



Question	Answer
<p>We were told that the Federal requirement to get individual state approval was put off until 2018. Is this correct? It states: We are pleased with this story from Inside Higher Ed that the Department of Education will delay issuing a regulation that would have required colleges to obtain state authorization from states in which they have out-of-state students, before they can offer those students federal financial aid</p>	<p>The federal government did not create and has not removed the requirements in state law that colleges get whatever authorization is needed. There is a lot of misunderstanding about this. Colleges are still required to meet requirements of state law. The U.S. Department of Ed has announced that they are "pausing" on the issuance of a rule on the authorization of postsecondary distance education. BUT STATE LAWS ARE STILL IN PLACE. For great way to understand and track the work of USDE as it relates to state authorization, you can visit this link: http://wcet.wiche.edu/learn/issues/state-authorization.</p>
<p>Is NC-SARA or other group advising legislators?</p>	<p>NC-SARA and the regional SARA staffs provide information to state level higher education leaders and institutional staff who then work at the state level with their legislators to decide if, how, and when they want to move forward with joining one of the regional SARAs.</p>
<p>Will SARA require that IHE's provide on their web sites pass rates for national licensure/certification exams? HLC requires that (don't know about the other regionals).</p>	<p>An institution that applies to a state portal agency and becomes a participating SARA institution will be required to submit data annually to NC-SARA, but the current (working) data requirements do not include such information as exam pass rates, completion rates, etc. The data requirements as they are currently outlined require a school to report the number of out of state students it is serving, by the number in each state. Please also remember that state licensing boards may have their own requirements about listing pass rates.</p>
<p>Will SARA virtually eliminate state oversight organizations like the Private Postsecondary Bureau of Voc. Ed. in Calif. or is it just for support to public postsecondary schools.</p>	<p>SARA allows participation by public, private non-profit, and private for-profit institutions that meet the SARA institutional participation requirements. SARA does not interfere or eliminate any existing agencies or entities within a state that regulates higher education. Existing state authorization agencies and practices will remain in place as they always have for the authorization of in-state institutions and out of state institutions that do not participate in SARA.</p>



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<p>Does the notification about professional licensure need to go to admitted students or to prospective students - before they even apply for admission. This may seem like a minor point, but please be very specific in the requirements and the communication of the requirements. Many marketing departments will want the notification to come after admission. Thanks!</p>	<p>Current SARA policy is that notice needs to be given when an *enrolled student* enters a *program* that customarily leads to licensure. There is no requirement that all potential students interested in a field be given notice. However, colleges are obligated to provide accurate information, so they should err on the side of giving the information to students as soon as the students are enrolled and identifiable as in the field.</p>
<p>Can an institution put consumer disclosure information (pertaining to state authorization) on the same page as it places other consumer disclosure information, or does the "complaint" disclosure information need to be placed on a separate webpage?</p>	<p>Yes, the institution can post consumer disclosure information regarding SARA on the same page as other consumer disclosure information. A separate webpage is not needed. I think it is ok for the institution to put information about the mechanics of the compliant process on whatever web site it wants to, as long as the student is told, in e-mail or paper form, where that information is.</p>
<p>Proposed (and on pause) fed regs would not seem to allow option 2 re notice of eligibility for license (ie providing state licensing agency contact information). Assuming fed reg on this remains unchanged, would SARA option 2 still be viable for SARA participating institutions?</p>	<p>SARA is designed to operate under existing law. SARA does not supersede any federal law, so if the federal rules change to preclude some aspects of SARA standards, SARA will need to revise those standards.</p>
<p>What exactly is needed from an individual institution?</p>	<p>If you are asking what an institution needs to do to apply to and participate in SARA, please see this link: http://nc-sara.org/what-does-institution-do. You can also view this webinar on the topic: https://www.youtube.com/watch?v=UFyo9xWOPTy&feature=youtu.be.</p>



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<p>We are hearing of proposed legislation regarding eliminating the regionals in the accrediting realm and eliminating SARA and its regional approach to move all such responsibilities to the states? What do you know about this?</p>	<p>I (Jenny Parks) have not heard anything about this. If you would like to call me and tell me more, I can certainly do some research on this question. My contact information is in the webinar materials. (Alan Contreras' comments follow) Yes, there is a certain amount of talk about this, and there may even be a House bill, but any such changes would be extremely complex and expensive and are not likely to be a factor in the next couple of years. Don't spend any energy on this.</p>
<p>In Indiana, how do students register complaints against schools in other SARA approved states? Is it through a website? Is this kept separate from a complaint system for Indiana schools only?</p>	<p>Under the SARA process, a student files a complaint at his/her institution in the other SARA state. The institution must have a SARA compliant complaint process that is clear and easy for the student to access and understand. In rare circumstances, the portal agency in the other state might hear a student complaint that is not resolved through the institutional complaint process. That other SARA state could not have joined SARA if it did not have a SARA compliant complaint system that was clear, easy to access, and published on the portal agency's website and linked from the institution's complaint and SARA compliance webpages.</p>
<p>Are there provisions for protection of U.S. students studying while deployed or living in other countries?</p>	<p>SARA does not cover any international deployments because courses offered at non-U.S. sites are not offered in a state. The question of whether and how state authorization applies to courses offered by a U.S. provider outside the U.S. does not have a clear answer. For now, none of that activity is covered by SARA, and normal state authorization rules apply.</p>



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<p>At this time, what is the cost to the "host state" for participation? What central organization will manage the agreements?</p>	<p>When a state joins its regional SARA, there is no cost to the state if it is a member of its respective higher education compact. Institutions pay an annual fee based on their FTE to NC-SARA (the National Council), which is the organization that coordinates and makes sure that the four regional SARAs remain aligned and that reciprocity is nationwide. For more information about the structure of the SARA organization, please see this link: http://nc-sara.org/about/national-council.</p>
<p>How might SARA apply/be helpful to institutions which offer programs in which each course features both online and on-campus components? For example: 50% in-residence and 50% online. Thank you.</p>	<p>SARA is helpful to such institutions in a number of ways. Any institutions that is degree granting and accredited by an accreditor recognized by USDE is potentially eligible to participate in SARA. Such institutions, if they offer educational services and engage in activities like on-line coursework, marketing, clinical placements, or recruiting in other states, are required by the laws of those states to seek out authorization or exemption from authorization. With SARA membership, all those activities are covered in all other SARA states by one streamlined application to the SARA portal agency in the state in which the institution is legally domiciled. Thus, there is less paperwork, data submission, staff time, risk of non-compliance, and expense from authorization fees for an institution when it participates in any kind of distance education under SARA.</p>
<p>If we have a student who lives on our campus in fall and spring and then goes home in the summer to another state, can that student take an online class from our institution without our having approval from that student's home state?</p>	<p>That will depend upon the state. In some states this will trigger a physical presence and require authorization. You will need to check with each of the states in question to determine if this is the case. Under SARA, this is not necessary for students who return home for the summer and take on-line courses in a SARA state.</p>



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<p>What about U.S. institutions serving deployed students?</p>	<p>If you are referring to deployed students who are overseas, then SARA has no impact, as it currently does not deal with any issues related to international educational activities. However, if you are referring to deployed students who are still residing and taking courses while they are on US soil, then yes, the SARA rules cover them and the institution from which they are taking courses, assuming that both the institution and the deployed student are in SARA states and the institution is approved for SARA.</p>
<p>So if the DOE isn't taking a stand at this time, and our state isn't part of SARA yet (I'm in WI), should individual institutions go off the SARA website and determine accordingly what states to accept students from and pay the price and what states to not accept students from? Or should individual institutions "pause" as well?</p>	<p>Is it critical that all institutions seek authorization in all states where they are engaged in educational activities. State laws on these activities and the need for authorization vary widely. SARA membership by your state and participation by your institution can help with these matters in other SARA states, but even SARA participating institutions still need to go through these steps of inquiry, authorization, and possible exemption in non-SARA states where they are serving students.</p>
<p>How do the limitations of both SARA and State Authorization, if at all, affect medical school clerkships that may be held out of state? Length of time of the learning experience? I don't hear much discussion about these.</p>	<p>Many states define an internship, practicum, externship, student-teaching, etc. as a physical presence and have some sort of requirement for authorization or at least notification of these activities when students are attending an institution that is not domiciled in that same state. SARA allows such placements with some limitations between its member states without the need to seek out additional authorizations from the higher education authorization entity in that state, though with such experiential learning there is usually a requirement to check with and sometimes authorize with the professional licensure board of that profession in the state in which the internship takes place.</p>



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<p>Are there any exemplary complaint processes from institutions that you could point us to</p>	<p>Below are a few examples of complaint processes:</p> <ul style="list-style-type: none"> • Indiana: http://www.in.gov/che/2744.htm • Kansas: http://www.kansasregents.org/state_university_student_complaints • Nebraska: http://www.ccpe.state.ne.us/PublicDoc/Ccpe/Complaint.asp • Wisconsin: http://www.wisconsin.edu/vpacad/PIR/ComplaintForm.htm
<p>will SARA provide authorization to all member states WITHOUT any federal legislation?</p>	<p>I am not sure what you are asking, please contact me (Jenny) and we can discuss this further. My contact information is in the webinar materials.</p>
<p>What if an institution uses generic advertising?</p>	<p>SARA covers all advertising by SARA participant institutions into other SARA states.</p>
<p>If institution offers degree programs as well as certificate/diplomas, does SARA covers certificate/diplomas in states where there are separate agencies for degree and non-degree programs?</p>	<p>Yes. As long as the institution offers degree programs and is therefore eligible for SARA, it may also offer certificate/diploma programs under SARA. The fact that a SARA member state has separate agencies covering the two kinds of programs is irrelevant.</p>



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<p>There are states that as a part of the higher education state authorization agency review of an online program with a field experience that includes a separate review by an application state licensure board. In that model, if the state becomes a SARA State, will the state licensure board app review requirement remain if it was directly tied to state higher education agency program review?</p>	<p>The state licensure boards and agencies are not a part of the SARA agreements and processes. Their requirements are separate and still intact and in force for programs and experiential learning that take place in their states. States such as Ohio or Oregon that currently have a blended or merged oversight process under which a professional licensing board in effect uses the state's postsecondary licensing agency as a pre-screen, or in which the same staff may provide evaluative or oversight functions for both kinds of state government agencies, will need to make some internal revisions to reflect the fact that the education licensing agency will no longer be performing certain functions under SARA. However, nothing in SARA precludes the licensing board from continuing to use the same staff to perform separate functions for the licensing board.</p>
<p>Higher Learning Commission requirements for Accreditation and state authorization requirements? Are they also being aligned with SARA?</p>	<p>The SARA staffs have frequent conversations with the larger accreditors and often discuss the overlap and alignment of requirements. However, there is no official agreement on these matters. SARA use accreditation by on the USDE approved accreditors as one of requirements for an institution to participate in SARA.</p>
<p>Any sites on information on licensure for Physician Assistants?</p>	<p>http://www.nccpa.net/StateBoards</p>
<p>Will SARA cover correspondence (IPEDS definition) programs?</p>	<p>YES</p>
<p>Can you give the site for C-RAC best practices?</p>	<p>http://www.nc-sara.org/files/docs/C-RAC%20Guidelines.pdf</p>
<p></p>	<p></p>



Question	Answer
will SARA states be able to include virtual k12	NO
Does SARA regulate transferability of credits across institutions?	NO
but no minimum threshold that enforcement would involve a number of students greater than X? WCET was mentioning the proposal that involved a minimum of 30 students.	I am not sure what you are asking, please contact me (Jenny) and we can discuss this further. My contact information is in the webinar materials.
Puerto Rico?	I am still researching this question and will try to have an indication of how SARA will proceed in Puerto Rico by the time of our next webinar in fall 2014.