

Should My Institution Join SARA?



Institutions must make the decision of whether or not to join SARA. This decision must be made on an individual basis after careful review of local factors such as student enrollment, faculty, advertising, service providers, etc. The information in this document should be used to help evaluate those local factors and make an informed decision of how to comply with state authorization regulations.

Considerations

To determine if State Authorization (SA) is an issue on your campus, answer the following questions:

- The SREB Electronic Campus Regional Reciprocity Agreement (SECRRRA) will be discontinued on June 30, 2017. Consequently, institutions using this resource to conduct post-secondary activity beyond the borders of North Carolina will need to seek State Authorization in those states where they currently conduct activity.
- Where are students participating in online courses?
 - This is not residency, but where the student is physically located when they are completing course work. (Reported on [IPEDS-Part A](#)ⁱ "If there are students reported as enrolled exclusively in distance education courses, further data on the location of these distance education students will need to be reported. Report, by degree/certificate-seeking status, the number of exclusively distance education students that are located in the same state/jurisdiction as the institution, in a different state/jurisdiction than the institution, in the U.S. but the state/jurisdiction is unknown, and residing outside the U.S. **Location for those students enrolled exclusively in distance education should be their physical location or current address, as of the institution's Fall reporting date.**"
- Where are students participating in field experiences (clinical, internships, service learning, etc.)?
 - Consider also those field experiences that may stem from face to face programs in a home state where students may be completing field experiences in another state.
- Does the institution market or advertise out of state?
- Does the institution hire faculty who provide online services from another state?
 - Do you have online instructors who live outside of NC?
- Does the institution have a physical location in another state for instruction, administrative offices, or other support services?
 - Do you have proctors located in another state?
 - Do you have servers located in another state?
 - Does your institution have a building in another state?
- Do you enroll military members or their dependents?
- Is your institution planning to expand online offerings and advertise outside of NC?

If students are located outside North Carolina or the answer to any of the other questions is "yes," the institution needs to address SA. The institution should determine the best way for it to meet SA – obtaining authorization as necessary from individual states or joining SARA. -Colleges bordering other states are more likely to be impacted by most of these triggers and have a higher likelihood of needing authorization. Other colleges must adopt processes to evaluate these triggers and work with administration to determine the cost benefit of joining or not joining SARA.

Fees Required to Participate in SARA

- Annual State Fees for SARA-North Carolina (SARA-NC) (2017)
 - \$2,000 – Less than 2,500 FTE students
 - \$4,000 – 2,500 – 9,999 FTE students
 - \$6,000 –10,000 or more FTE students
- Annual National Fees for NC-SARA (2017)
 - \$2,000 – Less than 2,500 FTE students
 - \$4,000 – 2,500 – 9,999 FTE students
 - \$6,000 –10,000 or more FTE students
- SARA-NC and NC-SARA fees recur annually
- Renewal notification sent to the college 90 days before the expiration date
- College must respond to the renewal within 30 days; requires application renewal, fee payments, and annual reporting data
- 25% penalty for late responses to renewal
- SARA-North Carolina may be found in the NC e-Procurement system by using the following search terms:
Supplier: University of North Carolina
Location: NCSEAA

Membership Process of SARA

- To be eligible, institutions must meet [C-RAC Guidelines](#)ⁱⁱ
- Complete the NC-SARA application and [Agreement for Institutional Participation in SARA North Carolina](#) and submit to the [SARA-North Carolina](#)ⁱⁱⁱ portal agency, with State fees only and supporting documentation attached.
- Portal reviews application. Portal may request additional information (which may impact the approval process).
- Once approved, notifications are sent to SREB, NC-SARA, and the College.
- NC-SARA will notify the College with an invoice.
- College has 60-days to pay NC-SARA invoice. If invoice is not paid within the 60-day time frame, membership process begins from start (i.e. institution must submit a new application).
- National reciprocity is issued for participating SARA institutions upon receipt of payment.
- Annual Reporting required to maintain membership

What Does SARA Not Cover?

- Professional licensing requirements
- Residency programs
- Programs on military bases open to the general public
- Hybrid Programs (will not cover any seated portion of a hybrid course that is offered across state lines; it covers ONLY the part of the program that is offered via distance education)
- Physical Presence (face-to-face instruction, office, branch campus, etc.)
- Non-SARA states
- Non Credit Courses (free courses and MOOCs, [see explanation](#)^{iv})

Options to Meet Compliance

- Join SARA
- Obtain State-by-State Authorization (if possible)
 - Remember that authorization must be obtained prior to the service being provided
- Modify terms of business to avoid registering out-of-state students and physical presence triggers
 - Alter admissions policy to deny out of state students in online courses if they reside in a state where your institution is not authorized
 - Avoid hiring instructors out of state, advertising, recruiting activities, and other physical presence triggers

ENDNOTES

ⁱ IPEDS Reporting Information,

<https://surveys.nces.ed.gov/ipeds/VisInstructions.aspx?survey=6&id=30077&show=all>

ⁱⁱ C-RAC Guidelines, https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/POLICIES/Pp90-Guidelines_for_the_Evaluation_of_Distance_Education_On_line_Learning.pdf

ⁱⁱⁱ SARA-North Carolina,

<http://www.saranc.org/>

^{iv} Non Credit course explanation,

<http://www.nc-sara.org/about/issues-sara-does-not-address>