



Living in a SARA World – Remaining in Compliance

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**Presenters**

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**Living in a SARA World**

- ▶ SARA – What an institution may and may not do
- ▶ Thoughts from a former regulator, current professional licensing board member, and SARA Coordinator
- ▶ Addressing professional licensure concerns
- ▶ An institution's perspective: NYU's approach

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## SARA

In SARA an institution may:

- ▶ Enroll online students
- ▶ Advertise and recruit
- ▶ Have resident employees and online faculty
- ▶ Conduct proctored exams
- ▶ Serve military on bases and posts
- ▶ Allow up to 10 students per program per site in a field experience (externships, clinicals, etc.)

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## SARA



Applies to online programs and some on-ground programs!

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## SARA

SARA does not apply to:

- ▶ Non-degree granting institutions
- ▶ Non-accredited institutions
- ▶ Professional licensing board requirements for programs leading to licensure
  - > Nursing
  - > Teacher certification, educational leadership
  - > Social work
  - > Psychology and counseling
  - > Allied Health

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- ▶ Professional licensing board requirements are independent of state authorization
- ▶ Some state higher education authorizing agencies will not “authorize” a program until a professional licensing board approves the program



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Professional licensing board requirements vary from state to state

- ▶ Some states will not accept an initial license from another state (transfer)
- ▶ Certain states allow transfer of a license but only if additional requirements are met
  - ▶ Additional practicum/internship hours
  - ▶ Additional state-specific coursework

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## Professional Licensure

Professional licensing board requirements vary from state to state (con't)

- ▶ Number of credits in a program
- ▶ Professional program-specific accreditation
- ▶ Field experience – number of hours, types of sites, and qualifications of site supervisors
- ▶ Licensure examinations
- ▶ Some boards do not accept online programs

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## Professional Licensure

### Institutional Responsibilities

- ▶ Professional licensure program approval in home state (minimum)
- ▶ Research regulations of other states where graduates intend to practice the profession
- ▶ Know in which states programs do not meet professional licensure requirements
- ▶ Disclosures to the general public

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## Institutional View - NYU

- ▶ SARA and New York
- ▶ Beginning to understand SARA

### SARA Institutional Application Process

1. An institution wishing to operate under the State Authorization Reciprocity Agreement (SARA) must submit an application to its home state's portal agency for SARA. The institution must meet the following requirements:
  1. Have its principal campus or central administrative unit domiciled in a state that has joined the State Authorization Reciprocity Agreement (SARA) and the authority to operate in that state. Only distance education content originating in the United States or a U.S. territory is eligible to be delivered under SARA. (Include documentation)
  2. Be a U.S. degree-granting institution that is accredited by an accrediting body recognized by the U.S. Secretary of Education. (Include documentation)
  3. For non-public institutions, have a financial responsibility index score from the U.S. Department of Education that is 1 or above, or, if its score is between 0 and 1, a documented demonstration to its home state's portal agency that its non-accredited subsidiary institutions meet its entry requirements in SARA. Public institutions are presumed to be sufficiently financially stable for SARA purposes. (Include documentation)
  4. Agree to abide by the Congressional Committee for the Evaluation of Distance Education advised by the Council of Regional Accrediting Commissions, an advisory committee established in 2011.
  5. Agree to be responsible for the actions of any third-party providers used by the institution to engage in operations under SARA.
  6. Agree to notify its home state's portal agency of any negative changes to its accreditation status.
  7. Agree to provide data necessary to monitor SARA activities.
  8. Agree to work with its home state's portal agency to resolve any complaints arising from its students in SARA states, and to abide by decisions of that entity.
2. Agree to its home state's portal agency over the signature of the institution's CEO or chief academic officer:
  10. Agree to notify its writing of students in a course or program that contains both in-person and online components, in which a student could reasonably be expected to learn normally, whether or not the course or program meets requirements for licensure in the state where the student resides. If an institution does not meet the normal or program meets licensure requirements for licensure in the state where the student resides, the institution may meet the SARA requirement by informing the student or advising the student the correct information for the appropriate state licensing board(s). An email addressed solely to the campus and sent to the student's last known e-mail address meets this requirement. The institution should use other means to notify the student if needed.
  11. Agree to ensure, where the institution cannot fully deliver the instruction for which a student has contracted, to provide a reasonable alternative for attending the institution or reasonable means of compensation for the education they did not receive.
  12. Agree to pay to the state any state fees for SARA participation requested by the state state for administering SARA.
  13. Agree to pay to the state any state fees for SARA participation requested by the state state for administering SARA. This charge amount fee replaces any fees that the institution would ordinarily pay to other SARA member states.
3. The institution's application must include the following:
  1. State fee schedule.
  2. State fee schedule.
  3. State licensing requirement of institution (if any).
  4. Financial responsibility index for average (1-11) fee.
4. If additional membership in SARA is desired by the home state's portal agency, the portal agency will provide to the applicant institution a written request to the state. The institution may respond at any time, having corrected any deficiencies, or they may send the letter to the SARA director of its region's compact. If the letter is signed by the regional compact, the institution may further appear to NE SARA.

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Type of Coverage	Coverage	Notes	Non-Coverage	Notes
Physical Presence	Offering courses to individuals via distance education in ways that do not require students to gather physically in groups, excepting the special provisions in Section 811.	"Distance Education" means instruction offered by any means where the student and faculty member are in separate physical locations. It includes, but is not limited to, online, interactive video or correspondence courses or programs. Section 811 provisions are stated in full under Physical Presence Non-Coverage.	If an institution establishes a physical location for students to receive synchronous or asynchronous instruction.	
Supervised Field Experiences	Supervised field experiences, subject to some limitations, are covered by the provisions of SARA, governing interstate distance education activity whether the field experience is part of a distance education or campus-based program.		Placement of more than ten students from an individual academic program placed simultaneously at one clinical or practicum site, where approval for a larger number is provided by the host state SARA portal agency.	
Professional Licensure	SARA member institutions that offer courses or programs potentially leading to professional licensure must keep all students, applicants and potential students who have contacted the institution about the course or program informed as to whether such offerings actually meet state licensing requirements.		Failure to provide proper notice to all students, applicants and potential students who have contacted the institution about courses or programs potentially leading to professional licensure as to whether courses or programs actually meet state licensing requirements, invalidates the SARA eligibility of any course or program offered without the proper notice.	
Field trips and seasonal residential activity	Class field trips across state lines among member states.		Full-scale residency programs such as a summer session at a field station.	

12 "Types" of coverage

89 "Covered" Items

6 "Notes" on covered Items

89 "Non-Covered" Items

8 "Notes" on non-covered Items

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## Institutional View - NYU

- ▶ Creating a strategic plan to operate pre-SARA and post-SARA
- ▶ Realization of need to increase staff
- ▶ Communicating the impact of SARA in a large and decentralized environment
- ▶ Begin the SARA application (proactive v. reactive)

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## Living in a SARA World

Questions?

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