

# TX SARA Forum 2025

June 6, 2025

9:00am-4:00pm



# Agenda Overview

Morning: Updates	Afternoon: Best Practices
9:00-9:15am: Welcome & Overview	12:00-1:30pm: Lunch & Networking
9:15-9:45am: TX Legislative Session Update	
9:45-10:15am: Federal Updates	1:30-2:15pm: Notifications to Students
10:15-10:45am: S-SARA/SREB Updates	2:15-2:45pm: NC-SARA Basics
10:45-11:00am: Break	2:45-3:00pm: Break
11:00-11:30am: SARA Policy Updates	3:00-3:30pm: Your SPE Guide
11:30am-12:00pm: All About TX Updates	3:30-4:00pm: Q&A/Wrap-up

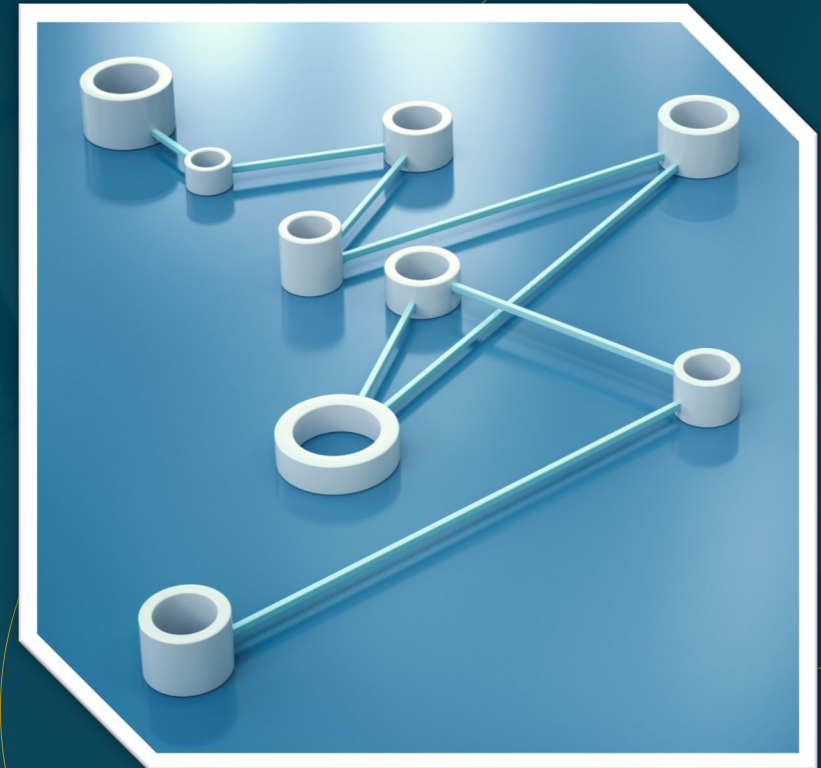
# Session Presenters

- Elizabeth Mayer, Assistant Commissioner, THECB
- Cam Maeyaert, TX SPE, THECB
- Cheryl Dowd, SAN/WCET
- Elisa Jaden, S-SARA, SREB
- Jared Abdirkin, NC-SARA

# Texas Legislative Session Update

Elizabeth Mayer, Assistant Commissioner  
Academic and Health Affairs, THECB

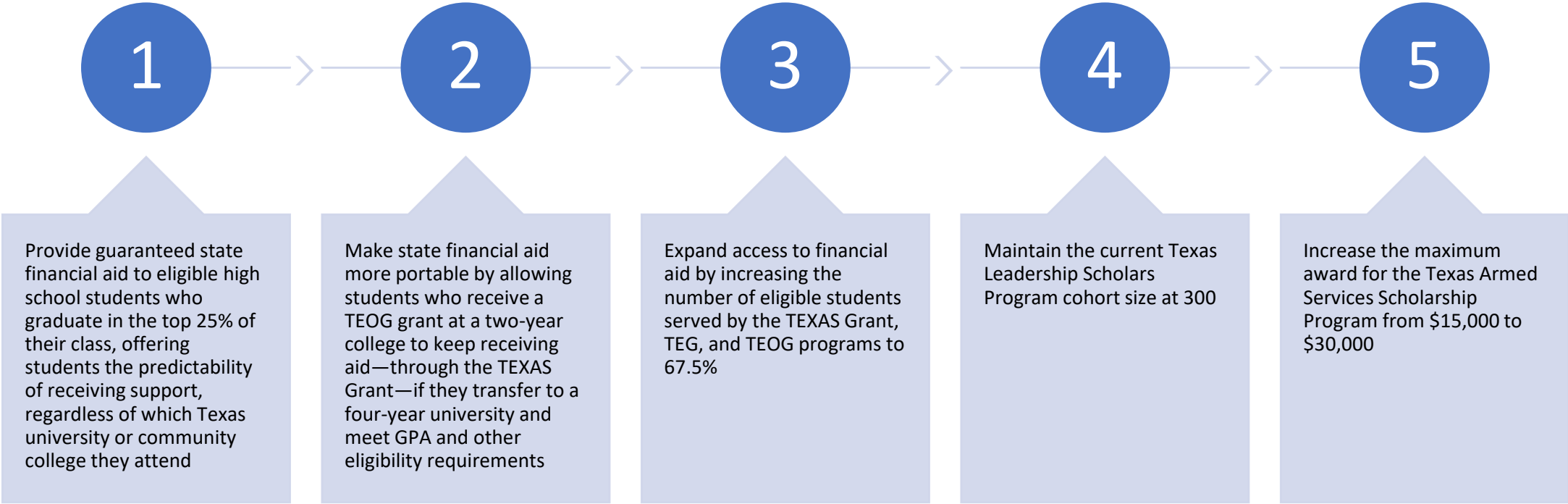
9:15-9:45 a.m.



# TX Lege 2025 Highlights

- The 89th Texas Legislative Session was one of the most successful sessions to date. Thanks to the legislature's strategic investments, higher education is now even better equipped to help ensure every student is prepared to contribute to the future of our state.
- This session delivered an additional \$328 million in support for student financial aid. This funding, a 22% increase over the prior biennium, represents a historic commitment to Texas's students and future talent pipeline—making higher education more predictable, portable, and accessible for students across the state.

# Expected use of these funds



# Other exceptional item requests

- Along with financial aid, the agency's other exceptional item requests also received significant investment from the legislature - \$409.7 million for research and innovation and \$15 million for continued support of our data and technology modernization efforts.

# Federal Updates

Cheryl Dowd, Sr. Director  
State Authorization Network & WCET Policy Innovations

9:45-10:15 a.m.





# Federal Update

June 6, 2025  
TX SARA Forum 2025  
Austin, TX

# Objectives



- Introduction
- Outcome of Biden Admin. DE Regulatory Agenda
- New Administration Higher Ed Priorities
- Compliance w/Effective Rules
- Questions

# Meet the SAN Team



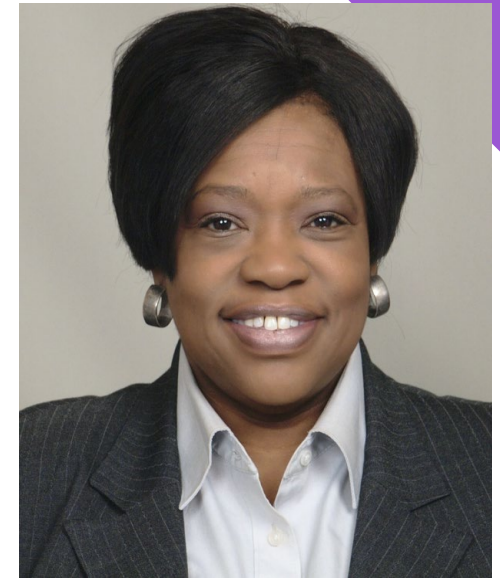
**Cheryl Dowd**  
Senior Director,  
State Authorization  
Network & WCET Policy  
Innovations



**Leigha Fletcher**  
Administrative  
Assistant



**Kathryn Kerensky** Director,  
Digital Learning  
Policy & Compliance



**Jana Walser-Smith** Director,  
Interstate Compliance &  
SAN Member Outreach

# Who we are

The State Authorization Network (SAN) empowers its members to successfully resolve postsecondary regulatory compliance challenges.

We provide expert analysis, resources and training to prepare for emerging issues, collaborate on compliance strategies, develop solutions and evaluate their efficacy.

Our members are digital learning and compliance professionals representing 800+ institutions and organizations nationally and across all sectors.



[wcetsan.wiche.edu](http://wcetsan.wiche.edu)

View | Edit | Delete | Revisions | Clone

The State Authorization Network

The leader for guidance and support for navigating state and federal regulatory compliance for out-of-state activities of postsecondary institutions.



SAN members, log in for exclusive content.

[Login to Member Portal >](#)

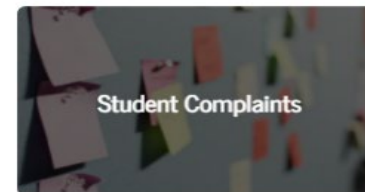
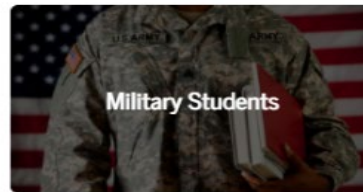
Learn more about SAN!

[The State Authorization Network \(SAN\) - Meeting an Important Need >](#)

Not a member?

[Join SAN Membership >](#)

Topic Areas



# Outcomes of Biden Administration Distance Education Regulatory Agenda

---





# Rulemaking Issues

remember compliance is tied to offering Title IV aid!

- Distance Education
- Return to Title IV (R2T4)
- TRIO Programs

Final rules – Effective July 1, 2026  
[Final Regulations - Program Integrity & Institutional Quality Regulatory Package](#) Released January 3, 2025

- 
- Accreditation
  - Cash Management
  - State Authorization

[Termination of negotiated rulemaking process](#)  
Released December 26, 2024



# What happened to the Third Party-Servicers (TPS)?

- TPS was originally listed in the Notice of Intent to Establish a Rulemaking for the 2023-2024 rulemaking.
- TPS Guidance released in February 2023 formally rescinded November 18, 2024.
- The Biden administration sought public input about OPM contract management.
  - Discussions included a revision to the 2011 Bundled Services Exception Guidance related to the statutory ban on Incentive Compensation.
  - No action was taken to revise the guidance.
- January 16, 2025, [\(GEN-25-01\) Notice of interpretation regarding misrepresentations by third-party service providers engaged by an institution of higher education.](#)

# New Administration Priorities for Higher Education

---



# Secretary, Department of Education, Linda McMahon

---



- Confirmed March 3, 2025.
- First communication to ED Staff: indicated their “Final Mission”.

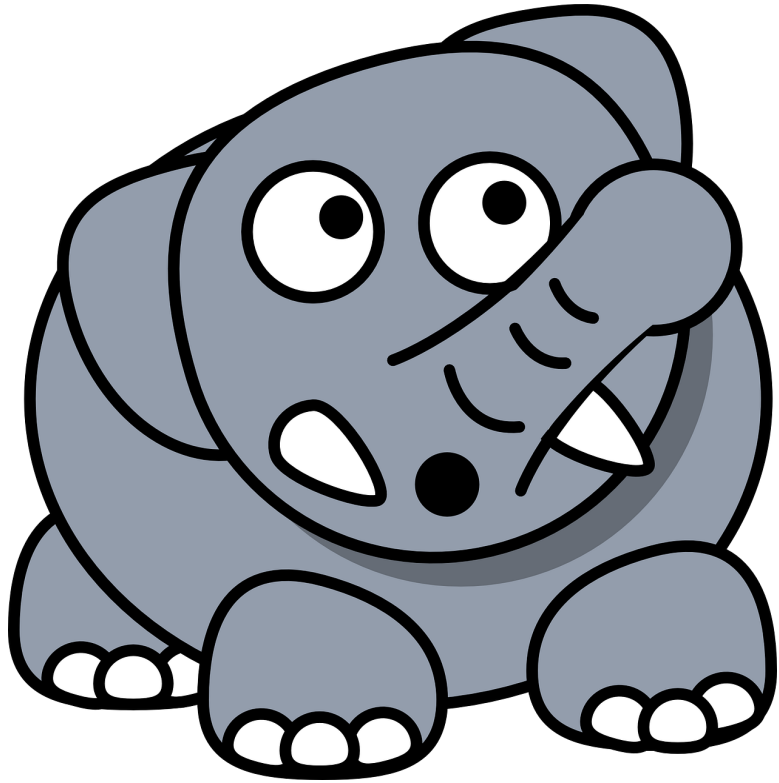
# U.S. Department of Education Reduction in Force

---



- Reduction in Force – March 11, 2025
- Affecting approximately 50% of ED workforce.
- FSA – 326 positions reported eliminated.
- Regional Offices – 6 of 8 locations reported to have the staff almost entirely dismissed.
- *State of New York v. McMahon*

# Elephant in the Room



What about the U.S. Department of Education?

An Executive Order to “Dismantle” ED released 3/20/25.

Congressional Action is required to eliminate ED.

Congressional Action is required to transfer responsibilities delegated to ED through statute (HEA).

- Transfer to Small Business Administration? Treasury? Authority? Bandwidth?

Regulations will remain in place until new rulemaking occurs, or legislative or judicial action is taken to vacate the regulations.

# Republican Priorities for Higher Education

## Diversity, Equity & Inclusion

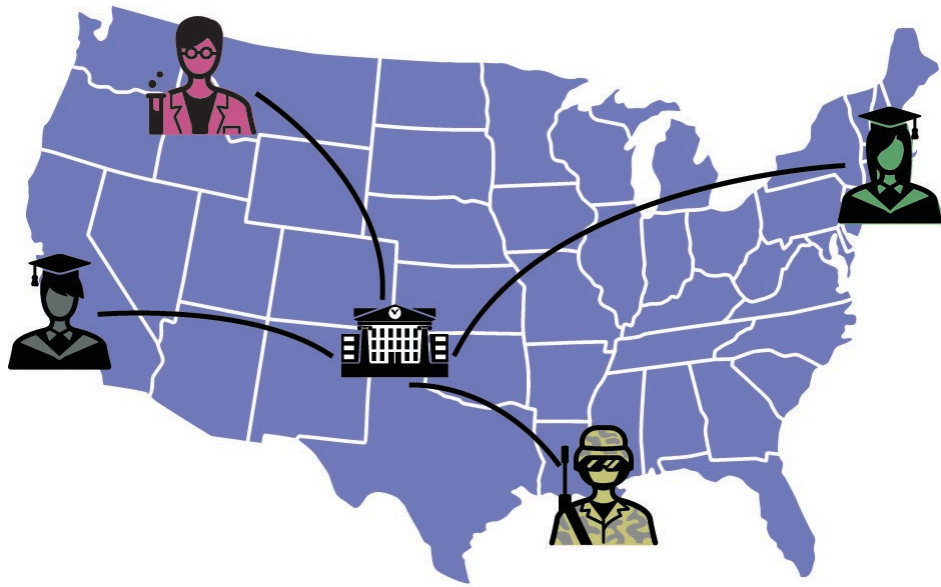
- Executive Order 14151, “Ending Racial & Wasteful Government DEI Programs & Preferencing”
- February 14, 2025, Dear Colleague Letter (Students for Fair Admission v. Harvard)

## Workforce Education

- Move to skills requirements for public jobs instead of degrees
- Degrees should tie to jobs
- Support short-term Pell Grants

## Efficiency and Reorganization

- ED staffing cuts
- Executive Orders directing Deregulation + OMB Public Request for Information Ideas for Deregulation
- [ED Summer Rulemaking](#)
- Executive Order and DCL addressing Accreditation
- Budget Reduction Efforts



Continued Compliance with  
Effective Federal Regulations



# Interstate Distance Education Regulations

- 34 CFR 600.9(c)
- 34 CFR 600.2
- 34 CFR 668.14(b)(32)
- 34 CFR 668.43(a)(5)(v) & (c)

Federal Regulations tie compliance to participation in Title IV HEA programs.

Effective since 7/1/20

- State Authorization
- Definition of state authorization reciprocity agreement
- Professional Licensure Disclosures

Effective 7/1/24

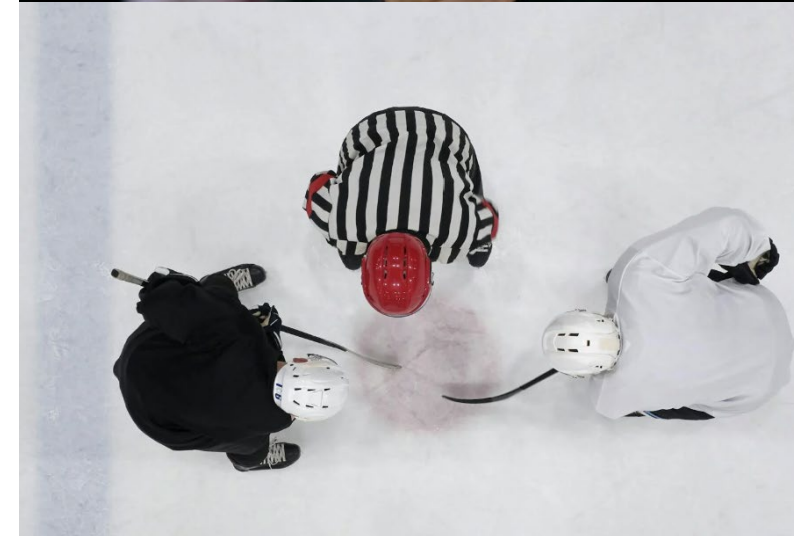
- Program Participation Agreement Certification
  - Satisfy state educational requirements for a professional license.

# Additional Effective Federal Distance Education/Digital Technology Regulations Remaining in Place:

- Regular and substantive interaction [34 CFR 600.2](#)
- Misrepresentation [34 CFR 668.71](#); [34 CFR 668.72](#)
- Student Identification Verification [34 CFR 602.17](#)
- Teach-Out Plans and Agreements [34 CFR 602.24 \(c\)](#)

## PLUS!

- DoJ Web Accessibility Regulations for 2026/2027
  - [28 CFR part 35](#) requires meeting [WCAG 2.1 Level AA](#)
  - [Meeting the Looming Web Accessibility Regulations: The Time to Start Was Yesterday](#); WCET Frontiers; 11/7/24



# SAN Events & Opportunities

## ONLINE COURSE

**SAN - State Authorization Foundations Course (8-week Online Fundamentals Course)**

**Registration is now open for Cohort #2!**

Cohort #2: August 19, 2025-October 13, 2025

- Enhance your understanding of out-of-state compliance/state authorization rules, and regulations.
- Member and Non-Member Rates!
- Fees cover the class and include all required course materials/texts.
- [Review the course description details here!](#)

**+ MORE!**

## SANsational Awards

[Nominations June 16](#) through July 18, 2025

**Recognizing Outstanding efforts by SAN member institutions and organizations.**

### 3 Categories:

**Licensure Programs** - Notifications and disclosures for professional licensure program status in each state.

**Licensure Programs** - Notifications and disclosures for professional licensure program status in each state.

**Compliance Innovations** - Institution policy, tools, compliance teams or other inventive or novel compliance management process.

## SAN Website:

- SAN Getting Started with Compliance Management Gateway: <https://wcetsan.wiche.edu/resources/getting-started>
- SAN Federal Regulations Landing Page: <https://wcetsan.wiche.edu/resources/federal-regulations>
- SAN Professional Licensure Landing Page: <https://wcetsan.wiche.edu/resources/professional-licensure>
  - [Professional Licensure Handbook 2nd edition](#) (2024)

## WCET Frontiers (Articles)

- [NC-SARA, SARA, and SAN: The Power of Collaboration](#), WCET Frontiers; 1/14/25
- [December Federal Rulemaking Activity – New Final Regulations & Withdrawn Provisions](#) WCET Frontiers; 1/7/25
- [Ready or Not, Here It Comes! New Regulations When Offering Programs Leading to a License Effective July 1!](#) WCET Frontiers, 7/9/24

# Your Questions?



# Thank you!

## Contact Us!

**Cheryl Dowd, Senior Director, State Authorization Network & WCET Policy Innovations**  
(303) 541-0210 | [cdowd@wiche.edu](mailto:cdowd@wiche.edu)

**Kathryn Kerensky, Director, Digital Learning Policy & Compliance**  
(303) 541-0290 | [kkerensky@wiche.edu](mailto:kkerensky@wiche.edu)

**Jana Walser-Smith, Director Interstate Compliance & SAN Member Outreach**  
(303) 541-0289 | [jwalsersmith@wiche.edu](mailto:jwalsersmith@wiche.edu)

**Leigha Fletcher, Administrative Assistance**  
(303) 541-0211 | [lfletcher@wiche.edu](mailto:lfletcher@wiche.edu)

---

3035 Center Green Drive  
Suite 200  
Boulder, CO 80301

**Email us at: [san-info@wiche.edu](mailto:san-info@wiche.edu)**



**[wcetsan.wiche.edu](http://wcetsan.wiche.edu)**

# S-SARA/SREB Updates

Elisa Jaden, Regional SARA Director  
SREB

10:15-10:45 a.m.



SREB

# Texas SARA

*State Meeting*

June 6, 2025

Elisa Jaden, EdS  
Regional SARA Director  
Postsecondary Access and Student Success

# SREB's History

- First Regional Interstate Compact
  - began in 1948 with Southern Governors
  - non-partisan, non-profit
- First program launched in 1949 with RCP
- Three other regional education compacts



# SREB Operates as:

- Largest Compact
  - The most states
  - The most institutions
- 16 original member states
- 4 affiliates (solely for SARA)
  - Pennsylvania
  - District of Columbia
  - Virgin Islands
  - Puerto Rico



# SREB SARA Operates as:

SARA is a voluntary program for both states and institutions that participate.

- SARA membership versus SARA Participation.
- States gain SARA membership through their regional compact membership, while institutions can participate in SARA through membership in their state agencies that facilitate SARA, as long as the state is a member of one of the four regional education compacts.
- States renew SARA membership every two years and institutions renew SARA participation annually.



# S-SARA RSC Operates as:

The SREB SARA Regional Steering Committee (S-SARA RSC) consists of the SPEs from SREB's 16 member states and its 4 affiliates, as well as 5 at-large members that represent various higher education sectors and SARA stakeholders:

- Large Online 4-year
- Two-year
- Private and Vocational
- Higher Education Policy Consultant

SREB's RSC includes both the states and institutions' voices in conversations and votes regarding SARA matters.



# SREB Office of Postsecondary Education

Vice President of Postsecondary Education

Harriette Scott, EdD

## Postsecondary Office of Access and Student Success Staff

Michael DeJesus III, PhD

Director, Postsecondary Access and Student Success

Elisa Jaden, EdS

Regional SARA Director

Program Specialist

Jimikea Wilson

Program Coordinator

Allison Buckley

Program Specialist

Melissa Juarez

Analyst I

# Postsecondary Access & Student Success Programs

## *Regional Tuition Reciprocity Programs*

Academic Common Market (ACM)

Regional Contract Program (RCP)

## *Education Technology and STEM*

Open Educational Resources (OER)

Education Technology Cooperative (ETC)

## *Higher Education Policy and Compliance*

State Authorization Reciprocity Agreement (SARA)

## *Collaborative Online Course Sharing*

[HBCU-MSI Course-Sharing Consortium](#)

[www.SREB.org/PostsecondaryEd](http://www.SREB.org/PostsecondaryEd)

SREB

# SREB's 6 Priorities

# SREB's Priority Work

1. AI in Education
2. Career Pathways and Credentials
3. Educator Workforce
4. Longitudinal Literacy
5. Crisis Recovery Support Network
6. Student Success in Postsecondary

SREB

# AI in Education

The SREB Commission on Artificial Intelligence in Education will evaluate research, industry data, and advice from experts to determine how education can successfully adopt and integrate AI across the region and lead the nation.

# Our Charge

Based on this critical evaluation, the Commission will then develop recommendations for:

- Policies regarding the use of AI in K-12 and postsecondary education,
- The use of AI in instruction to promote AI literacy among students, educators, and the workforce, and
- The development of skills and seamless pathways in the education-to-workforce system to meet industry and state needs.

# Commission Focus:

- AI in Education integrates artificial intelligence technologies to enhance learning, teaching, and leading.
- AI equips students with the skills to use it in a digitally driven future, solving complex problems and personalizing learning.
- AI in education advances efficiency, effectiveness, and accessibility, mitigating disparities in an ethical manner without losing the human element of learning.

# AI Commission Subcommittees

K-12 AI  
Policies

PSE AI  
Policies

K-12 AI  
Instruction

PSE AI  
Instruction

AI Skill  
Development

SREB

# Career Pathways and Credentials

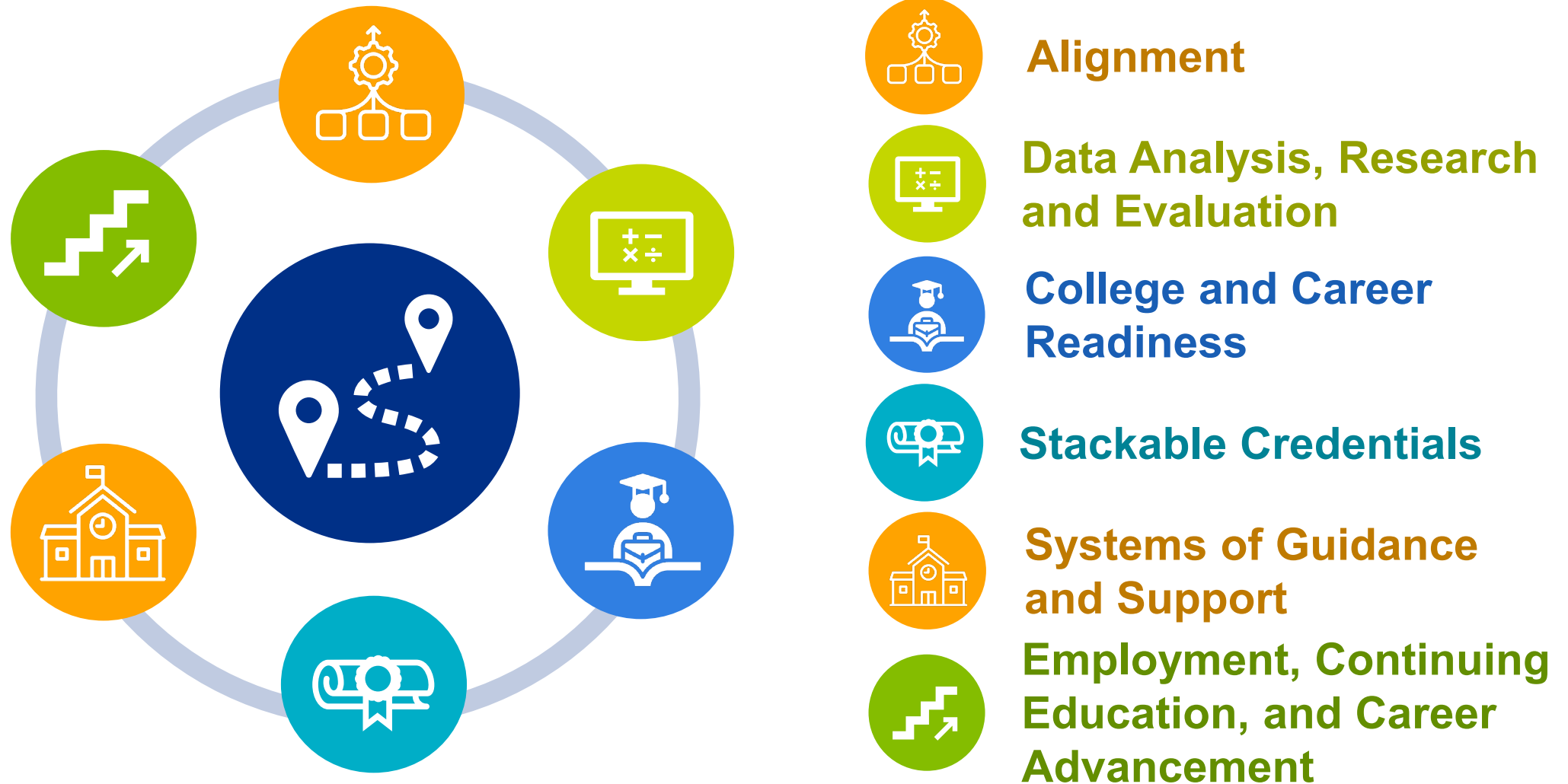
Career pathways provide students of all ages opportunities to gain knowledge and skills needed to achieve personal goals and earn industry-valued credentials.

# Defining SREB Career Pathways

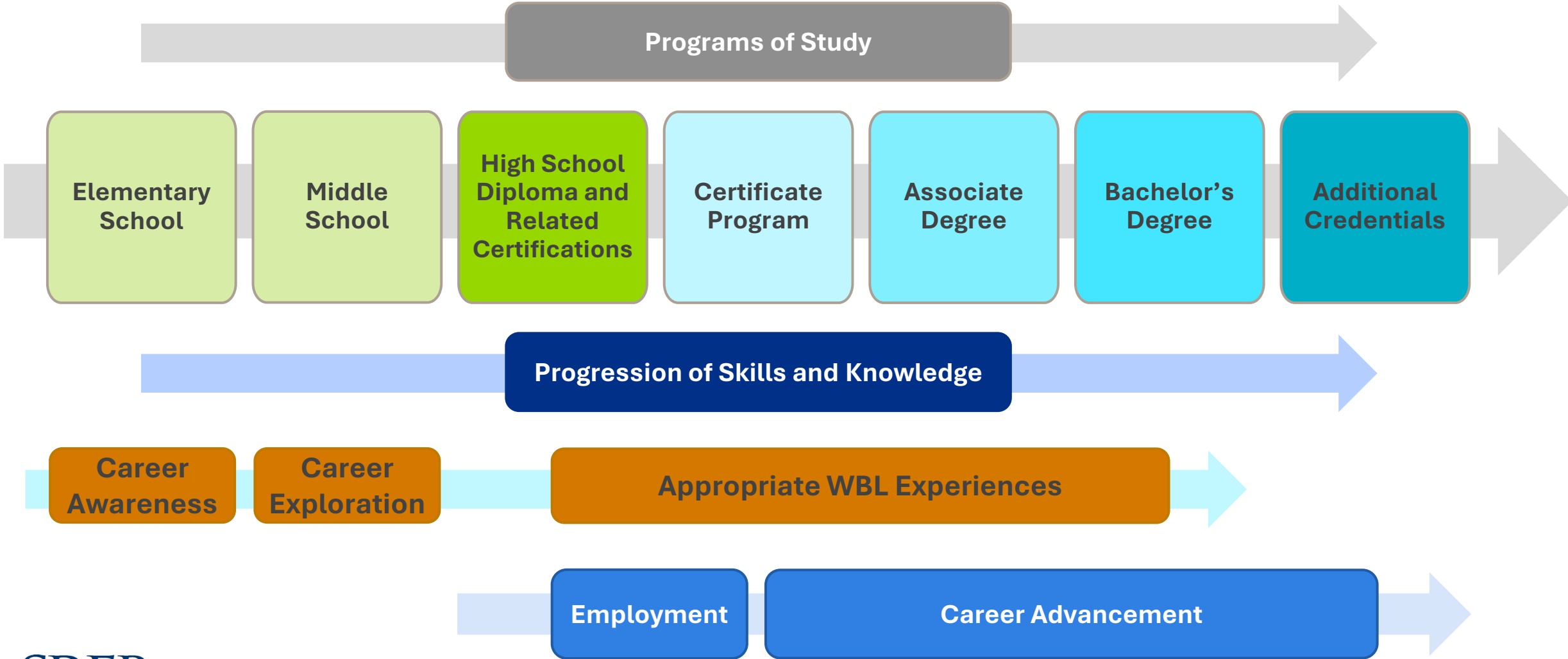
**SREB Career Pathways** connect elementary, secondary, and postsecondary education and training with rigorous and high-quality learning experiences.

Based on research and past experiences, SREB has identified six essential elements of career pathways that support workforce needs and thriving economies.

# Key Elements of Career Pathways



# SREB Career Pathways



SREB

# Educator Workforce

To sustain our economy, we must have great teachers and school leaders to fully prepare the next generation of leaders, entrepreneurs and workers.

# Educator Workforce cont'd

SREB is laying the groundwork to become a national leader in solving the complex issue of building and maintaining a first-rate educator workforce.

# SREB's Educator Workforce Blueprint



Preparation

## Pathways & Preparation

- A variety of **entry points** into teaching that share common **high standards**
- Preparation programs attuned to teachers' **real-life needs**, such as classroom management and the science of reading



Licensure & Certification

## Licensure & Advancement

- Licensure systems that **scaffold strategic roles** based on teachers' skills, competencies and impact — and **align** with pay and ongoing support
- Certification for levels **from pre-service** to advanced **teacher-leadership roles**



Growth & Support

## Professional Supports

- Quality **mentorship and induction** for novice teachers and leaders
- A variety of **quality professional learning**
- The **flexibility, time, resources and support staff** needed for teachers and their students to succeed



Compensation

## Compensation

- Salary structures that are **strategic** and **reward** teachers' skills, knowledge, impact and leadership
- **Health and retirement benefits** that are high-quality and affordable
- Other recognitions and incentives

# Longitudinal Literacy

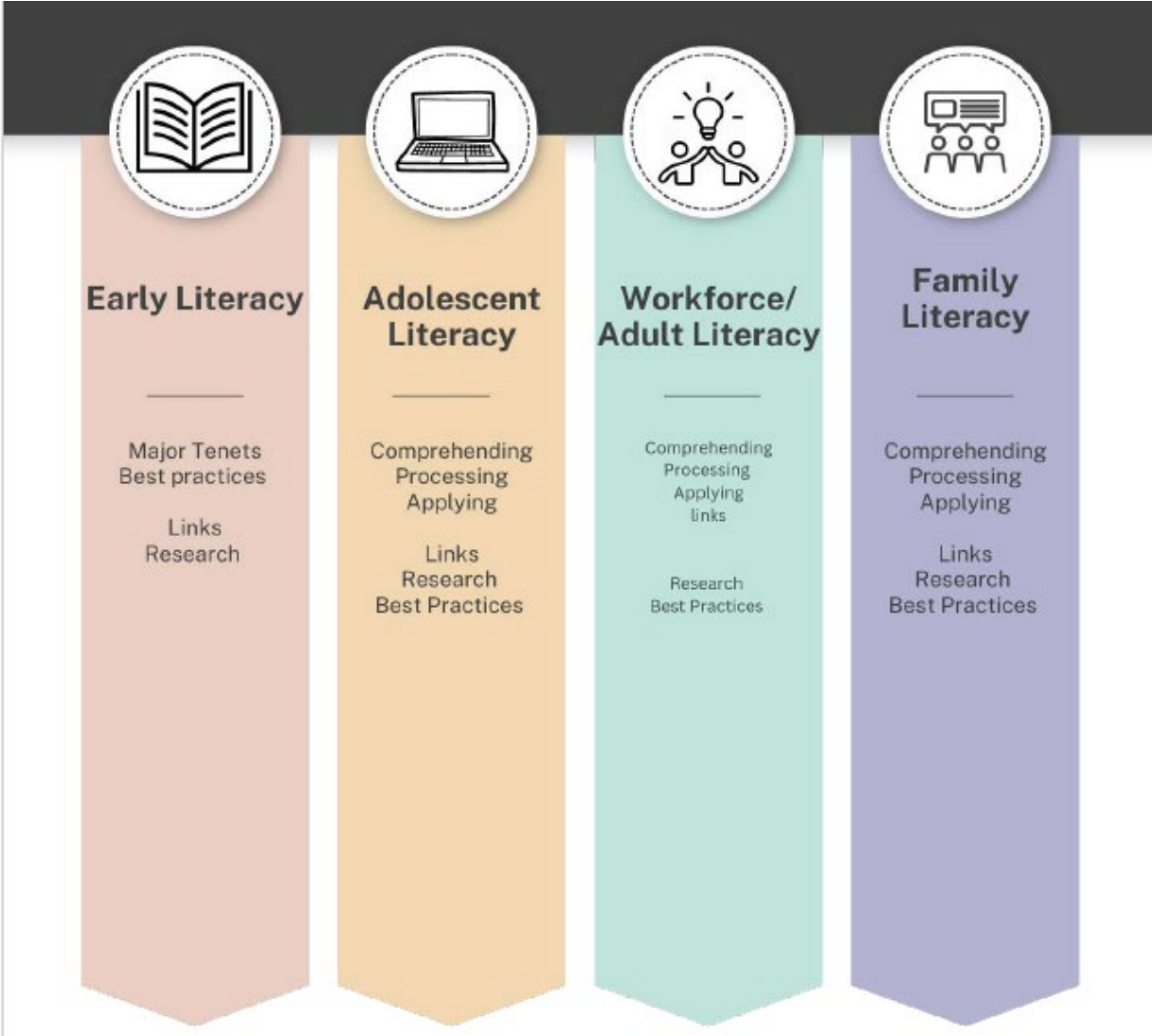
Longitudinal literacy understands literacy as a continuous journey, with each stage playing a crucial role in shaping personal and professional success. Addressing literacy needs at every life stage—from preschool to adulthood—aims to equip individuals with the skills needed to succeed in education, contribute to their communities, and ultimately support national economic growth.

# Defining Longitudinal Literacy

Longitudinal Literacy is a lifelong approach to learning that views literacy as a **progression through three interconnected skills: comprehending, processing, and applying information.**

This journey spans from early childhood to adulthood, recognizing that literacy development extends far beyond early education.

# Longitudinal Literacy Continuum





# Crisis Recovery Support Network

## Counseling Support for Recovery

- In collaboration with governors' offices, state education agencies, local districts and postsecondary institutions
- coordinated response to crisis recovery
- year-long emotional and mental health support for students, teachers and communities impacted by tragedy
- cadre of counselors across the South, building shared capacity to support crisis recovery in their home state or elsewhere

# Why Crisis Recovery Support?

Offers an extended healing process to students, teachers and entire communities with at least a year of dedicated support for:

## 1. Natural Disaster Recovery

1. Weather (hurricanes, tornados, floods)
2. Health (Covid or other Pandemics)

## 2. Violence on Campus

1. Shootings
2. Suicides

SREB

# Student Success in Postsecondary – A Framework

# Why a Framework for Student Success?

1. Increase Access for All Students
2. Support Completion and Persistence
3. Align Education with Workforce Needs
4. Facilitate Seamless Transitions
5. Data-Driven Strategies
6. Strengthen Economic Outcomes
7. Holistic Student Support

# Student Success Defined

The Southern Regional Education Board defines Student Success as access to and completion of postsecondary credentials that lead to lifelong learning, fulfilling careers, and stronger economies. SREB has identified four pillars as the foundation of the framework for Student Success — access, persistence, retention and attainment.

# The 4 Pillars Defined

<b>Access</b>	Postsecondary access refers to the capacity of all institutional stakeholders to prepare students to pursue and succeed in education beyond high school, encompassing awareness of various options, entry requirements and processes, and affordability.
<b>Persistence</b>	Postsecondary persistence emphasizes individual agency and goal-oriented progress towards personal goals in an aligned and transparent system by actively engaging with resources and supports.
<b>Retention</b>	Postsecondary retention is providing students with tools and services that enable them to complete their intended courses of study, including streamlined processes, robust support services, comprehensive learning environments, clear academic and career pathways, and proactive monitoring and support of each student's progress.
<b>Attainment</b>	Attainment refers to the completion of postsecondary education and training, including certificates, degrees, and work-based experiences, to prepare individuals for fulfilling careers and foster a diverse, skilled workforce.

# Access

## KEY PRACTICES

	K-12 Schools	Postsecondary	State Level/ Policymaker
<b>Challenging Coursework</b>	Ensure all students, including communities in need and non-traditional students, have opportunities to engage in challenging academic and technical skills necessary for the workplace and further education.	Provide students with opportunities to engage in rigorous academic and technical training that prepares them for the workforce and advanced education, including tailored support for communities in need and nontraditional students.	Prioritize state resources and efforts to develop academic degree programs and shorter-term, non-degree programs aligned to critical labor market needs.
<b>Career Pathways</b>	Provide all students access to quality work based-learning experiences that align with their career interests and aptitude.	Integrate high-quality work-based learning experiences into academic programs and career services, ensuring they align with students' career interests and aptitudes.	Ensure state policymakers and business and industry co-create career pathways, with K-12 and postsecondary institutions that include work-based learning experiences and opportunities.
<b>Student Support</b>	Equip students and families with advisory support and adequate information when selecting career pathways, such as interest inventories, aptitude tests, career awareness and funding sources.	Offer students comprehensive advisory support and resources for selecting career pathways, including career interest inventories, aptitude assessments, career exploration opportunities and information on financial aid and scholarships.	Endorse state policies that require schools and post-secondary institutions to provide comprehensive advisory support and resources for career pathway selection, including career interest inventories, aptitude assessments, career exploration programs and financial aid information.
<b>Human Capital</b>	Ensure each student has access to high-demand career programs in critical needs areas, regardless of their location or socio-economic status.	Ensure that all students have opportunities to enroll in high-demand career programs in critical need areas and provide them with information on how to access support programs, including academic support, mental health services and financial aid.	Establish coordinated state-wide policies that ensure access to high-demand career programs, promote data collection on student outcomes by institutions, and work with state agencies to provide insights on pay and in-demand careers so that critically understaffed programs are sufficiently staffed.

## KEY PRACTICES

	K-12 Schools	K-12 Schools	State Level/ Policymaker
<b>Challenging Coursework</b>	Design tiered systems of extra help and accelerated learning opportunities that help each student become an independent learner and complete a challenging academic and technical program of study.	Promote participation in summer bridge programs that offer both preparatory and core courses, along with peer mentoring and tutoring through a range of support programs, to aid students in their transition to college.	Champion state policies that fund and support summer bridge programs offering both preparatory and core courses and ensure the availability of peer mentoring and tutoring through a variety of support programs to enhance students' transition to college.
<b>Career Pathways</b>	Provide all shareholders with clearly defined academic and technical pathways from high school to college and career, including articulated and dual credit, and industry-recognized credentials.	Provide a transfer system that clearly articulates course and credit transferability between community colleges, universities that align with degrees, and industry-recognized credentials.	Align statewide policies and resources to simplify credit transfer and articulation among secondary and post-secondary institutions.
<b>Student Support</b>	Ensure each student participates in a comprehensive counseling program that addresses academic and career development, and mental health and wellness to attain skills for lifelong success.	Implement comprehensive student support programs that include academic and career counseling, as well as mental health and wellness services, to help students develop the skills needed for long-term success.	Promote state policies that ensure K-12 schools and higher education institutions provide comprehensive counseling programs addressing academic and career development, alongside mental health and wellness services, to equip students with skills for lifelong success.
<b>Human Capital</b>	Build capacity within the whole school community to have a growth mindset that all students can complete early college and career opportunities.	Collaborate with shareholders to identify and implement statewide initiatives that offer students opportunities to earn early college credit.	Support policies and foster collaboration between state agencies and industry partners to ensure alignment provides early access to college and career opportunities.

# Persistence

## KEY PRACTICES

# Retention

	K-12 Schools	Postsecondary	State Level/ Policymaker
<b>Challenging Coursework</b>	Provide dual enrollment and early college training opportunities for K-12 teachers to facilitate exposure and transition to postsecondary education.	Provide dual enrollment and early college opportunities to students, creating a pipeline of students, and promoting seamless transition to postsecondary education.	Support policies, regulations and laws that direct resources to support K-12 teacher training in dual enrollment and early college teaching and expand availability of dual enrollment and early college opportunities for students.
<b>Career Pathways</b>	Create programs of study with detailed career pathway progressions that are aligned with labor market needs and lead to fulfilling careers.	Cultivate partnerships between postsecondary institutions and businesses to provide work-based learning experiences in high-demand fields that provide livable wages.	Advocate for the provision of necessary resources and the data required to establish and facilitate partnerships between educational institutions and industries in high-demand fields.
<b>Student Support</b>	Ensure each student has support through mentoring, advocacy and advisory programs, co-curricular activities or community partnerships.	Establish wraparound services and partner with local support organizations to provide student academic advisement, financial aid, mental health supports, career services and other needed assistance.	Foster collaboration between state education institutions, social service and workforce development organizations to analyze data and ensure accountability for continuous improvement.
<b>Human Capital</b>	Use data-driven means to proactively monitor each student's progress and provide needed supports.	Implement data-driven student monitoring systems to better anticipate, identify and address potential challenges to each student's continued enrollment.	Promote the adoption of policies mandating ongoing, data-driven evaluation of programs to ensure their quality and effectiveness and to identify any areas of needed improvement.

## KEY PRACTICES

	K-12 Schools	Postsecondary	State Level/ Policymaker
Challenging Coursework	Ensure each student has opportunities to earn industry-recognized credentials and early post-secondary credits in their chosen program and career pathway.	Offer students opportunities to earn industry-recognized credentials and early post-secondary credits within their chosen program and career pathway.	Support the development and expansion of policies that provide students with opportunities to earn industry-recognized credentials and early post-secondary credits in their chosen career pathways.
Career Pathways	Ensure each student at all grade levels develops and annually reviews and revises a personalized education plan that includes rigorous academic core courses and challenging career pathway courses that align with their interests and aptitudes.	Ensure that each student, including communities in need and nontraditional students, obtains in-demand skills and earns a credential that serves as an on-ramp to a career and enhanced living standards.	Engage business and industry leaders in forging and strengthening regional industry sector partnerships in support
Student Support	Ensure each student receives appropriate support for a seamless transition between teachers, grade levels and schools. Additional targeted assistance is available for students who enter school during the school year.	Provide students with tailored support to ensure a smooth transition between academic levels, programs and departments, and offer additional assistance for students who enroll mid-year.	Promote policies that facilitate smooth transitions for students between educational stages and institutions, and support programs that offer targeted assistance for students entering mid-year.
Human Capital	Offer career interest and aptitude inventories, surveys and other tools, including a plan of support for each student that allows them to explore their talents and options.	Ensure every student has access to career interest and aptitude assessments, surveys and personalized support plans to help them explore their talents and career options.	Adopt an industry-aligned statewide policy for K-16 and work-based learning that promotes a continuum of experiences beginning in the middle grades and extending through post-secondary.

# Attainment

For more information on:

SREB

SREB's 6 Priorities

SREB SARA

Elisa Jaden

Regional SARA Director

[Elisa.Jaden@sreb.org](mailto:Elisa.Jaden@sreb.org)

Southern  
Regional  
Education  
Board

SREB.org

# Break



# SARA Policy Updates

Jared Abdirkin, Director, Institutional Engagement & Initiatives  
NC-SARA

11:00-11:30 a.m.





# NC-SARA Updates and Resources for SARA- Participating Institutions

## Texas SARA Institution Program

Jared B. Abdirkin

Director, Institutional Engagement & Initiatives

NC-SARA

Friday, June 6 2025



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE

# Agenda

## Today's Topics

What is SARA, What is NC-SARA

NC-SARA Resources

SARA Development

Policy Modification Process

Federal Considerations



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE

# What is SARA & NC-SARA

## What is SARA?

State Authorization Reciprocity Agreements (SARA) is an **agreement** amongst member states, districts, and territories that establishes comparable national standards and streamlines regulations, fees, and approvals for institutions offering interstate distance education programs. More than 2,400 institutions in 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands all voluntarily participate in SARA.

## What is NC-SARA?

The National Council for State Authorization Reciprocity Agreements (NC-SARA) is a private nonprofit **organization** [501(c)(3)] that in partnership with the four regional compacts coordinates the implementation of SARA nationally. NC-SARA supports, facilitates, and serves the regional compacts, the regional steering committees, the State Portal Entities, and SARA participating institutions.

# SARA Partners and Impact

## Institutions

Over 2,400 institutions voluntarily **participate** in SARA  
Institutions are reviewed for renewal annually by the SPE

## States (states/districts/territories)

52 states are **members** of SARA  
State are reviewed every two years for SARA Membership

## Regional Compacts (MHEC, NEBHE, SREB, WICHE)

Oversee SARA in their region

## State Portal Entities (SPE)

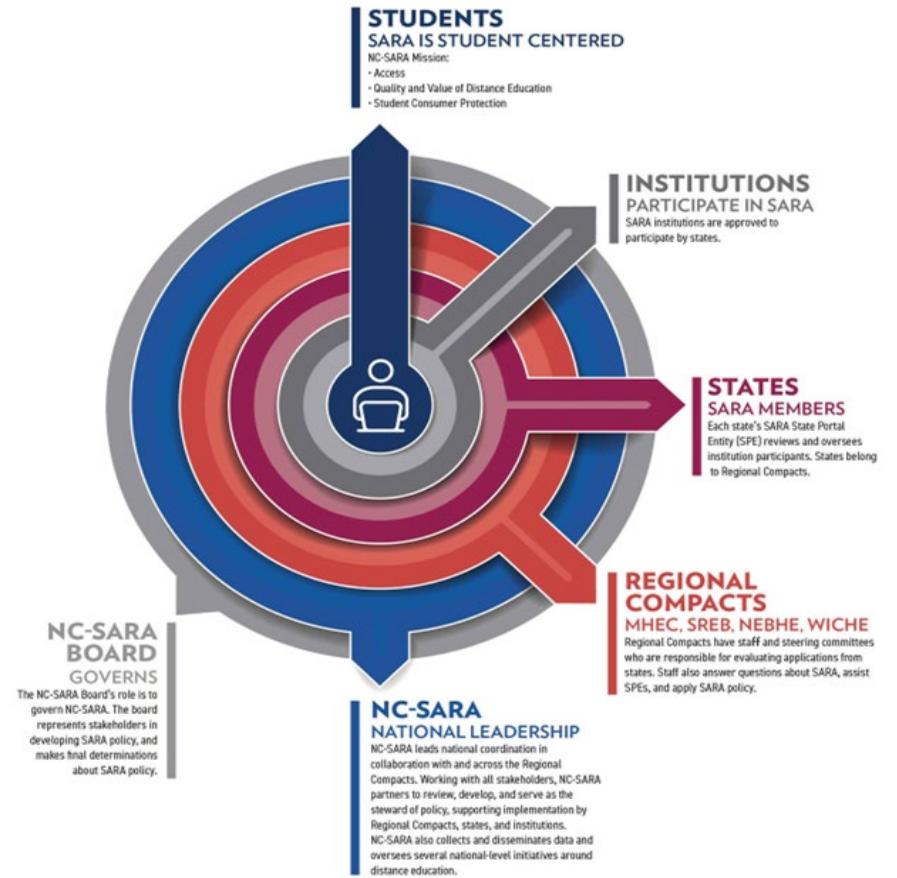
One SPE for each SARA member state

## Regional Steering Committees (RSC)

One RSC for each regional compact

## SARA Student Access

Over 1.6 million students attended SARA-participating institutions out-of-state exclusively via distance education (430,000+ out of state learning placements)



# The Critical Role of the States



- States approve their “home-state” institutions to participate in SARA
- The SARA State Portal Entity (SPE) is the state agency responsible for SARA approvals and compliance





# SARA Member States

## LEGEND

MHEC

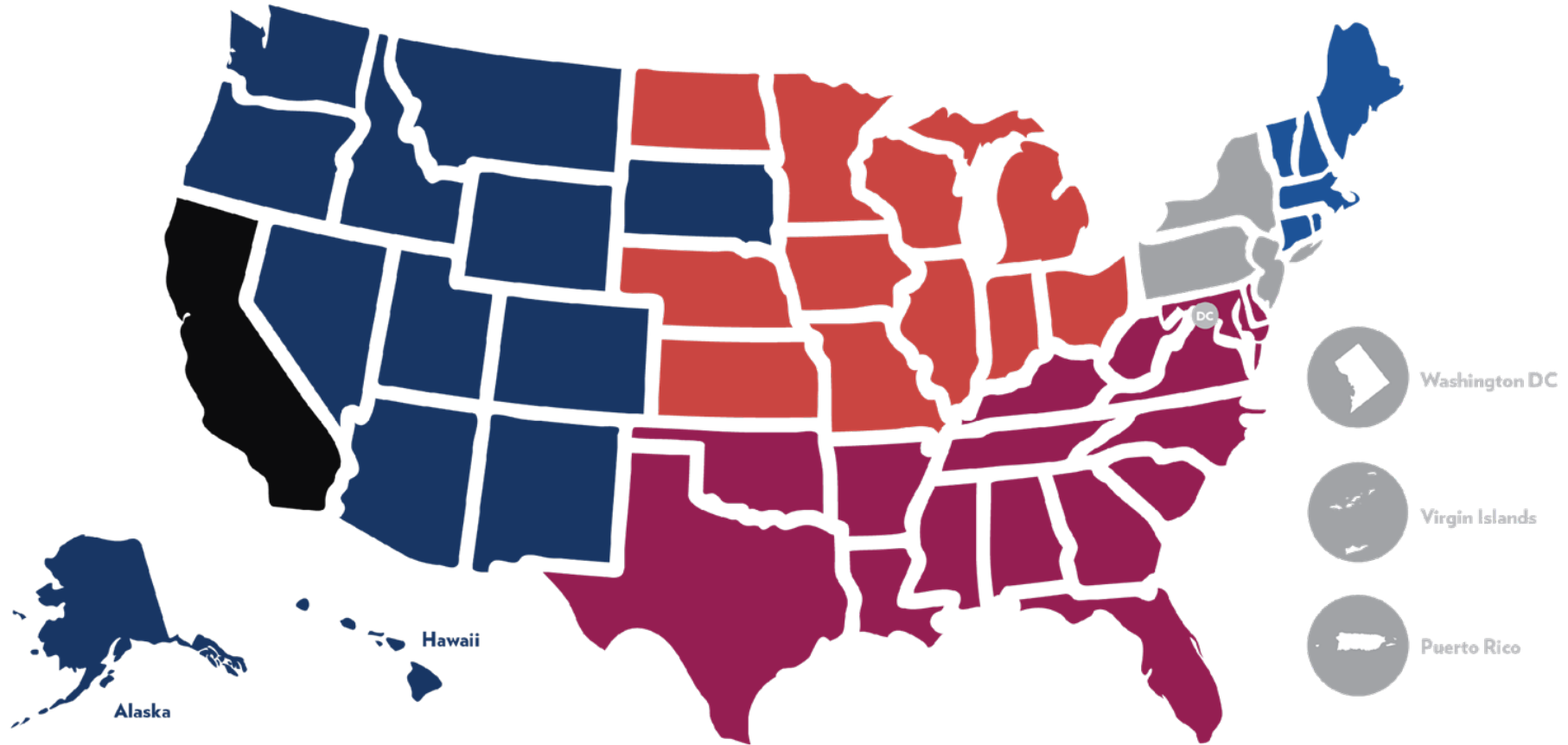
NEBHE

SREB

WICHE

MEMBERS  
of SARA; Not in a Compact

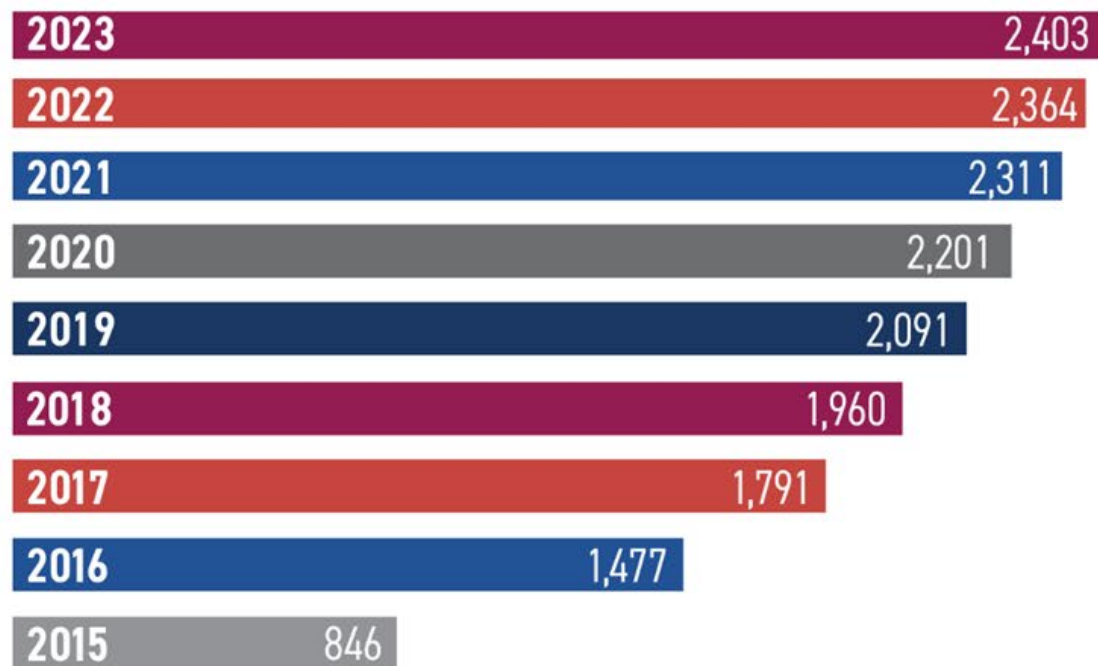
NON MEMBER



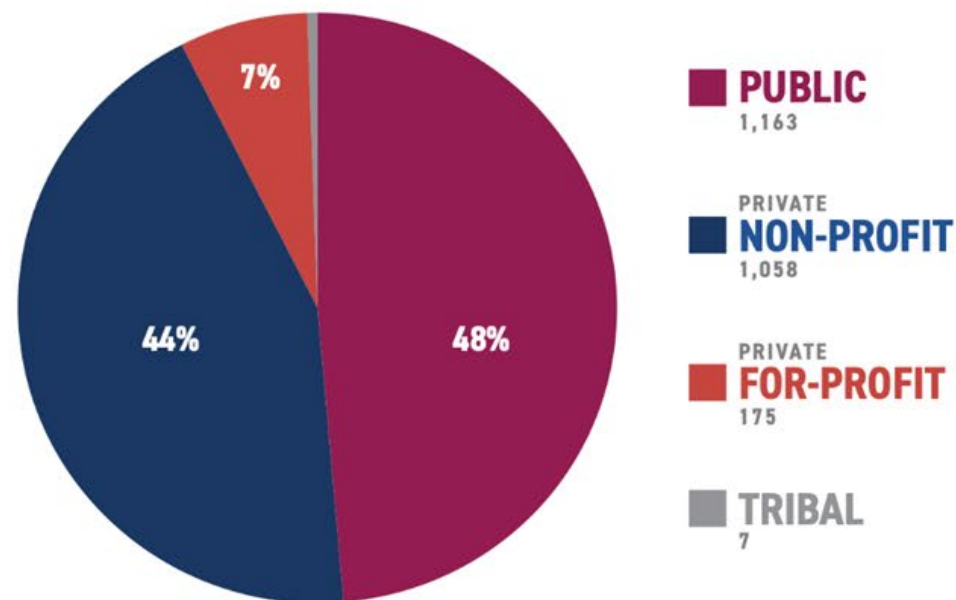
# SARA-PARTICIPATING INSTITUTIONS

## SARA PARTICIPATION CONTINUES TO INCREASE

The number of institutions participating in SARA has continued to increase, with 39 more institutions reporting data from 2023 than from 2022.



## PUBLIC INSTITUTIONS CONTINUE TO MAKE UP LARGEST SECTOR IN SARA



Note that percentages may not add up to 100 due to rounding.

# SARA Learning Station



Powered by NC-SARA



## Online Courses

- SARA 101
- Institution Courses
  - Foundations of NC-SARA Annual Data Reporting
  - Preparing for and Maintaining SARA Participation
- SPE Courses
  - An Overview of Essential Duties of SPE Staff Related to SARA
  - Managing Initial and Renewal Applications

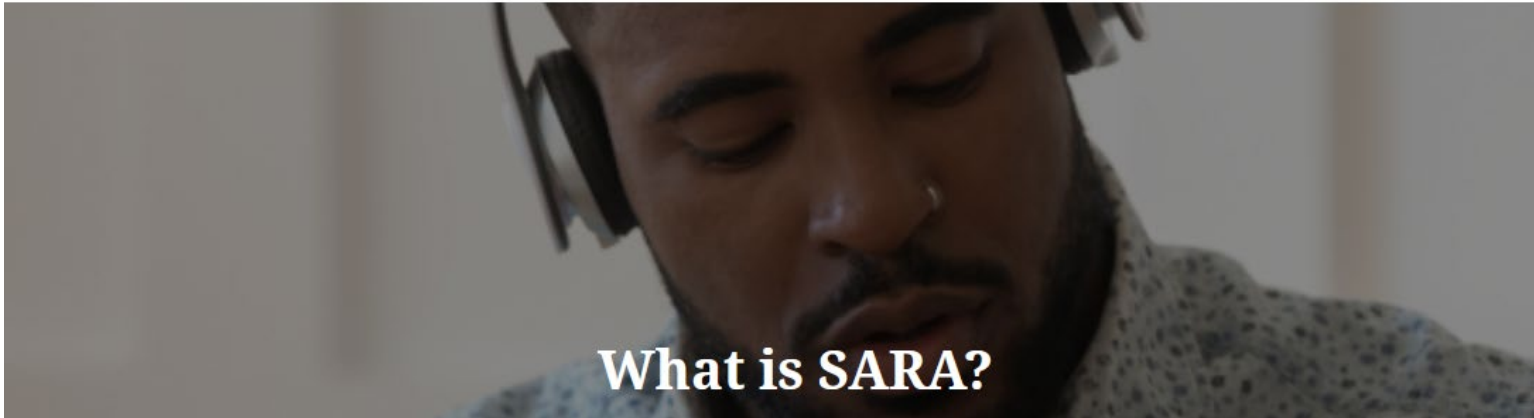
## Tools & Resources: SARA Learning Station

- Institution Welcome Kit
- SARA Quick Start Guides
- *SARA Policy Manual*
- Videos
- Articles
- “Explainers”
- Graphics & Infographics

## Events / Programming

- Webinars
- Webcasts
- Conferences and Other Presentations

<https://nc-sara.org/sara-learning-station>



## NC-SARA provides:

- Professional Licensure Directory
- State Authorization Guide
- SARA Student Complaint information
- SARA Source
- Cost Savings Calculator
- SARA Participating Institution Directory





## NC-SARA Participation Fees

**Note** – this is separate from and in addition to any fees state-specific fees charged

The NC-SARA fee will be assessed as follows (effective July 1, 2024):

Enrolled FTE	Annual Fee –
Less than 2,500	\$2,200
2,500-9,999	\$4,400
10,000-29,999	\$6,600
30,000 or more	\$8,800

# SARA Institution Cost Savings

## 2023 Estimated Renewal Savings by Region:

State	Number of SARA Member Institutions	Estimated Costs	State and NC SARA Costs	SARA Affiliation Fee	Estimated Savings
MHEC	644	\$39,197,355	\$2,912,100		\$36,285,255
NEBHE	344	\$35,764,100	\$2,683,563	\$100,000	\$32,980,538
SREB	1,067	\$73,354,450	\$5,408,000	\$160,000	\$67,786,450
WICHE	275	\$18,217,525	\$1,328,000		\$16,889,525
Grand Total	2,330	\$166,533,430	\$12,331,663	\$260,000	<b>\$153,941,768</b>

## SARA Cost Savings Calculator



The SARA Cost Savings calculator may be used by colleges and universities offering interstate distance education to:

- Estimate the costs associated with state authorization, both for SARA and non-SARA participants.
- Project changes to costs based on the addition of new distance education programs or expansion of existing programs.
- Evaluate the cost savings and the return on investment of SARA participation.

<https://nc-sara.org/sara-cost-savings-calculator>



# Current Areas of Work

- Converting to eForms - electronic processing
- SARA Institution Application
  - new versions - 1/1/25, **7/1/25**, **1/1/26** (expected)
  - new policies require updates
  - 1/1/25 also included updates to institution “contact roles”
- Electronic Enhancements to Institution Application



# Enhancing Institution Engagement

- Quarterly Institution Newsletter (began January 2025)
- Timely webinars
  - **June 23** - Federal Financial Responsibility Composite Scores (FFRCS)
  - March - Professional Licensure
- Updated learning resources
  - Institution Application “Quick Start Guide”



# SARA Policy in Effect

Institution Application for Participation and Renewal

*NOTE – an institution only needs to complete the application at the time of initial participation and then annual renewal*

# Institution Application for Participation & Renewal

- **January 1, 2025** - 3.9 Disclosure requirements

Institutions shall disclose to their home state:

- any adverse action against the institution and any investigation by an oversight entity related to the institution's academic quality, financial stability, student consumer protection policies or practices, or compliance with any state or federal requirement, within thirty days of the institution's first knowledge of the action or investigation.
- any changes in the institution's operations that are inconsistent with the requirements contained in the *SARA Policy Manual* or that may impair the institution's ability to satisfy any requirement of the *SARA Policy Manual* within thirty days of the institution's first knowledge of the change.

- **July 1, 2025** - 5.2 Programs leading to professional licensure

- Any institution approved to participate in SARA that offers courses or programs designed to lead to professional licensure or certification or advertised as leading to licensure must satisfy all federal requirements for disclosures regarding such professional licensure programs. For SARA purposes, these requirements will also apply to non-Title IV institutions and programs.



# PMP24-0619: Responsibilities for Resolving Complaints

- **January 1, 2026** Institution Application
- Already reflected in [SARA Student Complaints](#) “Quick Start Guide”
- eBlast to all institutions mid-March letting them know this is coming, given potential timeline for their next academic catalog. Continue reminding in new quarterly newsletter for institutions for remainder of 2025.
- 4.4 Responsibilities for resolving complaints (italicized language effective January 1, 2026)
  - a. Effective beginning January 1, 2026 - Institutions operating under SARA policies shall provide their and SARA’s complaint resolution policies and procedures to all students taking courses under SARA policies *on the institution’s website and in the institution’s catalog or equivalent information provided either in print or electronically to students when they enroll.*



## 2025 SARA Policy Modification Process Calendar

Date	Activity
Tuesday, January 21, 2025	Call for proposed SARA policy modifications opens
Friday, February 7, 2025	Deadline for submitting or withdrawing proposed SARA policy modifications
Thursday, March 6, 2025	Period to amend or withdraw proposed SARA policy modifications opens
Thursday, March 6, 2025	First call for public comments on proposed SARA policy modifications opens
Monday, April 7, 2025	First deadline for public comments on proposed SARA policy modifications
Friday, April 25, 2025	Policy Public Forum
Monday, June 2, 2025	Final deadline to amend or withdraw proposed SARA policy modifications
Monday, June 9, 2025	Second call for public comments on proposed SARA policy modifications opens
Monday, July 7, 2025	Second deadline for public comments on proposed SARA policy modifications
Tuesday, September 2, 2025	Deadline for Regional Compacts and Regional Steering Committees to review and vote to approve or not approve each proposed policy modification
Tuesday, September 9, 2025	Deadline for NC-SARA to publicly post results of Regional Compacts and Regional Steering Committees voting outcomes
Thursday, October 23, 2025	NC-SARA Board review and vote on proposed policy modifications approved by each Regional Compact and Regional Steering Committee
Monday, December 22, 2025	Revised <i>SARA Policy Manual</i> published on NC-SARA website
Tentative: Wednesday, January 21, 2026	SARA Policy Modification Process cycle for 2026 begins

Engage directly with proposers.

Register your initial and final thoughts during the “public comment” periods.

Attend and share your opinion during the “public form”.

# Learn, View, Participate & Follow

## Learn About the SARA Policy Modification Process

- [2025 SARA Policy Modification Process Calendar](#).
- View the SARA Policy Modification Process in a [flowchart format](#).
- Learn about the [history of the SARA Policy Modification Process and how the regional compacts review proposals](#).

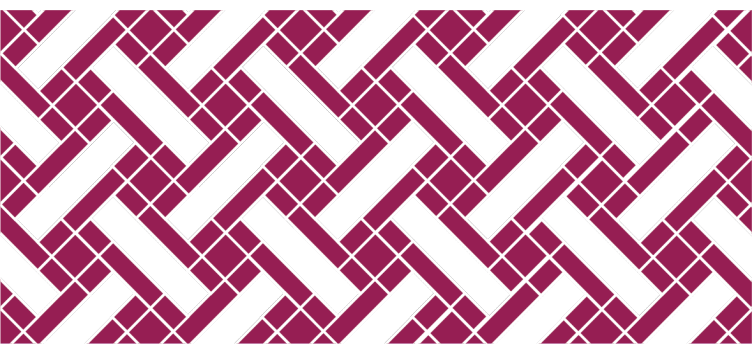
## View SARA Policy Modification Proposals

- [SARA Policy Portal](#)

## Participate & Follow the SARA Policy Modification Process

- Public Comments
- SARA Public Forum





# **Federal Developments**

# Federal Developments as of January 2025

- Republican control of Executive and Legislative branches
- US ED final action on Winter 2024 Negotiated Rulemaking
- NC-SARA and SARA stakeholders remain focused on continuous improvement

# Biden-Harris Department of Education

December 20, 2024:



*“The Department also believes it is worth evaluating how State-led efforts at improving state authorization proceed before making further regulatory changes. This particularly involves the **policy modification process** adopted by the National Council for State Authorization Reciprocity Agreements (NC-SARA), an organization formed in partnership with four regional compacts in which almost all states across the country participate for purposes of providing state authorization and reciprocity. NC-SARA first started using a policy modification process in January 2023 to create a formal mechanism for addressing issues with state authorization and reciprocity.<sup>1</sup> That process continues to be refined. As many commenters noted during the public hearings and negotiated rulemaking sessions on state authorization, **allowing this policy modification process to continue is one way to address the Department’s goals.**” (emphasis added)*

<https://www.federalregister.gov/documents/2024/12/26/2024-30919/program-integrity-and-institutional-quality-state-authorization-cash-management-accreditation-and>



www.nc-sara.org



info@nc-sara.org



National Council for  
State Authorization  
Reciprocity Agreements

MHEC • NEBHE • SREB • WICHE



# Federal Developments

## **Abolish the U.S. Department of Education? Not so fast...but we could see it dismantled:**

- A downsizing of staff (cutting half the staff)
- Freezing grants
- Shifting enforcement authority to other agencies

## **The US Department of Education**

- Created in 1979
- More than 4,000 people currently work for the department
- In fiscal year 2024, the department had a \$80 billion discretionary budget; 268 billion total budget
- Its spending makes up just over 4 percent of the federal budget



# Federal Rules and Regulations

Professional Licensure federal regulations and State Authorization federal regulations remain effective.

- These regulations are not subject to any freeze and will remain legal obligations until there is a new rulemaking amending regulations or Congress making a change to the HEA.

Any changes, such as moving departmental functions to other agencies or amending the Higher Education Act, will need Congressional approval.

- Reversing Biden-era regulations cannot happen quickly and will require actions from courts, the legislature, or rulemaking committees.

# SARA Stakeholders Stay Focused on ED

## **Working Group – Institutional Closures**

- Teach out plan / teach out agreement
- Financial arrangements
- Records retention

## **SARA Narrative**

- White papers/blogs on a variety of topics
- One pager on student consumer protections
- *“NC-SARA, SARA and SAN: The Power of Collaboration”*
- *Myth Busting*
- *The Value of SARA*

## **Collect, Review, and Disseminate Information**

- Collect and share exclusively distance education enrollments trend data with SPEs
- Continue to gather data and information from SARA states/institutions on issues related to ongoing concerns.



## What To Do?

- Continue your good work of providing educational opportunities to all students.
- Remain compliant with all state and federal laws and regulations that pertain to distance education programs.
- Stay Informed!



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE

# Thank You!

 [www.nc-sara.org](http://www.nc-sara.org)

 [info@nc-sara.org](mailto:info@nc-sara.org)

 <https://www.linkedin.com/company/nc-sara>

# All About Texas Updates

Jared Abdirkin, Director, Institutional Engagement & Initiatives  
NC-SARA

11:30 a.m. -12:00 p.m.





# Texas SARA Workshop

NC-SARA Data Reporting

June 6, 2025



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE



## Agenda:

- 2024 Data Reporting
  - Participating Institutions
  - Exclusively Distance Education Enrollment (EDEE)
  - Out-of-State Learning Placements (OOSLP)
- 2025 Data Collection
  - Changes for 2025
  - Important Dates
  - Best Practices
- Other Data Resources



Next Topic

# 2024 Data Reporting

# What is the SARA Data?

## **Exclusively Distance Education Enrollment (EDEE)**

- Institutions report their exclusively distance education enrollments
- Report enrollments as you do to IPEDS (Fall EF report) – but disaggregated by state
- Includes in-state and out-of-state

## **Out-of-State Learning Placements (OOSLP):**

- Report on-ground and online student OOSLP
- OOSLP Does NOT include In-State



# How You Might Use the SARA Data

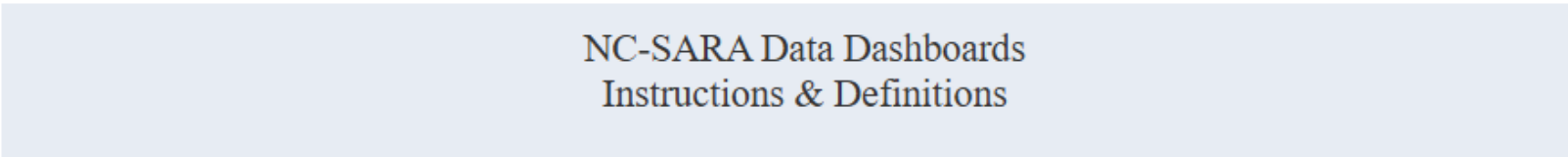
- The data describe the distance education landscape in your state or region
- They hold historical trends and may provide insights that could inform key decisions about distance education offerings
- These data may be used as your institution plans for new distance education programs to meet student needs and institutional goals
- These data may be used by your state to ensure institutional compliance

# NC-SARA's Data Dashboards

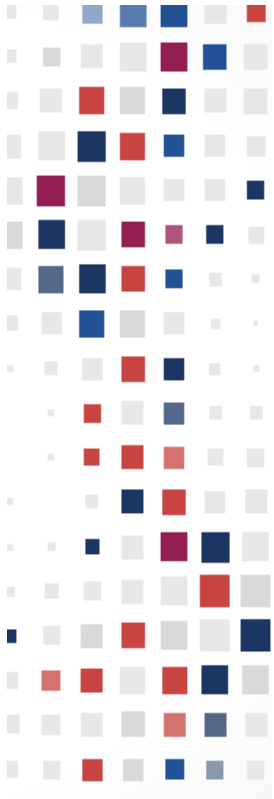
## Data Dashboards

NC-SARA is pleased to share new interactive data dashboards, below. These dashboards include all the data NC-SARA has been sharing publicly all along (and includes the most recent data collected from Fall 2023), but in an easier format for your access and use. Begin with the Instructions & Definitions tab, below, to learn how to use the dashboards and what the terminology means, and then feel free to move through the dashboards by using the tabs at the top. If you are seeking the previously shared downloadable data files, or if you need additional assistance with these dashboards or NC-SARA data in general, please contact: [data@nc-sara.org](mailto:data@nc-sara.org).

To download any of the charts or data tables, select the image of the square with downward pointing arrow in the bottom right corner of the dashboard. The dashboards can be downloaded as an image, PDF, PowerPoint, or where applicable, a crosstab in Excel or CSV format.



# Methodology



**SARA Data Reporting Window is May 15 – June 15 each year**

**2,428 Institutions were sent email requests to report**

- 25 exemptions were extended
  - 23 non-renewals or institutional closures
  - 1 joined near the end of 2023
  - 1 exemption given due to extreme staff shortage
- 0 institutions did not report



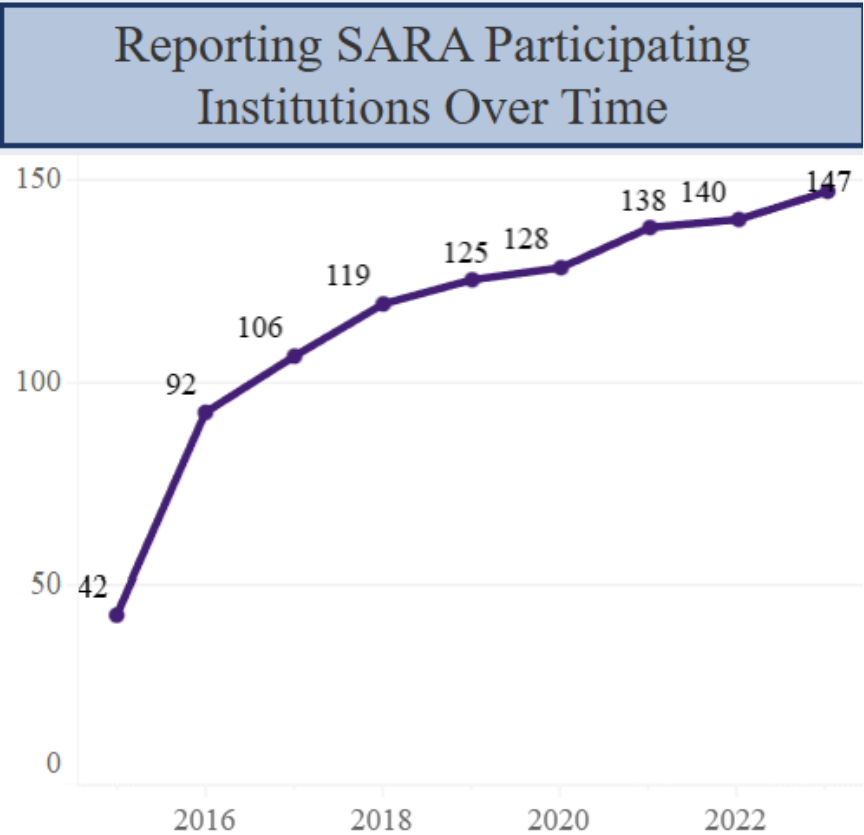


Next Topic

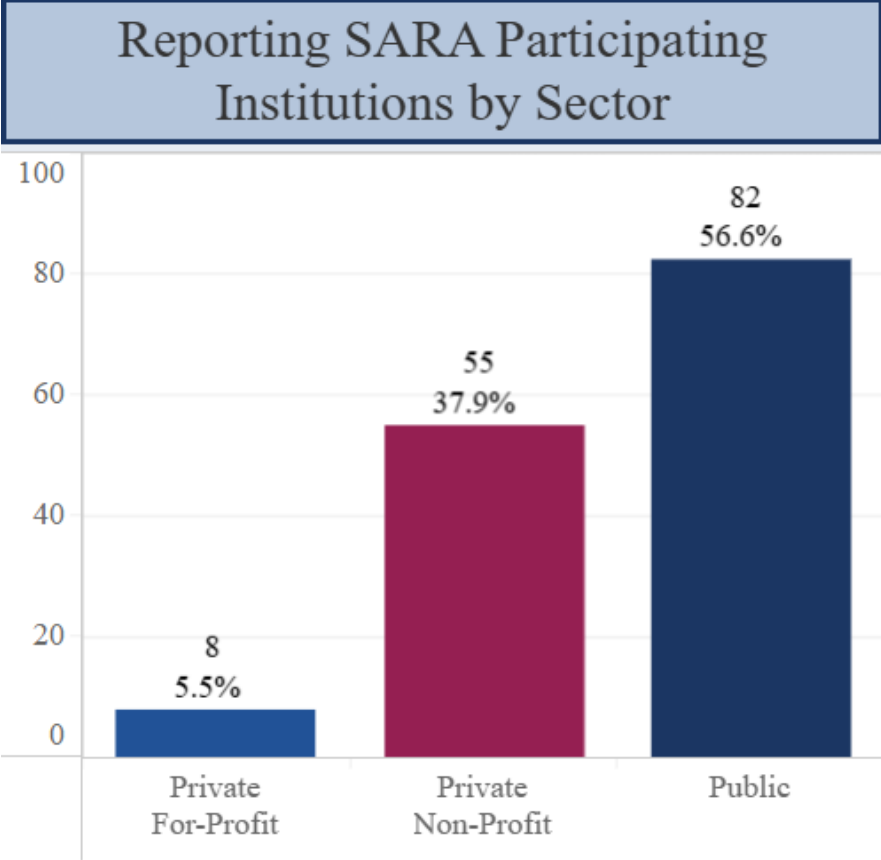
# Participating Institutions

# Total Number of Reporting Texas Institutions

### Number of TX Institutions Over Time



### Number of TX Institutions Over Time

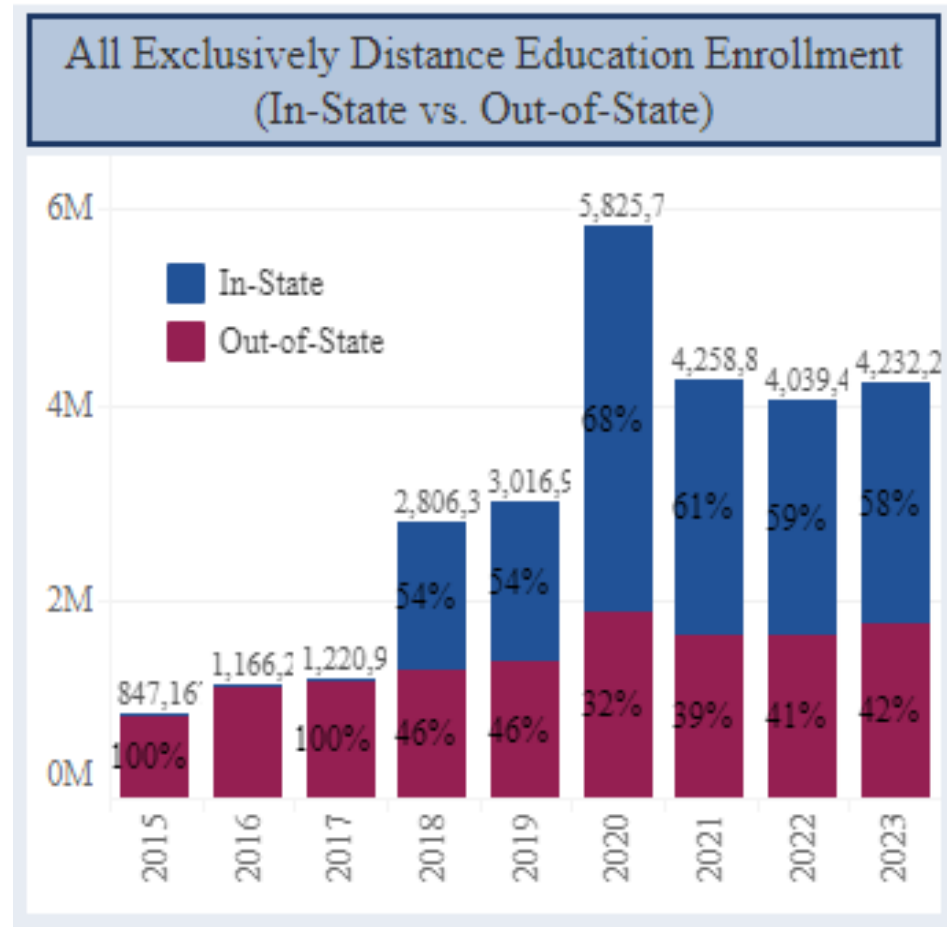




Next Topic

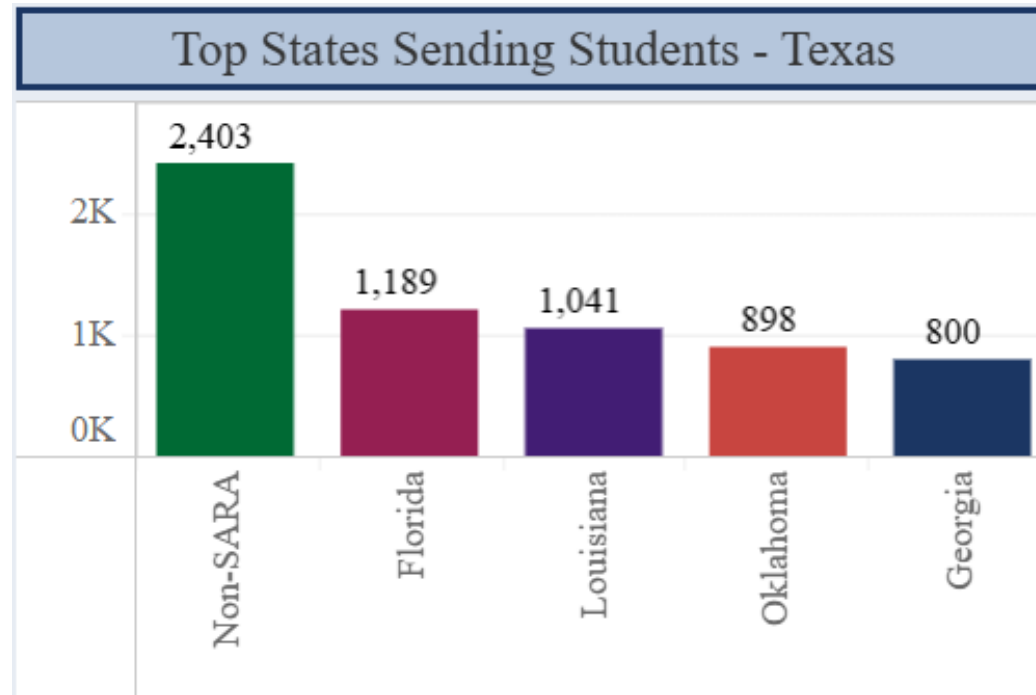
## Fall 2023 Exclusively Distance Education Enrollment (EDEE)

# Total Reported In-State and Out-of-State EDEE 2015-2023



# Who is attending Texas institutions?

- In Fall 2023, 18,094 out-of-state students attended a TX institution exclusively via distance education.
- 59% attended a public institution.

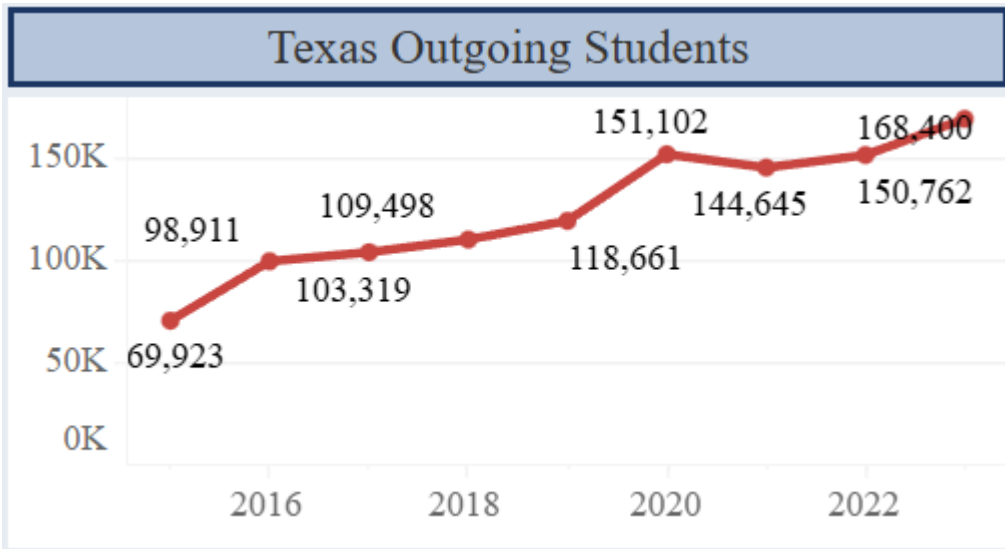
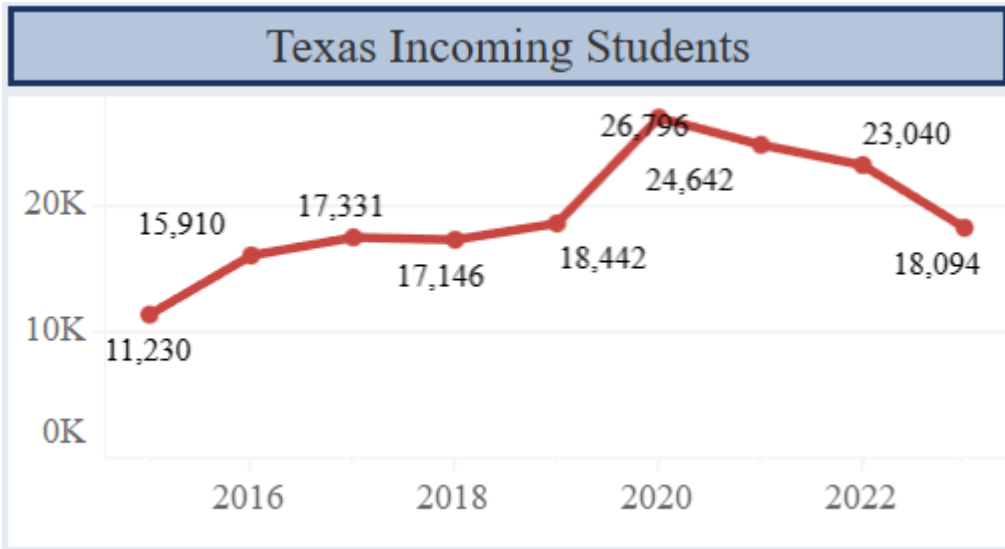


# Where are Texas residents enrolling?

- In Fall 2023, 168,400 Texas residents enrolled at an out-of-state institution exclusively via distance education.
- 46% attended a private non-profit; 33% attended a private for-profit; and 20% attended a public institution.

Top Institutions Attended by Texas Outgoing Students				
Institution	State SARA Gr.	Member Type	2 vs 4 Year	
Western Governors University	Utah	Private Non-Profit	4 Year	20,922
Southern New Hampshire University	New Hampshire	Private Non-Profit	4 Year	15,740
University of Phoenix	Arizona	Private For-Profit	4 Year	11,228
Grand Canyon University	Arizona	Private Non-Profit	4 Year	8,531
Liberty University	Virginia	Private Non-Profit	4 Year	7,562





## Out-of-State Student Trends in Texas



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE



Next Topic

# 2023 Out-of-State Learning Placements

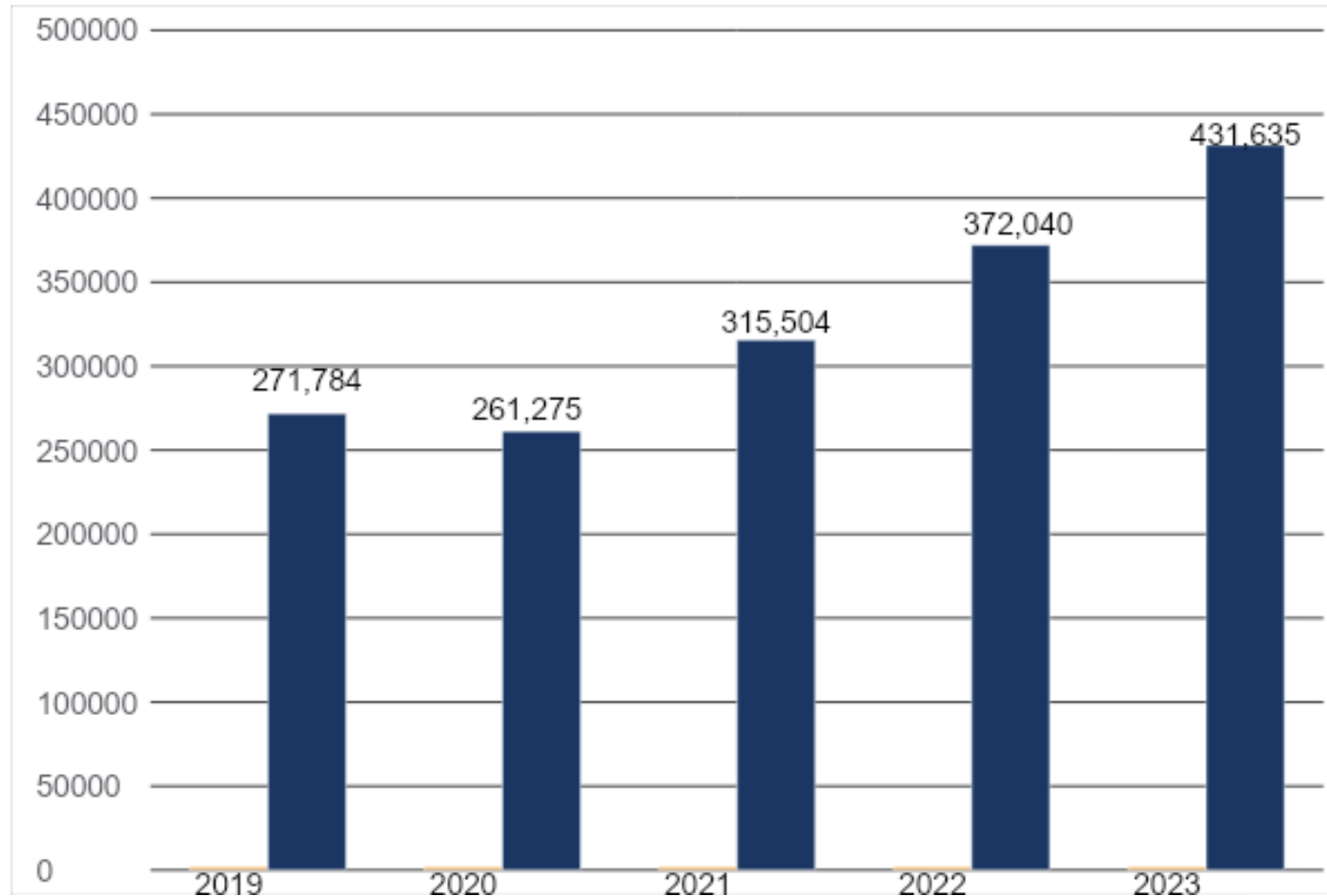
# Out-of-State Learning Placements (OOSLP)

## What are OOSLP?

- Learning placements are on-ground, out-of-state experiential learning activities
- OOSLP include clinical rotations, student teaching, internships, and other similar activities
- OOSLP are often a required part of obtaining a degree and/or license to practice a particular profession
- Note that reporting **includes on-ground students** as well as distance education students



# Total Reported Out-of-Learning Placements 2019-2023



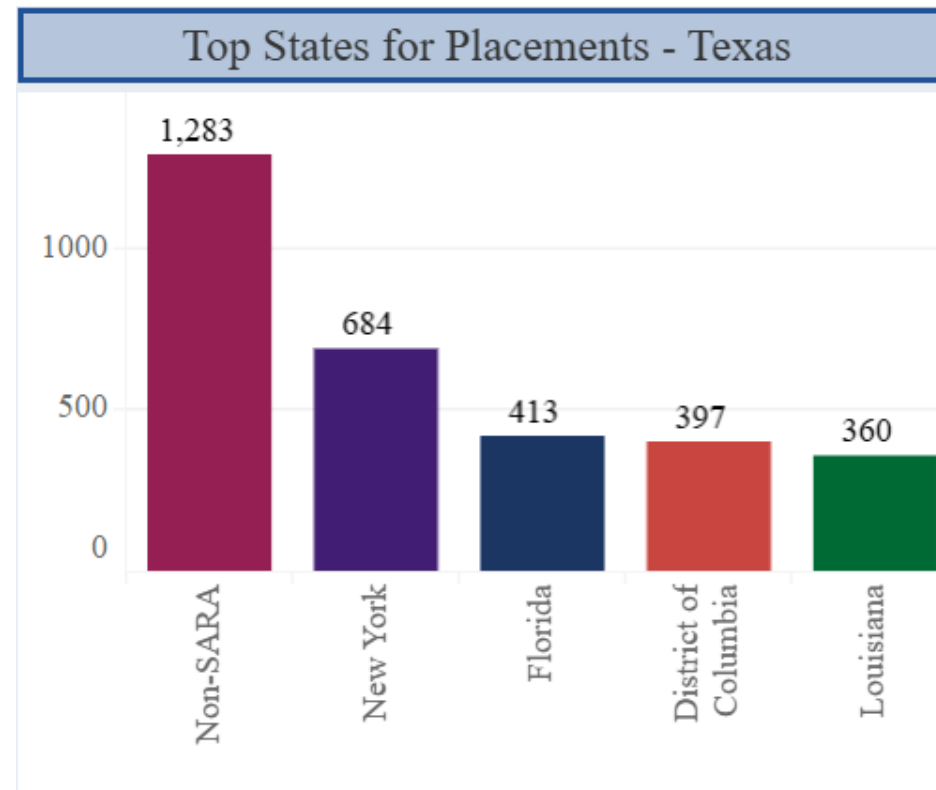
# Who is placing students in Texas?

- In 2023, 22,890 students from out-of-state institutions did a learning placement in Texas.
- 58% were in Health Professions, followed by Education (7%) and Business Management (6%).

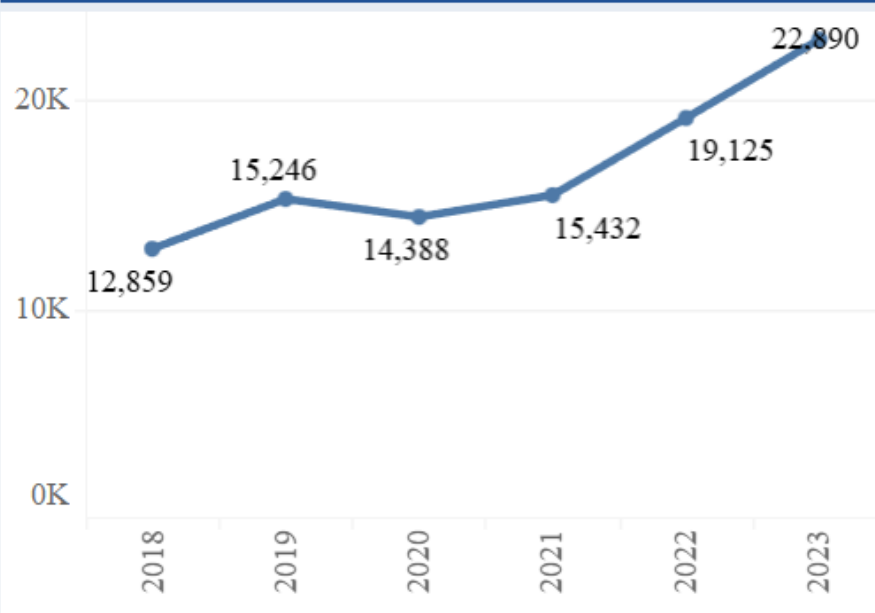
Top 5 Institutions with Incoming Placements				
Account Name	State/Province	Member Type	2 vs 4 Year	
Western Governors University	Utah	Private Non-Profit	4 Year	1,910
Grand Canyon University	Arizona	Private Non-Profit	4 Year	1,305
Miller-Motte College, Chatta..	Tennessee	Private For-Profit	2 Year	884
Liberty University	Virginia	Private Non-Profit	4 Year	815
Purdue University	Indiana	Public	4 Year	785

# Where are Texas institutions placing students?

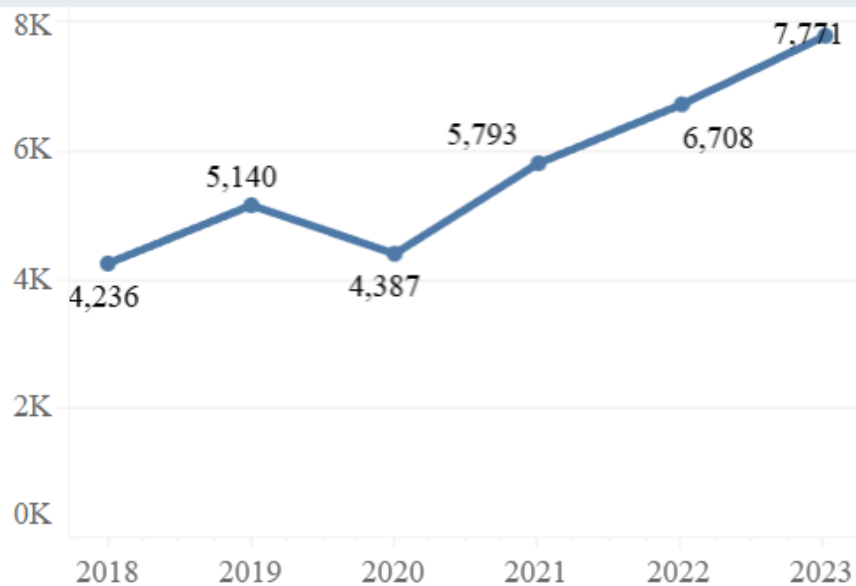
- In 2023, Texas institutions had 7,771 students participate in learning placements out-of-state.
- 53% were in Health Professions, followed by Business (8%) and Engineering (7%).



Texas Incoming OOSLP Over Time



Texas Outgoing OOSLP Over Time



## Out-of-State Learning Placement Trends in Texas



National Council for  
State Authorization  
Reciprocity Agreements

MHEC • NEBHE • SREB • WICHE



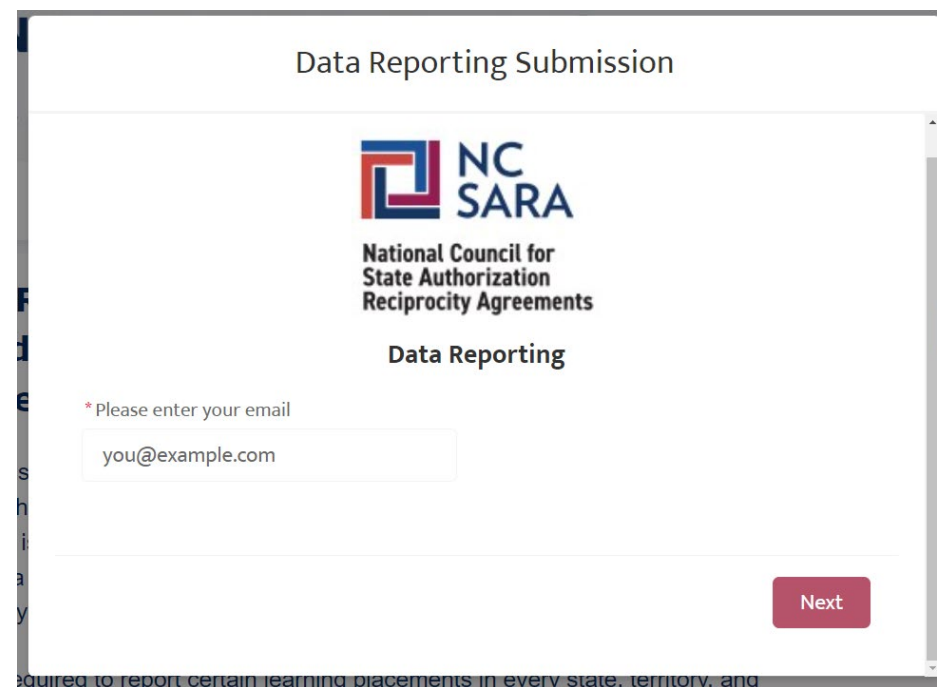
Next Topic

# 2025 Data Collection

# Changes for 2025 Data Collection

## Contact Verification

- Only users assigned as an institutional contact in Salesforce will be able to upload data.
- Users not in Salesforce will need to be verified by a current Salesforce contact for their institution (then entered by NC-SARA staff).
- Data reporting portal will be one public link, rather than individual institution links.
- Contacts for multiple institutions will be able to select the institution to submit for.



The screenshot shows a web form titled "Data Reporting Submission". At the top center is the NC SARA logo, which consists of a stylized square icon with red and blue lines, followed by the text "NC SARA" and "National Council for State Authorization Reciprocity Agreements" below it. Underneath the logo is the heading "Data Reporting". A text input field is present with the placeholder text "you@example.com". Above the input field is a red asterisk and the text "\* Please enter your email". To the right of the input field is a red button with the text "Next". At the bottom of the form, there is a line of small text that reads "required to report certain learning placements in every state, territory, and".



# Changes for 2025 Data Collection

The screenshot displays the 'Data Reporting Submission' page. At the top, it says 'Data Reporting Submission'. Below that is the NC SARA logo and the text 'National Council for State Authorization Reciprocity Agreements'. Underneath is the heading 'Data Reporting'. There are two columns of information. The left column is for 'Exclusively Distance Education Enrollment (EDEE)' and shows 'INCOMPLETE' in red, with the message 'You have 2 Institutions with incomplete EDEE data' and a 'Start EDEE' button. The right column is for 'Out-of-State Learning Placement (OOSLP)' and also shows 'INCOMPLETE' in red, with the message 'You have 2 Institutions with incomplete OOSLP data' and a 'Start OOSLP' button. At the bottom right of the page is an 'Exit' button.

## File Upload vs. Manual Entry

- Users will be provided with two templates to compile their EDEE and OOSLP data.
- Data will be upload in a .csv file, rather than manually entered in the web form.
- Institutions will be given the chance to confirm data and resubmit a file in case of errors.
- Confirmation emails will include counts and submitter name.
- Users will easily see when they have a submission outstanding.





# Institution Directions for Data Reporting

## Your One-Stop Shop for Required Annual Data Reporting

### [NC-SARA Data Reporting Portal](#)

The [NC-SARA Data Reporting Portal](#) is currently open for email verification. The portal will open for data submission on May 15, 2025.

**2025 Data Reporting Templates:** There are significant changes to the data submission process for the 2025 data collection cycle. Rather than entering data in a web form, institutions will upload their data as a .csv file. The templates that institutions will be required to use can be found below:

- [Exclusively Distance Education Enrollments \(EDEF\) Template](#)
- [Out-of-State Learning Placement \(OOSLP\) Template](#)

### **2025 Data Reporting Dates**

The 2025 timeframe to report Fall 2024 exclusively distance education enrollments and calendar year 2024 out-of-state learning placements will be May 15, 2025 through June 15, 2025.

### **2025 Must-Have Data Reporting Resources for SARA-Participating Institutions**

- [NC-SARA Data Reporting Handbook for Institutions \(2025\)](#): The Data Reporting Handbook provides all the information and



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE



# NC-SARA Data Reporting



NC-SARA Website

Support

## Welcome to the NC-SARA Data Reporting Portal for Exclusively Distance Education Enrollment (EDEE) and Out-of-State Learning Placements (OOSLP).

Data Reporting Submission

Every year, SARA-participating institutions are asked to report the number of students enrolled exclusively in distance education courses delivered both in the home state of the institution and outside the home state of the institution. This required data submission is based on the enrollment data your institution reported to the Integrated Postsecondary Education Data System (IPEDS). For SARA, that data is to be disaggregated by the state, territory, or district where the activity takes place.

SARA-participating institutions are also required to report certain learning placements in every state, territory, and district other than their own. Learning placements (clinical rotations, student teaching, internships, etc.) are a critical component of many instructional programs. Out-of-state learning placements include on-the-ground, out-of-state learning placements, both for on-campus/face-to-face courses as well as those associated with distance education courses.

### Data Reporting Window: May 15 – June 15

While every effort has been made to provide clear instructions through the NC-SARA Data Reporting Handbook, the variety of institutional practices in determining student location and tabulating placement data make some institutional reporting decisions difficult to answer. Please use your best judgment and adopt and document an approach that ensures your institution's reporting is consistent from year-to-year and captures the requested information.

### Important Reporting Instructions for NC-SARA Data Submission

#### Step-by-Step Guide:

##### 1. Start with Email Verification:

- Click the Data Reporting Submission button on this page.
- Enter your email to initiate the verification process.

**Access the NC-SARA Data Reporting Portal at:**  
<https://nc-sara.org/institutional-data-reporting>

# Huge Thanks to Our Pilot Institutions



# Important Annual Data Reporting Dates

- **2024 Annual Data Handbook & Templates Available:** Now!
- **2024 Annual Data Collection Webinar:** Wednesday, March 5<sup>th</sup>,  
Recording and slides available: <https://www.nc-sara.org/news-events/2025-nc-sara-annual-data-reporting-exclusively-distance-education-enrollments-and-out>
- **2024 Annual Data Collection Window:** May 15 – June 15, 2025

# Institution Directions for Data Reporting: Your One-Stop Shop



# SARA Institution Cost Savings

## 2023 Estimated Renewal Savings by Region:

State	Number of SARA Member Institutions	Estimated Costs	State and NC SARA Costs	SARA Affiliation Fee	Estimated Savings
MHEC	644	\$39,197,355	\$2,912,100		\$36,285,255
NEBHE	344	\$35,764,100	\$2,683,563	\$100,000	\$32,980,538
SREB	1,067	\$73,354,450	\$5,408,000	\$160,000	\$67,786,450
WICHE	275	\$18,217,525	\$1,328,000		\$16,889,525
Grand Total	2,330	\$166,533,430	\$12,331,663	\$260,000	<b>\$153,941,768</b>

## SARA Cost Savings Calculator



The SARA Cost Savings calculator may be used by colleges and universities offering interstate distance education to:

- Estimate the costs associated with state authorization, both for SARA and non-SARA participants.
- Project changes to costs based on the addition of new distance education programs or expansion of existing programs.
- Evaluate the cost savings and the return on investment of SARA participation.

<https://nc-sara.org/sara-cost-savings-calculator>



# Questions about NC-SARA Data?





**National Council for  
State Authorization  
Reciprocity Agreements**

**MHEC • NEBHE • SREB • WICHE**

# Thank You!

 [www.nc-sara.org](http://www.nc-sara.org)

 [info@nc-sara.org](mailto:info@nc-sara.org)

 <https://www.linkedin.com/company/nc-sara>

# Lunch & Networking



# Notifications to Students

Best Practices and Effective Elements

Cheryl Dowd, Sr. Director  
State Authorization Network & WCET Policy Innovations

1:30-2:15 p.m.



A close-up photograph of a person wearing a blue denim jacket, sitting at a desk and typing on a laptop keyboard. The person's hands are visible, and the laptop is open. The background is slightly blurred, showing a pink wall and a wooden floor. A white semi-transparent box is overlaid on the bottom left of the image, containing the title and date information.

# Disclosures & Documentation: Best Practices & Effective Elements

June 6, 2025  
TX SARA Forum 2025



# Objectives



- Introduction – State & Federal Responsibilities
- Professional Licensure
  - Public and Direct Disclosures
  - Program Participation Agreement – Attestation Option
- Complaint Process
  - Public Disclosures
- Questions



# **State and Federal Responsibilities**

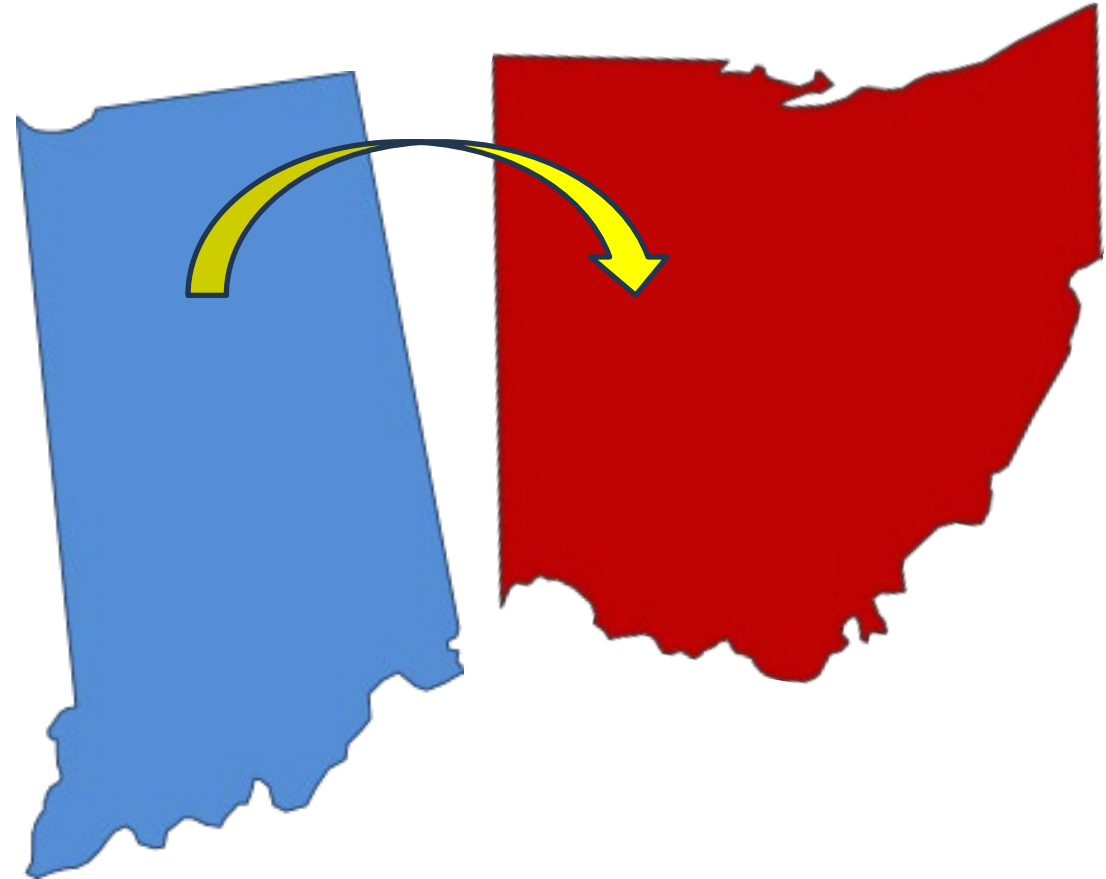
---

# State Approvals

## Foundational Principle

**For any activity of the institution that occurs in another State, it is the institution's responsibility to be compliant with the laws and regulations of that State.**

**\*or country**



# Types of State Compliance



- **State Institutional Approval** – By the state’s authorizer or through reciprocity in SARA member states.
- **State Program Approval** - some states require separate program approval in the state where the student is located.

**\*SARA Participation does not include the additional program approval.**

# Whose Rules? State vs Federal

## State



## Federal



- **State Institutional Approval**
  - Interstate Distance Education
    - Individual State to State or Reciprocity (SARA)
- **State Program Approval**
  - Interstate Prof. Licensure Programs

- **Department of Education – Title IV**
  - State Institutional Approval + Location
  - Complaint Disclosures
  - Prof. Licensure Programs
    - “Satisfy” State Educ. Requirements (PPA Certification)
    - Disclosures



# **Documentation related to Professional Licensure Compliance**

---

# Federal Regulation for Professional Licensure Disclosures

[Disclosures \(34 CFR 668.43\(a\)\(5\)\(v\) and \(c\)\)](#) effective July 1, 2020 \*public disclosures amended 2024



- 1.Regulations address **all modalities** (includes Face to Face and Online)
- 2.Educational Programs **designed or advertised** as leading to a license required for employment in the occupation.
- 3.Public notifications – meets, does not meet, (states & territories where institution advertises or serves students).
- 4.Direct/individualized notification for prospective or enrolled students.

# Disclosures

34 CFR 668.43(a)(v) and (c)

**Minor changes since these became effective July 1, 2020.**

1. Public notifications – institution determinations of whether the curriculum meets or does not meet various state educational requirements where students are served.
2. Direct/individualized notification for:
  - Prospective students to inform if the program does not meet or if the institution has not made a determination.
  - Enrolled student to inform if the program no longer meets state educational requirements. Within 14 calendar days of the institution making that determination.

## **SARA Policy Section 5.2 – Compliance is tied to compliance with Federal Regulations**

- 5.2 Programs leading to Professional Licensure
- SARA has no effect on state professional licensing requirements. Any institution approved to participate in SARA that offers courses or programs designed to lead to professional licensure or certification or advertised as leading to licensure must **satisfy all federal requirements for disclosures regarding such professional licensure programs**. For SARA purposes, these requirements will **also apply to non-Title IV institutions and programs**.

# New PPA Certification Requirements

Program Participation Agreement (PPA)

[34 CFR 668.14\(b\)\(32\)](#)

---

For the program to be eligible for Title IV, the institution must satisfy state educational requirements

- Where the institution is located.
- Where the student enrolled in distance education is located at the time of initial enrollment.

OR

- **Where the student attests that they intend to seek employment**

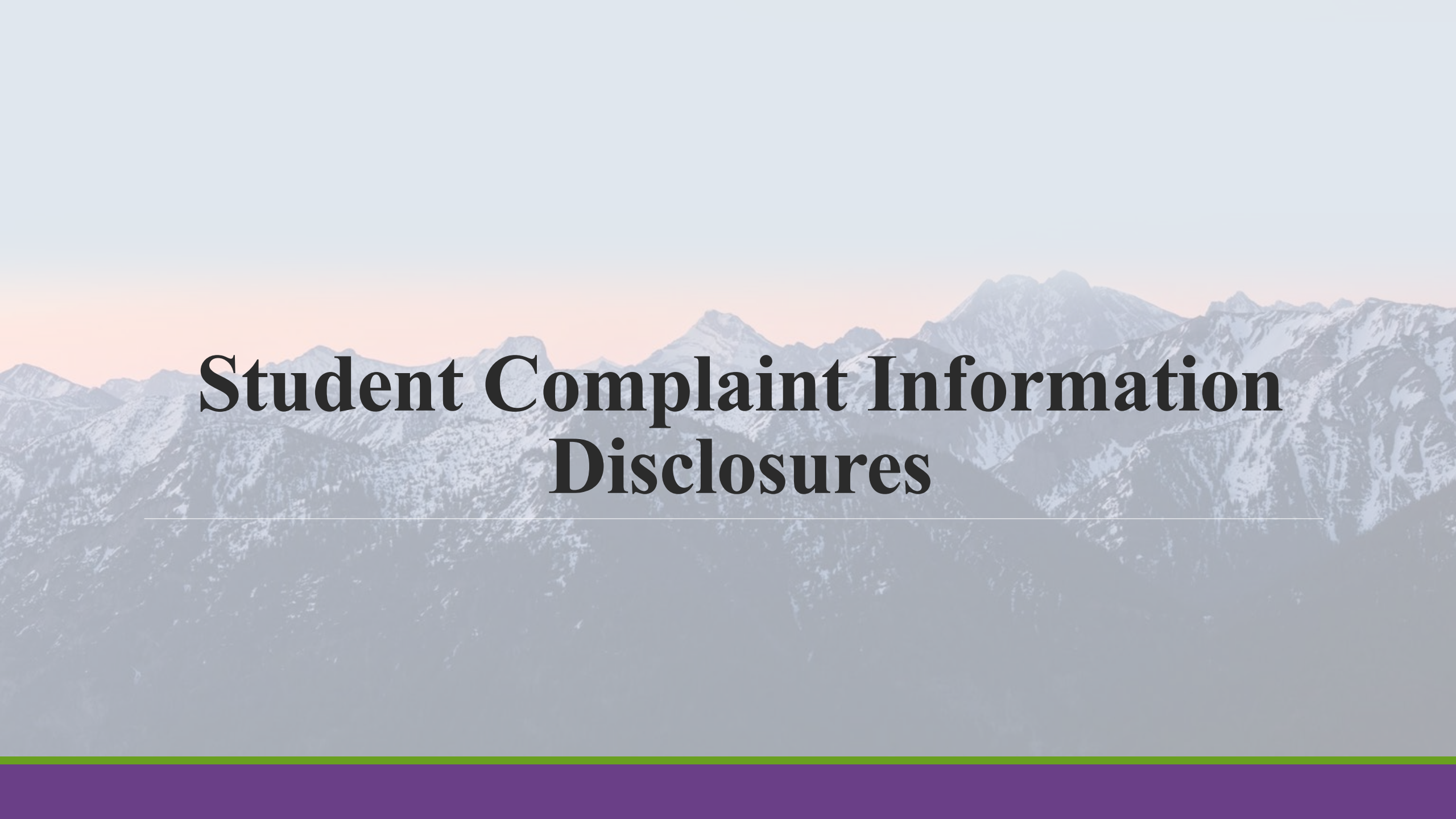
# Attestation - Purpose

- OPTION provided in the regulation
- A student may be served even if the institution cannot satisfy state educational requirements where the student is located.
- **IF** the student attests that they intend to seek employment in another state; **and**
- The institution **can satisfy** state educational requirements **in that state**.

# Attestation – Key Elements



1. Attestation Document – e-document is satisfactory
2. Documented Process for use of attestation option - to indicate that there has been interaction with the student to show that the student knowingly and voluntarily provided the attestation.



# **Student Complaint Information Disclosures**

---

# Student Complaints – Institution Responsibilities

Per Federal regulation [34 CFR 668.43 \(b\)](#), an institution must make available:

- **Copy of Documents:**
  - Institution's Accreditation
  - Institution's Approval or Licensing – State, Federal or Tribal
- **Contact information** for filing complaints:
  - Accreditor
  - State approval or licensing entity & any other relevant State official or agency
- Enrolled or Prospective Students
- For face-to-face and distance education.



## Top Website Recommendations #1 - #4

1. Stand in the shoes of the student to understand the terminology they may encounter.
2. Produce useful results when searching for “complaint.”
3. Use common language and more than one term.
  - Complaint, grievance, dispute, concern.
4. Define concepts not common to students.
  - Ex.: ADA, Title IX, SARA, sexual misconduct, or an ombudsman.



## Top Website Recommendations #5 - #7

5. Provide understandable steps for students to proceed.
  - One institution link to a central place for its official policies.
6. Make the forms available online.
7. Provide a complete list of complaint options in one place.
  - Don't make the student search for VA, DoD, or other options.



## Top Website Recommendations #8 - #10

8. Make links as direct as you can to the intended destination.
  - One institution linked to the Ohio website, students would need to do a whole new search there.
9. Schedule a review of your information and update it.
10. Remember the focus on consumer protection.



# SAN Events & Opportunities

## ONLINE COURSE

**SAN - State Authorization Foundations Course (8-week Online Fundamentals Course)**

**Registration is now open for Cohort #2!**

Cohort #2: August 19, 2025-October 13, 2025

- Enhance your understanding of out-of-state compliance/state authorization rules, and regulations.
- Member and Non-Member Rates!
- Fees cover the class and include all required course materials/texts.
- [Review the course description details here!](#)

**+ MORE!**

## SANsational Awards

[Nominations June 16](#) through July 18, 2025

**Recognizing Outstanding efforts by SAN member institutions and organizations.**

### 3 Categories:

**Licensure Programs** - Notifications and disclosures for professional licensure program status in each state.

**Licensure Programs** - Notifications and disclosures for professional licensure program status in each state.

**Compliance Innovations** - Institution policy, tools, compliance teams or other inventive or novel compliance management process.

[Watch Here for More Upcoming SAN Events as they are developed!](#)

## **SAN Website:**

- SAN Getting Started with Compliance Management Gateway: <https://wcetsan.wiche.edu/resources/getting-started>
- SAN Federal Regulations Landing Page: <https://wcetsan.wiche.edu/resources/federal-regulations>
- SAN Professional Licensure Landing Page: <https://wcetsan.wiche.edu/resources/professional-licensure>
  - [Professional Licensure Handbook 2nd edition](#) (2024)

## **WCET Frontiers (Articles)**

- [NC-SARA, SARA, and SAN: The Power of Collaboration](#), WCET Frontiers; 1/14/25
- [December Federal Rulemaking Activity – New Final Regulations & Withdrawn Provisions](#) WCET Frontiers; 1/7/25
- [Ready or Not, Here It Comes! New Regulations When Offering Programs Leading to a License Effective July 1!](#) WCET Frontiers, 7/9/24

# Your Questions?



# Thank you!

## Contact Us!

**Cheryl Dowd, Senior Director, State Authorization Network & WCET Policy Innovations**  
(303) 541-0210 | [cdowd@wiche.edu](mailto:cdowd@wiche.edu)

**Kathryn Kerensky, Director, Digital Learning Policy & Compliance**  
(303) 541-0290 | [kkerensky@wiche.edu](mailto:kkerensky@wiche.edu)

**Jana Walser-Smith, Director Interstate Compliance & SAN Member Outreach**  
(303) 541-0289 | [jwalsersmith@wiche.edu](mailto:jwalsersmith@wiche.edu)

**Leigha Fletcher, Administrative Assistance**  
(303) 541-0211 | [lfletcher@wiche.edu](mailto:lfletcher@wiche.edu)

---

3035 Center Green Drive  
Suite 200  
Boulder, CO 80301

Email us at: [san-info@wiche.edu](mailto:san-info@wiche.edu)



[wcetsan.wiche.edu](http://wcetsan.wiche.edu)

# NC-SARA Basics

Who, What, When, Where, How?

Cam Maeyaert, TX SPE/Director, Private Postsecondary Institutions  
THECB

2:15-2:45 p.m.



# #1 Helpful Resource

- [SARA Resources for States & Institutions | NC-SARA](https://nc-sara.org/sara-resources-states-institutions)
  - <https://nc-sara.org/sara-resources-states-institutions>

# Texas SPE

- Texas Higher Education Coordinating Board is designated as the State Portal Entity (SPE)
- Cam Maeyaert is the SPE contact
  - Cathie.Maeyaert@highered.THECB.gov
- TX SARA webpage:
  - <https://www.highered.texas.gov/state-authorization-reciprocity-agreement/>

# WHO to contact?

SPE is primary contact

- Any contact changes
- Renewal dates
- Timing of invoices and payments
- What to include in application
- Student complaints
- Changes that might affect SARA participation
- Specific questions on policy

# WHEN to contact NC-SARA?

## NC-SARA handled items

- Not receiving NC-SARA emails or updates
- Data reporting questions
- Upcoming webinars
- Commenting on policy proposals if you want to comment directly to NC-SARA

## Helpful email addresses

- [info@nc-sara.org](mailto:info@nc-sara.org): General Qs
- [data@nc-sara.org](mailto:data@nc-sara.org): Data reporting Qs
- [accounting@nc-sara.org](mailto:accounting@nc-sara.org): receipt of payments

# WHAT info to calendar?

- Participation end date:
  - Should be same each year unless modified
- 60 days prior to end date:
  - Calculate when the renewal is due to SPE
- Fees due date:
  - Will receive invoice after approval
- Data reporting window:
  - May 15-June 15 of each year
- Policy proposals – submit or comment:
  - Calendar developed each year and on NC-SARA website

# WHAT info to calendar?



- Participation end date:
  - Should be same each year unless modified
- 60 days prior to end date:
  - Calculate when the renewal is due to SPE
- Fees due date:
  - Will receive invoice after approval
- Data reporting window:
  - May 15-June 15 of each year
- Policy proposals – submit or comment:
  - Calendar developed each year and on NC-SARA website

# WHERE is helpful info?

- [SARA Student Complaints | NC-SARA](#)
  - A good page to link to so students have the correct info
- [US Department of Education Certification Procedures - Questions and Answers](#) (the flowchart under LDR-A1 is helpful. The Q&A under LDR-Q2 and LDR-A2 are also helpful.)
- [SARA for Institutions | NC-SARA](#)
  - Helpful resources all linked
- [SARA Quick Start Guides | NC-SARA](#)
  - Quick answers on select topics
- [Data Dashboards | NC-SARA](#)
  - Detailed data that you can use

# HOW does everyone work together?

## NC-SARA Partners | NC-SARA

- NC-SARA
  - Staff that assists in carrying out the SARA policies
  - Board that governs NC-SARA
- Four regional compacts
  - SREB is our compact – part of a Unified Agreement
  - Our RSC consists of SPEs and members at large
- SPEs in each of the 49 states, DC, Puerto Rico and the US Virgin Islands
- The State Authorization Network (SAN)
  - A nonprofit organization serving institutions and organizations, including invaluable training

# Questions?



# Cathie A. Maeyaert

[Cathie.Maeyaert@highered.texas.gov](mailto:Cathie.Maeyaert@highered.texas.gov)



# Break

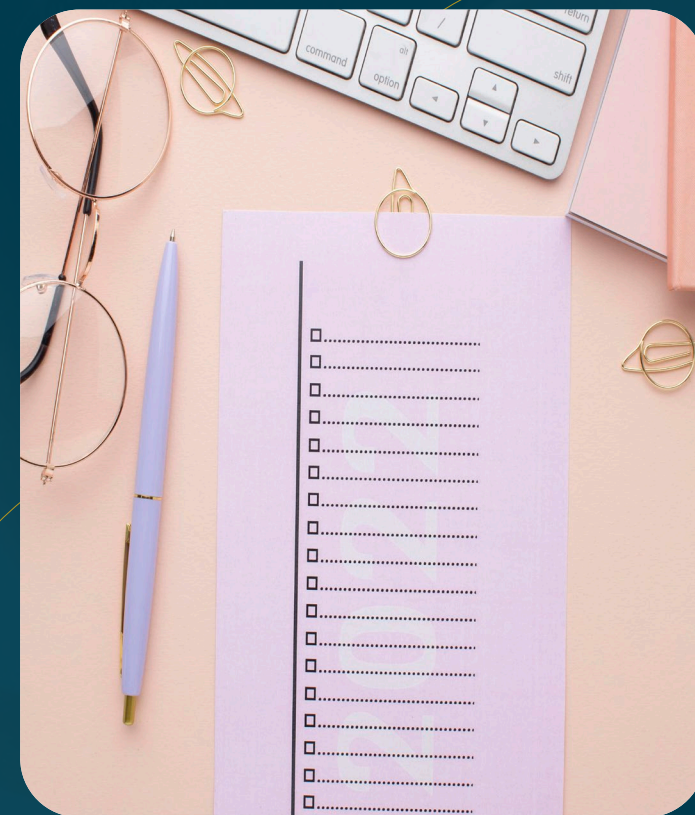


# Your SPE Guide

Streamlining Processes Efficiently

Cam Maeyaert, TX SPE/Director, Private Postsecondary Institutions  
THECB

3:00-3:30 p.m.



# Renewal application timeline

90 day notice (Renewal date minus 90 days)

Start your renewal application



60 day notice (Renewal date minus 60 days)

Submit your renewal application



Pause in reminders OR 30 day, 7 day, or expiration notices

After you submit your renewal application, SPE will pause your reminders

# Post-approval timeline

## SPE approval of renewal application

- You will receive emails from SPE with signed application and NC-SARA with invoice link

## Payment due date

- The invoice will list the fees due date (SARA participation end date)

## Grace period (only if necessary)

- A 30 day grace period to submit fees payment


## Payment confirmation and welcome to SARA

- NC-SARA will acknowledge payment and the new participation period

# Welcome to SARA!



# Invoice Email Example

 Outlook

---

SARA Participation Approval for **Name of Institution**

---

From noreply@salesforce.com <noreply@salesforce.com>  
on behalf of  
NC-SARA <info@nc-sara.org >  
Date Thu 2025-04-17 4:45 PM  
To  
Cc Maeyaert, Cathie <Cathie.Maeyaert@highered.texas.gov>

ALERT: This message was sent from outside of THECB.



Congratulations!

\_\_\_\_\_ has been approved for participation in SARA! In order to finalize the renewal process and ensure continuing participation, **please use the link below for payment of your NC-SARA annual fee:**

Invoice Due Date: 6/29/2025  
Invoice: [Click here to view invoice](#)

Payment link:



NC-SARA accepts all major credit cards. If paying by check, please allow ample time for the payment to reach NC-SARA via the United States Postal Service. If you are planning to pay via wire transfer or need a copy of your invoice, please contact us at [accounting@nc-sara.org](mailto:accounting@nc-sara.org).

If you have any questions about SARA policy or process, please contact [info@nc-sara.org](mailto:info@nc-sara.org) or your home state Portal Entity contact which can be found at <https://nc-sara.org/state-portal-entity-contacts>

# Invoice Example



National Council for  
State Authorization  
Reciprocity Agreements

MHEC • NEBHE • SREB • WICHE

Federal Tax ID#: 47-4382124

NC-SARA  
3005 Center Green Drive  
Suite 130  
Boulder, CO 80301-2204

<b>Billed To</b>	<b>Invoice Number</b>	<b>Invoice Total</b>
████████████████████	Invoice-████	\$2,200.00
<b>ATTN:</b> ██████	<b>Invoice Date</b>	<b>Invoice Due Date</b>
	April 17, 2025	June 29, 2025

Payment Link: Download pdf and [Click here to pay online](#)

Payment Description	Amount
NC-SARA Participation Fee*	\$2,200.00
Late Fee**	\$0.00
Participation Date Change Fee	\$0.00

### Invoice Terms

The payment of this invoice will complete the SARA participation fee requirement for ██████████ for a period of one year.

### Current Participation Period\*\*\*

June 30, 2025 - June 29, 2026

\* This payment does not replace any required fees by your SARA state portal entity.

\*\* A 5% late fee will be applied after June 29, 2025 unless noted.

\*\*\*Current Participation Period will be blank for new institutions. Participation dates are established once payment is received by NC-SARA.

\*\*\*\*The NC-SARA participation fee payment is non-refundable.

# The renewal application

- Before you begin, please check:
  - Are you using the correct application?
  - D
  - Are you using the current application?

Institution Application 7.1.25



Institution Name \_\_\_\_\_  
Institution State \_\_\_\_\_  
Initial Application   
Renewal Application

Application and Approval Form for Institution Participation in SARA<sup>1</sup>

**NOT:**



State: \_\_\_\_\_  
Regional Compact \_\_\_\_\_  
Initial Application \_\_\_\_\_  
Renewal Application \_\_\_\_\_

Application and Approval Form for State Membership in SARA

# 7/1/25 application revisions

- Professional licensure disclosures apply to non-Title IV institutions and programs for SARA purposes
- Four required roles to be identified:
  - Primary SARA contact,
  - Primary billing contact,
  - CEO/CAO, and
  - Authorized signatory contact.

# Quick review of process

- Institution completes form.\*
- Institution emails form and any attachments to SPE.
- SPE reviews and requests any additional information.
- SPE approves and sends signed application back to institution.
- SPE approves in NC-SARA database.
- NC-SARA sends email with invoice link.
- Institution uses link to see invoice.
- Institution pays annual fee based on student FTE.
- NC-SARA acknowledges payment and welcomes institution for another year of participation.

# Email Issues

- Check domain restrictions
  - Are there restrictions on @nc-sara.org or @salesforce.com?
- IT teams should whitelist the following trusted domains:
  - [nc-sara.org](https://nc-sara.org)
  - [bounce.s11.mc.pd25.com](https://bounce.s11.mc.pd25.com)
  - [\\*.bnc.salesforce.com](https://*.bnc.salesforce.com)
- NC-SARA can re-send emails directly to people if emails continue to be blocked.
- Try emailing [info@nc-sara.org](mailto:info@nc-sara.org) and have them send a test email to see if you get it through their Salesforce system.

# Application pain points



- Application not initialed by the CEO or CAO.
- Federal financial responsibility composite score is listed but can't be verified through an ED publication or a letter from an ED official.
- OPEID or IPEDS numbers are incorrect or missing.
- Link to the institution's student complaint process is missing or broken.
- Link to professional licensure information is broken, missing, blank, or doesn't follow ED Title IV requirements.
- The required SARA contacts are not provided.



# Catastrophic Events and Disaster Recovery

- Requesting this for AY2026
- The institution agrees to provide the catastrophic event policy and disaster recovery procedures to the State Portal Entity, if/when requested.
- The institution agrees that it has well-documented policies and practices for addressing catastrophic events.
- Impacted students will receive the services for which they have paid or reasonable financial compensation for those not received.
- This may include tuition assurance funds, surety bonds, irrevocable letter of credit, assistance with transfer, teach-out provisions or other practices deemed sufficient to protect consumers.
- The institution agrees that it and/or its home state has adequate measures to protect student records in the event of closure.

# Best Practices: Student Complaints

- Info on pages that make sense:
  - Student services
  - Student handbook
  - Academic policies
- Link to policies and contacts
- Include form
- Give instructions on how to file
- Provide info on different pathways or resources:
  - Title IV
  - Distance education
  - Grade disputes
  - Accreditation concerns
- Explain when or how each pathway applies
- Plain language

# Example: SARA Student Complaints

## Complaint Process for Online/Distance Learning Students ^

SARA is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state, thereby increasing educational opportunity and access. It protects students in other states by providing a process by which out-of-state distance learning students can have their complaints about substantive programmatic or institutional issues addressed.

As stipulated in the [OLLU Student Handbook](#), OLLU has established grievance procedures to address diverse issues:

[Academic Grievance Procedure](#) ↗

[Southern Association of Colleges and Schools Commission on Colleges \(SACSCOC\)](#) ↗

[Title IX Incident](#) ↗

[Nondiscrimination Policy](#) ↗

[Students with Disabilities](#) ↗

Additionally, students in a SARA member state must first follow the OLLU Grievance Procedure outlined above.

If the issue is not resolved satisfactorily, an online or distance learning student from any SARA member state may appeal to the SARA portal agency in Texas within two years of the incident. Complaint appeals should be addressed to the [Texas Higher Education Coordinating Board](#) ↗. A [description of the process for complaints](#) ↗ is available; questions about their complaint process should be addressed to [studentcomplaints@theccb.state.tx.us](mailto:studentcomplaints@theccb.state.tx.us).

While the Texas Higher Education Coordinating Board will be the primary authority responsible for complaints, the SARA portal agency in the state where the student is located may assist as needed. Accordingly, students may wish to consult the list of [SARA Portal Entity Contacts](#) ↗.

The [SARA Student Complaint Process flowchart](#) ↗ illustrates the relationship between the OLLU Grievance Procedure and the SARA Student Complaint Process as well as how the Texas Higher Education Coordinating Board will work with the SARA portal agency in the state where the student is located.

## State Authorization Reciprocity Agreements (NC-SARA)

Our Lady of the Lake University has been approved by Texas to participate in the National Council for State Authorization Reciprocity Agreements (NC-SARA).

What is SARA? ▼

As a SARA participant, OLLU may engage in the following activities: ▼

Limitations to SARA ▼

Complaint Process for Online/Distance Learning Students ▼

# Best Practices: Professional Licensure Disclosures

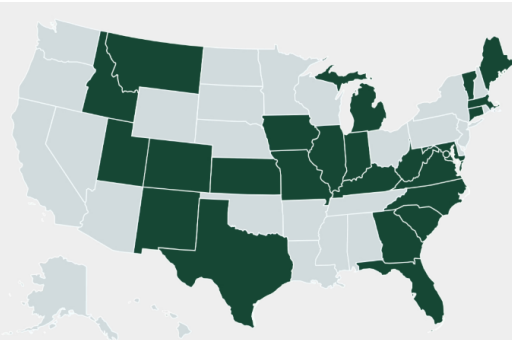
- Make sure students can find the information.
- If you have a general distance ed page and specific program pages, include links back and forth
- Make disclosures clear between on-ground programs and distance education programs
- Clearly indicate when a student can or can't enroll in a program due to licensure restrictions
- If you want to enroll distance education students from a particular state, do the work to determine licensure requirements

# Examples: Professional Licensure Disclosures

## Do I Qualify?

See below for a list of states in which we accept applicants for the online DNP-AGACNP program:

- Colorado
- Connecticut
- District of Columbia
- Florida
- Georgia
- Idaho
- Illinois
- Indiana
- Iowa
- Kansas
- Kentucky
- Maine
- Massachusetts
- Michigan
- Missouri
- Montana
- New Mexico
- North Carolina
- South Carolina
- Texas
- Vermont
- Virginia
- West Virginia



## Professional Licensure Disclosure

LeTourneau University participates in the State Authorization Reciprocity Agreements administered by [NC-SARA](#). This allows us to provide distance learning programs to residents of states other than Texas and establishes comparable national standards between member states, districts and territories. NC-SARA participation, however, does not grant reciprocity for state professional licensing requirements.



### STATE LICENSURE REQUIREMENTS BY PROGRAM

For programs that lead to professional licensure approved by a state board, such as teacher education or counseling, LeTourneau's programs are designed to meet the requirements for approval in Texas. To determine whether a LeTourneau program will meet the educational requirements for professional licensure in your state, please click on the appropriate link below:

- ▶ [COUNSELING](#)
- ▶ [TEACHER EDUCATION](#)

# Questions?



# Cathie A. Maeyaert

[Cathie.Maeyaert@highered.texas.gov](mailto:Cathie.Maeyaert@highered.texas.gov)



# Q&A/Wrap-Up

3:30-4:00 p.m.

