

Proposed SARA Manual Changes for the May 2020 Board Meeting
March 17, 2020 Webinar Questions and Answers

Topic	Question	Answer
General	What is the likelihood that the proposed changes (particularly related to licensure) will be approved by the Board in May?	We are in the process of gathering everyone's input via the regional compacts. Let us know your thoughts either via your compact director or direct to myself, or other NC-SARA staff.
General	Will the adjustment to Section 5.2 be immediate? Or, is there an effective date?	The effective date will be determined at the May Board meeting, not until.
General	How can we receive a link to the document Lori is referencing?	https://www.nc-sara.org/resources/draft-documents-may-2020-nc-sara-board-meeting
Branch Campus	What if your accreditor considers your remote location an "Additional Location"? Full Programs can be taught at additional locations	Yes, for the purposes of SARA activity, use the SARA Branch Campus definition as noted in the SARA Manual: "Branch Campus" means: a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers full programs of study, not just courses. (Integrated Postsecondary Education Data System (IPEDS)) For SARA purposes, a Branch Campus that operates under the accreditation of a Main Campus is not considered a separate Institution for purposes of SARA.
Branch Campus	I do have the same concern about the definition of branch... we will not be able to answer those two questions... Luz	Institutions will work with their SARA State Portal Entity staff.
Branch Campus	Under Section 2.5(i)(7), is a "branch campus" defined in the document as well?	For the purposes of SARA activity, use the SARA Branch Campus definition as noted in the SARA Manual: "Branch Campus" means: a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers full programs of study, not just courses. (Integrated Postsecondary Education Data System (IPEDS)) For SARA purposes, a Branch Campus that operates under the accreditation of a Main Campus is not considered a separate Institution for purposes of SARA

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Branch Campus	NECHE - Instructional Sites and Branch Campuses are the two terms.	For the purposes of SARA activity, use the SARA Branch Campus definition as noted in the SARA <i>Manual</i> : "Branch Campus" means: a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers full programs of study, not just courses. (Integrated Postsecondary Education Data System (IPEDS)) For SARA purposes, a Branch Campus that operates under the accreditation of a Main Campus is not considered a separate Institution for purposes of SARA
Branch Campus	They have three categories of remote locations: Course Locations (teaching less than 50% of a program), Additional Locations (teaching full programs with direct administration dependent on main campus), and Branch Campus (teaching full programs and has its independent administrative body)	For the purposes of SARA activity, use the SARA Branch Campus definition as noted in the SARA <i>Manual</i> : "Branch Campus" means: a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers full programs of study, not just courses. (Integrated Postsecondary Education Data System (IPEDS)) For SARA purposes, a Branch Campus that operates under the accreditation of a Main Campus is not considered a separate Institution for purposes of SARA
Branch Campus and SARA Complaints	In regard to Section 2.5 (i) (7) are these physical campuses or do they apply to online learners?	These would be SARA complaints.
Branch Campus and SARA Complaints	So, for complaints...the student has the option or filed within the state where they are taking courses and then the information is shared with the main?	Yes, that is correct.
Branch Campus and SARA Complaints	Regarding student complaints and branch campuses, I could understand the option for a student to file a complaint in the "base" state or the branch campus state. The concern is that students can "double dip" if they don't get the answer they want from one venue. Once a path of complaint is selected, the other path should be closed.	The SARA State Portal Entity of institution's home state is responsible for the SARA Complaint. The student may complain to the SARA SPE of the branch campus, but the complaint moves to the institution's home state for resolution. The SPE of the institution's home state notifies the SPE of the student's location.

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California	What, please are the primary reasons why California is not a part of the agreement? Is there a prospect for this changing?	Dana, There are several reasons for this and the person who can best discuss this is Christina Sedney from WICHE as their SARA director and her contact information is below. Western Interstate Commission for Higher Education (WICHE) 3035 Center Green Dr, Ste 200 Boulder, CO 80301 303.541.0238 csedney@wiche.edu
California	Any updates on CA joining SARA?	The person who can best discuss this is Christina Sedney from WICHE as their SARA director and her contact information is below. Western Interstate Commission for Higher Education (WICHE) 3035 Center Green Dr, Ste 200 Boulder, CO 80301 303.541.0238 csedney@wiche.edu
Data Reporting	Unrelated question: when reporting distance education (online programs) this year do we only report as we would those that intentionally took online programs or do we report on all the students being moved to online instruction in response to the pandemic?	The SARA data reporting period is May 15 through June 15. The enrollment data is based on the data that was submitted to IPEDS in Fall 2019. The Data Committee will have information on how to handle students moving to online this month in time for the 2021 reporting period (May 15-June 15, 2021).
Data Reporting	Does this mean that we should track where students are going due to the pandemic?	Yes, as you would for purposes of complying with state authorization and providing accurate information regarding professional licensure.
Data Reporting	Would tracking this be beneficial to us?	Yes, as you would for purposes of complying with state authorization and providing accurate information regarding professional licensure.

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Data Reporting	Has the committee taken into account that although the reporting is for 2019, all current staff and clinical placement coordinators are directing resources to re-placing students at sites and dealing with clinical site closures due to COVID-19?	<p>NC-SARA 2020 Data Information can be found at www.nc-sara.org/data and includes the 2020 Data Handbook. The NC-SARA 2020 Webinar registration information is at www.nc-sara.org/news-events/...</p> <p>The SARA data reporting period is May 15 through June 15. The enrollment data is based on the data that was submitted to IPEDS in Fall 2019. The learning placement reporting is based on the 2019 calendar year. Should any institution not be able to meet the data reporting period, they should reach out directly to Marianne Boeke (mboeke@nc-sara.org) after May 15, when they are sure they will be unable to meet the SARA reporting requirement.</p>
Data Reporting	Do we need to track practicums or program activity that does not have overnight activity and is only in the home state of the institution?	Please see the 2020 Data Handbook for specifics on what type of activity is reported. It can be found at www.nc-sara.org/data
Field Trip	Are there plans to define "field trip"?	See 5.3 Field trips and seasonal residential activity of the SARA <i>Manual</i> . There is some leeway for institution activity, but the proposed modification will provide better understanding of the activity covered by SARA Policy.
Field Trip	Section 5.3, multi-night residency for field trips—does this mean when the trip includes credit?	Yes. SARA covers both credit and non-credit at participating institutions.
Professional Licensure and Disclosures	Regarding 5.2, if the program of study does not receive Title IV, is the professional disclosure process still required?	Yes, if the program leads to licensure it will still be required the program meets the Federal requirement.
Professional Licensure and Disclosures	With aligning Professional Disclosures to 34 CFR 668.43, does this mean we will no longer need to make direct disclosure to "potential students"?	You will need to provide direct disclosures are when you do not know or are not sure if the program meeting requirements. So, there will be some overlap with the general disclosures. Again, it is not about listing what the requirements are, but about whether your program meets requirements.
Professional Licensure and Disclosures	What is the difference between a "potential student" and an "applicant"?	An applicant has applied.

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Professional Licensure and Disclosures	<p>34 CFR 668.43(a)(5)(v) Institutional Information - General Disclosures for ALL programs leading to professional licensure or certification (face to face and distance education) THIS IS A KEY CHANGE!</p> <p>34 CR 668.43(c) Institutional Information - Individual Disclosures for ALL programs leading to professional licensure or certification to prospective students if the institution makes a determination that the program does not meet state educational requirements or the institution has not made a determination where the student is located prior to enrollment in the program (USED indicated in the preamble of the regulations: before a financial transaction occurs). Individual Disclosures to enrolled students if the institution determines that the curriculum no longer meets educational requirements where the student is located - within 14 days of the institution making that determination.</p>	General disclosures would be on your website. Using 3 buckets of information: Meet the requirements; do not meet; or we are not sure. Direct disclosures are when you do not know or are not sure. So, there will be some overlap. Again, it is not about listing what the requirements are, but about whether your program meets requirements.
Professional Licensure and Disclosures	I didn't think they were requiring direct disclosures? I thought we had to have a statement on our website regarding what states are a yes, a no, and not determined. Can you guide us to where this is required? Is it in 668.43?	General disclosures would be on your website. Using 3 buckets of information: Meet the requirements; do not meet; or we are not sure. Direct disclosures are when you do not know or are not sure. So, there will be some overlap. Again, it is not about listing what the requirements are, but about whether your program meets requirements.
Professional Licensure and Disclosures	When ready, how would candidates be able to apply for certification/licensure, credential via SARA? This is a common question students coming to my office ask	Students do not apply to SARA; the professional licensure certification is handled through the professional licensure agency.
Professional Licensure and Disclosures	How long is someone considered a 'potential student'. At what point is someone who filled out an RFI no longer a prospect requiring documentation of status changes.	If a prospective student requests info, the institution is required to disclose whether the program for which they requested information leads to licensure at the time of the request.

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Professional Licensure and Disclosures	<p>You mentioned that if the US Department of Education changes its rules on disclosure, NC-SARA will make similar changes. Will this be codified in SARA manual to reflect that the disclosure requirements are dependent on ED's actions.</p>	<p>Yes, it would be a change in policy and would be addressed at that time.</p>
Professional Licensure and Disclosures	<p>My question is about professional licensure. We offer teacher licensure programs for the state in which we operate (Massachusetts). We don't know and wouldn't be able to tell students if our programs might lead to licensure in other states. The way I read the regulations, it seems to me that we must provide prospective students with a listing of all the teacher licensure bodies in other states so they can contact those agencies to determine if our programs prepare them for licensure in their state. We don't have that list and are not comfortable providing such a list. Are we misreading the regulations?</p>	<p>To meet the federal requirements, institutions will be required to make disclosures for all modalities and all states. For federal purposes the institutions will not need to provide contact information for all licensing agencies in all states.</p>
Professional Licensure and Disclosures	<p>When disclosing whether a program meets licensure requirements, how granular do we need to get? For example, we have graduate programs that do IF the underlying undergraduate degree is not a foreign degree?</p>	<p>You must provide clear direction as to whether your programs will meet licensure requirements.</p>
Professional Licensure and Disclosures	<p>SARA currently requires that we make reasonable efforts to determine if our program meets a state's professional licensure requirements. If SARA requirements are aligned with the federal requirements, are we still required to make a reasonable effort to determine if our program meets the state's professional licensure requirements?</p>	<p>Yes, you would be required to have both General Disclosures and Direct Disclosures. General disclosures would be on your website. Using 3 buckets of information: Meet the requirements; do not meet; or we are not sure. Direct disclosures are when you do not know or are not sure. So, there will be some overlap. Again, it is not about listing what the requirements are, but about whether your program meets requirements.</p>
Professional Licensure and Disclosures	<p>Do the disclosure requirements differ if the institution only has post-licensure (nursing) programs?</p>	<p>No</p>

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Professional Licensure and Disclosures	With the new licensure notification requirements will posting on our websites be sufficient or do we need to provide written notice to each potential student?	Yes, you would be required to have both General Disclosures and Direct Disclosures. General disclosures would be on your website. Using 3 buckets of information: Meet the requirements; do not meet; or we are not sure. Direct disclosures are when you do not know or are not sure. So, there will be some overlap. Again, it is not about listing what the requirements are, but about whether your program meets requirements.
Professional Licensure and Disclosures	I am not part of Instruction at my campus - how or where do I look to see if my requirements are accepted by another state?	Begin by check with your compliance department and/or the person responsible for experiential learning such as clinical placements.
Professional Licensure and Disclosures	Would you please provide additional clarification on licensure disclosure requirements concerning expectations for *non-credit* continuing education activity - on-line or otherwise? My understanding was that SARA was exclusive to activity for academic credit but I hear I may be mistaken???	SARA covers non-credit activity at an institution and therefore non-credit activity follows SARA policy.
Professional Licensure and Disclosures	Do US Territories need to be included in the general disclosure lists?	Yes, US Territories need to be included in the general disclosure list
Professional Licensure and Disclosures	Prof licensure programs offering a Ph.D. (non clinical) say they do not need to clear PhD programs with other state boards because boards don't have any jurisdiction over a Dr. of Philosophy. Comments?	Regardless of the degree level, there may still be state requirements that must be disclosed.
Provisional	Sorry if this has been answered already- if SPEs already accept institutional applications from institutions that would probably fall in a condition for provisional status for a fair review of their entire circumstances, do we need to come up with a specific procedure specifically for those institutions? I'm not sure the review process will be entirely different other than reviewing additional documentation	Each SARA State Portal Entity processes an institution application in the manner they develop. The SARA SPE is not required to grant an institution provisional status, but they are required to review a request for provisional status.

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Provisional	Sorry if this has already been answered - Will the modifications now require SPE to use provisional status?	Each SARA State Portal Entity processes an institution application in the manner they develop. The SARA SPE is not required to grant an institution provisional status, but they are required to review a request for provisional status.
Provisional	Is only reason for prov. status right now for institutions financial score? If no, what else can place institution on provisional status?	No. There are several reasons. The Institution is on provisional or probationary status or the equivalent with its institutional Accrediting Agency; The Institution is currently required by the U.S. Department of Education to post a letter of credit or is under a cash management agreement with the U.S. Department of Education. (Such institutions must still have a Federal Financial Responsibility Composite Score above 1.0); The Institution's Federal Financial Responsibility Composite Score falls between 1.0 and 1.5. (For renewing institutions or institutions between renewal periods. An Institution with a score below 1.0 is not eligible for SARA participation.); The Institution is the subject of a publicly announced investigation by a Government agency, and the investigation is related to the Institution's academic quality, financial stability or student consumer protection; The Institution is the subject of a current investigation by its home State related to the Institution's academic quality, financial stability or student consumer protection.; Lack of compliance with SARA policies related to data reporting.; The Institution has a change of ownership as determined by the Home State