"SARA"
State Authorization Reciprocity Agreement

A Nationwide Process To Make State Authorization More Uniform, Effective and Efficient

Presidents' **Forum**

CSG
The Council of State Governments
Sharing capitol ideas.

The Presidents' Forum

- **Launched in 2004,** *The Presidents' Forum* **is a** collaborative of regionally accredited institutions and programs offering online higher education, related national associations, and stakeholder policy bodies that cover all sectors of not-for-profit and for-profit higher learning. This collaborative provides a venue to formulate policies and action strategies that drive innovation and best practices in online learning.

The Council of State Governments

- **The *Council of State Governments*,** founded in 1933, is a non-partisan, nonprofit organization that represents every elected and appointed official in the three branches of state government in the fifty states and U.S. territories. CSG offers guidance and technical assistance in dealing with interstate compacts and other interstate agreements.

Evolution of SARA: Presidents' Forum Projects

- ***2006 - Access to Learning***, Introduce public policy leaders to the methods, advantages, and quality of online learning.

- ***2008 - Transparency By Design***, with support from the **Lumina Foundation**, create a common data reporting process to track learning outcomes and institutional performance ("***College Choices for Adults"***).

- ***2009 - Demonstration Projects:*** with support from the **Lumina Foundation,** facilitate a national dialogue on the impact of the complex and widely diverse state regulatory requirements for institutional authorization among each of the 54 American states and territories.

    - Forum Task Force Report: "*Aligning State Approval and Regional Accreditation for Online Postsecondary Institutions: A National Strategy*."

    - Forum Position Paper: "*Toward A Model Template Upon Which An Interstate Reciprocity Compact Of College And University Program Authorization Could Be Based*."

- ***2010 – Making Opportunity Affordable***, with support from the **Lumina Foundation,** explore the potential for a voluntary, interstate agreement (***Multi-State Reciprocity in Postsecondary Approval and Regulation - SARA***) to broaden the availability of accredited online degree programs by reducing state regulatory barriers while ensuring strong consumer safeguards**.**

2500+ Institutions Offering Online Learning Within 54 States and Territories … Many Requiring Application To Multiple Entities For Approval to Operate
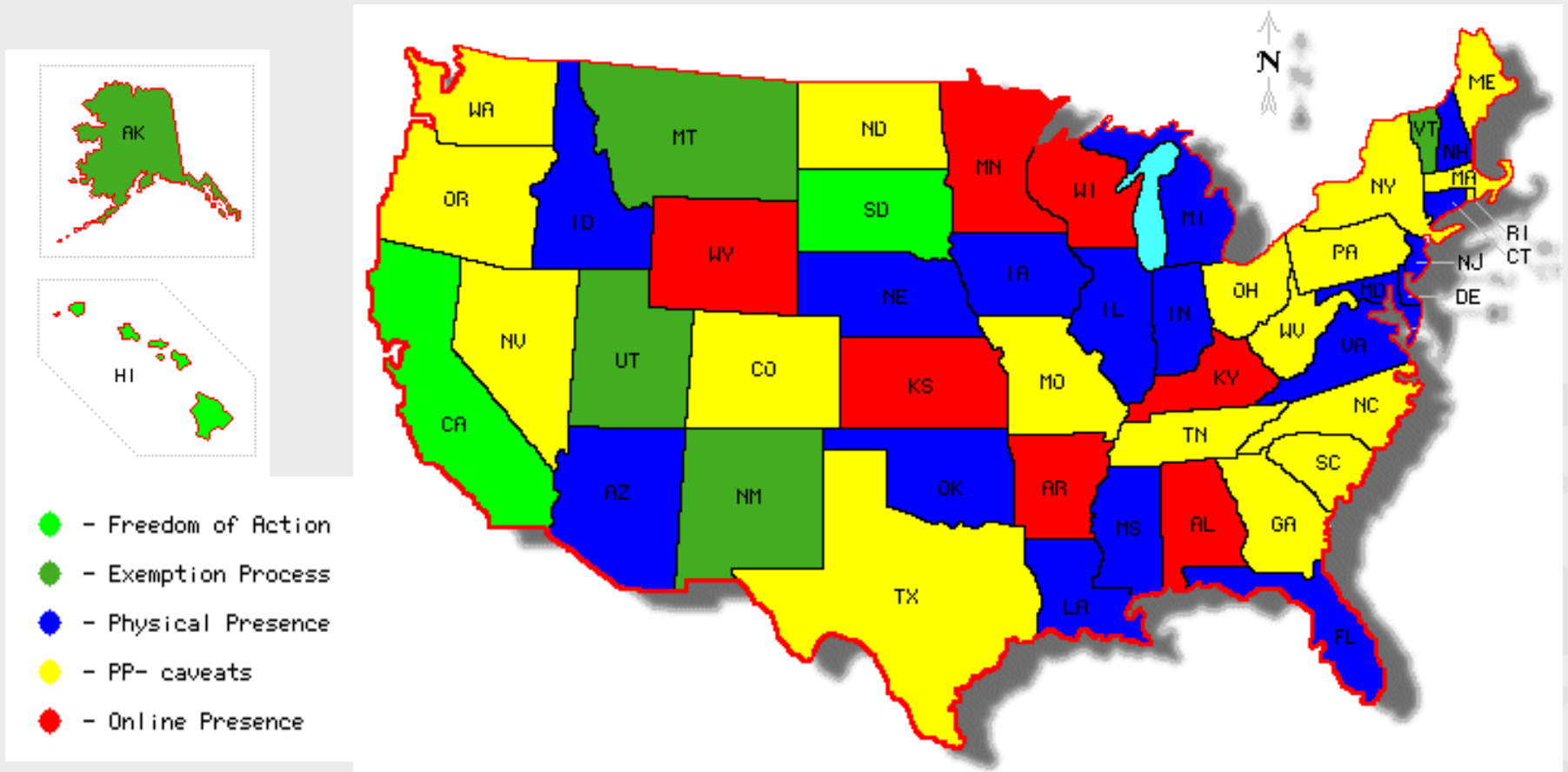
% of States that Assert Jurisdiction Over Aspects of Unconventional Physical Presence
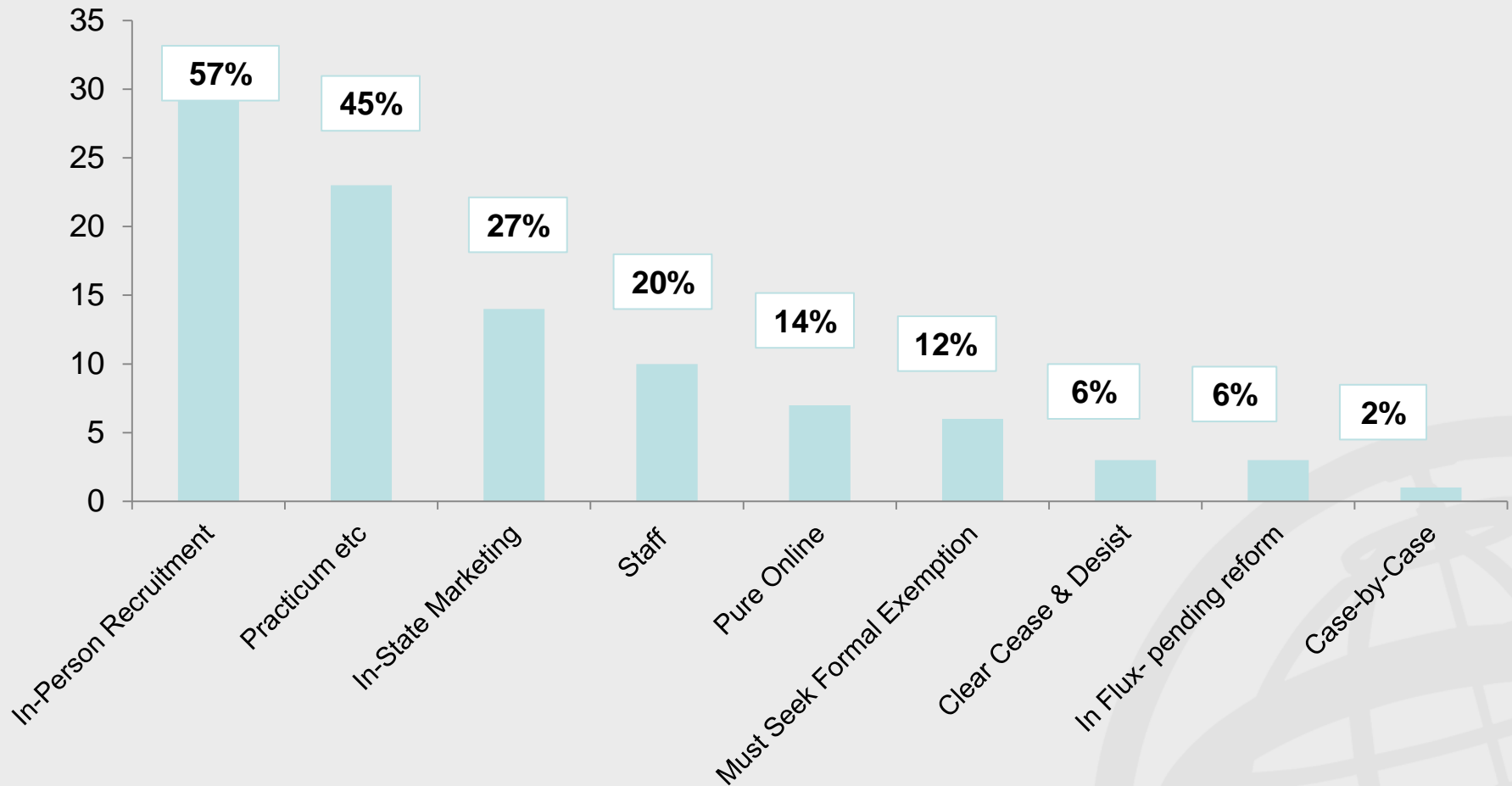
Source: agency sites, WCET report, Dow Lohnes report, Eduventures correspondence and analysis

The Need for SARA

- States regulate the offering of postsecondary education within their borders with widely varying standards, policies, practices, and 'triggers" for application and enforcement.

- Institutions vary in the degree to which they pay attention to state regulation, particularly in regard to activities they pursue outside their home state, <u>and especially in regard to "distance" or "online" students</u>.

- At present, there is no alternative to each institution separately pursuing state authorization (or assurance that authorization is not required) in each state and territory in which it serves students.

- Consequently, thousands of institutions must seek approval/authorization in as many as 54 states and territories.

- That approach is inefficient and challenging for institutions and states alike.

SARA: A Model for Access, Efficiency, Cost Containment, and Consumer Protection

The **Lumina Foundation** has provided funding to the **Presidents' Forum**, working with the **Council of State Governments**, to develop a "**model state reciprocity agreement**" that states could adopt to acknowledge other states' work and decisions in regard to institutional authorization.

Working With Stakeholders

- **SARA**, developed as a working draft by a team familiar with these issues, is the current product of that effort. Talks with:
  - Broad advisory committee representative of all sectors
  - Regional higher education compacts
  - State regulators
  - State Higher Education Executive Officers
  - Accrediting organizations
  - U.S. Department of Education
  - Others to come

Goals

- **SARA** offers a process that will support the nation in its efforts to increase the educational attainment of its people by making state authorization:

    - more efficient, effective and uniform in regard to necessary and reasonable standards of practice that could span states;

    - more effective in dealing with quality and integrity issues that have arisen in some online/distance education offerings; and

    - less costly for states and institutions and, thereby, the students they serve.
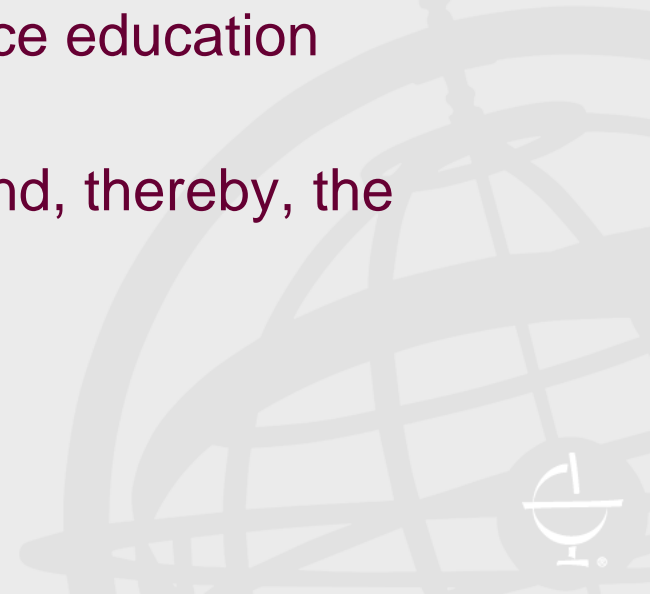
Challenges

- State laws, rules and regulation around these issues are remarkably diverse and the *reasons* for that diversity vary from state to state.

- Any alternative to the current situation must include a means of effective governance and a workable model for financial sustainability.

- Efforts to facilitate and enable good practice must also maintain the ability to deal with bad institutional behavior. In particular, <u>states must be able to trust other states to carry out their responsibilities</u>.

- A fully effective means of dealing with these issues <u>requires a comprehensive national model</u> that will serve all interested states, accommodate all sectors of higher education (public, independent non-profit, and for-profit), and embrace the diversity of institutional and specialized accreditation.

Essential Characteristics of SARA

- Acknowledges the traditional roles of members of the accountability triad: federal government, states, and recognized accrediting bodies.

- Preserves full state oversight and control of on-the-ground institutions and campuses.

- Sets forth a reasonable set of "triggers" of "physical presence."

- Requires institutional accreditation by an accrediting body recognized by the U.S. Secretary of Education.

- Calls on states to assume the principal role in matters of consumer/student protection while working in partnership with recognized accreditors.

- Shifts principal oversight responsibilities from the state in which the "distance learning" is being offered to the "home state" of the institution offering the instruction.

- Lays out a model reciprocity agreement that states could adopt, including outlines of a possible organizational structure and financial plan to support operations.

Governing a Nationwide Agreement
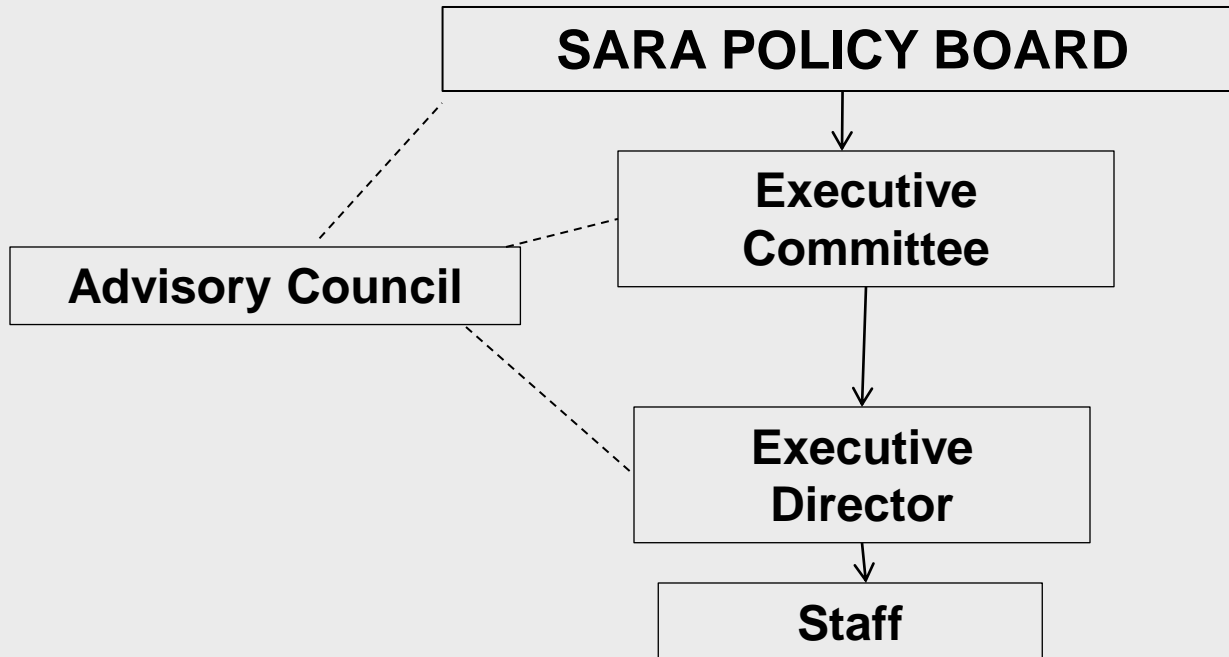
Issues SARA Does Not Address

- **SARA** does not deal with issues of professional licensing (i.e. nursing, education, psychology), leaving that to future work, probably carried out by others.

- **SARA** intentionally provides minimal details on the operation of the organization that will be required to support **SARA**. Such an organization could be constituted and managed in a variety of ways.
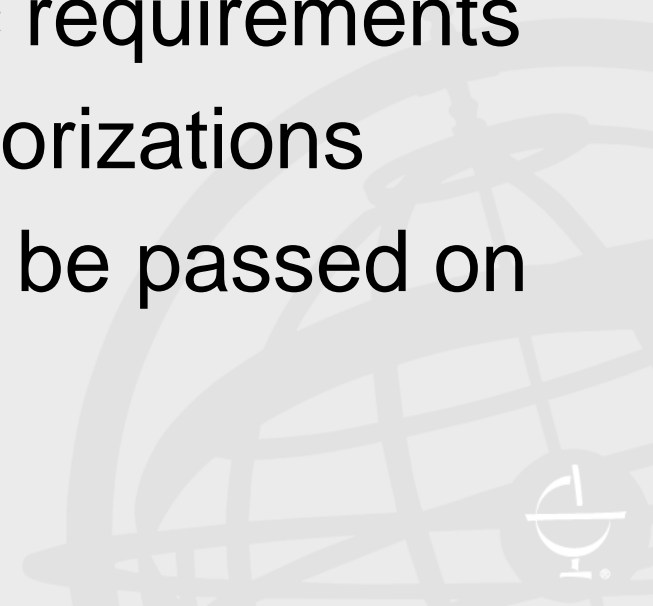
What's next?

- Additional conversations with stakeholders
- Complete tuning the SARA model
- Outreach and education project
- Consideration by the higher education community, policy makers, and legislators

SARA's Impact on Institutions

- Reduces number of state applications/authorizations required
- Potentially reduces staff workload
- Reduces complications in tracking and complying with state-specific requirements
- Reduces costs for state authorizations
- = reduces costs that need to be passed on to students

Questions?