

Melanie Booth:

Hi, everybody. We're going to wait about one more minute before we begin, to let everybody get into the Zoom here and get ready for an introduction to SARA. And we'll wait just one more minute, but if that's what you're here for, you're in the right place. All right. Welcome to part two of the NC-SARA and WCET/SAN two-part summer webinar series, all about state authorization. This is part two, which is focused on an introduction to SARA. Last week, our colleagues Cheryl Dowd and Kathryn Kerensky, the director of digital learning policy and compliance with WCET/SAN, joined all of us to focus on state and federal building blocks for out of state activity compliance. And that webinar is was recorded, and is posted on both the WCET/SAN and NC-SARA websites for access. So, if you missed part one, you can certainly watch that recording at a later time. Kathryn, thank you for joining us today.

Kathryn Kerensky:

Yes, thank you, Mel. Thank you for having us. And I just wanted to say quickly, before moving on, on behalf of SAN, how much we really appreciate this collaboration with our colleagues at NC-SARA. So, I'm really happy to be here and take it away, Mel. Looking forward to the presentation.

Melanie Booth:

Thank you, and we appreciate the collaboration very much as well, and it's been a great opportunity to reach out to all of our constituents, our shared constituents, and help lay the groundwork, some introductory information about state authorization, and today, about SARA, State Authorization Reciprocity Agreement. I am joined today by Marianne Boeke, acting president and CEO of NC-SARA, and the vice president of research and state partnerships, as well as Jeannie Yockey-Fine, general counsel and vice president, policy and regulatory affairs. And we also have our colleague Mary Larson from NC-SARA, who will be running the Q and A for us, and we do have plenty of opportunity and time throughout the webinar to stop and take some questions from all of you. So, make sure you post those as they come up in the Q and A, and Mary will help us manage that.

Melanie Booth:

Next slide, please, Marianne. So, our agenda today. We're going to talk a little bit about before and after SARA. What was the problem that SARA has solved? How does SARA work? What are some of the basics that folks need to know to understand how SARA functions in the higher ed environment? And then we'll take some questions. Then we'll go into a section called SARA Today & What Might Be At Risk, and we'll take some questions, and then NC-SARA resources, and we will share all of those resources that NC-SARA has been developing, and are publicly available on our website. With that, let's start with before and after SARA, and I'll turn it over to Jeanie.

Jeannie Yockey-Fine:

All right. Thank you, Mel. It's good to have everyone here. Let's talk about how it used to be and where we are now. Those of us who've been in the state authorization world a long time know that things were sometimes tough, not only for the states, but for the institutions, I would say, especially prior to SARA, and for those who still have to operate outside SARA. I can remember working with a client institution that called me and said, "Oh my gosh, we have applications ready for two of our states," and they literally took pictures and had a yardstick out. One application is 18 inches high, and the other one is over two feet high. And, "What can you do to fix this?" And I told them that despite my magical powers, I was not able to convince either of those two states that they needed to submit less paperwork, but that I'd be happy to help them review that paperwork before it went in.

Jeannie Yockey-Fine:

And that's how it used to be. Some states wanted a lot of information. All states wanted some information. However, the caveat to that was some states, in fact, quite a few states, prior to SARA, did not regulate purely online education. So if you created a physical presence in their state in some sort, then they might choose to regulate you. So, institutions were tasked with, "Well, if we have faculty members in this state, what does it mean? If we are setting up just placements in this state, what does that mean? What do I need to do?" And of course, that varied by state. So, some institutions chose to only send students to their neighboring states because it was much easier to determine what was required in their bordering states than to determine what was required in 49 other states.

Jeannie Yockey-Fine:

Larger institutions with very, very large budgets sometimes would get authorization where it was required in all the other states, but that was not the norm prior to SARA. So, SARA has helped with reducing that need to determine, at least for state authorization purposes, what is required in all of the other states that are SARA member states. It also has, of course, saved money, because there aren't the myriad of fees associated with that, as well as the myriad of internal compliance costs. That staff can be used for other areas within the institution. Of course, right now, some things such as professional licensure, or other areas where staffing can be used. Next slide please.

Jeannie Yockey-Fine:

So, this is a chart that we did, actually it's been a couple years ago now, I believe. Just to break it down, especially for those not as familiar with SARA, or those who weren't involved with SARA, weren't involved with state authorization prior to SARA. So, I'll just [inaudible 00:07:25] on a couple of them. I've already talked about the affordability, and when you have more money available, then that creates access. When an institution has to not offer certain programs in certain states because of author associated authorization or associated costs, then what does that mean for the student? That means reduced access to programs that they may have chosen. Another area is enhanced protection. So, not only do we have the authorization of the home state, we also have the policies required by SARA, but also almost one third of states outside of SARA don't require accreditation for degree-granting programs. So, that's another area where SARA has helped lift the bar, is with the requirement of accreditation. Next slide, please. I'm going to hand it to Melanie now, to talk about how SARA works.

Melanie Booth:

Thank you, Jeannie. So in this section, I'll do a high-level overview of what's some important information about, how does SARA work? So if you'd go to the next slide, please. Let's start with some essential principles. It's important to note that SARA is voluntary. All of the states that are members are voluntarily members, and institutions that apply to participate and are eventually approved have that voluntary opportunity as well. So, there's nothing forcing this on anybody, but all of those benefits that Jeannie outlined certainly apply. The other principle about SARA that's really important to know is that it truly is built around acknowledging the traditional rules within higher education's accountability triad. That is, the state's purview over consumer protections, accreditation over continuous improvement and quality assurance. And of course, the federal government. And it lays out this framework for reciprocity.

Melanie Booth:

It's a SARA policy across all of the state members, with the members being very important constituents in that policy. And NC-SARA, the national council, works in partnership with the four regional compacts

for that support and implementation of SARA across all of the member states. So, these are just some essential principles about the design of the reciprocity agreements. Next slide, please.

Melanie Booth:

As mentioned, the role of the states is really important in SARA. States approve their home state institutions to participate, and SARA relies on the importance of this home state authorization as a starting place. You may have heard the word SPE, or state portal entity. This is the agency in each SARA member state that's responsible for approving and assuring compliance with SARA policies for those institutions that participate. And NC-SARA maintains a directory of State Portal Entities on our website. NC-SARA also maintains a directory of all the institutions that participate in SARA as well. But the states are really at the center of SARA, and ultimately are essential toward the authorization for institutions within their state. Next slide, please.

Melanie Booth:

So, how does an institution participate? What's involved? Well, this outlines the steps for the application and renewal process, and it is a cyclical process. So, in step one, the institution applies to the state SARA Portal Entity to participate in SARA, or if they're already participating, an annual renewal application. The state portal entity in step two reviews and approves or denies that. Step three, the administrative process begins with a payment link, and that includes step four. And then, there's confirmation in step five. And then, step six, the institution must renew annually to that SARA state portal entity to maintain participation status. And on the NC-SARA website, we have information that goes into detail about the requirements for the application, and we'll be talking about that a little bit later when we talk about all of the resources that NC-SARA has available for institutions that are interested in applying. There are many benefits to SARA participation for institutions. If you'd go to the next slide, please, and Jeannie touched on some of these already.

Melanie Booth:

We've already talked about reducing the paper burden and the bureaucracy associated with multiple authorizations for multiple states, as well as the cost for institutions. In partnership with NCHEMS, NC-SARA released a cost saving study, and on our website, we have a calculator that estimates the potential cost savings an institution either has as a result of participating in SARA, or could predict based on enrollment and a variety of other factors based on this research. And of course, Jeannie talked about access to students in other states, and opportunities to serve students beyond one state's orders for distance education. And another benefit that we just released this year, and we'll talk a little bit more about this later, is the SARA Source, and this is a searchable online catalog of distance education programs that are offered by SARA-participating institutions, and I'll tell you a little bit more about that later, but there's a lot of benefits for institutions to participate in SARA. Students also benefit. Next slide, please.

Melanie Booth:

So, it expands access to educational offerings for students. There's better resolution of complaints from students in SARA states, and we have a complete process in place. And, again, we're hopeful that the institutional costs that are reduced from participating in SARA ultimately go, in one way or another, towards students. So, these are just some of the benefits, and we have a lot more information, again, on the NC-SARA website, aimed at students so they can glean information about, what does it mean to be associated with a SARA-participating institution, and what are some of the benefits for me as a student?

With this, it's an important transition to understand that the primary, central purpose here is student consumer protections, and what SARA affords. So, I'll turn it back to Jeannie to talk about that.

Jeannie Yockey-Fine:

Thanks, Mel. So, you see here, this really cool daisy graphic, that is really a summary of some of the high points of the consumer protection that SARA, and it should say SARA, improves. I already mentioned the accreditation requirement. And again, I think a lot of people who don't live in our world realize, again, that one third of the institutions are not required to be accredited. I should say, one third of the states don't require their institutions to be accredited. That doesn't mean that a lot of the institutions are not accredited, but it is interesting to know that. And by requiring that, I do believe, and I think most people would agree, that it does help ensure the quality of education, and when you have quality education that helps protect the students.

Jeannie Yockey-Fine:

SARA also ensures that there is financial stability. We know that if an institution has a federal financial responsibility score of 1.5 or above, that they can participate. But if they're in range, the state can choose to put them on provisional or not allow them into SARA. And of course, if they're below 1.0, then they will be removed from SARA. So, there is some protection based on financial responsibility. I will hit on one more thing, and one is that one requirement of SARA is that member states must provide some alternative, if an institution cannot provide the programs or courses that were promised to the students. So, every state must have something. Some states have more than one something, but every state must have at least one. And with that, we'd like to open it up for questions related to anything that we've talked about regarding before or after SARA, before we move on to the next area.

Melanie Booth:

We'll wait just a little bit. Mary, I don't know that we have any questions so far, but maybe I'm wrong.

Mary Larson:

No, I haven't seen any yet. I think one of them is, we do have one that just popped in. Do institutions join local compact, regional education compact, or NC-SARA directly?

Jeannie Yockey-Fine:

So, the institution must first, of course, be in a member state, and then they must have home authorization in that state. They'll join from their state. The state, of course, must be a member of the regional compact, or must be affiliated. So, they don't have to be a member of the compact, but they at least must affiliate with that compact and pay a related fee for that affiliation. So, there are several steps. The home state authorization, the state that is in SARA, the state that either affiliates or is a member of the compact. So, all of those things come first, and of course, the institution must be degree-granting and accredited, and meet all the other myriad of policy requirements in the SARA policy manual. And then, perhaps then, they will be a SARA-participating institution. And then, once that happens, they'll renew annually and the SPE will make sure that all of those things look good again for the next year, and then we'll see them again.

Mary Larson:

And one other question. Just the confirmation, Jeannie, that it's institution to state, to region to NC-SARA. And then, Terrance has a question, asking you if you can expound on what you mean that a state must provide an alternative if the institution is unable to fulfill certain criteria, if he heard you correctly?

Jeannie Yockey-Fine:

So, the state is ensuring that the institution provides it. So, the state has something in their requirements that say, "Okay, institution. We want to make sure that you have a surety bond, or that you have a student tuition recovery fund, or teach-out agreements, or teach-out plan. Some level." The state has that requirement, and then the institution, of course, has to meet that requirement. So, that's what I mean by the state having it, and then that impacts the institution having it. And that's a SARA state member requirement so there's something to fall back on

Mary Larson:

And Terrance says thank you. You've clarified that for him.

Jeannie Yockey-Fine:

Thanks, Terrance.

Melanie Booth:

Any other questions, Mary?

Mary Larson:

No, I think we can move on to the next session, and I'll keep my eyes open.

Melanie Booth:

We will have plenty of time for questions after this next section of this webinar, and at the end. So with this, I'll turn it over to Marianne to talk about SARA today.

Marianne Boeke:

Thank you, Melanie. Thank you, Jeannie. So, I'm going to talk about, or a little bit about, the membership that we have currently and the SARA-participating institutions, and I'll even talk a little bit about data. So, we'll start with our SARA member states. I love this map because I think it is just such a nice visual. It really shows our SARA partners here, particularly our regional compacts. You can see it's color-coded. So, the dark blue is WICHE, the orange is MHEC. The cranberry is SREB, and the soft blue is NEBHE. So, those are the four regional compacts. You can also see that there are some states that are gray out. Those are the ones that have affiliated with one of those four compacts, just as Jeannie said, so that they be members of SARA.

Marianne Boeke:

You also see a big state that's black. That is California, and California is not in SARA yet. The other 49 states are in SARA. We also have three territories and districts. We have Puerto Rico, US Virgin Islands, and the District of Columbia. So, 52 total, but we do not have California yet. And I know people like to

ask questions about California, and so if those come up at the end, we're welcome to talk about what strategies are happening in that state.

Marianne Boeke:

I also want to just point out, again, that the states are such a vital part of what we do. They are the boots on the ground. They're the ones who are doing the good work of explaining what SARA is, helping institutions get through the application process. They're the ones that review them annually. So, I just think this map is really nice, to show the regional compacts and show all the states.

Marianne Boeke:

This next slide, I'm going to talk a little bit about what's on this slide, and then I'm going to give you a little bit more information as well, because this slide is all about the institutions that participate in SARA, and currently we have over 2300 of them. The most big takeaway from this is that public institutions continue to comprise the majority of our institutions. Here, it's talking about the distance education enrollments, and I'll talk about that in a minute. But honestly, the majority of SARA-participating institutions are public. It's about 50%. There's about 43% that are the non-profits, and about 7% that are the for-profits. And you can also see here that we're talking about the enrollments, because that's really important too.

Marianne Boeke:

Folks think it's interesting to know about the sectors of the institutions, but it's also really exciting to understand who our students are, and where they're being enrolled. And we put both of these up here, the 2020 enrollment and the 2019 enrollment. We did that because 2020 was a little bit strange because of the COVID, but you can still see here that the majority of students are coming from the public sector, and then non-profit, and then for-profit. So, it mirrors the actual number this that we have in the sectors as well, and that's sort of interesting. I also wanted to mention that we've had a steady growth at SARA. About 5% a year in terms of institutions that are still joining SARA. So, that's been pretty consistent year over year.

Marianne Boeke:

I also want to just mention a few things that aren't on here, and that is that 65% of the total HBCUs in the US participate in SARA now. Also, 620 community colleges participate in SARA. That represents 94% of all community college distance education enrollment, so that's a big chunk. I also wanted to mention that 75% of eligible US post-secondary institutions that offer distance education are now participating in SARA, so we've come a long way in eight years. I also thought I might give you just a quick sneak peek of the data that's going to come out this fall. We just finished our data reporting that we do annually. It closed in June. And so, we're working busily behind the scenes to crunch the data, but I just wanted to share a little bit with you.

Marianne Boeke:

So, for the exclusively distance education enrollments, we had a total of 4.2 million this year, and that breaks out to about 1.6 million for out-of-state enrollments and about 2.5 million for in-state. So, obviously down a little bit from last year, but that makes sense, given that the COVID problem was happening, but still up from 2019, so we're still doing a nice incline. Enrollments by sectors stayed consistent with what you see here. It was about 62% public, 25% non-profits and 13 for-profits in terms

of the enrollment. And we can ask more questions and talk a little bit more about data if you want to, or if you want to talk about the nuances of the institutions that participate in SARA. Happy to do that.

Marianne Boeke:

Want to spend just a tiny bit of time talking about out-of-state learning placements, because this is a piece that sometimes gets forgotten or overlooked a little bit when we're talking about SARA's membership. This is really something that's fantastic that's part of SARA. Out-of-state learning placements are on-site learning placements that occur in a state other than the home state of the institution. They include activities such as clinical rotations, student teaching, internships, clinicals, those sort of things. What we have found is that the bulk of them tend to happen, at least for our SARA-participating institutions, in the health professions, and then in education, and then in business, and then in a variety of fields. You can see that at the bottom of that slide. But what's really important is that these out-of-state learning placements are covered by SARA. That is part of being in SARA.

Marianne Boeke:

The 261,000 that were reported, that actually is from, I believe, 2020. It was down a little bit from 2019, but actually, this year, another sneak peak, it looks like it's going to be over 300,000 when we get the data all crunched and ready to share this fall. So, we had a little dip because of the COVID pandemic, and then we're going back up, and in fact, a substantial increase from even 2019.

Marianne Boeke:

So, that was a real quick overview of SARA member states, SARA-participating institutions, and a little bit of data thrown in for good measure. With that, I will split to the next slide here and ask Jeannie to come back on. I believe she's going to talk a little bit about the negotiated rulemaking that happened this last spring and SARA.

Jeannie Yockey-Fine:

Okay. Thanks, Marianne, and if you could go to the next slide, we'll take a look at that. And many of you on the call, I'm sure, have followed us and some of our webinars and have looked at our call to action on the website, but I will give a refresher on that. And for those of you who are newer to this, then this might be newer to you. But the key component of what happened in neg reg is, first of all, it was a big surprise. Because, state authorization falls under a different section under 34 CFR 600.9, when it's state authorization related to distance education. And this negotiated rulemaking was in a different section, 668.14, which is really about the program participation agreement. So, it was a surprise to almost everyone that anything related to reciprocity came up in a PPA section, but it did, and we all needed to pay quick attention to what was happening there.

Jeannie Yockey-Fine:

And the key to the language that would potentially impact SARA is that language that says, in romanette three here on the slide, it brings in that states could apply their education-specific language. Right now, when a state becomes a member of SARA, they agree to not apply their education-specific requirements related to state authorization on institutions that also participate in SARA, outside their state. But this would allow states to choose to do that. That then creates a conflict, of course, with being a member state in SARA, because you agree not to do that. So, it becomes an inherent conflict between an agreement made up of states that is voluntary, and a potential requirement at the federal level that would allow it.

Jeannie Yockey-Fine:

The key language then centered on, what does this really mean? And what the negotiators said was, "Well, when you look at the last clause of this, it talks about the exception." So initially, some people thought, "Oh, good, there's an exception for SARA." But the negotiators said, and those who wrote about it that were negotiators said their intent was that exception is only for obtaining authorization, and that's why it's highlighted. And that highlight is there simply for the purpose of these slides. They did not highlight it. What does that mean? When they talked about it during the rulemaking, and I was one of those people who listened through all those sessions, live and after. Obtaining authorization, their intent behind that was simply that you would do your initial application, you would pay your fee, and the feds would not step into that. But after that, states would be free to add on whatever education requirements they chose, and be okay at the federal level, and be allowed to do so at the federal level.

Jeannie Yockey-Fine:

So, what does that mean? That means that a state could then say, "That's great you're in SARA. We know that you are a participating institution, but you will now need to meet our refund policy too, in addition to your own." So, an institution could be having to meet multiple refund policies, or a state could say, "We need an additional surety bond," or additional STRIP, and when I say STRIP, that is a student tuition recovery fund payment. Now, the conflict, as I said, comes in where the federal language would allow one thing, but the SARA membership agreement would say the opposite. So right now, there's also a conflict in the definition of a reciprocity agreement, which sits at 34 CFR 600.2. That definition is very clear that a state may apply its requirements, its consumer protection requirements generally. That means to all businesses, everyone is treated the same. There's nothing allowed by definition that could bring in those education-specific requirements.

Jeannie Yockey-Fine:

So, it would conflict with its own language at a different section. Eventually, if this language were to move forward as written, that would have to be clarified in the definition. So, eventually they would have to align, because you would have two competing requirements and the definition wouldn't match the requirement at the federal level. So, eventually that would need to be aligned. If that were the case, and it's aligned with this language, then the problem would be if a state chose to add additional requirements, then legally, SARA and NC-SARA, the compacts, the state, could not stop that state from doing that. Because, if that were the case, then the institutions impacted could have an issue with their title for funds. So, right now it's been a circular situation on what could happen, what could come first, if states would actually even choose to. It's not saying states have to do this. It would allow states to do this.

Jeannie Yockey-Fine:

Who would do it? How would that look? So, there have been a lot of discussions. There have been meetings. We've looked at a lot of data on what could be impacted. We've played out a lot of scenarios. But here's the situation now. Next slide, please. Right now, everything is paused. And what the feds released was a statement that said, right now, they're looking at publishing something in spring of 2023, in April. If that is the case, then at least 30 days will be allowed for a comment period from the public, and if everything moves along such that they can answer all the comments and move their language through and get it on the master calendar by November 1st of 2023, then whatever the language is that moves forward would go in effect July 1st of 2024.

Jeannie Yockey-Fine:

So, right now we're almost two years away from whatever the language is going to be, moving through. What we don't know is if the language will remain the same as what we have seen already, or if during that time changes will take place. And of course, whatever we learn, we'll keep everyone informed, we'll have new information on our call to action on our website. But right now, there's nothing new to share, nothing new to tell. Right now we're in a wait and hold, wait and see pattern, quite frankly, but we do know the timeline, at least, as it sits now. Now, if something would happen and they didn't have whatever the new language is on the calendar by November 1st, 2023, and if it comes after that, then the earliest implementation would be another year later, so it would be July 1st, 2025. So, everything will keep moving back depending on when they calendar it. Next slide, please. All right. Before we move on to resources, does anyone have any questions on neg reg?

Melanie Booth:

I think there might be a data question too in there. Mary?

Mary Larson:

I think there are questions in, but it's not related to neg reg. So, would you like me to go ahead and ask those, or do you want to hold those until the next section?

Melanie Booth:

Why don't you go ahead and ask them, since...

Mary Larson:

Okay.

Melanie Booth:

And then we'll... Yeah.

Mary Larson:

Okay. The first one is, if a state is in a regional membership, i.e., Tennessee is an SREB, then it is assumed that the reciprocity among the states is in that region, or is it for the national reciprocity agreement, and...

Jeannie Yockey-Fine:

Okay, sure.

Mary Larson:

[inaudible 00:35:16] that part.

Jeannie Yockey-Fine:

Right. So, the reciprocity, because the way SARA is written, the reciprocity, whatever region you're in, gives you that reciprocity across the United States with any other member state. It's just that the regional compacts work with their states within that region to help oversee the institutions in those

states. So, we have the different compacts as you saw earlier, and that reciprocity, however, does extend across the nation. So, you're not limited to just that region.

Mary Larson:

Thank you. And the other is a broader question, somewhat related to how Marianne opened the webinar. What can you share about Pacific territories, Guam, American Samoa, and the Mariana Islands, and the sovereign states of Palau, Micronesia and Marshall Islands? Any update if they will join SARA, and if not, do you know if they're regulated, and if no regulations, do the institutions still need to seek authorization?

Jeannie Yockey-Fine:

All right. So, there are a lot of parts of that. Right now, we don't have an update on any of those as far as for SARA purposes. That doesn't mean there haven't been discussions with regional compacts, but right now we don't have anything to share on that. The next question is, do some of them have some type of authorization? Some of them might. So, it's really important that your institution try to contact wherever you think you might have students or might be planning to have students, that you contact any of the territories where that might be the case. The third is, if you have been told they do not have regulations, meaning from someone from there, if they are not overseeing state authorization, then there is nothing for you to do and you can then provide distance education.

Jeannie Yockey-Fine:

There were some in the past that I know did not. They said, "We're not trying to look at distance education," so that was the case, but I have not looked at those in a while, because they're not part of SARA. So, it's something I haven't had to do like I used to have to do. So, I can't tell you, and I wouldn't want to be the one to tell you what the requirements are. So, that is something that, please work with your general counsel, your compliance teams at your institution, to determine what you need to do. But again, if a territory, an agency in that territory that would be related to what would traditionally be some form of authorization tells you that you don't need to be authorized, then you don't need to be authorized. Other than that, keep looking, talk with your peer institutions to see if any of them have made determinations and how they determined it. And sorry not to have better answers, but I can tell you, that's how it's been for a long time with some of the smaller territories.

Mary Larson:

And we do have one question related regarding neg reg. Can you give examples of the state regs that might be imposed, should states be allowed to increase the regulation, and what would be the negative implications?

Jeannie Yockey-Fine:

Sure. So, I mentioned some of those. And remember, too, that it's not even necessarily about increasing them, because the home state already has a lot of regulations. The institution has already had to meet that home state authorization. But what it could happen is, let's say, you could be a Florida institution. So, you already have your home state authorization. But the state of Maryland could say, "We want you to follow our refund policy because we think ours is better." So, if you have students in Maryland, you would have to meet theirs. But then, Nebraska could say the same thing. "We want you to meet our refund policy." Now, in addition to that, Kansas might say, "We want you to have a surety bond. We know that you already seem fine in Florida, but you have some students now in Kansas, so we want to

add a surety bond on top of whatever you had to do in the state of Florida." And then Georgia might say, "Well, we notice you have some faculty members here, and so we need to talk to you about that. You might need to do something with them." Also, it could impact placements. States could require something additional for placements. Right now, SARA, as you know, covers placements under certain limitations, but that could happen.

Jeannie Yockey-Fine:

So, it's a myriad of what could. And again, that doesn't mean that states would choose to do that, but it's what could happen. What does that mean ultimately? It means several things. One, if state A does that to state B, state B might decide to do that back to state A, so it becomes that. But also, ultimately, what does it mean? It means it could hinder access for students, because it goes back to what I mentioned earlier, which is, if an institution is concerned with trying to figure out what's changing in the various states, what new regulations they might need to meet, "What additional things do we have to do? We need additional staffing, it's so difficult to keep up with these." We're worried that we'll be out of compliance. Sometimes, they might have something in, let's say, the office of general counsel, who will say, "You know what? It's not worth the risk. Pull back from those states. Let's go back to where we used to be. We worked with our neighboring states. Let's keep it there. We know what we need to do there. And that's what we'll do."

Jeannie Yockey-Fine:

And what does that mean? You've just pulled back access to students from maybe 10 other states, or 15 other states, or 20 other states. So, the impact goes back to, again, ultimately who's harmed, it's the students. As online education has expanded, we know that so has access and students have been able to be in programs they may not have otherwise been. And so, this could dial us back a little bit closer to where we used to be prior to SARA. And again, limiting that access, limiting that access to placements. We're in a time now where you don't have to read very far in various articles to see that there's a struggle sometimes to get students in placements. So, you think about having those impacted and how difficult it could be in a time where we're having nursing shortages, teacher shortages. It would just be going the wrong direction.

Mary Larson:

Oh, do you have time for a couple more questions, or do you want to move on and then come back?

Melanie Booth:

Why don't we do one more question that's relevant to this topic, and then we can move on and we'll have time at the end?

Mary Larson:

That sounds great. Just a reminder that if for some reason we don't get to your questions, please forward it to info@nc-sara.org, and we'll be able to follow up with you at that time. So, one of the questions is, could you control this by having member institutions sign a revised agreement with SARA to not impose specific regulations on members, or do you feel that you would lose some states? The question references member institutions, but I think it might be member states.

Jeannie Yockey-Fine:

Well, right now that is what states do. States do agree not to impose their additional requirements on institutions outside their state. So, right now, that's exactly how it looks. The problem will be when a state decides to go against that and follow federal language. Again, depending on how that federal language looks, what then happens? That then places the regional compact in the situation where they have to look at that state and decide, "Are we going to remove you?" And it creates a myriad, then, of potential issues, because if the state is removed, then that means the institutions are not able to participate in SARA, therefore, impacting access. So ideally, states would follow what they've been doing for the past eight years, those who started out in the beginning, because quite frankly, we've seen SARA be extremely successful. So, that would be the ideal. We don't know what will happen. We will pivot and work toward whatever it is we need to do to make SARA continue, and to make SARA work, because it has worked, at this point, for millions of students. Yeah.

Melanie Booth:

And we will have time at the end for more questions. So, I think at this point we will shift gears and talk about the resources that NC-SARA has pulled together to support the state members and the institutional participants, as well as some of those of you who may be thinking about institutional participation, and wanting to know more before you really go down that road. Next slide, please.

Melanie Booth:

So, the first resource that I will share with you is a page at our website called the SARA Learning Station. And we have cultivated from our state members, and many of our institutions, very effective practices from the field, and we've compiled them into different formats. On this website, we have a series of SARA quick start guides. These are very brief, easy to access explanatory documents for institutions, primarily, that talk about SARA policy, and help to demystify what an institution needs to do, and how a state might work with institutions around a particular SARA policy requirement.

Melanie Booth:

We also have two online courses now that are publicly available. One is SARA 101. It's an expansion of this webinar, quite honestly, and goes into a lot more detail about the ways in which SARA it was put together, and the ways in which it works. And then, we also just released with our In the Field conference, an online course called Foundations of Annual Data Reporting. And if you are a SARA-participating institution and you're responsible for the data reporting that occurs annually, you'll want to make sure to take that course. It is a companion to the handbook. The handbook is your how-to guide, but that course lays out a foundational overview of data reporting. It also may be a helpful course for colleagues to take, so that they understand the rationale for the data, what's reported. And another important part of that course is, what can you do with the data dashboards? And I posted a link to those data dashboards earlier. How might they help you think about planning or think about your own institution in the context of this SARA universe?

Melanie Booth:

We also have resources from NC-SARA's Institution Conference. Our first conference was last year, 2021, and all of the resources from that conference are available. And we will soon, in about 10 days, have the resources from the 2022 conference all up on that website. And it's all accessible through the SARA Learning Station, so it's your one-stop shop, and I will put that link for you to grab in the chat as well. You can bookmark it and take a look later. Next slide, please.

Melanie Booth:

I mentioned the SARA quick start guides. This is the topics that are covered in the 10 that we have, and we're developing more. Again, we've developed these in partnership with our State Portal Entities, and have really pulled together some of the best effective practices. And these quick start guides really are intended to be quick answers to things that an institution may have. So, how does SARA deal with field trips? How do I think about what a short course is in the SARA universe? What do I need to know about addressing SARA on military bases? One I would point out is the institution application quick start guide, and that one is actually a much longer guide, because it details and describes information for submitting the institution application.

Melanie Booth:

With all of these resources that NC-SARA puts on the website.,It will be very important to talk to your state portal entity specifically, as there may be some state-specific approaches or processes or requirements that you'll want to know about. So again, what we put on the NC-SARA website is generally nationally applicable, and you'll always want to be in contact and communication with your state portal entity. And again, the list of those folks is available on our website as well. Next slide, please.

Melanie Booth:

Also on our website, we have a variety of other resources that you may find useful in your day to day work. We have a collection of resources and a professional licensure directory, and as Jeannie mentioned, that's a hot topic right now. We have the state authorization guide, which provides information about state authorization requirements outside of SARA, for all of the states, and it's updated regularly. As I mentioned, when Maryanne was talking about the data, we have data dashboards and annual data reports, and all of the data is publicly available on that page. We talked previously about SARA cost savings, and the SARA cost savings report, as well as that cost savings estimation calculator are available on the NC-SARA website. And, again, we have a directory of institutions that are approved to participate in SARA, and as Marianne mentioned, there's more than 2300 of them, so that directory is growing as we speak.

Melanie Booth:

I also do want to point out the SARA Source. We're really excited about SARA Source here. We launched this earlier this year, and it is an online catalog designed for students to showcase SARA-participating institutions distance education programs. And if you go to SARAsource.org, and I'll put this in the chat as soon as I'm done talking, you can see this catalog and you can search it. We have more than a thousand programs in there now, and it's growing, and we're just gradually getting more institutions and their programs in the catalog. And so, we think that this will be an incredibly useful resource to students out there as they look to understand, what are the benefits of attending a SARA participating institution? So, again, we have a variety of resources available on the website from the SARA Learning Station, through these other directories and guides, and we invite you to explore these under the resources tab on the NC-SARA website.

Melanie Booth:

And, as Mary mentioned, our email info@nc-sara.org is also a very important resource for you, because sometimes you may not be able to find the answer to your question, and if you put it in that email address, we'll get it to you directly, and that's one of our help desk availabilities that NC-SARA offers.

Next slide, please. With that, we are now toward the end, and I'm going to put a couple of links in the chat that I just mentioned. And Mary, we'll see if we have more questions.

Mary Larson:

We do have a question and that is, I think it probably goes back to Jeannie's portion of the presentation, what is the process to follow if an interpretation of NC-SARA rules is different by a state and a particular university?

Jeannie Yockey-Fine:

So, the university would definitely talk to their SPE to figure out what the misunderstanding is, and what's happening. What then happens is the state talks with their regional compact. And oftentimes, they talk to us, and we talk about what may not be clear in it, we talk about the intent of the SARA policy language. And I can tell you that the policy manual has been a work in progress since SARA started. It has grown, we have seen things come up that need to be addressed, and sometimes language isn't clear. And when that happens, then an institution, a state will be able to, and has been in the past, bring that language forward through their compacts. And then, the compact brings it to the board and works with NC-SARA staff as well, to help maybe bring something forward that can clarify that language.

Jeannie Yockey-Fine:

With our new policy process, then, everyone will be able to submit language and explain the why and explain what might help it be better and run that through the system, and we'll see changes in language that are brought about by all of this, the constituents. But that's the process. It's really a lot of talking, a lot of looking, a lot of looking at intent, and also sometimes there's confusion between a may and a shall, something as simple as that, and that's all it takes.

Mary Larson:

Okay. Then we have two other questions on California, and they're both related to California. One of them is, can you talk about what's going on in California? And the second one is, could presenters provide an update on the status of California?

Jeannie Yockey-Fine:

So, it's super important that WICHE, the compact there, that California's in, they have communications with California. So, it's really important that if you have questions that you direct those to WICHE. We have Molly Hall-Martin, who's the regional compact director there now. Demi Michelau is the president there. She's also a member of our board. So, I would suggest that you do that. You can talk with your regional compact, who can get you in touch with them if you're not familiar with who they are, and they'll help you with that. But they're in the best position to talk about what's happening with California.

Marianne Boeke:

And I might just add on there that they definitely are still in conversations with California. Those conversations continue, and I know WICHE is working very hard with some of the territories, as well. As soon as we know anything about California or the territories, we would certainly share that, because I know we're all waiting to finish out that map. But Jeannie's absolutely right. For the latest and greatest information, the folks at WICHE that work in the SARA shop would know the most about that, but I know they're working on it behind the scenes.

Melanie Booth:

I just posted the link to the WICHE SARA page too, so whoever has those questions, you might just find the contact information there as well, in the chat.

Jeannie Yockey-Fine:

Thanks, Mel.

Mary Larson:

Here's a question that I don't know if you're able to answer. Is it correct that California does not require additional authorization/fees for out-of-state placements?

Jeannie Yockey-Fine:

That is something that you can first look on our state authorization guide that's on our website. It gives you California's requirements. But it's still important to use that just as a starting point, and then confirm that information with California BPPE to ensure that nothing has changed, whatever that is. They have had legislation recently and have made some changes, so please check with them to see what the requirements are.

Melanie Booth:

We also have the California students quick start guide, and that has contact information as well. I'm multitasking with the chat, so sorry for my delay, but that quick start guide is a helpful resource around working with students.

Jeannie Yockey-Fine:

Thanks again, Mel, for putting all the various resources in, because it's super helpful. And Mary, thank you so much as always for fielding questions. We are absolutely going to miss you for all kinds of reasons, but this is one of the reasons that we will also miss you, because you do such a great job of fielding questions. It makes me sad talking about it, so I'm going to stop talking about it.

Mary Larson:

Thank you. I'll miss everybody, but I'm looking forward to sleeping a little bit later, taking longer walks and quilting and all those kinds of things. We do have one quick question. I think the answer is to refer to the state authorization guide, but it's, should we contact each state department's education to understand out-of-state placements? And I'm not sure if that question is related to reporting of out-of-state placements, Marianne, or the policy of SARA for placing out-of-state placements. So maybe, Jeannie, you and Marianne tag-team on that one.

Jeannie Yockey-Fine:

Sure. If you are a SARA-participating institution, then SARA policy covers those placements as long as you don't have more than 10 students at one location per program at a time. So, if you're exceeding that, you need to talk to your state portal entity to see if you can be allowed to go above that and also work with the state's... It would be the state portal of that state, so they will communicate with the other state portal entity to have that discussion. And if it seems excessive, then you will need to work with that other state to determine what the requirements are for placement. Some states, let's say it's a hospital, a clinical. They want to look at what that agreement is. And oftentimes the board, the licensing

board will too, which is independent of SARA, but sometimes the state authorization agency will also want to see what that agreement is, how that looks. But again, that's if you have exceeded what you're allowed under SARA policy, and if you're not a SARA-participating institution, then obviously you need to be working with that state.

Marianne Boeke:

And I would just add that if it is a question about data, we actually have a data handbook that walks folks through exactly why we're asking to report this data, what data you need to report and how to do it. So, that'd be a great resource to look at. There's just so many different complexities to it. And I know we only have about three minutes left, so, if you can't find it in that handbook, email me and I'll help you out.

Mary Larson:

Thanks Marianne.

Melanie Booth:

Any last questions, Mary?

Mary Larson:

I think there's one question I don't know if we're going to have time to get to, and so, I will remind the individual that they could send the question to info@nc-sara.org, and it's, how is an individual academic program defined?

Melanie Booth:

So, that may be for data purposes and that would be in the handbook, but please feel free to contextualize your question so we know a little bit more about it. info@nc-sara.org. With that, we'd like to say thank you to all of you who joined us today, and also thank you to Kathryn and Cheryl at WCET/SAN for this collaborative partnership that has put on these two webinars. Again, you can access the recording of last week's webinar, and then, soon, the recording of this webinar from the SARA Learning Station website on the NC-SARA site, as well as from WCET-SAN's website. And we're so appreciative of all of you who came and participated today, and we hope that we can continue to answer your questions at that info@email, and we'll see you next time. Thank you very much.