

**Midwestern Higher Education Compact
How to Apply to Become an Approved SARA Webinar Q A 6.18.2014**

State or Issue	Question	Answer
Alabama		
	I was told Alabama was in this process. Have you any updated information or timeline?	Alabama needs legislative action, including legislative action to designate a portal agency. At this time there are three agencies involved in the state authorization process, (Alabama Commission on Higher Education, Alabama Department of Postsecondary Education and the Alabama Secretary of State), thus the need for legislation. Discussions are ongoing in the state, but it anticipated Alabama will not be an early adopter of SARA. The SARA contact for Alabama is Elizabeth French. Elizabeth can be reached at 334-242-2179 or elizabeth.french@ache.alabama.gov.
Applications		
	Will the portal agencies eventually be listed along with the approved institutions on the NC-SARA pages for the individual approved states?	Yes, we are posting institutions as they are approved and have finalized the process to participate in SARA. We have been gathering state portal agency details. Contact information for current approved SARA states are now posted at: http://www.nc-sara.org/content/state-portal-agency-contacts SPA contact info will show on each state page as well.
	Is Kansas expected to be ready to handle applications prior to the Sept. 1 grand opening deadline?	This is unclear. KS is in the final stages of preparing its application to M-SARA, and then the regional steering committee and the executive committee will have to meet and vote on the application. I know that the folks in KS are working hard to move this process along while still attending to all the important details that will allow them to establish and run a top notch portal agency.
	is there still a deadline for submitting applications by July 1, 2014	I think I know what you are asking here. Is it about the deadline for schools be able to show compliance in being authorized and/or exempted in each state in which they serve students or otherwise set off physical presence triggers, or else they are subject to sanctions regarding their Title IV funding? If that is the question, then no is the answer. This is a common misunderstanding of what does happen on 7/1/14, which is that all <i>states</i> must have an authorization system and mechanism up and running in order not to jeopardize their relationship with USDE and the Title IV funding system.
	Can an application be submitted by a System with multiple campuses or does it need to be by each institution?	While it is possible to submit a single Application and Evaluation for Institutional Membership to a SPA, and thereby realize some administrative efficiencies, each campus is evaluated separately. For instance, a single application from the Indiana University System, included 7 campuses. Each Indiana University campus was independently considered as each campus has its' own accreditation, and pays a separate membership fee.
California		
	Any updates about California?	The governor's staff is supportive and is working on ways to get the state positioned to join. This will not happen in 2014 owing to the complex, decentralized nature of postsecondary oversight in California. Our current expectation is that there will be legislation in 2015 with an effective date of January, 2016, but that is speculative.
Clinicals		
	To clarify, if we don't have any clinical sites with more than ten students, then we don't need to worry about getting approval to operate in other states?	Please see the SARA policies and standards 5(2)(i) http://www.nc-sara.org/files/docs/FINAL%20SARA%20General%20Policies%20released.pdf
	Our University has 2 campuses: one in IL and on in AZ. We are accredited by NCA-HLC. Our students must complete clinical rotations throughout the Midwest and southwest.	SARA covers clinical placements in any SARA member state. It does not replace any standards established by a professional board. So it would exempt your school from the screening of the education agency, but you'd still have to meet any rules of, say, the Board of Nursing. Also, SARA treats branch campuses as covered by the status of the home campus, if the branch is not separately accredited.
	When you say SARA covers clinicals and practica, with certain limits - where are those limits shared?	Please see the SARA policies and standards 5(2)(i) http://www.nc-sara.org/files/docs/FINAL%20SARA%20General%20Policies%20released.pdf
	Do we need to notify all students, even if just taking one online class, of the licensure requirements for the students' state of residence? Or, do we only need to notify those students who have applied to programs and plan to take the entire program online of meeting or not meeting the licensure requirements for their particular states?	This is a gray area. If the student is taking a math class that might be applicable to a dozen programs, you don't need to treat that as relating to professional licensure. If the student gives the school information that makes clear that he/she is on a licensure track, you have to notify. This is an evolving policy, we will have a working group on these issues.
	What if the notice is in the program admissions letter/email or the program application?	I think that is fine. There may be situations in which someone enters a program by the back door, so a school needs to be alert to make sure potentially affected students get what they need. There is always merit in posting this sort of information so that students do not get all the way through the admissions process and only then learn that the program for which they have applied will not or might not allow them to obtain a license in their chosen field in their state of residence.
	For our University with campuses in IL and AZ, how would we process our applications so that we have access to rotations in various states in the Midwest and southwest without having to apply for licenses in separate states in these regions?	If they are all SARA members, you are covered. For those that are not (the situation for most of them today), you need to check with the states where you do placements and see what is required.
	Does SARA address approvals/requirements by state agencies such as Board of Nursing?	No, SARA expressly excludes unique requirements that professional boards may impose on training programs.
	My optometry school does not teach any distance courses, but we do send students to academic quarter-long externships to receive clinical training in different states by our adjunct faculty. Does SARA apply to us?	Yes, SARA covers clinicals and practica across state lines for programs that are otherwise campus-based.
Complaints		

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	for complaint processes for the specialty accrediting bodies, would that require a link or is it just for the regional bodies?	A participating SARA institution will need to lay-out on their website and in its other informational materials the normal institutional complaint process and all the variations thereto (i.e., Title IV complaints got to USDE, accreditation complaints go to the accreditor). The complaint process needs to be clear and accessible to students and follow the traditional paths up and until there is a lack of resolution that does not fall under one of these other categories and is not about grades or student conduct. The student then needs to know that there is a limited scope of appeal to the SPA. We at SARA are working to create templates that will help institutions with these wordings and postings.
C-RAC		
	what does C-Race mean again?	Council of Regional Accrediting Commissions (C-RAC). Here is the link to the C-RAC Guidelines http://www.ncsara.org/files/docs/C-RAC%20Guidelines.pdf
	We are regionally accredited by HLC and have programs that are programmatically accredited, would the institution need to do a C-RAC?	C-RAC standards apply to all regionally accredited providers already, as they have been adopted by the accrediting bodies. There is no extra paperwork.
Data		
	Will the data gathering cover only those in degree program and not individuals who wish to take a single course?	This is one of the data definitions the data working group will be determining in the reporting guide we are putting together to present to the National Council in November. The goal is to produce tight definitions and reporting procedures that optimize accuracy and consistency while minimizing guess work and calculations for institutions. As soon as the reporting guide is approved, we will make it available to participating SARA institutions.
D.C.		
	Progress in District of Columbia?	Discussions are ongoing regarding the District of Columbia is affiliating with SREB for the purposes of SARA. Regulatory issues are being closely reviewed to determine and authorize a SARA Portal Agency and generate the necessary MOU's. DC is presenting to it's council this week.
	What about some of the southern or northeastern states?	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. KY, NC, TX and VA have biennial legislative sessions. All SREB states are discussing participation in SARA and statewide meetings have been held in many states, to include representation from SREB and NC SARA. Early adopters may be Arkansas, Louisiana, Oklahoma, Virginia and West Virginia. These states may be active participants by the end of 2014. It is anticipated that Alabama will be a late adopted due to the level of legislative action required. Georgia and Mississippi may be participating towards the end of 2015. The SARA contact for each of the SREB states can be found at http://www.sreb.org/page/1771/sara_state_contacts.html .
		The Northeastern states also have unique regional issues that mean the transition to SARA will take longer there than in West and the Midwest. For more information about N-SARA and the NEBHE, you can use the following website: http://www.nebhe.org/ and/or contact the Director of N-SARA, Sandra Doran, sdoran@nebhe.org , 617-533-9520
Fees		
	Are the fees based on total students or out of state distance learners?	Total FTE as reported to IPEDS - this is because there is no set definition and no reliable information on the number of distance education learners at this time. That is something we hope to help address with data collection under the SARA agreement.
	What are the average costs that states charge? Can a member opt out of a state of fees are extremely high?	There is no way to think of an average yet. The range I have heard about in MHEC states is from nothing to fees that are parallel to those of NC-SARA.
	So we pay state fees and our SARA fees?	Correct. NC-SARA fees as outlined in the presentation and state fees to be determined by the states. You only pay state fees to your home state for participation in all SARA states. For no-SARA states in which your institution still wishes to operate, traditional state authorization fees will still apply until that state joins SARA.
	If schools are still required to seek compliance state by state and pay a host of different fees, what exactly is the benefit of joining SARA?	Once you join SARA, such fees and paperwork from other SARA member states are waived.
	As for the fees, why is there not a lower scale for small schools..say student population of 100.	This is question we need to discuss further at the National Level. I shall put it on our discussion list.
	Are the fees annual costs?	Yes, the required SARA fee paid to the National Council for SARA is an annual fee based on an institution's total full-time equivalent (FTE) enrollment as shown in the Integrated Postsecondary Education Data System (IPEDS) and is assessed as follows: <ul style="list-style-type: none"> • \$2,000/year for institutions with fewer than 2,500 FTE students • \$4,000/year for institutions between 2,500-9,999 FTE students • \$6,000/year for institutions with 10,000 or more FTE students
	Do we pay state fees to the individual states, our states SPA, MHEC or who?	If states choose to charge fees to their in-state institutions that want to participate in SARA, those fees will be collected by the state portal agency.
	so the reduction on SARA fees is due to the fact that in the beginning with only 7 states having joined, it does not yet make economic sense to pay fees to SARA for only 7 states - perhaps none of which you have students in.	The "Grand Opening" sale or special provision fee for institutions that join prior to September 1, 2014, granting 18 months membership for the initial fee then continuing on a 12 month renewal basis was designed to extend benefits for early participants. There are currently seven states but many more are expected to join in that 18 month period.
	When we submit our application for approval, can we choose which states we pay the fees & surety bonds to? Can you explain how this will work in more details please.	You are automatically assigned to the state in which your principal accredited campus (not necessarily your corporate HQ, if you are a for-profit) is located. That becomes your "home state." If it has fees, you pay them to that state only. Your fees to NC-SARA are paid to the SARA office AFTER your get approved for SARA by your state, if it is a member.
	With State Fees, is that assessed to the student /institution wanting to send a student into that state for clinicals, etc.? Not by the 'sending out' state then? Just checking.	The only state that will charge you a fee under SARA is your home state. There is also an annual fee to the SARA office. States where you place students in clinicals will not charge you a fee.

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	Alan, is State SARA fee payable only to home state or to every state in the agreement?	The only state that will charge you a fee under SARA is your home state. There is also an annual fee to the SARA office. States where you place students in clinicals will not charge you a fee.
Financial Scores		
	What happens if the financial score is higher one year and lower another year?	If the score remains at 1.5 or above, no change in institutional membership in M-SARA will occur. A score lower than 1.5 may result in the institution having to submit an independent audited financials demonstrating financial stability.
	The FRSs are from 2010/2011. Is there any place we can obtain more current information?	The most current source is found on the student aid website at: https://studentaid.ed.gov/about/data-center/school/composite-scores The student aid website displays composite scores for private, non-profit and proprietary institutions for the fiscal years ending between 7/1/2011 and 6/30/2012.
	What paperwork is needed to document the fiscal responsibility score?	The Institution would need to affirm the question: "For non-public institutions, have a financial responsibility index score from the U.S. Department of Education that is 1.5 or above, or, if its score is between 1.0 and 1.5, successfully demonstrate to its home state's portal agency that it is nevertheless sufficiently financially stable to justify participation in SARA. (Public institutions are presumed to be sufficiently financially stable for SARA purposes.)"
	Any idea how much a surety bond costs per online student (on average)?	This would depend on how the bond is calculated and how much risk it is intended to manage. States already differ widely on these calculations and requirements. MHEC is working on a program that would help institutions with acquiring and affording surety bonds.
	If a private institution falls between a 1.0 and 1.4, I understand that the documentation to demonstrate financial stability is up to the state. Based on the SARA requirements, are private institutions scoring in this range only able to participate in SARA for one year? Therefore, if a private institution scores a 1.4 in year one, they can only participate the next year if the institution raises the score to a 1.5 or higher?	If the institution's score is between 1.0 and 1.5, the institution would need to demonstrate to its home state's portal agency that it is nevertheless sufficiently financially stable to justify participation in SARA. An independent audit may demonstrate sufficient financial stability.
	Our college has a financial responsibility score, private, non-profit, but we are not listed on the website. I suspect there may be more of us.	An institution may be able to demonstrate sufficient financial stability by having an independent financial audit report.
Florida		
	Any updates for the state of Florida?	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. Florida is one of the SREB states that may need to pass legislation and the current statute and regulatory language is being reviewed closely. Discussions are underway regarding the selection of the SARA Portal Agency. Discussions are on-going within the state, but it is anticipated Florida will not apply for SARA participation before the fall of 2015. The SARA contact for each of the SREB states can be found at http://www.sreb.org/page/1771/sara_state_contacts.html .
Illinois		
	Where is Illinois, and are there contacts that we can reach out to in order to push this through a little quicker in IL?	Illinois has SARA legislation that has passed and is awaiting the governor's signature. The Board of Higher Education is moving forward with careful planning of their SPA, and it is my understanding that they aim to submit an application to M-SARA in the fall of 2014 and to accept institutional applications by 1/1/15. Dan Cullen at the Board of Higher Education is your best contact there: Cullen, Daniel <cullen@ibhe.org>.
Institutions		
	How can institutions get involved in their state joining SARA?	Institutions can contact the key SARA leaders in their states and help to host meetings, support legislation, etc. There are many ways to do this, and it is the job of the regional SARA directors to help connect you to those people and their efforts. Please contact me directly so that I can connect you with the right folks in your state.
	Will Sara participation "cure" institutions who may currently be non-compliant in certain states?	Yes, for activity that occurs after your home state and that other state are both SARA members. There is no retroactive effect to SARA, and enforcement for prior bad acts is at the state's discretion.
Iowa		
	Where is Iowa in the process and is there anything I can do once Iowa legislature has approved?	Iowa legislation has been approved and signed by the governor. The Iowa College Student Aid Commission will be the portal agency, and Karen Misjak and Carolyn Small there are working very hard to prepare procedures that will allow them to submit an application to M-SARA some time in the fall of 2014. It is my understanding that they would aim to accept institutional applications by 1/1/15.
Massachusetts		
	Mass?	Please see the previous response above regarding an update from N-SARA and NEBHE.
Michigan		
	Where is MI in the process?	Michigan is in the process of drafting SARA legislation that could be introduced in the Fall of 2014. The portal agency will be LARA (Licensing and Regulatory Agency), and the lead on that effort is Mike Beamish. Michigan would be looking at applying to M-OSARA in the spring of 2015 and accepting application some time in the summer of 2015.
Minnesota		
	Do you know the status of Minnesota?	Minnesota has passed legislation and the governor has signed it. The Office of Higher Education will be the portal agency, and the lead on the SARA efforts will be George Roedler. It is my understanding that OHE is working on its M-SARA application and portal procedures and aims to submit an application to M-SARA by the Fall of 2014 and to accept institutional applications be around 1/1/15.
Missouri		
	Do we know how soon Missouri's governor might sign off on the SARA bills passed by the legislature?	Actually, the legislation has passed in Missouri, and the governor has already signed it. The Department of Higher Education will be the portal agency, with LeRoy Wade leading the efforts there. My understanding is that they are crafting their procedures and their M-SARA application and will likely apply to M-SARA in the fall of 2014 and begin accepting applications from institutions around 1/1/15.
New Mexico		

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	Any word on New Mexico's progress with moving forward with SARA?	New Mexico has drafted legislation that they plan to introduce in 2015.
New York		
	Any idea about New York's timeline for joining?	We met with commissioner of higher education, and he will make a presentation to the Board of Regents in early July. All the institutions in New York signed and sent a letter to the commissioner of higher education urging adoption, which would be likely either in 2015 or 2016.
	what about the Connecticut	Legislation was introduced by the Higher Education and Employment Advancement Committee and Representative Roberta Willis. The bill was reported out of committee favorably, but was amended to address a fiscal note that was attached. The amended version was passed and signed into law and it calls for the Office of Higher Education to submit a plan for SARA to the Education and Cultural Affairs Committee no later than January 15, 2015.
Ohio		
	Where is the Ohio Board of Regents in signing onto SARA?	Ohio legislation passed and will become effective in ninety days. The Ohio Board of Regents will begin the process to apply to MHEC while bill waits to become effective.
Pennsylvania		
	What about Eastern states like Pennsylvania?	MHEC and M-SARA have had consistent communications with Pennsylvania about both compact membership and SARA membership since the beginning of 2014. Both of the memberships would require legislation and will take some time to sort out. I hope to have more of an update for you on Pennsylvania late in the summer or early in the fall of 2014.
Portal Agencies		
	I'm a bit confused. After we join MHEC SARA we still need to apply to every state SPA?	No, you only apply to your home state SPA and then to the authorizing agency in every other non-SARA state in which you are engaged in educational activities.
	Just to be clear...each institution applies to SARA and to its home state SPA ... and not to other state SPAs, right?	Yes. The SPA first, and then NC-SARA after the SPA signs off.
SALE		
	What is the rate during the "sale" period (i.e., 18 months)	The fees are the same, based on an institution's total full-time equivalent (FTE) enrollment as shown in the Integrated Postsecondary Education Data System (IPEDS) and is assessed as follows: <ul style="list-style-type: none"> • \$2,000/year for institutions with fewer than 2,500 FTE students • \$4,000/year for institutions between 2,500-9,999 FTE students • \$6,000/year for institutions with 10,000 or more FTE students The "Grand Opening" sale or special provision fee for institutions that join prior to September 1, 2014, grants 18 months membership for the initial fee then continues on a 12 month renewal basis.
	Could the 18-month benefit be given by all the compacts for the first 25 states to join SARA?	We will refer this question to the regional compacts.
	In regards to the 18th month special, what if our state does not submit it's application before September. Would a school be eligible for the 18 month special afterwards?	Sorry, the special provision fee for institutions that join prior to September 1, 2014, granting 18 months membership for the initial fee then continuing on a 12 month renewal basis will not be extended.
South Carolina		
	are you aware of what the status is of South Carolina? did their legislature pass change their law yet to be able to enter reciprocity agreements?	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. All SREB states are discussing participation in SARA and statewide meetings have been held in many states, to include representation from SREB and NC SARA. Early adopters may be Arkansas, Louisiana, Oklahoma, Virginia and West Virginia. These states may be active participants by the end of 2014. It is anticipated that Alabama will be a late adopted due to the level of legislative action required. The South Carolina Commission on Higher Education has approved staff to monitor the SARA initiative. Georgia and Mississippi may be participating towards the end of 2015. The SARA contact for each of the SREB states can be found at http://www.sreb.org/page/1771/sara_state_contacts.html .
STATES		
	Are there states you could predict will elect not to join?	There are half a dozen states that we think will be relatively slow to join, probably after 2015. No state has announced that it has decided not to join.
	If a state is not yet part of the agreement, can other states begin offering courses within the state?	Both states have to be SARA states - ALAN
	Any info on any of the Southern States...AL GA MS	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. KY, NC, TX and VA have biennial legislative sessions. All SREB states are discussing participation in SARA and statewide meetings have been held in many states, to include representation from SREB and NC SARA. Early adopters may be Arkansas, Louisiana, Oklahoma, Virginia and West Virginia. These states may be active participants by the end of 2014. It is anticipated that Alabama will be a late adopted due to the level of legislative action required. Georgia and Mississippi may be participating towards the end of 2015. The SARA contact for each of the SREB states can be found at http://www.sreb.org/page/1771/sara_state_contacts.html .
	Do states require legislation to enter SARA, or is it usually done through the State Board or State Education office?	Most states require legislation; there are a few exceptions.
	Alan - what is the latest DOE position on their acceptance of SARA for state authorization purposes? They seem to be intent on causing states to adopt active authorization regardless of SARA.	They have consistently told SARA staff that they are supportive of what we are doing. There have been no formal statements "signing off" on SARA.

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	Can a state's university system office serve as the official repository of student records in case of the closure of a state institution?	Yes.
	Once we are approved by SARA, do we still need to contact individual states, particularly those not approved by SARA?	You only need to contact and pursue traditional authorization/exemption procedures in non-SARA states.
	If we are a member of the Midwest region, are we then connected with other regions around the country?	Absolutely! This is nation wide reciprocity. States that join in one region are eligible for reciprocity with states that join in any other region.
	if a state has joined Sara will the state regulations still stay the same for institutions outside of SARA	Yes. Some accredited providers may choose not to participate in SARA. States will need to retain their rules because SARA does not apply to unaccredited colleges or to colleges offering courses from outside the U.S. There are states in which the new portal agency is not the traditional authorizing agency or agencies. All the traditional contacts will remain the same.
	Which other states do you not expect to join by end of 2015?	If a state passes legislation late in 2015, it probably won't be a member until early 2016. No state has indicated that it won't join.
	In some states having faculty living in their states that teach online programs is a trigger for a need for further authorization. Does SARA eliminate that concern?	Please see the SARA policies and standards 5(2)(e) http://nc-sara.org/files/docs/FINAL%20SARA%20General%20Policies%20released.pdf
	If a state chooses to opt out of SARA for a specific year, will an institution need to pursue that state's authorization process for that year?	I cannot envision a scenario like this, but if you want to contact me individually, I am happy to ponder it together.
	When is the deadline to have state's permission through this process vs. an individual approach?	There is no deadline of this sort. The new proposed federal rules come out at the end of June or beginning of July and will likely have some sort of deadline proposed therein. We would make sure to cover this development in our Fall update webinar.
Tennessee		
	Any updates on Tennessee	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. Tennessee has been able to determine that it will need legislative action, including the designation of a portal agency. Legislation has been passed to create a committee to review participation in SARA. Tennessee is not expected to apply for SARA participation before the fall of 2015. The SARA contact for Tennessee is Julie Woodruff, she can be reached at 615-253-8857 or julie.woodruff@tn.gov .
Texas		
	Any word on Texas?	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. KY, NC, TX and VA have biennial legislative sessions. Texas is one of the SREB states that may need to pass legislation and its current statute and regulatory language is being reviewed closely. The next legislative session will begin in January, 2015. Agency discussions are on-going within the state, but it is anticipated Texas will not apply for SARA participation before the fall of 2015. Rex Peebles would be the contact for Texas and his information can be found at http://www.sreb.org/page/1771/sara_state_contacts.html
Website		
	How often is the SARA website updated for states and institutions? Daily, weekly?	Every attempt is made to update the site as soon as we receive confirmed information regarding states and institutions. To clarify our process for institutions, once payment is received the institution is officially participating in SARA and will then be listed on the nc-sara.org site. Note, the time between a state portal agency approval and finalized payment process varies by institution and their method of payment.
West Virginia		
	Any news on WV status?	The SREB states have had a reciprocity agreement through SREB's Electronic Campus Regional Reciprocity Agreement (SECRRA) since 1998. In order to move from SECRRA to SARA participation, many of the SREB states have to take legislative action. KY, NC, TX and VA have biennial legislative sessions. All SREB states are discussing participation in SARA and statewide meetings have been held in many states, to include representation from SREB and NC SARA. West Virginia is closely reviewing statutes and regulatory issues to determine if legislative action is necessary for participation. Early adopters may be Arkansas, Louisiana, Oklahoma, Virginia and West Virginia. These states may be active participants by the end of 2014. It is anticipated that Alabama will be a late adopted due to the level of legislative action required. Georgia and Mississippi may be participating towards the end of 2015. The SARA contact for each of the SREB states can be found at http://www.sreb.org/page/1771/sara_state_contacts.html .
Wisconsin		
	Is there any update on Wisconsin's actions to join SARA (or inactions)?	Leaders from all sectors of the higher education community in Wisconsin have been meeting to discuss how best to move forward with reciprocity since April 2013. They continue to meet along with key legislators and MHEC commissioners. As a state without a central higher education agency, there is no "natural" SPA to use, so they are discussing how to create one. I hope to have a better update on the state of SARA in Wisconsin by the end of the summer or the early fall of 2014.
	For documentation of HLC accreditation status, is it enough to send the Statement of Affiliation Status (SAS)?	Applicant must affirm the question: "Be a U.S. degree-granting institution that is accredited by an accrediting body recognized by the U.S. Secretary of Education."
	If students are enrolled in a University in one state, but complete an Internship in another state do we need to have State Authorization for Internship site state?	In most states, yes. SARA covers this situation for member states.
	What exactly is meant by Agree to notify all students in writing? Is this a notice on our website or an email to specific students in specific states?	You will be required to notify any student who indicates that they are in a track leading to professional licensure. A web notice is not sufficient.
	If an institution has an approval to offer online degree programs by their accrediting body do they need to complete the C-RAC?	Accredited institutions already adhere to the Council of Regional Accrediting Commission Guidelines.

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	Does reciprocity only apply to the 7 other states that have adopted SARA guidelines?	As of today, yes. We think that there will be about 20 states by the end of 2014 and about 40 by the end of 2015.
	Will SARA unify the "trigger" conditions necessitating application?	Please see the SARA Policies and Standards, page 6, item 4.
	What happens if Congress or a change in the Executive branch reverses this requirement?	The requirement for state authorization predates the federal rulemaking process and is not directly affected by it. Colleges are obligated to abide by state laws.
	Does on-line student mean a student who will only take on-line courses but a student who takes 1 or more online classes and the remainder being traditional?	This depends on state law. For example, if a college has one online student in Minnesota, that means it has to get licensed in Minnesota. In Oregon, there is no such requirement. You need to check with each state in which you have students.
	Are we required to attach documentation as was described in your Item 1, 2 and 3 discussed in the "What's the same and requires documentation?" section	Yes. Please attach the documentation as requested in the application and as referenced in the webinar.