

SREB — STATE AUTHORIZATION RECIPROCALITY AGREEMENT

(Developed from the original draft prepared by the WICHE SARA Advisory Committee in consultation with WICHE staff, EducationCounsel, the Presidents' Forum, the Council of State Governments, MHEC, SREB, and NEBHE)

PREAMBLE

Americans deserve and require access to high quality postsecondary education, not only because the economic vitality of the nation depends upon how well our population is educated but because a well educated population also contributes greatly to the social and civic vitality of the nation. The Southern Regional Education Board (SREB) operates as a regional interstate compact between the 16 Southeastern states to promote this national imperative within the region.

Historically, the federal government, state governments and the postsecondary education community through its accrediting processes and organizations have collaborated to assure that the providers of higher education services were meeting standards of quality and access to serve the nation and its citizens well. Through what is often referred to as the federal triad the federal government has accepted responsibility for assessing the financial viability of education providers; the states have accepted primary responsibility for assuring that students, as the consumers of educational services, are protected from fraud, abuse, or inadequate provision of services by educational providers; and the educational community through accreditation has accepted responsibility for assuring the adequacy of educational services offered by educational providers.

This three-way collaboration has traditionally worked well to assure reasonable quality, accountability and consumer protection.

As the nature of postsecondary education has evolved, particularly since the advent of the Internet and the exponential growth of education offered "off campus," each leg of the federal triad has faced challenges, but the role of the state in assuring consumer protection has come under particular scrutiny. What state is responsible when an institution physically located in one state (the traditional criteria for state oversight) provides education in other states?

To clarify the federal government's understanding of state responsibilities in this regard, in October 2010 the U.S. Department of Education issued regulations indicating that, consistent with existing federal law, states were responsible for all education offered to residents within their state boundaries, regardless of where this education "originated." This regulation appropriately applied to all types of postsecondary education for which students qualified for federal student assistance, regardless of the sector or level of higher education. While this was consistent with existing law, it was counter to the way in which many states were overseeing education; relatively few states were either overseeing or were even aware of the substantial amount of education being provided within their boundaries by institutions from other states.

This clarification of federal expectations had major implications for postsecondary institutions and states. In addition to existing state regulations, there was now a clear federal requirement that all institutions offering education in other states be able to demonstrate that they had the approval to serve students in each of those other states. With the expansion of distance education (via Internet-based education, telecommunications, or other means) many institutions increasingly served students from other states. While some institutions had sought and

52 received such authorizations, in many cases at substantial expense, most institutions offering
53 such instruction had not done so. This federal clarification, therefore, had significant potential
54 implications for institutions, including incurring the costs of securing and maintaining such
55 approvals to operate and the substantial time and effort in securing such authorizations. In some
56 cases, access for students to quality higher education was eliminated if their institution decided
57 not to incur the cost of complying. States also faced substantial new expectations, with the
58 potential of thousands of institutions requesting approval from all states, well exceeding the
59 management capacity of current state authorization agencies.

60
61 Although a federal district court has vacated this regulation and an appeals court affirmed the
62 lower court's decision, those rulings dealt only on technical issues regarding the Department of
63 Education's processes for notification in development of the regulation. The Department's
64 ultimate authority to regulate in this area was upheld. The Department continues to believe
65 strongly in the role of the states in overseeing the delivery of these educational services. While it
66 will not enforce the regulation as originally written, we believe that some form of the regulation will
67 emerge that addresses the court's concerns but maintains a strong state role in overseeing all
68 education delivered within their boundaries.

69
70 Despite the difficulties arising from the federal regulatory action, the federal expectation of a
71 strong state role in authorization makes sense. This is, in fact, an appropriate state role and
72 responsibility with or without the federal mandate. Consistent with their collaborative missions,
73 we believe that the four existing regional higher education interstate compacts are uniquely
74 positioned to quickly and effectively assist on this issue. The compacts include the Midwestern
75 Higher Education Compact (MHEC), the New England Board of Higher Education (NEBHE), the
76 Southern Regional Educational Board (SREB) and the Western Interstate Commission for
77 Higher Education (WICHE). The compacts operate with the express purpose of expanding
78 educational opportunity within their respective regions. We believe that states within a region,
79 working together and agreeing on terms of engagement and collaboration, can trust each other
80 to work cooperatively and consistently toward reciprocally accepting each other's authorization
81 of institutions to operate. Interstate recognition within a region would also extend to cover all
82 participating states regardless of region. Trust, thus, becomes a guiding principle for a state
83 authorization reciprocity agreement. Trust, however, requires confidence that each of the
84 partners takes seriously its responsibilities with regard to authorizing only institutions that
85 provide high quality education, whether that is through traditional campus-based classroom
86 experiences or through technology mediated or off-campus based experiences.

87
88 Similarly, this agreement presumes the efficacy of the federal triad.

89
90 This SREB State Authorization Reciprocity Agreement (S-SARA), therefore, is built upon these
91 three partnerships: the first being between SREB member states as reciprocal partners, the
92 second being agreement between the four higher education regional compacts, and finally the
93 partnership between nationally recognized accreditors, the federal government, and the states.¹
94

95 Definitions

96
97 A good agreement must be easily and consistently understood by all partners. Definitions of
98 terms, therefore, become very important. Throughout this agreement, where references are

¹ SARA is an agreement among states; it is not an agreement among institutions. Institutions need to seek authorization from their home state to participate in the reciprocity agreement.

99 made to terms that might be interpreted differently by different partners, definitions are
100 included in footnotes to ensure maximum transparency.

101

102 This is a Voluntary Agreement

103

104 This agreement establishes reciprocity between willing *SREB* member states that accept
105 each others' authorization of accredited institutions to operate in their states to offer
106 educational services beyond state boundaries. Participation in this agreement is entirely
107 voluntary on the part of the state. This agreement is intended to facilitate expanded
108 access to high quality distance education opportunities for students by improving state
109 policy and operational mechanisms. This agreement applies only to educational services
110 provided by institutions outside of their home state boundaries, and in no way affects the
111 unique processes that states may use to authorize institutions to operate or to exempt²
112 institutions from oversight within their own state.

113

114 Just as participation in this agreement at the state level is voluntary, so, too, is
115 participation at the institution level. Institutions that wish not to subject themselves to the
116 level of oversight consistent with interstate reciprocity can opt not to participate and thus
117 either choose not to provide educational services beyond the boundaries of their state or
118 to seek separate authorization to operate in those states in which they wish to offer
119 educational services.

120

121 Benefits of Reciprocity

122

123 Significant benefits will accrue to students, institutions and states if the current lack of
124 uniformity in the patchwork of state regulation can be improved through sharing in
125 common, high quality and consistently applied processes and standards.

126

- 127 • Institutions will reap financial benefits by no longer having to engage in the
128 confusing and duplicative process of seeking approval to operate on an individual,
129 case-by-case basis in each state in which it serves students.
- 130
- 131 • States will benefit by maintaining their rights and responsibilities to assure quality
132 programs are offered by institutions within their state. States will also benefit by
133 focusing their limited resources on the oversight of institutions within their state,
134 regardless of where that institution serves students. As the number of institutions
135 serving students in multiple states continues to increase, state regulatory offices
136 would find it difficult to conduct meaningful reviews and on-going oversight of the
137 hundreds, if not thousands, of out-of-state institutions operating in their states.
- 138
- 139 • Students will benefit as lower costs for institutions will mean fewer costs passed
140 on to students. Some students are finding their options limited as institutions
141 choose not to serve students in states with onerous authorization requirements.
142 Since regulators will focus their reviews on their "home state" institutions, they will
143 have more confidence in the review process and that complaints will be handled
144 and resolved.

145

² *Exempt* means: an institution that by state regulation is not required to have a full approval to operate within the state based on meeting certain criteria in that state. Exempt institutions will not be eligible to participate in the State Authorization Reciprocity Agreement unless they seek and obtain approval from their home state to operate under the terms of this agreement.

146 Ultimately, the quality of postsecondary education is reflected in the outcomes derived
147 from education. But quality outcomes result from quality processes, and state
148 authorization must focus on both the processes that enable students to acquire the
149 pertinent knowledge and skill as well as the outcomes that demonstrate the acquisition of
150 knowledge and skills.

151
152 Partnerships

153
154 WICHE and the regional compacts have benefitted greatly in the development of this
155 agreement from the work of the Presidents' Forum and Council of State Governments.
156 With support from Lumina Foundation, they have been engaged in an effort to create a
157 model nationwide interstate reciprocity program. Now both efforts are being brought
158 together, establishing a framework for the four regional interstate compacts, and states
159 and territories that do not currently belong to one of the four interstate compacts, to join
160 together in a collaborative effort to ensure nationwide coverage through four collaborative
161 regional reciprocal agreements. We believe that collaboration between these well-
162 established and highly-regarded regional interstate compacts is the most cost-effective
163 and viable approach to achieve nationwide coverage and will achieve the purposes
164 imbedded within the work of the Presidents' Forum and Council of State Governments.

165
166 **PURPOSES**

167
168 This compact builds upon and strengthens the existing efforts of states, accrediting bodies and
169 the federal government to facilitate expanded access to high quality education by:

- 170
- 171 1. Establishing common, high quality and consistently applied processes and
172 standards endorsed by participating states, which are efficient and cost-effective;
 - 173
174 2. Providing for consumer protection and a complaint resolution process;
 - 175
176 3. Providing for the uniform collection and sharing of information between and
177 among member states for the purposes of assuring adequate quality for
178 education services provided by institutions operating outside of their home state
179 boundaries;
 - 180
181 4. Reducing barriers to innovation in educational delivery;
 - 182
183 5. Increasing access to postsecondary education and degree completion.

184
185 **RESPONSIBILITIES OF THE REGIONAL COMPACTS AND THE RECIPROCATING STATES**

186
187 Responsibilities of the Regional Compacts

188
189 Each of the regional higher education compacts will manage reciprocity between its
190 member *states*³ in the acceptance of state authorization from all reciprocating states that
191 meet the criteria for reciprocity as defined in this agreement. Each compact will establish
192 a regional State Authorization Reciprocity Agreement (SARA) steering committee. The
193 regional steering committees shall be composed of one representative from each state
194 participating in the reciprocity program selected by the regional compact's

³ **State** means: any state, commonwealth, district or territory of the United States.

195 commissioners from that state, and up to five additional members selected by the
196 regional compact's commissioners from a slate developed by the respective compact's
197 chief executive officer to represent communities of interest in this agreement that have
198 not been included naturally through the selection process outlined above. Examples of
199 communities of interest include, but are not limited to: state regulators, accreditors,
200 institutions from all sectors of higher education, and state government. Steering
201 committee members' terms of service will be determined by the respective regional
202 compact's governing board.

203
204 Three states (New Jersey, New York, and Pennsylvania), the District of Columbia, and
205 all of the U.S. territories and protectorates, do not currently belong to a regional compact.
206 They all have access to all federal education programs and thus are captured at least by
207 the federal government's interest in this set of regulatory issues. These states and
208 territories, subsequently referred to as "non-affiliated" states in this agreement, have the
209 option of paying a \$50,000 annual fee to align with one of the regional compacts so that
210 they can participate in the reciprocity agreement. If they do so, they will each have one
211 representative on the respective compact's regional steering committee.

212
213 Each of the regional State Authorization Reciprocity Agreement (SARA) steering
214 committees will establish the criteria for state participation in this reciprocity program and
215 will adjust these criteria, as appropriate, over time. A state seeking to participate in its
216 region's SARA program will submit a plan as to how it will meet the criteria for
217 participation. The regional steering committee will review the plan and work with the
218 state to improve the plan until the committee is able to recommend its approval by that
219 region's regional compact. The steering committee also recommends other procedural
220 details and actions regarding participation in SARA to their regional compact's
221 commissioners.

222
223 Each regional compact will develop processes for informing states of the requirements for
224 joining the regional reciprocity agreement, accepting states into the reciprocal
225 arrangement, rejecting states from acceptance into the reciprocal arrangement,
226 sanctioning states that fail to meet fully the requirements for participation, and dismissing
227 from the reciprocal arrangement states that fail to respond to concerns that they are not
228 meeting the requirements for participation. These processes must include a process for
229 appeal in the event that a state disagrees with the compact's decision. All states entering
230 into the reciprocity agreement will be reviewed on at least a biennial basis by their
231 respective regional compact to assure that their authorization processes and
232 participating institutions continue to meet all of the criteria for inclusion in the reciprocity
233 agreement.

234
235 In the South, the program will be operated by the Southern Regional Education Board,
236 under the bylaws and consistent with all other SREB programs. The other three regional
237 interstate compacts, the Midwestern Higher Education Compact (MHEC), the New
238 England Board of Higher Education (NEBHE) and the Western Interstate Commission for
239 Higher Education (WICHE) will oversee the agreement in their region.

240
241 SREB is unique among the four regionals in that it has had a longstanding and effective
242 reciprocal arrangement in place among 14 of its 16 member states for online programming.
243 From the inception of the Electronic Campus (EC) in 1998, a central and fundamental aspect of
244 the original guiding principles of the EC, established and adopted by all SREB member states,
245 was establishing procedures, which would allow colleges and universities to operate freely

246 without additional state approval/authorization in other member states. This process was
247 adopted and included in the original EC guidelines for participation. The reciprocal process —
248 SREB Electronic Regional Reciprocity Agreement (SECRRA) — allows institutions offering
249 courses and programs that were reviewed and approved by the institution's home state and
250 listed in the EC to be exempted or otherwise recognized to deliver online offerings in other
251 SREB states. A central and fundamental aspect of the original guiding principles of the EC,
252 established and adopted by all SREB member states (15 in 1998) was establishing procedures,
253 which would allow colleges and universities to operate freely without additional state
254 approval/authorization in other member states. This process was adopted and included in the
255 original EC guidelines for participation. The reciprocal process allowed institutions offering
256 courses and programs that were reviewed and approved by the institution's home state and
257 listed in the EC to be exempted or otherwise recognized to deliver online offerings in other
258 SREB states. There were restrictions, including the institution had to be a not-for-profit,
259 regionally accredited and chartered in one of the SREB states. While there were restrictions,
260 SECRRA has worked well and SREB states and institutions remain supportive of the
261 arrangement.

262

263 In administering the national reciprocity agreement among its member states, SREB will build
264 off the experience in SECRRA to move states to adoption.

265

266 Creating Reciprocity Nationwide

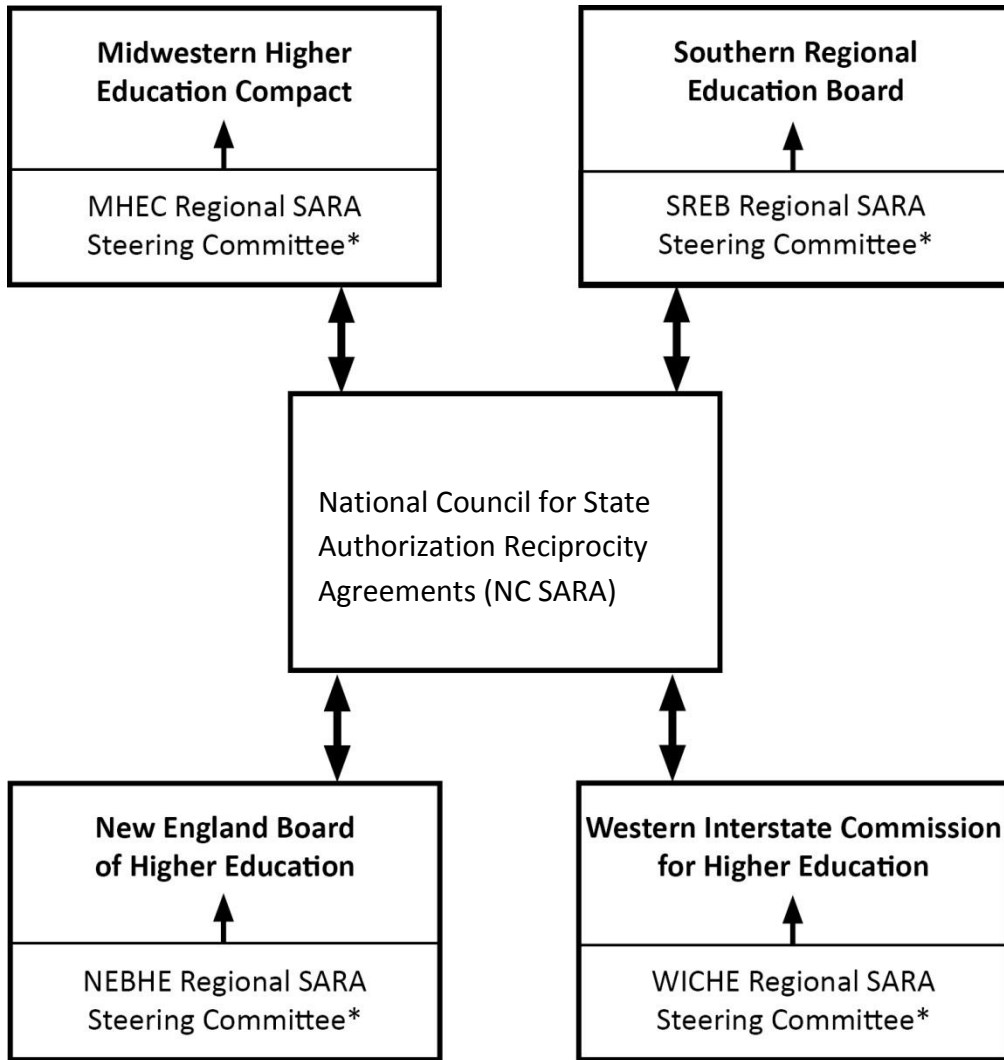
267

268 The four regional compacts jointly accept the responsibility for working together and with states
269 and territories that currently do not belong to a regional compact, for the purposes of
270 harmonizing the State Authorization Reciprocity Agreement across the regions and assuring that the
271 quilt of regional agreements will cover the nation as a whole. This will include creating an
272 organizational structure for the coordination of efforts between these various entities. This
273 National Council for State Authorization Reciprocity Agreements (NC SARA) will be sufficient in
274 size to assure that the perspectives of all stakeholder groups will be represented on the council,
275 but small enough to be an effective working council. We anticipate that 15-17 council members
276 will be selected. The National Council for State Authorization Reciprocity Agreements will
277 include the CEO's of the four regional compacts (or their designee), which will be charged with
278 developing the four Regional State Authorization Reciprocity Agreements that will ensure
279 nationwide coverage of state reciprocity. The remainder of the council, up to 13 possible
280 additional members, will be selected to represent a diverse set of perspectives and interests.
281 Membership will not be driven by numerical representation or delegated interests; rather
282 members will be selected based on their knowledge of the field, ability to work across multiple
283 perspectives, and commitment to the collaborative work and success of the national council.
284 The selection committee will draw from all institutional sectors (including large- and small-scale
285 public, private and for-profit distance education providers), regional and national accreditation
286 associations, state regulators, state attorneys general and state higher education executive
287 officers. Council members will serve staggered terms, with limits established for the length of
288 time that members may serve.

289

290 Below is a diagram of how this network of collaborative efforts will fit together to provide a
291 nationwide framework. An organizational flow chart follows.

292



* Refer to the Responsibilities of the Regional Compacts and the Creating Reciprocity Nationwide sections for information on the composition of the committees and board.

293
294
295
296
297
298
299

This organizational structure will work as follows. The states will be the principal guardians of consumer protection. They will develop processes for authorizing and overseeing all accredited degree granting postsecondary education⁴ institutions⁵ within their state that wish to offer educational services outside the state’s boundaries. The regional SARA Steering Committees will develop processes for recognizing⁶, for purposes of reciprocity in state authorization, states

⁴ **Postsecondary education** includes all education beyond high school and includes all public, non-profit private, and for-profit private institutions as well as all institutions offering certificates, and/or degrees. For purposes of this reciprocity agreement, however, institutional participation will be restricted only to degree granting institutions.

⁵ **Institution** means: a college, university, or other postsecondary education institution or collection of such entities doing business as one organization, with an institutional identification from the Office of Postsecondary Education within the U.S. Department of Education (OPEID).

⁶ **Recognize** means: states participating in the reciprocity agreement agree to accept each other’s institutional authorization decisions.

300 that demonstrate that they have developed and operate agencies that appropriately authorize⁷
 301 and oversee all degree granting postsecondary education institutions within their state that wish
 302 to offer educational services outside state boundaries. The National Council for State
 303 Authorization Reciprocity Agreements will develop processes for recognizing reciprocity
 304 between regional SARAs, for assuring that each SARA is appropriately overseeing the states
 305 within its regional reciprocity agreement, and for harmonizing procedures among the regions to
 306 make the reciprocal recognition of state authorization as seamless and uniform as possible for
 307 institutions.

308 Responsibilities of the Reciprocating States

309 States participating in this reciprocity agreement have two major areas of responsibility.
 310

311 Authorizing Responsibility. First, the states must assure that they have appropriate laws,
 312 policy, practice and processes for authorizing all accredited⁸ postsecondary education
 313 institutions that operate from their state. The state is defined as the home state⁹ for all
 314 institutions claiming the state as its principle location for accreditation purposes. This
 315 includes authorizing all distance learning activities of these institutions not only in the
 316 home state, but in all other states (defined as *host states*¹⁰) in which the institutions
 317 provide educational services. After initial authorization, the home state must review the
 318 institution every year for the purposes of affirming or denying authorization. To
 319 demonstrate a state's adequacy in authorizing institutions, the state must demonstrate to
 320 the regional SARA that it meets all of the criteria for authorizing institutions outlined in the
 321 next section of this agreement.
 322
 323

324 Physical Presence

325 One of the most difficult tasks in crafting an interstate agreement on state authorization is
 326 determining what activities an institution can or cannot conduct in a state, whether those
 327 activities be at a distance or face-to-face. While states use different monikers for these
 328 criteria used to determine which activities are allowed in a state, they tend to fall under
 329 the notion of "physical presence." It is imperative, therefore, to clearly define what
 330 "physical presence" means for institutions participating in SARA for two reasons: 1)
 331 because institutions with a physical presence in a host state will not be eligible for
 332 reciprocal authorization; and 2) to clearly define what activities can be conducted in a
 333 state as a result of participating in this agreement.
 334
 335

336 The following sections begin to describe the activities that an institution participating in
 337 SARA can or cannot conduct in other states that are part of the Agreement. There are so
 338 many variations on these activities that it is impossible to cover all contingencies. The
 339 items listed below provide initial guidelines to each regional compact, but it is anticipated
 340

⁷ **Authorized** means: holding a current valid charter, license or other written document issued by a state, federal government or government of a recognized Indian tribe, granting the named entity the authority to issue degrees.

⁸ **Accredited** means: holding institutional accreditation by name to offer distance education as a U.S.-based institution from an accreditor recognized by the U.S. Department of Education. Only institutions holding such accreditation can participate in interstate state authorization reciprocity.

⁹ **Home State** means: a state where the institution holds its principal institutional accreditation.

¹⁰ **Host State** means: a state in which an institution operates under the terms of this agreement, other than the home state.

341 that each region's steering committee will need to review specific instances of activities
342 conducted in other states and provide additional guidance.

343

344 Physical Presence Activities in a Host State Allowed by SARA

345

346 If an institution is authorized by its home state and that home state is an approved
347 participant in SARA, the institution is eligible to conduct the following activities in any of
348 the SARA states. Physical presence (or "to operate") is not triggered in a state
349 participating in this agreement by any of the following activities:

350

351 1. Courses offered at a distance (online, through the United States mail or similar
352 delivery service) that do not require the physical meeting of a student with
353 instructional staff in a host state.

354

355 2. Academic offerings among institutions from SARA states that are participating in
356 a consortia agreement approved by each of those participating institutions.

357

358 3. Advertising to students within a state, whether through print, billboard, direct mail,
359 internet, radio, television or other medium.

360

361 4. Recruiting

362

363 5. Experiential learning opportunities arranged for an individual student, such as a
364 clinical, practicum, residency or internship, provided that:

365

366 a. The institution has already obtained all of the professional and licensure
367 approvals necessary (if any) to conduct the learning opportunity in the state
368 or only a small number of students from each institution is physically present
369 simultaneously at a single field site.

370 b. There is no multi-year contract between the institution and the field site.

371

372 6. An offering in the nature of a short course or seminar, if instruction for the
373 short course or seminar takes no more than twenty classroom hours.

374

375 7. An educational field experience arranged for a group of students that are
376 participating in campus-based programs in another state.

377

378 8. An offering in the nature of a short course or seminar, if instruction for the
379 short course or seminar takes no more than twenty classroom hours.

380

381 9. A portion of a full-term course that comprises less than 2 class periods
382 equivalent to six hours that takes place in a setting where the instructor and
383 students physically meet as one of the requirements necessary to complete the
384 course.

385

386 10. Course offerings by an accredited institution on a U.S. military installation,
387 limited to active and reserve military personnel, dependents of military
388 personnel, and civilian employees working on the military installation.

389

390 11. Operation of a server, router or similar electronic service device when such

- 391 device is not housed in a facility that otherwise would constitute a physical
392 presence; the presence of a server or similar pass-through switching device in a
393 state.
- 394 12. Having faculty, adjunct faculty, mentors, tutors, recruiters or other personnel
395 residing in a state. The presence of instructional faculty in a state, when those
396 faculty offer entirely online or other distance-education instruction and never meet
397 their students in person for educational purposes while in that state, does not
398 establish a presence of the institution in that state or an offer of a course or
399 program from that state for purposes of this agreement.
- 400
- 401 13. Requiring a student to take a proctored exam at a location or with an entity in the
402 host state prescribed by the institution.
- 403
- 404 14. Having a contractual arrangement in a state.
- 405

406 Physical Presence Activities in a Host State Not Covered by SARA

407

408 For purposes of this agreement, any of the following activities in a host state are not
409 covered by this agreement since they constitute a “physical presence.” An institution
410 would be subject to the laws and regulations of each individual state in which it conducts
411 these activities:

412

- 413 1. Establishing a physical location in a state for students to receive synchronous or
414 asynchronous instruction; or
- 415
- 416 2. Requiring students to physically meet in a location in the state for instructional
417 purposes as required for the course; or
- 418
- 419 3. Establishing an administrative office in the state, including:
- 420
- 421 a. Maintaining an administrative office in the state for purposes of
422 providing information to prospective students or the general public
423 about the institution, enrolling students, or providing services to
424 enrolled students;
- 425
- 426 b. Providing office space to instructional or non-instructional staff; or
- 427
- 428 c. Establishing an institutional mailing address, street address or
429 phone number in the state.
- 430

431 Complaint Resolution Responsibility: The states must assure that they have reasonable
432 processes for monitoring authorized institutions and for addressing and redressing
433 complaints or concerns that are raised concerning authorized institutions. To
434 demonstrate a state’s adequacy in monitoring and adjudicating the actions of authorized
435 institutions, the state must demonstrate to SREB that it meets all of the criteria for
436 monitoring and adjudicating actions of authorized institutions, as outlined in the next
437 section of this agreement.

438

CRITERIA FOR STATE AUTHORIZATION AND OVERSIGHT

439
440
441 The previous section introduced the responsibility of states in two essential, related, but distinctly
442 different types of activities: authorization of accredited institutions to operate and oversight of
443 institutions that are authorized to operate. Because the criteria for these two functions differ,
444 they are detailed separately in this section.

445
446 Criteria for Authorizing Institutions to Operate and to Continue Operating

447
448 *Academic Integrity.* States wishing to participate in this regional interstate reciprocity
449 agreement will agree to accept accreditation by a federally-recognized accrediting
450 association as both necessary and sufficient evidence of reasonable institutional
451 academic quality for purposes of delivering services outside their home state or
452 receiving services from other states participating in the reciprocity agreement.
453 Accreditation, therefore, will be acceptable evidence of adequacy with respect to
454 curriculum, measurement and achievement of student learning outcomes, award of
455 credit, faculty qualifications, student support services and academic support
456 services. States that wish to require more documentation for their home institutions
457 certainly have the prerogative of doing so, but for purposes of reciprocal acceptance
458 of institutional authorization from other states to offer educational services beyond
459 state boundaries, accreditation by an accrediting association recognized by the U.S.
460 Secretary of Education upon the advice of the U.S. Department of Education's
461 National Advisory Council on Institutional Quality and Integrity (NACIQI) must be
462 accepted as sufficient evidence of reasonable institutional academic quality.
463 Additional criteria to be used in resolving student academic complaints about an
464 institution are provided in the complaint section below.

465
466 *Financial Integrity.* SREB states wishing to participate in this interstate reciprocity
467 agreement will agree to accept the standards established by the federal government for
468 demonstrating financial responsibility. The U.S. Department of Education (the
469 Department) considers a public institution to be financially responsible if its debts and
470 liabilities are backed by the full faith and credit of the state or other government entity.
471 The school must provide the Department with a letter verifying that backing from the
472 state, local, or municipal government entity, tribal authority, or other government entity
473 that has the legal authority to make that designation.

474
475 While accrediting associations also collect financial information, the federal government
476 has developed a robust and well-accepted process for assessing independent, nonprofit
477 and for-profit institutions' financial data based on audited financial statements. Relying on
478 this federal information provides a high quality mark that is updated annually and
479 reduces redundancy of reporting by institutions, thus reducing administrative burden.
480 The Department uses a financial responsibility composite score to provide an initial
481 evaluation of an institution's financial health and determines a score on a range between
482 -1.0 and 3.0. The Department has identified a score of 1.5 or greater as an indication
483 that an institution is financially responsible, although institutions with lower scores also
484 may continue to receive federal funding if they meet additional fiscal requirements.

485
486 For the purposes of this agreement, public institutions, consistent with U.S. Department
487 of Education policies, are presumed to be financially responsible by virtue of their status
488 as state or municipal institutions enjoying the financial backing of their state or municipal
489 government.

490 A private non-profit or for-profit institution is determined to demonstrate sufficient
 491 financial strength for participation in the reciprocity agreement if the institution is eligible
 492 for federal Title IV student financial aid programs plus the U.S. Department of Education,
 493 for the institution's most recent fiscal year for which data is available, has not determined
 494 it to have a financial responsibility composite score below 1.5 (only institutions with
 495 composite scores of 1.4 or lower are currently notified of their scores); or the institution is
 496 otherwise eligible for federal Title IV student aid programs, has a financial responsibility
 497 composite score of at least 1.0 but less than 1.5, and the state has determined, upon
 498 examination of additional supporting material, that the institution has sufficient financial
 499 strength for inclusion or that the reason for the score being at least 1.0 but less than 1.5
 500 is the result of accounting error or the misapplication of generally accepted accounting
 501 standards in the calculation of that score
 502

503 A private non-profit or for-profit institution that is currently included in its state's
 504 reciprocity agreement but that the Department determines in a given year to have a
 505 financial responsibility composite score of at least 1.0 but less than 1.5 and remains
 506 eligible for federal Title IV student aid programs, may, upon approval of its state, be
 507 deemed conditionally financially responsible for up to two years.
 508

509 A private non-profit or for-profit institution that is currently included in its state's
 510 reciprocity agreement but that the Department determines to have a financial
 511 responsibility composite score below 1.5 for a second, consecutive year may no longer
 512 participate in the state's reciprocity agreement, unless the institution demonstrates to the
 513 state that the cause of the score is the result of accounting error or the misapplication of
 514 generally accepted accounting principles in the calculation of that score. A private non-
 515 profit or for-profit institution that has lost its approval to participate in its state's
 516 reciprocity agreement under this provision but remains eligible to participate in federal
 517 Title IV student aid programs will meet the financial responsibility requirements of the
 518 reciprocity agreement if and when the U.S. Department of Education determines the
 519 institution no longer has a financial responsibility composite score below 1.5.
 520

521 No institution with a federal composite financial responsibility score of less than 1.0 will
 522 be considered eligible for interstate reciprocity, even if it has been deemed to be Title IV
 523 eligible by the U.S. Department of Education.
 524

525 Any institution that wishes to participate in the State Authorization Reciprocity
 526 Agreement but that does not have an established federal composite financial
 527 responsibility score because it has chosen not to participate in federal Title IV programs
 528 must be determined by the state authorizing entity in its home state to be financially
 529 responsible based on audited financial information and calculations comparable to those
 530 used by the U.S. Department of Education.
 531

532 The above provisions do not limit the right of the home state to require more demanding
 533 financial responsibility requirements for its home state institutions. A SARA member
 534 state can require a higher federal financial responsibility score for its participating
 535 nonpublic colleges and universities if that standard is applied to the institutions as part of
 536 the state's general rules for operating in the state. The state cannot apply a standard
 537 higher than the SARA standard solely for eligibility screening for an institution's
 538 participation in SARA. For this reason, in a state that applies a higher standard to its
 539 nonpublic providers, those providers will by definition operate under a higher standard for
 540 the purposes of SARA, but not because of SARA rules.

541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589

Consumer Protection: The federal triad gives states the lead responsibility for protecting consumers of postsecondary education. Some of the criteria in this arena are also included within institutional accreditation and within federal oversight, but the primary responsibility of the states lies in this area. The potential adverse consequences for the citizens of the states are so significant that these criteria cannot be assigned solely to either the accreditors or the federal government. States will maintain responsibility for:

Recruitment, Marketing, and Other Institutional Disclosures: To qualify for acceptance into the State Authorization Reciprocity Agreement, a state must demonstrate that institutions authorized by the state are held accountable for and have attested to the veracity and adequacy of the institutions' recruitment material, marketing efforts, and other institutional disclosures. This must include each institution being held accountable for and attesting to at least the following:

- Providing full information about institutional and program requirements in a format that prospective students and the public can easily understand and access.
- Assuring that program advertisements and promotional information include all special or exceptional program requirements.
- Ensuring that job placement and related salary information are supported by evidence of their accuracy and efficacy.
- Providing information on programs that prepare students for licensed professions that explicitly states whether the program, including clinical or experiential practice, meets licensure standards in all states in which the institution has students enrolled.
- Monitoring and accepting responsibility for assuring professional conduct of recruiting and marketing staff.
- Disclosing institutional and programmatic accreditation status and providing a brief explanation of what the accreditation status means along with the respective accreditor's information.

Tuition, Fees, and Other Charges: With respect to tuition, fees, and other charges, states require their authorized institutions do at least all of the following:

- Disclose all tuition, fees, and other costs associated with attendance, including fees and costs that are unique to specific programs of study.
- Publish clear policies and practices regarding refunds to students, including transparent and readily available information on refund deadlines and refund amounts.

590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639

- Provide accurate and complete information about financial aid available to students attending the institution, including all forms of financial aid (grants, scholarships, loans, and work-study) and the sources (institutional, private philanthropic, state, and federal) of each form of aid.

Admissions: To qualify for acceptance into the State Authorization Reciprocity Agreement, a state must demonstrate that it assesses the efficacy of the admissions process for every institution seeking new or renewal of authority to serve students via distance delivery in other states. Admissions criteria must include at least the following:

- Clearly stated and comprehensive requirements for admission to the institution must be available to prospective students and this information must also be available as applicable for programs resulting in a certificate or degree.
- Reasonable assurance the admitted students have the capacity to succeed in the program(s) to which they are accepted.

Complaints and Concerns: To qualify for acceptance into the State Authorization Reciprocity Agreement, a state must assure that it requires all institutions seeking authorization to demonstrate that they do at least all of the following with respect to complaints against the institution and resolution of such complaints:

- Establish and sustain a complaint procedure that includes clearly understood and published processes for lodging a complaint, both within the institution, to the state authorizing entity, and to the institution's accrediting association;
- Establish and sustain processes within the institution for responding appropriately to complaints and for documenting their resolution;
- Establish and sustain a process for reporting formal complaints and their resolution to the state authorizing entity, including procedures that ensure that an institution's complaint resolution process has been exhausted before the complaint is elevated to the state authorizing entity; and
- Establish and sustain a process for working with the state authorizing entity on resolving complains that have been lodged and not resolved with that entity.

In addition to requiring institutions to provide such assurances of responsiveness to consumer complaints, the state must demonstrate that it has processes for following up on both formal complaints that it receives and on concerns that come to the attention of the state authorizing entity. The state must demonstrate that it is prepared to accept and act on all legitimate complaints and concerns registered with the state agency with regard to an institution that it has authorized for operation, whether the education provided

640 by the institution was provided in the home state or in a host state. The state
641 authorizing entity must have processes for responding to complaints and
642 concerns from students as consumers, institutions, accrediting agencies,
643 other states within the reciprocity program, the federal government or other
644 interested parties. Because the states have the primary responsibility for
645 consumer protection and because the accrediting bodies focus more directly
646 on institutional issues, rather than individual student or consumer complaints,
647 it is the responsibility of the state to follow up on all legitimate complaints. The
648 responsibility includes complaints not only related to violations of the
649 consumer protection requirements or of financial solvency of the institution but
650 also include academic standards initially established with an institution's
651 accreditation.

652
653 With respect to resolving complaints or concerns regarding academic
654 standards, all states participating in the State Authorization Reciprocity
655 Agreement will be guided by the standards for the evaluation of distance
656 education (on-line learning) adopted by the Council of Regional Accrediting
657 Commissions (C-RAC) (Appendix A), which is composed of all of the regional
658 accrediting associations. Abiding by the C-RAC guidelines will ensure that the
659 standards used by accreditors for initial authorization of institutions by the
660 state will be consistent with the guidelines used by states in responding to
661 complaints or concerns lodged with them regarding matters of academic
662 integrity. If deemed necessary in the future, SARA can review and replace
663 these guidelines that are consistent with those used by other entities in
664 reviewing institutional practices.

665
666 The state must demonstrate that it accepts affirmative responsibility to
667 promptly report, as appropriate, complaints and concerns to both the
668 institutions about whom the complaints/concerns were lodged and, as
669 appropriate, to the body that accredits the institution. While the host state is
670 not responsible for following up on complaints regarding an institution
671 operating within the state but based elsewhere, the host state must have a
672 process of transferring such complaints that it receives to the home state that
673 has authorized the institution to operate. The home state is responsible for
674 informing the host state of the status or outcome of a complaint lodged
675 through the host state.

676
677 Data Collection and Sharing: Data collected and shared by participating SARA
678 institutions will be essential to monitoring SARA processes and success. Such
679 data will also allow states to know how many of their students are receiving
680 distance educational services and degrees from providers outside their
681 boundaries. In this way, data collection and sharing among SARA institutions
682 and SARA states will greatly enhance the assessment of the scope and impact
683 of distance education in the nation. Institutions will not be asked to collect and
684 submit data that is readily available and submitted to other entities such as
685 IPEDS and their accrediting association. Data to be collected and shared by
686 participating SARA institutions may include but will not necessarily be limited to
687 the following:

688

- 689 • Numbers, types, and enrollment of on-line courses offered in each year.
- 690
- 691 • Number of out-of-state students enrolled in each on-line degree program/by
- 692 state/by demographic categories.
- 693
- 694 • Number of out-of-state students completing each on-line degree
- 695 program/degrees conferred/by state
- 696
- 697 • Numbers of complaints lodged against the institution by out-of-state on-line
- 698 students/by program
- 699

700 Criteria for Overseeing Authorized Institutions

701

702 As important as assuring that institutions seeking authority to operate within a state are fit for

703 this purpose is the responsibility of the state to assure that the institution abides by the

704 assurances and commitments it made in seeking authorization.

705

706 Complaints: The state must periodically demonstrate at least every other year to its State

707 Authorization Reciprocity Program that the formal complaint process on which it was

708 approved works effectively to protect students from possible institutional malfeasance,

709 abuse, incompetence or criminality. This must include evidence of at least the following:

710

- 711 • Evidence that consumers (students and subsequent employers) have
- 712 reasonable access to information about the complaint process.
- 713
- 714 • Documentation of: 1) all formal complaints received, 2) notifications of
- 715 complaints provided to institutions and accrediting associations, and 3)
- 716 complaint resolutions.
- 717
- 718 • Demonstration that complaint resolutions were appropriate to the severity and
- 719 veracity of the complaints, including punishment and restitution for violations
- 720 (within clearly described guidelines) including specific criteria for the termination of
- 721 authorization to operate.
- 722

723 Each regional SARA steering committee will establish the specific criteria for these reporting

724 requirements.

725

726 Concerns: The state authorizing entities will become aware of potential problems or

727 possible violations of state authorization, either through staff inquiries or other sources. It

728 is the affirmative obligation of the state entity to address appropriately such concerns. All

729 states participating in a regional State Authorization Reciprocity Agreement must

730 periodically demonstrate that they have clear and well-documented policies and practices

731 for addressing such concerns, and that they have followed these policies and practices,

732 consistent with the processes identified in the preceding paragraph. Each regional

733 SARA steering committee will establish the specific criteria for these reporting

734 requirements.

735

736 Catastrophic Responses: State authorizing entities must respond on occasion to

737 catastrophic events at one or more of the institutions that they oversee. All states must

738 periodically demonstrate to their regional SARA entity that they have clear and well-

739 documented policies and practices for addressing such catastrophic events, including at
740 least the following.

741

742 • In the event of the unanticipated closure of an institution, that the state has a
743 process of assuring that students receive the education they contracted for or
744 reasonable financial compensation for what they did not receive. Such
745 assurances can come in various forms — tuition assurance funds, surety
746 bonds, teach-out provisions, etc. — and they can come from individual
747 institutional requirements, multi-institutional cooperatives or state-supported
748 activities. A participating state can choose its own approach, but it must
749 demonstrate regularly that the approach it has selected adequately protects
750 students as consumers.

751

752 • The state entity must also assure that it either requires institutions to have
753 disaster recovery plans, particularly with respect to the protection of student
754 records, or that the state provides such a plan.

755

756 Financing SARA

757

758 To finance the expenses of establishment, organization and ongoing activities and to assist
759 states in fulfilling their roles in the State Authorization Reciprocity Agreement, the National
760 Council for State Authorization Reciprocity Agreements has the authority to collect fees. Fees
761 will be collected from institutions from SARA member states that have chosen to participate in
762 the Agreement and have been authorized by the appropriate state entity.

763

764 These fees will be managed and distributed by the council and will be guided by the following
765 principles:

766

767 A. Participation in SARA does not infringe upon the right of any member state to charge
768 fees to its home state institutions to cover the costs associated with review, approval,
769 and monitoring of operations of institutions in its state. The home state shall retain all
770 such fees.

771

772 B. Institutions operating in states other than their home state under the provisions of this
773 agreement shall pay a SARA fee annually to the SARA National Council.

774

775 C. The SARA fees will be sufficient, in aggregate, to fund the operational expenses
776 associated with the National Council for State Authorization Reciprocity Agreements
777 and the regional compacts' SARA related work and will be low enough to encourage
778 institutional participation in this activity.

779

780 D. The SARA fee will be standardized across all regions.

781

782 After receiving input from each regional compact and participating states and institutions, the
783 coordinating board shall annually approve and publish the SARA fee schedule for institutions.

784

785 The SARA fee will use a graduated scale based upon the number of students enrolled in or
786 served by an institution. The tier levels and the metrics to measure students will be determined
787 by the NC SARA and openly published as part of the fee schedule.

788

789
790
791
792
793
794
795
796
797
798
799
800
801
802
803

It is anticipated that the annual operating costs for the four regional compacts' SARAs and the National Council for State Authorization Reciprocity Agreements will be approximately \$1.5 million. If as few as 300 institutions chose to participate in these agreements, which is the fewest we can imagine would do so, the average cost, would be approximately \$5,000 per institution. If as many as 1,000 institutions chose to participate, which would represent slightly more than 20 percent of all degree-granting institutions currently participating in the federal Title IV student aid programs, and which represents a reasonable target for participation, the average cost per institution would be \$1,500. Initial fees will probably range between \$1,500 and \$5,000 per year and will be adjusted over time as more institutions participate.

Such are the criteria for participating in the State Authorization Reciprocity Agreement. Any of the states who meet these criteria, and are deemed to have done so by the relevant SARA steering committee, will be accepted into this reciprocal agreement.

Appendix A

Council of Regional Accrediting Commissions Standards for Distance Education

Revised 2011

The Interregional Guidelines for the Evaluation of Distance Education (Online Learning) were developed by the *Council of Regional Accrediting Commissions (C-RAC)* to assist institutions in planning distance education and to provide an assessment framework for institutions already involved in distance education. They are based on two documents: a 2006 report prepared by the U.S. General Accounting Office, *Evidence of Quality in Distance Education Drawn from Interviews with the Accreditation Community*, and *Best Practice Strategies to Promote Academic Integrity in Online Education*, prepared by the Western Interstate Commission for Higher Education Cooperative for Educational Technologies (WCET). These standards are now incorporated in the requirements of all regional accrediting associations and the National Council for State Authorization Reciprocity Agreements.

1. Online learning is appropriate to the institution's mission and purposes

- The mission statement explains the role of online learning within the range of the institution's programs and services;
- Institutional and program statements of vision and values inform how the online learning environment is created and supported;
- As appropriate, the institution incorporates into its online learning programs methods of meeting the stated institutional goals for the student experience at the institution;
- The recruitment and admissions programs supporting the online learning courses and programs appropriately target the student populations to be served;
- The students enrolled in the institution's online learning courses and programs fit the admissions requirements for the students the institution intends to serve;
- Senior administrators and staff can articulate how online learning is consonant with the institution's mission and goals.

2. The institution's plans for developing, sustaining, and, if appropriate, expanding online learning offerings are integrated into its regular planning and evaluation processes.

- Development and ownership of plans for online learning extend beyond the administrators directly responsible for it and the programs directly using it;
- Planning documents are explicit about any goals to increase numbers of programs provided through online learning courses and programs and/or numbers of students to be enrolled in them;
- Plans for online learning are linked effectively to budget and technology planning to ensure adequate support for current and future offerings;
- Plans for expanding online learning demonstrate the institution's capacity to assure an appropriate level of quality;
- The institution and its online learning programs have a track record of conducting needs analysis and of supporting programs.

853 **3. Online learning is incorporated into the institution's systems of governance and**
854 **academic oversight.**
855

- 856 • The institution's faculty have a designated role in the design and implementation of
857 its online learning offerings;
- 858 • The institution ensures the rigor of the offerings and the quality of the instruction;
- 859 • Approval of online courses and programs follows standard processes used in the
860 college or university;
- 861 • Online learning courses and programs are evaluated on a periodic basis;
- 862 • Contractual relationships and arrangements with consortial partners, if any, are clear
863 and guarantee that the institution can exercise appropriate responsibility for the
864 academic quality of all online learning offerings provided under its name.

865
866 **4. Curricula for the institution's online learning offerings are coherent, cohesive and**
867 **comparable in academic rigor to programs offered in traditional instructional formats.**
868

- 869 • The curricular goals and course objectives show that the institution or program has
870 knowledge of the best uses of online learning in different disciplines and settings;
- 871 • Curricula delivered through online learning are benchmarked against on-ground
872 courses and programs, if provided by the institution, or those provided by traditional
873 institutions;
- 874 • The curriculum is coherent in its content and sequencing of courses and is effectively
875 defined in easily available documents including course syllabi and program
876 descriptions;
- 877 • Scheduling of online learning courses and programs provides students with a
878 dependable pathway to ensure timely completion of degrees;
- 879 • The institution or program has established and enforces a policy on online learning
880 course enrollments to ensure faculty capacity to work appropriately with students;
- 881 • Expectations for any required face-to-face, on-ground work (e.g., internships,
882 specialized laboratory work) are stated clearly;
- 883 • Course design and delivery supports student-student and faculty-student interaction;
- 884 • Curriculum design and the course management system enable active faculty
885 contribution to the learning environment;
- 886 • Course and program structures provide schedule and support known to be effective
887 in helping online learning students persist and succeed.

888
889 **5. The institution evaluates the effectiveness of its online learning offerings, including**
890 **the extent to which the online learning goals are achieved, and uses the results of its**
891 **evaluations to enhance the attainment of the goals.**
892

- 893 • Assessment of student learning follows processes used in onsite courses or
894 programs and/or reflects good practice in assessment methods;
- 895 • Student course evaluations are routinely taken and an analysis of them contributes
896 to strategies for course improvements;
- 897 • Evaluation strategies ensure effective communication between faculty members who
898 design curriculum, faculty members who interact with students, and faculty members
899 who evaluate student learning;
- 900 • The institution regularly evaluates the effectiveness of the academic and support
901 services provided to students in online courses and uses the results for
902 improvement;

- 903 • The institution demonstrates the appropriate use of technology to support its
- 904 assessment strategies;
- 905 • The institution documents its successes in implementing changes informed by its
- 906 programs of assessment and evaluation;
- 907 • The institution provides examples of student work and student interactions among
- 908 themselves and with faculty;
- 909 • The institution sets appropriate goals for the retention/persistence of students using
- 910 online learning, assesses its achievement of these goals, and uses the results for
- 911 improvement.

912
913 **6. Faculty responsible for delivering the online learning curricula and evaluating the**
914 **students' success in achieving the online learning goals are appropriately qualified and**
915 **effectively supported.**

- 916
- 917 • Online learning faculties are carefully selected, appropriately trained, frequently
- 918 evaluated, and are marked by an acceptable level of turnover;
- 919 • The institution's training program for online learning faculty is periodic, incorporates
- 920 tested good practices in online learning pedagogy, and ensures competency with
- 921 the range of software products used by the institution;
- 922 • Faculty are proficient and effectively supported in using the course management
- 923 system;
- 924 • The office or persons responsible for online learning training programs are clearly
- 925 identified and have the competencies to accomplish the tasks, including knowledge
- 926 of the specialized resources and technical support available to support course
- 927 development and delivery;
- 928 • Faculty members engaged in online learning share in the mission and goals of the
- 929 institution and its programs and are provided the opportunities to contribute to the
- 930 broader activities of the institution;
- 931 • Students express satisfaction with the quality of the instruction provided by online
- 932 learning faculty members.

933
934 **7. The institution provides effective student and academic services to support students**
935 **enrolled in online learning offerings.**

- 936
- 937 • The institution's admissions program for online learning provides good web-based
- 938 information to students about the nature of the online learning environment, and
- 939 assists them in determining if they possess the skills important to success in online
- 940 learning;
- 941 • The institution provides an online learning orientation program;
- 942 • The institution provides support services to students in formats appropriate to the
- 943 delivery of the online learning program;
- 944 • Students in online learning programs have adequate access to student services,
- 945 including financial aid, course registration, and career and placement counseling;
- 946 • Students in online learning programs have ready access to 24/7 tech support;
- 947 • Students using online learning have adequate access to learning resources,
- 948 including library, information resources, laboratories, and equipment and tracking
- 949 systems;
- 950 • Students using online learning demonstrate proficiency in the use of electronic
- 951 forms of learning resources;
- 952 • Student complaint processes are clearly defined and can be used electronically;

- 953
- 954
- 955
- 956
- 957
- 958
- Publications and advertising for online learning programs are accurate and contain necessary information such as program goals, requirements, academic calendar, and faculty;
 - Students are provided with reasonable and cost-effective ways to participate in the institution's system of student authentication.

959 **8. The institution provides sufficient resources to support and, if appropriate, expand its**

960 **online learning offerings.**

- 961
- 962
- 963
- 964
- 965
- 966
- 967
- 968
- 969
- The institution prepares a multi-year budget for online learning that includes resources for assessment of program demand, marketing, appropriate levels of faculty and staff, faculty and staff development, library and information resources, and technology infrastructure;
 - The institution provides evidence of a multi-year technology plan that addresses its goals for online learning and includes provision for a robust and scalable technical infrastructure.

970 **9. The institution assures the integrity of its online offerings.***

- 971
- 972
- 973
- 974
- 975
- 976
- 977
- 978
- 979
- 980
- 981
- 982
- 983
- 984
- 985
- 986
- The institution has in place effective procedures through which to ensure that the student who registers in a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit. The institution makes clear in writing that these processes protect student privacy and notifies students at the time of registration or enrollment of any projected additional costs associated with the verification procedures. (Note: This is a federal requirement. All institutions that offer distance education programs must demonstrate compliance with this requirement.);
 - The institution's policies on academic integrity include explicit references to online learning;
 - Issues of academic integrity are discussed during the orientation for online students;
 - Training for faculty members engaged in online learning includes consideration of issues of academic integrity, including ways to reduce cheating.

987 *Institutions are encouraged to consult *Best Practice Strategies to Promote Academic Integrity*

988 *in Online Education*, prepared by WCET and available at <http://www.wcet.wiche.edu>