARA states.
- Open to degree-granting postsecondary institutions from all sectors: public colleges and universities; independent institutions, both non-profit and for-profit.
- Sets forth a reasonable, uniform set of triggers of “physical presence”.

Essential principles of SARA ...



- Preserves state approval and oversight of on-the-ground campuses.
- Shifts principal oversight responsibilities from the state in which the distance education is being received to the “home state” of the institution offering the instruction. (Host state can also work to resolve problems.)
- Initial funding from Lumina Foundation, eventual reliance on institutional fees paid to the National Council for SARA.

Issues SARA does not address



- Professional licensing board approval for programs leading to licensing: nursing, teacher education, psychology, etc.
- Online offerings provided free and beyond the scope of current regulation of the degree programs of accredited academic institutions (free, non-credit MOOCs, etc.).
- Non-credit instruction.

What's next?



- National Council for SARA (NC-SARA)



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- Purposes – coordination, appeals, financing, data.
- 22 members – regional compact presidents, accreditors, regulators, state government, SHEEO, various higher education sectors.
- First meeting November 1, 2013.
 - Consideration of by-laws.
 - Financial overview for SARA.
 - Establish fees for institutional participation in SARA.
 - Review and endorse regional SARA documents.
 - Regional status reports.

What's next?



- Regional Compacts.
 - Adopt SARA (mostly done).
 - Hire staff (happening now).
 - Invite states to participate (late 2013 or early 2014).
 - Review and approve states that meet SARA criteria (2014 and following).
 - Administer SARA (2014 and following).



Midwestern Higher Education Compact –
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New England Board of Higher Education –
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Southern Regional Education Board –
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Western Interstate Commission for Higher Education –
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What do states need to do?



- Determine if the state wants to participate.
- Make any needed changes to statutes or rules.
- Identify agency(ies) to solicit and approve participation of in-state institutions and resolve complaints.
- Identify lead agency (if needed).
- Adopt in-state funding model (if needed).
- Develop and submit SARA plan to the state's regional compact.

Benefits to states



- Expands educational offerings to state residents.
- Allows SARA states to focus on their home-state institutions, rather than on institutions from many other states.
- Maintains state regulation of on-the-ground instruction offered by out-of-state institutions.
- Other SARA states will help resolve complaints. (SARA states commit to resolving complaints stemming from distance education offered by their institutions.)
- Reduces costs for institutions, lessening this particular need to raise fees and thereby supporting affordability.
- No cost to states.

Benefits to institutions



- Enables **more efficient provision of distance education** to a broader market.
- Reduces number of other-state regulations to continually monitor and track.
- Reduces number of applications and individual state requirements.
- **Reduces costs.**
 - Applications, surety bonds, agent licenses, etc.
 - Staff (payroll and time).
 - Reduced costs = potentially lower fees for students.

Benefits to students



- Expands access to educational offerings.
- Should lead to better resolution of complaints from students in SARA states.
- Reduces a rapidly growing institutional cost that is in one way or another passed along to students.
- Should enhance overall quality of distance education

Learn more about SARA



- Presidents' Forum website: <http://PresidentsForum.excelsior.edu>
- CSG website: <http://www.csg.org/>
- NC-SARA website: Soon – <http://nc-sara.org>
- WCET website: <http://wcet.wiche.edu/advance/state-approval>
- SHEEO website: <http://www.sheeo.org/>
- Regional compacts
 - MHEC – <http://www.mhec.org/>
 - NEBHE – <http://www.nebhe.org/>
 - SREB – <http://www.sreb.org/>
 - WICHE – <http://www.wiche.edu/>

Questions?

