

State Authorization Reciprocity Agreement Implementation Entities and Processes

National Coordinating Board

Establishment of the National Coordinating Board is anticipated in July 2013

- The four regional Presidents, under the leadership of WICHE, in collaboration with the National Commission on the Regulation of Postsecondary Distance Education, the Presidents' Forum, and the Council of State Governments, will make decisions that are of a board nature as required until the board is operational. The four regionals, under the leadership of WICHE, will periodically report to the above mentioned groups during this interim period.
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- The board will be selected with the same collaborate process set forth above. The board will be representative of key stakeholder groups.
- The board will consist of the four regional Presidents and an odd number of others to include:
 - ❖ the regional and national accrediting community, state officials including attorney generals, state higher education executive officers, and state regulators
 - ❖ leaders of institutions representative of the various sectors of higher education.
- The board will:
 - ❖ hire an executive director with substantial knowledge of state authorization and credibility in the broad community
 - ❖ establish an office, affiliated with WICHE, to be financed initially by grant funds and transitioning within three years to institutional fee-based funding
 - ❖ convene at least semi-annually.
- Once established, the national SARA staff, with oversight by the board, will:
 - ❖ develop bylaws, policies and procedures
 - ❖ advocate for the expansion of SARA membership, in collaboration with the regional compacts
 - ❖ develop a process for adjudicating concerns that arise between the regional compacts
 - ❖ develop and maintain the national database of participants (states and institutions)
 - ❖ develop an institutional fee structure. The current plan (*and it is only that at this point*) entails self-sufficiency of SARA national and regional operations by year four, based on annual institutional participation fees of \$2,000 for institutions with FTE enrollments under 2,500; \$4,000 for institutions with enrollments of 2,500 to 9,999; and \$6,000 for institutions with enrollments of 10,000 or more. (FTE enrollments are used because currently there is no good process for counting online enrollments.)
 - ❖ manage the finances of the SARA enterprise.

Regional Compacts: the Midwestern Higher Education Compact (MHEC), New England Board of Higher Education (NEBHE), Southern Regional Education Board (SREB) and Western Interstate Commission for Higher Education (WICHE)

All four compacts have gained the approval of their governing bodies to administer the State Authorization Reciprocity Agreement. It appears likely that funding from a foundation will be secured; the regional compacts cannot proceed without that support.

- Each of the four compacts will establish regional SARA operations and will:
 - ❖ hire staff to manage the reciprocity agreement
 - ❖ establish steering committees with one representative from each state participating in SARA and up to five additional members selected to represent communities of interest.
- The compacts and the national staff will work collaboratively to develop standard operating procedures. They will:
 - ❖ create standards for state and institutional participation based on the SARA document
 - ❖ develop the application, review, approval, advising, and appeal process for states interested in becoming a member of SARA
 - ❖ inform states of the requirements for institutions to participate in SARA
 - ❖ develop processes for periodic review of SARA member states once approval has been granted to ensure they are fulfilling the SARA requirements
 - ❖ develop a process, including an appeal process for dismissal of states that have participated in reciprocity, but are deemed to no longer meet the requirements to do so.

States

States will need to determine whether they meet the requirements of the regional reciprocity agreements.

- States will establish the extent of compliance with SARA standards for reciprocity with their respective regional compact. If a state is in compliance, it will:
 - ❖ select a lead agency or entity to represent all relevant agencies in seeking SARA membership and in serving as the lead in all subsequent interactions for carrying out the agreement's requirements.
 - ❖ through the lead agency, apply to the regional compact for membership in the reciprocity agreement.
- If a state is not in compliance, the lead state agency staff will:
 - ❖ confer with regional SARA staff about what deficiency exists, and seek the necessary regulatory or legislative changes to gain reciprocity.
- The lead state agency must have the capacity to assure that it or one of its companion state agencies can verify an institution's performance in relation to the consumer protection, institutional quality, and financial responsibility standards required for participation in SARA. The agency must assure that it or one of its companion agencies will:
 - ❖ maintain the processes for both institutional approvals and ongoing oversight of consumer protection through a complaint handling process
 - ❖ have policies and procedures in place to suspend or terminate an institution's participation for noncompliance
 - ❖ communicate the terms of the agreement to institutions and provide necessary assistance

as the institutions seek participation in the agreement.

- The lead state agency will provide timely notification to the respective regional compact of the status of institutions it has authorized for participation in SARA. The agency will ensure that it or one of its companion agencies will:
 - conduct annual reviews of institutions' compliance
- States can use their own prerogative in financing their state authorization operations, just as they do today.

Institutions

Accredited, degree-granting Institutions will seek participation in SARA from their home state.

- Institutions seeking reciprocity via SARA will:
 - ❖ Determine if all of the institutional requirements for participation are met
 - ❖ Apply to the home state's lead authorizing agency to participate
 - ❖ Pay the required annual fees. The fee structure is currently proposed as: fees of \$2,000 for institutions with FTE enrollments under 2,500; \$4,000 for institutions with enrollments of 2,500 to 9,999; and \$6,000 for institutions with enrollments of 10,000 or more.
- Once approved, institutions meeting the SARA standards will be reviewed by their lead state authorizing agency or one of its companion agencies annually and will remit their annual fees to their respective regional compact.