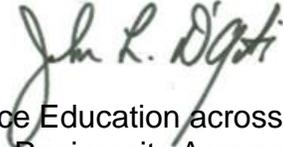




TO: Higher Education Committee

FROM: John L. D'Agati 

SUBJECT: Approval of Distance Education across State Lines:
State Authorization Reciprocity Agreement (SARA)

DATE: January 5, 2015

AUTHORIZATION(S): 

SUMMARY

Issue for Discussion

Should the Board of Regents give further consideration to participation in the National Council for State Authorization Reciprocity Agreements' State Authorization Reciprocity Agreement (SARA) for the purposes of regulating distance education across state lines?

Reason(s) for Consideration

For discussion.

Proposed Handling

A panel including representatives from SUNY, CUNY, the Commission on Independent Colleges and Universities (cicu), and the Association of Proprietary Colleges (APC), will present their perspectives on SARA at the Regents January 2015 Higher Education Committee meeting.

Panel Members:

SUNY: Carey Hatch, Associate Provost for Academic Technology & Information Services. Carey Hatch is currently the Associate Provost for Academic Technologies and Information Services at the State University of New York, System Administration. Carey is currently coordinating the planning and implementation efforts for Open SUNY, the University's strategic initiative to take online learning to scale. Carey also heads the SUNY Office of Library and Information Services, which supports and coordinates a

variety of cooperative library programs and the SUNY Center for Professional Development, which provides professional development services to the University. Carey Hatch received his MLS from the University at Maryland at College Park, and his BA in Philosophy from the State University College of New York at Brockport.

CUNY: Dr. George Otte, University Director of Academic Technology and Associate Dean for Academic Affairs, CUNY's School for Professional Studies.

George Otte is the University Director of Academic Technology at The City University of New York (CUNY). His principal responsibility in that capacity is overseeing online and hybrid (partly online, partly in-class) instruction. Formerly (and additionally) the Academic Director of the CUNY Online Baccalaureate Program (begun in 2006), Dr. Otte is now also the chief academic officer for the CUNY School of Professional Studies (home of all CUNY's fully online degrees, now ten and counting, and including graduate as well as undergraduate degrees). He was named an Online Learning Consortium Fellow in 2013. He is also a faculty member of the CUNY Graduate Center's doctoral programs in English, Urban Education, and Interactive Technology and Pedagogy. Director of Instructional Technology since 2001 (the title was changed to University Director of Academic Technology in 2008), he held various administrative and faculty positions prior to that. Dr. Otte received his Ph.D. from Stanford in 1982.

clcu: David R. Odiorne, MS, DC, Vice President, Institutional Advancement, Special Assistant to the President, New York Chiropractic College.

In nineteen years as an academic administrator and executive, Dr. Odiorne has had the opportunity to provide vision, leadership, and oversight in assessment, curriculum development, pedagogy, student affairs, faculty development, educational technology, institutional effectiveness, institutional advancement, government affairs, regulation and compliance, public relations, and budget management. He has worked extensively in accreditation, having shepherded new programs from concept to full accreditation, led the preparation of self-studies for six different agencies, participated as a site visitor for five agencies, chaired teams for three and served as a commissioner for two professional accrediting agencies.

APC: Dr. Warren Rosenberg, Provost & Vice President of Academic Affairs, The College of Westchester.

Warren Rosenberg, Ph.D., currently serves as Provost and Vice President of Academic Affairs at The College of Westchester and is responsible for providing leadership, budget and supervisory oversight of all academic units, academic support services (library, learning center, advisement, counseling), information technology (academic and administrative computing), and student activities. He formerly served for ten years as Provost and VPAA at Iona College, seven years as Iona's Dean of the School of Arts & Science and, prior to that, as Chair of the Department of Biology. In 2003 he served for six months as Iona's Acting President during the sitting president's sabbatical leave. Dr. Rosenberg has participated on and chaired visiting teams for the NYSED's Office of College and University Evaluation and for the Middle States Commission on Higher Education as well as having served as a member of the New York Regents' Advisory Council on Institutional Accreditation. He earned his M.S. and Ph.D. degrees in Biology at New York University and his undergraduate degree in Biology from the City University of New York. Dr. Rosenberg has served on the Boards

of Rice High School in NYC, the Briarcliff Nursery School, and currently serves on the Board of Richmond Community Services. He has served as President on the Boards of The Metropolitan Association of College and University Biologists and of The Westchester Photographic Society.

Background Information

Over the past several years, the widespread availability of digital and internet-connected technologies has created greater opportunities for institutions of higher education (IHEs) to provide programs of study to students through distance education. The opportunity to offer programs of study through distance education has opened up new opportunities for IHEs, who can potentially enroll students who physically reside in places other than where an IHE is located, including other states or countries.

Being competitive in the national marketplace for distance education is of critical importance for New York State's colleges and universities. Declining population, particularly upstate, and decreases in the number of students projected to graduate from high school over the next several years are prompting IHEs to consider changes in their allocation of resources, recruitment strategies, investment decisions, tuition policies and financial aid as they attempt to maintain their enrollment and remain competitive. One strategy for maintaining or increasing enrollment is the development of new course offerings that may be delivered through distance education to in-state and out-of-state residents.

The approval by the Board of Regents and the Department of a New York State IHE to offer distance education degree programs in-state does not extend its authority to offer online programs to students residing in other states. Because authorization requirements vary from state to state, new challenges have emerged for IHEs in terms of gaining the requisite state approvals to offer distance education to students across state lines. For example, some states may require full and detailed program approval and review processes for out-of-state IHEs seeking to offer distance education to its residents. Other states may additionally require monetary fees from out-of-state IHEs for program proposal review. As is the case in New York State, other states require no specific state approval if the IHE is not establishing a physical presence within the state. Navigating these separate and varied approval processes can be time consuming, cumbersome and costly for New York State IHEs.

New York State residents currently enroll in many distance education programs offered by out-of-state IHEs. Those out-of-state IHEs that establish a physical presence¹ in New York State obtain the approval of the Board of Regents to offer their programs to State residents. The Department determines that these programs meet the Board of Regents standards of program quality before receiving approval by the Board

¹ Establishing a physical presence may include such things as maintaining an instructional site or sponsoring organized activities within the State that are related to the academic program offered, having a representative acting on its behalf within the State to arrange or conduct instructional or academic support activities, or placing students in certain clinical internships related to the licensed professions.

of Regents. Out-of-state IHEs that do not intend to have a physical presence in New York State do not, under current practice, need approval to offer distance education programs to New York State residents. State residents who enroll in these programs have no assurance that the program meets the Board of Regents standards of program quality, and may not be able to access the consumer protections afforded to students enrolled in state-approved IHE degree programs.

For the United States Department of Education (USDE), ensuring the program integrity of distance education across state lines has been a major point of concern related to its expenditure of billions of dollars in federal aid for postsecondary students and their families under Title IV of the Higher Education Act of 1965 (HEA). In October 2010, the USDE promulgated new regulations that would require IHEs providing distance education services, such as online courses, to obtain specific authorization from both the state in which the school was located, and the state(s) in which its students reside. If this regulation had been implemented, IHEs would not have been able to offer federal financial aid to students who were residents in states that did not specifically authorize the distance education programs. Several national higher education associations believed these new regulations, which were to take effect on July 1, 2011, would have imposed significant, and in some instances insurmountable, burdens to online learning programs, and challenged them in a civil action against the USDE. Subsequently, in July 2011, a U.S. District Court vacated the new regulations for state authorization, and they never took effect. It is important to note, however, that these regulations were not vacated on their substance or because USDE lacked authority to impose them. Rather, they were vacated on the procedural basis that USDE did not provide proper public notification of the proposed rule-making. USDE has not yet reintroduced proposed regulations related to authorization of distance education. However, even in the absence of federal regulation of distance education related to Title IV federal student aid, the issues and challenges of state authorization remain since IHEs are still required to meet the varied approval requirements that exist from state to state.

As one solution to the problem of interstate authorization of distance education, the higher education sectors in New York State have expressed interest in participating in the National Council for State Authorization Reciprocity Agreements' State Authorization Reciprocity Agreement (SARA). Since state membership in SARA is a requirement for individual IHEs to participate, the higher education sectors have urged the Department and Board of Regents to consider New York State's participation. This item will provide an overview of SARA and highlight key issues for consideration by the Regents related to New York State's potential participation as a member of SARA.

The National Council for State Authorization Reciprocity Agreements and SARA

As an outgrowth of the national and state-level policy conversations and concerns regarding the authorization and regulation of distance education across state lines, the National Council for State Authorization Reciprocity Agreements was formed. The Council was formed with start-up funding from the Lumina Foundation, and is

moving toward a membership-driven funding base from the states and IHEs that become members.

The Council is governed by a 21-member board of directors (see Appendix A). The Board of Directors has been nominated by representatives from the four regional higher education compacts - the Midwestern Higher Education Compact (MHEC); New England Board of Higher Education (NEBHE); Southern Regional Board of Higher Education (SRBHE); and the Western Interstate Commission on Higher Education (WICHE) - the Commission on the Regulation of Postsecondary Distance Education, and the Council of Governments. The Council's primary function is to coordinate and administer the State Authorization Reciprocity Agreement (SARA).

According to the Council:

SARA is an agreement among member states, districts and territories that establishes comparable national standards for interstate offering of postsecondary distance education courses and programs. It is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state.

Membership in SARA is voluntary. The Council provides an opportunity for a state to join as a member, provided it:

- agrees to all SARA policies and standards without modification including but not limited to required institutional guidelines for distance education;
- establishes a clearly articulated and comprehensive state process for initial institutional approval and ongoing oversight, including the resolution of consumer complaints;
- assures that it will work cooperatively with other SARA states to enable success of the initiative, including data-sharing upon request; and
- belongs to, or pays an annual affiliation fee to, a regional compact to facilitate national SARA coordination.

SARA is administered by the four regional higher education compacts (MHEC, NEBHE, SRBHE, and WICHE). New York, New Jersey, and Pennsylvania are the only states not currently members of a regional compact. Individual states, whether members of a regional compact or not, must explicitly join SARA to take part in interstate reciprocity under SARA. Because New York is not a member of a regional compact, in order to participate in SARA, the Department would have to enter into an affiliation agreement with a regional compact to cover interstate SARA activity, and pay an annual fee to that compact (\$50,000 for the first year). In addition, once a state joins SARA, each individual IHE in that state that wishes to participate in SARA must apply and pay a fee to SARA (described below).

In order to participate in SARA, the Board of Regents would need to agree to all SARA policies and standards. The SARA policies and standards include common definitions for key terms for interstate distance education, conditions for state membership and institutional participation, guidelines for consumer protection procedures, and identification of data-reporting procedures for IHEs. In addition, the SARA policies and standards, require that the state apply the guidelines for distance education which have been put forth by the Council on Regional Accrediting Commission (C-RAC). The C-RAC guidelines represent institutional-level standards for distance education. These guidelines are not specific to individual degree programs. Under SARA, an IHE must meet both institutional C-RAC guidelines and its home state's degree program quality standards. (See Appendix B for the complete SARA policies and standards, and the C-RAC guidelines).

If New York State were to join as a member of SARA, the Department would be responsible for managing an annual application and approval process for individual New York State IHEs wishing to be members of SARA. New York State IHEs would be required to apply through the Department, and if approved by the Department, would be authorized to offer distance education in other SARA member states, without the burden of seeking state-specific approvals. In return, New York State, as a member of SARA, would accept IHEs approved by other SARA participating states to offer distance education to New York State residents.

It is important to note that SARA only applies to IHEs that do not have or establish a physical presence in a member state. Should New York State join as a member of SARA, it would assume a new scope of responsibilities with regard to out-of-state IHEs that do not have a physical presence in New York State. The Department would be responsible for managing and addressing complaints from out-of-state residents made against New York State IHEs that are part of SARA. In addition, the Department may also be responsible for facilitating New York State residents' complaints against out-of-state IHEs in other SARA member states and the sharing of reports and data concerning complaints with the Council or other SARA states.

It is also important to note that SARA has no effect on state professional licensing or teacher certification requirements. Any institution operating under SARA that offers courses or programs potentially leading to professional licensure or teacher certification must keep all students, applicants and potential students who have contacted the institution about the course or program informed as to whether such offerings actually meet state licensing or certification requirements.

In order to join as a member of SARA, the Department would be required to pay an annual affiliation fee to a regional compact to cover the costs of national SARA administration and coordination. In addition, individual IHEs would be required to pay an annual membership fee to participate in SARA. The current IHE membership fees are between \$2,000 and \$6,000, annually.

Issues to Consider Related to State Participation in SARA

1. Reducing administrative barriers for IHEs seeking interstate approval

If New York State were to participate as a member of SARA, it is clear that many of the administrative barriers that New York State IHEs now face if they want to enroll students in distance education programs would be removed, facilitating their ability to offer programs to students residing in other SARA member states. While there may be many states considering SARA participation, currently only 18 states are members of SARA (see Appendix C). Thus, SARA membership may not fully solve the problem of interstate approval, as individual IHEs would still be responsible for seeking and obtaining approval from non-SARA states.

2. Ensuring Comparable Quality Consistent with Board of Regents Standards

Under SARA, New York State IHEs applying through the Department for approval to offer programs to other SARA member states would be held accountable for meeting the SARA policies and standards, including the national C-RAC guidelines, and the Board of Regents standards of program quality put forth in Part 52 of the Commissioner's Regulations. However, an out-of-state IHE would be required to meet the national C-RAC guidelines and its home state's program-level standards for authorization, which may differ from those in Part 52 of the Commissioner's Regulations.

Since the Board of Regents does not currently require any approval for out-of-state IHEs without physical presence in New York State, identification from another SARA member state that its IHEs have met the common national SARA standards and C-RAC guidelines, may provide a new level of quality assurance for out-of-state distance education programs. However, under SARA, the Board of Regents would accept other states' degree program-level standards of quality in lieu of its own, which, if perceived to be less rigorous, may create tension between the requirements for in-state traditional and distance education programs and the requirements for out-of-state programs to operate.

3. New State-level Administrative Responsibilities and Costs

The currently reported cost for New York State to affiliate with a regional compact for the purposes of SARA is \$50,000 annually. In addition, SARA participation would require the Department to establish a new system for SARA application review, approval, annual renewal, and ongoing oversight, which will create additional administrative responsibilities for the Department. Without new resources, including new professional staff to administer SARA work, there may be significant negative impact on the Department's ability to provide effective and timely management of its existing responsibilities, including program approval and registration, institutional accreditation, field engagement via canvass and master planning, guidance to the field, and in-state complaint resolution.

The Board of Regents would have the option of charging participant IHEs a fee to cover the Department's costs in administering SARA, however, without a state appropriation; we could not access these resources.

4. Meeting SARA expectations for complaint resolution and data sharing and reporting.

In order to participate in SARA, New York State would need to agree to implement a process for the investigation and resolution of complaints that a New York State institution is operating a course or program contrary to SARA standards and practices. However, the specifics of this process are not clear. The Department may also be required to provide assistance to other SARA states that have received complaints from New York State residents.

In addition, under SARA, the Department may have reporting and data-sharing requirements with the regional compact. Should the Board of Regents wish to participate in SARA, more information regarding this aspect of the work will be necessary.

Next Steps

The Department is seeking direction on how the Board of Regents would like to proceed regarding New York State's participation in SARA. Are there specific policy or program issues that the Board would like further analysis and information on before making a decision regarding participation?

NC-SARA BOARD

The NC-SARA board is a nationwide coordinating entity of 21 leaders from various sectors of higher education and government that help guide the activities of SARA and assures the four regional compacts establish uniform standards and procedures for accepting and monitoring states participating in each of their respective regional reciprocity agreements.

Barbara Ballard
State Representative
Kansas Legislature

Chris Bustamante
President
Rio Salado College

Crady deGolian
Director/National Center for
Interstate Compacts
Council of State Governments

Kathryn G. Dodge
Founder and Principal
Dodge Advisory Group, LLC

Dianne Harrison
President
California State University, Northridge

Terry Hartle
Senior Vice President
American Council on Education

***Larry Isaak** (Treasurer)
President
Midwestern Higher Education Compact

Arthur K. Kirk, Jr.
President
Saint Leo University

***Paul Lingenfelter** (Chair)
President Emeritus
State Higher Education Executive
Officers Association

David A. Longanecker
President
Western Interstate Commission for
Higher Education

Teresa Lubbers
Commissioner
Indiana Commission for Higher
Education

***M. Peter McPherson** (Vice Chair)
President
Association of Public and Land-grant
Universities

Patricia O'Brien
Senior Vice President
New England Association of Schools
and Colleges

Pam Quinn
Provost/CEO LeCroy
Dallas County Community College District

George E. Ross
President
Central Michigan University

***Paul Shiffman**
Chief Executive Officer
Presidents' Forum

David S. Spence
President
Southern Regional Education Board

Helena Stangle
Senior Director, Government Relations
and Community Relations
DeVry Education Group

***Michael Thomas**
President and CEO
New England Board of Higher Education

***Leroy Wade**
Deputy Commissioner
Missouri Department of Higher
Education

***Belle Wheelan**
President
Southern Association of Colleges and
Schools Commission on Colleges



**National Council for
State Authorization
Reciprocity Agreements**

*A voluntary, regional approach
to state oversight of distance education*

*Member of NC-SARA Executive Committee



National Council for State Authorization Reciprocity Agreements

A voluntary, regional approach to state oversight of distance education

State Authorization Reciprocity Agreements

Policies and Standards

A State Authorization Reciprocity Agreement (SARA) is an agreement among its member states, districts and U.S. territories that establishes comparable national standards for interstate offering of postsecondary distance-education courses and programs. It is intended to make it easier for students to take online courses offered by postsecondary institutions in a state other than the one where they reside. SARA is overseen by a national council and administered by four regional higher education compacts, MHEC, NEBHE, SREB and WICHE. The four SARA agreements of those compacts are collectively treated as a plural, the Agreements.

Section 1. Definitions

1. “Accredited” means: holding institutional accreditation by name as a U.S.-based institution from an accreditor recognized by the U.S. Department of Education.
2. “Approve” or “Approval” in the context of an institutional application to operate under SARA means: a written statement by a home state that an institution meets the standards required by SARA and is eligible to operate under SARA.
3. “Authorized” means: holding a current valid charter, license or other written document issued by a state, the federal government or a recognized Indian tribe, granting the named entity the authority to issue degrees and operate within a state or jurisdiction.
4. “Bylaws” means: those bylaws established by the National Council for SARA for its governance, or for directing or controlling its actions and conduct.
5. “Charter” means: a document bearing the word Charter issued by proper governmental authority that names a college or university as a degree-granting institution authorized to operate under the laws of the issuing jurisdiction.
6. “Complaint” means: a formal assertion in writing that the terms of this agreement, or of laws, standards or regulations incorporated by this agreement, are being violated by a person, institution, state, agency or other organization or entity operating under the terms of this agreement.

7. "Council" means: the National Council for State Authorization Reciprocity Agreements, or in short form National Council for SARA, or NC-SARA.
8. "[C-RAC Guidelines](#)" and other uses of "[C-RAC](#)" refers to the [Interregional Guidelines for the Evaluation of Distance Education Programs \(Online Learning\)](#) for best practices in postsecondary distance education developed by leading practitioners of distance education and adopted by the [Council of Regional Accrediting Commissions \(C-RAC\)](#).
9. "Credits" means: numeric descriptors of completion of academic work applicable toward a degree, including the Carnegie unit system.
10. "Degree" means: An award conferred at the Associate level or higher by an institution as official recognition for the successful completion of a program of studies. (Based on IPEDS definition.)
11. "Distance Education" means: instruction offered by any means where the student and faculty member are in separate physical locations. It includes, but is not limited to, online, interactive video or correspondence courses or programs.
12. "Faculty" means: a professional individual employed by or contracting with an institution primarily to teach, conduct research or provide related professional education services.
13. "Home State" means: a member state where the institution holds its legal domicile. To operate under SARA an institution must have a single home state.
14. "Host State" means: a member state in which an institution operates under the terms of this agreement, other than the home state.
15. "Hybrid" means: an educational program or course that includes both face-to-face and distance education. Also known by the name "blended" and, sometimes, other terms.
16. "Institution" means: a degree-granting postsecondary entity.
17. "Legal Domicile" of an institution for purposes of SARA eligibility means the state in which the institution's principal campus holds its institutional accreditation and, if applicable, its federal OPEID number. In the event that the OPEID number is assigned to a campus that is in a different state than the principal accredited campus, the SARA committees of the affected regional compacts shall determine which is the home state for purposes of SARA.
18. "Member State" means: any state, district or territory that has joined this agreement.
19. "Non-degree award" means: a formal postsecondary award that does not carry the designation of Associate degree or higher.
20. "Operate" means: activities conducted by an institution in support of offering distance education degree or non-degree courses or programs in a state, including but not limited to instruction, marketing, recruiting, tutoring, field experiences and other student support services.

21. “Physical Presence” means: a measure by which a state defines the status of an educational institution’s presence within the state. See the special section on physical presence below for the SARA standard.
22. “Portal Agency” means: the single agency designated by each SARA member state to serve as the interstate point of contact for SARA questions, complaints and other communications.
23. “Regional Compact” means: the New England Board of Higher Education, Midwestern Higher Education Compact, Southern Regional Education Board or Western Interstate Commission for Higher Education.
24. “Rule” means: a written statement promulgated by the National Council for SARA that is of general applicability; implements, interprets or prescribes a policy or provision of the agreement; or an organizational, procedural, or other requirement of the Council, including these policies and standards.
25. “State” means: any state, commonwealth, district, or organized territory of the United States.
26. “Supervised field experience” means: a student learning experience under the oversight of a supervisor, mentor, faculty member or other qualified professional, located in the host state, who has a direct or indirect reporting responsibility to the institution where the student is enrolled, whether or not credit is granted. Examples include practica, student teaching, or internships. Independent off-campus study by individual students not engaged in a supervised field experience is exempt from requirements of this compact and does not constitute a physical presence of a postsecondary institution in a SARA member state.

Section 2. States and Membership

1. Eligibility for membership

- a. The state must be a member of one of the four interstate Regional Compacts that administer SARA, or must have concluded an agreement with such a compact covering SARA activity.
- b. The state agency responsible for joining SARA must have the legal authority under state law to enter an interstate agreement that covers all of the elements of SARA.

NOTE: The District of Columbia and U.S. territories are also eligible to join SARA.

2. Member withdrawal

A member state may withdraw from SARA by providing 90 days written notice from the appropriate state authority to its Regional Compact. Any institution operating under SARA from that state may continue to do so to the conclusion of its current academic term or 90 days after the date of receipt of notice of withdrawal, whichever is later, but not to exceed six months from the date the notice was received by the Regional Compact. An institution that withdraws from SARA partway through its participation year receives no fee refund.

3. Member removal

A member state may be removed from SARA membership by its Regional Compact if it ceases to abide by the requirements of SARA. The effect of removal on students and institutions will follow the same standards as set forth for **Withdrawal**.

4. Application

States apply for SARA membership using a uniform SARA application process through which a state will be required to demonstrate to its Regional Compact that it meets the standards established for participation in the interstate reciprocity agreement.

5. Functional responsibilities of states

- a. The state accepts institutional accreditation by an accrediting body recognized by the U.S. Secretary of Education as sufficient, initial evidence of academic quality for approving institutions for participation in SARA.
- b. The state considers applications from degree-granting institutions of all sectors (public, private non-profit, and private for-profit) on the same basis and approves institutions that meet SARA standards and agree to SARA processes and commitments without differentiating by sector.
- c. For private institutions, the state accepts an institutional federal financial responsibility rating of 1.5 (or 1.0 with justification) as sufficient financial stability to qualify for participation in SARA. In the event that an institution does not participate in federal Title IV financial aid and therefore has no federal responsibility rating, the state must calculate this rating before allowing an institution to participate in SARA.

NOTE: This SARA policy does not preclude a state from requiring a higher rating for nonpublic providers operating in the state as their home state. In that case, institutions operating from that state under SARA would have a higher required score, not because of SARA rules, but because of the home state's law applicable to all providers.

- d. The state has a clearly articulated and comprehensive state process for consumer protection in regard to SARA activities, both with respect to initial institutional approval and on-going oversight, including the resolution of consumer complaints in all sectors.

NOTE: The problem-solving methods need not be identical for all institutions, as different boards or agencies may be involved depending on the nature of the problem, but the authority of the state to resolve complaints related to SARA activity must be substantially the same for all institutions.

- e. The state designates a "portal agency" to coordinate SARA matters for the state and provide a principal point of contact for resolution of student complaints. The portal agency has the following duties:
 - A. Serve as the point of contact for all other SARA member states and their agencies for questions about SARA within its state;

- B. Determine whether an institution in its state is eligible for participation in SARA, and lead any investigations regarding whether an institution is in compliance with SARA rules and policies;
- C. Serve as the initial contact point for complaints about any institutions in the state that are operating under SARA; and
- D. Collect and manage any in-state fees¹ assessed on participating institutions for oversight of SARA.

NOTE: The designated portal agency need not itself be responsible for all oversight activities of SARA providers inside the state, and need not have a governance role with any institution, but will be the SARA portal for that state.

- f. The state agrees that it will work cooperatively with other SARA states, Regional Compacts and the National Council for SARA to enable success of the initiative. The state will follow up on requests for information or investigation from other SARA member states or any SARA regional or national office, providing such data or reports as are required.
- g. The state agrees that it will not impose on an institution operating under SARA from another state any requirements, standards, fees or procedures other than those set forth in SARA policies and rules. This does not preclude the state from enforcing its laws against nondomestic institutions in non-educational subject areas outside those covered by SARA.
- h. The state agrees to require each SARA applicant institution to apply for state approval using the standard SARA institutional application, including agreement to operate under the [C-RAC guidelines](#).
- i. A state, at its discretion, may approve an institution to participate in SARA on provisional status (See Section 3(2) below).

Section 3. Institutions and Participation

1. Eligibility

Any degree-granting institution based in the United States, holding proper authorization from Congress, a U.S. state or a federally recognized Indian tribe and holding accreditation from an accrediting association recognized by the U.S. Secretary of Education is eligible to apply to its home state to participate in SARA if that state is a SARA member. To be eligible for offer under SARA, distance education must originate inside the United States or a U.S. territory. Ownership of an institution located outside the United States or its territories by a U.S. institution does not qualify the nondomestic institution to operate under SARA.

2. Provisional admission of an institution

- a. A state, at its discretion, may approve an institution applying for initial participation in SARA to participate on provisional status in any of the following circumstances:
 - 1. If the institution is on probationary status or the equivalent with its institutional accrediting association,

¹ It does not collect the fees paid by institutions directly to the National Council for SARA.

- b. If the institution is currently using a letter of credit or is under a cash management agreement with the U.S. Department of Education,
 - c. If the institution is the subject of a publicly announced investigation by a government agency, and the investigation is related to the institution's academic quality, financial stability or student consumer protection,
or
 - d. If the institution is the subject of a current investigation by its home state related to the institution's academic quality, financial stability or student consumer protection.
2. States shall notify their regional compact and NC-SARA of their admission of an institution on provisional status. The regional compact and NC-SARA will provide indication of the institution's provisional status on their SARA websites.
 3. An institution admitted to SARA participation in provisional status is subject to such oversight measures as the home state considers necessary for purposes of ensuring SARA requirements are met regarding program quality, financial stability and consumer protection, including enrollment limits if deemed necessary. The home state shall report to its regional SARA committee at least once a year on the status of any institutions admitted in provisional status.
 4. An institution admitted to SARA in provisional status shall remain in that status for a period not to exceed one year, Section 4 notwithstanding.
 5. In the event that its home state determines that an institution on SARA provisional status is no longer subject to any of the conditions set forth in Section 1, its home state shall remove the institution's designation of provisional status and shall notify the regional compact and NC-SARA.
 6. If an institution on SARA provisional status is found by its home state to not meet the requirements of SARA, the home state shall disallow any further enrollments under SARA and shall:
 - a. Remove the institution from SARA participation and notify its regional compact and NC-SARA, or
 - b. Allow the institution a period of time not to exceed 12 months in which to come into compliance with SARA standards under state supervision. Only one such grace period is allowed in any three-year period.
 7. If an institution on SARA provisional status is found by its home state to not meet the requirements of SARA, the home state shall allow any students enrolled in the institution under SARA at the time of the finding of noncompliance a period of six months in which to conclude their work at the institution, irrespective of the institution's SARA status.

3. Participation Fees

- a. Fees for an institution to participate in SARA potentially consist of two parts. The first is a required SARA fee paid to the National Council for SARA. This annual fee² is 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:

² Fees may be revised by the National Council for SARA as needed beginning in 2016.

Enrolled FTE.....Annual Fee

Under 2,500.....	\$2,000
2,500-9,999	\$4,000
10,000 or more.....	\$6,000

- b. Institutions that pay SARA participation fees prior to September 1, 2014 receive 18 months of initial approval to operate under SARA instead of 12 months. Renewals are on an annual basis.
- c. States have the option of charging SARA participant institutions a fee to cover the state’s costs in administering SARA.

4. Loss of institutional eligibility

An institution that does not renew its participation agreement with its home state or pay its required SARA fees annually is no longer eligible to participate in SARA. At the time of annual renewal, the state must determine whether the institution still meets SARA requirements. An institution can also be removed at any time by its home state or by the SARA Regional Compact under which it operates for violation of SARA standards. An institution that is removed from eligibility partway through a period of approval receives no fee refund.

NOTE: The National Council for SARA office will maintain a list of SARA participant institutions.

5. Limitations of SARA

SARA applies solely to distance education activity conducted across state lines. It does not apply to distance education activity inside a state or to on-ground campuses. For purposes of SARA, “distance education” includes a limited number of group activities conducted for short periods on the ground. See Section 3, subsections 6, 7, 9 and the **Physical Presence** standards in Section 5 for details.

6. Programs leading to licensure

SARA has no effect on state professional licensing requirements. Any institution operating under SARA that offers courses or programs potentially leading to professional licensure must keep all students, applicants and potential students who have contacted the institution about the course or program informed as to whether such offerings actually meet state licensing requirements. This must be done in one of two ways:

- a. The institution may determine whether the course or program meets the requirements for professional licensure in the state where the applicant or student resides and provide that information in writing to the student, or
- b. The institution may notify the applicant or student in writing that the institution cannot confirm whether the course or program meets requirements for professional licensure in the student’s state, provide the student with current contact information for any applicable licensing boards, and advise the student to determine whether the program meets requirements for licensure in the state where the student lives.

Failure to provide proper notice in one of these two ways invalidates the SARA eligibility of any course or program offered without the proper notice.

7. Field trips and seasonal residential activity

SARA covers class field trips across state lines among member states, but does not cover full-scale residency programs such as a summer session at a field station.

8. Short courses and seminars

Physical presence under SARA is not triggered if the instruction provided for a short course or seminar takes no more than 20 classroom hours. Class meetings during a full-term course do not trigger physical presence if the instructor and students physically meet together for no more than two meetings, totaling less than six hours. Apparent abuses of these provisions may be brought to the attention of the home state.

9. Third-party providers

Contacts between a third-party provider of educational services and any SARA office or state must be made via the degree-granting institution that operates under SARA. A third-party provider may not represent an institution regarding any subject under SARA operating policies to any SARA office or any state operating under SARA. The institution that transmits a course is considered the degree-granting institution for purposes of this section.

NOTE: A SARA-approved institution may hire third-party providers to offer or support instruction contained within a program that is otherwise SARA-eligible, assuming that the instruction otherwise meets SARA standards, institutional requirements and requirements of accrediting bodies. However, the degree-granting institution cannot delegate any SARA-related problem-solving functions to a third-party provider, nor may it use the third-party provider as its vehicle for contacting or working with a state.

10. Offerings on military bases

All distance education course offerings provided interstate by a SARA participant institution to federal employees and their dependents located on a U.S. military facility or vessel in a SARA member state are covered by SARA. If such offerings are open to the general public for enrollment, SARA does not apply and state law where the facility or vessel is located applies.

Section 4. Consumer protection

SARA *Policies and Standards*, including those for consumer protection and the resolution of complaints, apply to interstate distance education offered by participating SARA institutions to students in other SARA states. Only those complaints resulting from distance education courses offered by participating institutions to students in other SARA states come under the terms of the agreement. Complaints about a SARA institution's in-state operations are to be resolved under the state's provisions, not those of SARA.

SARA consumer protection provisions require the home state, through its SARA “portal” entity or agency, to investigate and resolve allegations of dishonest or fraudulent activity by a provider, including the provision of false or misleading information.

Consumer protection within SARA, in addition to dealing with alleged fraudulent activity, also provides for the investigation and resolution of complaints that an institution is operating a course or program contrary to practices set forth in the [C-RAC Guidelines](#) (see below) in such a way that a student is harmed. Examples of issues that may arise in regard to alleged fraudulent activity or more general complaints include, but are not limited to:

- a. Veracity of recruitment and marketing materials;
- b. Accuracy of job placement data;
- c. Accuracy of information about tuition, fees and financial aid;
- d. Complete and accurate admission requirements for courses and programs;
- e. Accuracy of information about the institution’s accreditation and/or any programmatic/specialized accreditation held by the institution’s programs;
- f. Accuracy of information about whether course work meets any relevant professional licensing requirements or the requirements of specialized accrediting bodies;
- g. Accuracy of information about whether the institution’s course work will transfer to other institutions; and
- h. Operation of distance education programs consistent with practices expected by institutional accreditors (and, if applicable, programmatic/specialized accreditors) and/or the [C-RAC Guidelines](#) for distance education.

1. Responsibilities for resolving complaints

Initial responsibility for the investigation and resolution of complaints resides with the institution against which the complaint is made. Further consideration and resolution, if necessary, is the responsibility of the SARA portal agency, and other responsible agencies of the institution’s home state (see the following section: Complaint Resolution Processes). The portal agency is responsible for staffing the investigation and resolution of complaints that are not resolved at the institutional level. (The portal agency may enlist the assistance of other responsible entities in the state in carrying out the work of complaint resolution.) Institutions operating under SARA shall make their and SARA’s complaint resolution policies and procedures readily available to students taking courses under SARA provisions.

2. Complaint Resolution Processes

- a. Complaints against an institution operating under SARA go first through the institution’s own procedures for resolution of grievances.
- b. Complaints regarding student grades or student conduct violations are governed entirely by institutional policy and the laws of the SARA institution’s home state.
- c. If a person bringing a complaint is not satisfied with the outcome of the institutional process for handling complaints, the complaint (except for complaints about grades or student conduct violations) may be appealed, within two years of the incident about which the complaint is made, to the SARA portal agency in the home state of the institution against which the complaint has been lodged. The resolution of the complaint by that SARA portal agency, through its SARA

complaint resolution process, will be final, except for complaints that fall under the provisions of (g), below.

- d. While the final resolution of the complaint rests with the SARA portal agency in the home state of the institution against which the complaint has been lodged, nothing precludes the state in which the complaining person is located from also working to resolve the complaint, preferably through that state's SARA portal agency. Indeed, it is expected that SARA states will facilitate the resolution of any complaints brought to their attention.
- e. While final resolution of complaints (for purposes of adjudication of the complaint and enforcement of any resultant remedies or redress) resides in certain cases with institutions (complaints about grades or student conduct violations), or more generally with the relevant institution's home state SARA portal agency (all other complaints), the regional compact(s) administering SARA may consider a disputed complaint as a "case file" if concerns are raised against a participating state with regard to whether that state is abiding by *SARA Policies and Standards*. The regional compact may review such complaints in determining whether a state under its purview is abiding by the SARA standards. Similarly, a complaint "case file" may also be reviewed by NC-SARA in considering whether a regional compact is ensuring that its member states are abiding by the SARA standards required for their participation in the agreement.
- f. SARA shall develop policies and procedures for reporting the number and disposition of complaints that are not resolved at the institutional level. Such data will create transparency and can be used in determining whether a regional compact is ensuring that its SARA member states and those states' institutions are abiding by the standards required for participation in the agreement.
- g. Nothing in *SARA Policies and Standards* precludes a state from using its laws of general application to pursue action against an institution that violates those laws.

3. Oversight of complaint investigation

Investigation of a SARA-related complaint against an institution requires that a board or agency outside the institution's immediate management be available to handle complaints that are not resolved within the institution. A system board responsible for more than one separately accredited institution may serve this role under SARA provisions. A board responsible for only one accredited institution, or which lacks enforcement authority over an institution, cannot serve as the SARA external oversight agency for such an institution. In such circumstances, the institution's home-state SARA portal agency may serve that function.

4. Incorporation of Existing Guidelines

The *Interregional Guidelines for the Evaluation of Distance Education (Online Learning)* (referred to as "[C-RAC Guidelines](#)" in this document) adopted by the Council of Regional Accrediting Commissions are incorporated in the requirements of SARA. States that join SARA need to base their oversight of SARA activity and their investigative actions on the following expectations.³ The president or chief academic officer of each institution participating in SARA (whether accredited by a "regional" or other recognized

³ The complete [C-RAC](#) framework and examples of good practices shall be made a part of the institutional application process. The numbering system used in this section is retained from the [C-RAC](#) framework.

accreditor) shall attest that their institution meets and agrees to comply with the following [C-RAC](#) provisions.

1. Online learning is appropriate to the institution's mission and purposes.
2. The institution's plans for developing, sustaining, and, if appropriate, expanding online learning offerings are integrated into its regular planning and evaluation processes.
3. Online learning is incorporated into the institution's systems of governance and academic oversight.
4. Curricula for the institution's online learning offerings are coherent, cohesive, and comparable in academic rigor to programs offered in traditional instructional formats.
5. The institution evaluates the effectiveness of its online learning offerings, including the extent to which the online learning goals are achieved, and uses the results of its evaluations to enhance the attainment of the goals.
6. Faculty responsible for delivering the online learning curricula and evaluating the students' success in achieving the online learning goals are appropriately qualified and effectively supported.
7. The institution provides effective student and academic services to support students enrolled in online learning offerings.
8. The institution provides sufficient resources to support and, if appropriate, expand its online learning offerings.
9. The institution assures the integrity of its online offerings.

Section 5. Physical presence standards

Generally, an institution has physical presence when it operates a campus, branch instructional facility whether leased or owned, or administrative office within the boundaries of a state. However, because the specific definitions of physical presence currently vary greatly from state to state, especially with regard to out-of-state institutions that seek to conduct any activity within another state, SARA has established its own uniform standard for physical presence vs. distance education. For purposes of participation in SARA, this standard applies, but it does not affect the application of existing state laws to colleges that choose to operate outside of SARA or which are based in states that are not SARA members.

- 1. For purposes of SARA, an institution has physical presence and therefore must meet the state's current non-SARA requirements if it does any of these things in a state:**
 - a. Establishes a physical location for students to receive synchronous or asynchronous instruction;
 - b. Requires students to physically meet in a location for instructional purposes more than twice per full-term (quarter or semester) course for a total of more than six hours;
 - c. Establishes an administrative office;

- d. Provides information to students for the purpose of enrolling students, or provides student support services, from a physical site operated by or on behalf of the institution in the state;
- e. Offers a “short course” that requires more than 20 contact hours;
- f. Provides office space to instructional or non-instructional staff;
- g. Maintains a mailing address or phone exchange in a state.

2. An institution does not have physical presence, and is therefore covered by SARA in SARA member states, if it is only:

- a. Offering courses to individuals via distance education in ways that do not require students to gather physically in groups, excepting the special provisions in Section 5(1);
- b. Advertising to students whether through print, billboard, direct mail, internet, radio, television or other medium;
- c. Offering distance education courses on a military base if enrollment in such courses is limited to federal employees and family members;
- d. Maintaining a server, router or similar electronic service device housed in a facility that otherwise would not constitute physical presence (the presence of a server or similar pass-through switching device does not by itself constitute the offering of a course or program in that state);
- e. Having faculty, adjunct faculty, mentors, tutors, or other academic personnel residing in a member state (the presence of instructional faculty in a state, when those faculty teach entirely via distance-education and never meet their students in person, does not establish physical presence for purposes of this agreement);
- f. Holding proctored exams on behalf of the institution in the host state;
- g. Having contractual arrangements in the home or host state.
- h. Offering educational field experiences for students, including an educational field trip arranged for a group of students that are normally in residence at an institution in another state;
- i. Operating limited supervised field experiences. For purposes of this agreement, interstate supervised field experiences originating from campus-based programs in a member state are considered to be distance education and not to establish physical presence if they:
 - A. place fewer than ten students from each program in a member state who are physically present simultaneously at a single facility or site in a host state, and
 - B. do not involve any multi-year contract between a sending institution and a field site.
- j. Using recruiters in a SARA member state. (This provision is not restricted to recruiting for courses or programs offered under SARA.)

Section 6. Data Submission Requirements for Institutions Participating in the State Authorization Reciprocity Agreements (SARA)

Institutions participating in the State Authorization Reciprocity Agreements (SARA) shall annually report to the National Council for State Authorization Reciprocity Agreements the number of students enrolled in the institution via distance education delivered outside the home state of the institution, disaggregated by state, territory, or district in which the students reside. This data shall be reported annually to NC-SARA one month following the due date for institutions to make their fall enrollment reports to the federal government’s Integrated Postsecondary Education Data System (IPEDS). The first submission will be in fall, 2015.

Prior to such submission, NC-SARA will provide each SARA institution a data reporting manual and a data usage agreement to be signed by responsible parties of the SARA institution and NC-SARA .

NC-SARA on its website will report those enrollments, by institution, in the following format:

Out-of-State enrollments of SARA institutions via distance education						
	SARA State 1 (example, Oregon)	SARA State 2	SARA State 3	SARA State 4	Total in Non-SARA States	Total SARA + Non-SARA
Alaska						
SARA Institution 1						
SARA Institution 2						

NC-SARA will not collect individually identifiable student data and will comply with the Family Educational Rights and Privacy Act (FERPA).

Beginning in fall 2016, institutions participating in SARA will be required to further disaggregate the above enrollment data by broad program of study.

NC-SARA will invite SARA institutions to provide a link to the institution’s distance education home page to assist students in determining programs of study that can be completed at a distance. NC-SARA will include such provided links on its listing of SARA institutions on www.nc-sara.org

Section 7. Complaint Resolution Reporting for States Participating in SARA

States participating in the State Authorization Reciprocity Agreements shall report the following information to the National Council for State Authorization Reciprocity Agreements on a quarterly basis:

1. The number of complaints from out-of-state students, by institution, appealed to the state’s SARA portal agency after the person making the complaint has completed the institution’s and/or governing board’s (if relevant) complaint resolution process;
2. The resolution of those complaints in the aggregate, by SARA institution: number resolved in favor of the person making the complaint, number resolved in favor of the institution, number resolved by agreement, and number pending resolution.
3. The reporting by SARA states of such complaints will begin in April 2015.

The number of complaints appealed to the portal agency will be placed within the context of the institution’s total out-of-state distance education enrollments, as follows:

Student complaints appealed to SARA portal agencies (Date to Date)*						
	Number of complaints appealed to the portal agency*	Institutional out-of-state distance ed enrollments	Number resolved in favor of student	Number resolved in favor of institution	Number of negotiated resolutions	Number still under consideration
Alaska						
SARA Institution 1						
SARA Institution 2						

* After completion of the institution's full complaint resolution process.

NC-SARA will not collect individually identifiable student data and will comply with the Family educational Rights and Privacy Act (FERPA).

Section 8. Revisions to Policies and Standards

Changes to these Policies and Standards shall be classified as **Corrections** or **Revisions**. Corrections represent minor technical fixes or clarifications that do not represent a substantive change in policy, standards or procedures. Revisions represent substantive changes in policy (or new policies), standards or procedures. The last page of this document shall contain a running list showing the date that any Corrections or Revisions were made, and referring to any documentation of such changes, in order to maintain a record of such changes. That record follows this section.

Policies and Standards adopted by the National Council for SARA November 1, 2013, published in final form with minor revisions and corrections by NC-SARA staff November 18, 2013.

Record of Corrections

- November 19, 2013 1) Staff corrected section heading numbering, which was missing Section 4. We also adjusted FAQ references to match corrected headings. ALC
- 2) Addition of commas to unify the format of the FTE and fee schedule. ALC

Record of Revisions

February 10, 2014.....Revision of SARA's Policies and Standards for Consumer Protection

- May 14, 2014 1) Policy Added Section 6: Data Submission Requirements for Institutions Participating in SARA
- 2) Policy Added Section 7: Complaint Resolution Reporting for States Participating in SARA
- August 19, 2014 Revision of SARA's Policies and Standards Section 3: Institutions and Participation, item 9: Offerings on military bases
- December 5, 2014..... 1) Definition Added for the term “Legal Domicile”
- 2) Addition to SARA's Policies and Standards Section 2: States and Membership, item 5: Functional responsibilities of states (i)
- 3) Addition to SARA's Policies and Standards Section 3: Institutions and Participation, item 2: Provisional admission of an institution. Note: Renumbering of existing content.
- 4) Addition to SARA's Policies and Standards Section 5: Physical presence standards, item 2 (j)
- 5) Revision of SARA's Policies and Standards Section 6: Data Submission Requirements for Institutions Participating in SARA
- 6) Revision of SARA's Policies and Standards Section 7: Complaint Resolution Reporting for States Participating in SARA

Interregional Guidelines for the Evaluation of Distance Education

Council of Regional Accrediting Commissions (C-RAC) (2011)

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

*Analysis/Evidence:*¹

- 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.

Analysis/Evidence:

- 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.

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

Analysis/Evidence:

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

¹ These bulleted points illustrate actions, processes and facts that institutions may use to demonstrate that they meet SARA requirements.

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

Analysis/Evidence:

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

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

Analysis/Evidence:

- Assessment of student learning follows processes used in onsite courses or programs and/or reflects good practice in assessment methods;
- Student course evaluations are routinely taken and an analysis of them contributes to strategies for course improvements;
- Evaluation strategies ensure effective communication between faculty members who design curriculum, faculty members who interact with students, and faculty members who evaluate student learning;
- The institution regularly evaluates the effectiveness of the academic and support services provided to students in online courses and uses the results for improvement;
- The institution demonstrates the appropriate use of technology to support its assessment strategies;
- The institution documents its successes in implementing changes informed by its programs of assessment and evaluation;
- The institution provides examples of student work and student interactions among themselves and with faculty;
- The institution sets appropriate goals for the retention/persistence of students using online learning, assesses its achievement of these goals, and uses the results for improvement.

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

Analysis/Evidence:

- Online learning faculties are carefully selected, appropriately trained, frequently evaluated, and are marked by an acceptable level of turnover;
- The institution's training program for online learning faculty is periodic, incorporates tested good practices in online learning pedagogy, and ensures competency with the range of software products used by the institution;
- Faculty are proficient and effectively supported in using the course management system;

- The office or persons responsible for online learning training programs are clearly identified and have the competencies to accomplish the tasks, including knowledge of the specialized resources and technical support available to support course development and delivery;
- Faculty members engaged in online learning share in the mission and goals of the institution and its programs and are provided the opportunities to contribute to the broader activities of the institution;
- Students express satisfaction with the quality of the instruction provided by online learning faculty members.

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

Analysis/Evidence:

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

8. The institution provides sufficient resources to support and, if appropriate, expand its online learning offerings.

Analysis/Evidence:

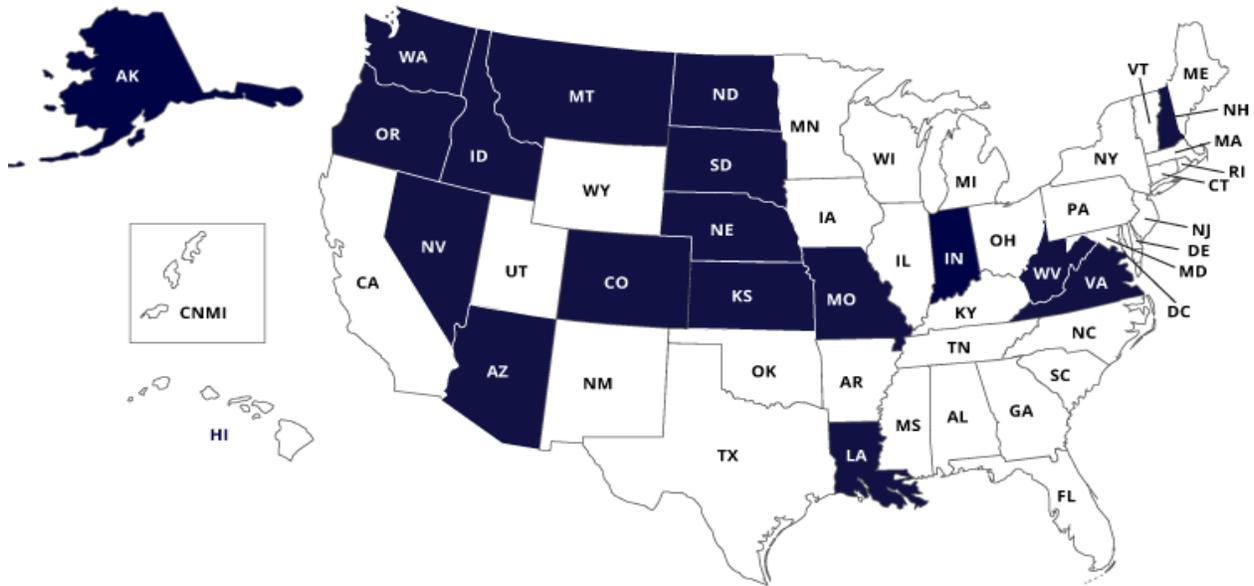
- The institution prepares a multi-year budget for online learning that includes resources for assessment of program demand, marketing, appropriate levels of faculty and staff, faculty and staff development, library and information resources, and technology infrastructure;
- The institution provides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

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

Analysis/Evidence:

- 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.

SARA States as of December 2014



- Alaska
- Arizona
- Colorado
- Idaho
- Indiana
- Kansas
- Louisiana
- Missouri
- Montana
- Nebraska
- Nevada
- North Dakota
- New Hampshire
- Oregon
- South Dakota
- Virginia
- Washington
- West Virginia