

**Lori Williams**

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Indiana Commission for Higher Education

**\*Edward "Ed" Ray (Vice Chair)**

Oregon State University

**Rob Anderson**

State Higher Education Executive Officers Association (SHEEO)

**Barbara Ballard**

Kansas Legislature

**\*Chris Bustamante**

Arizona Community College Coordinating Council

**John Cavanaugh**

Consortium of Universities of the Washington Metropolitan Area (Retired)

**Arthur "Art" Coleman**

EducationCounsel, LLC

**Laurie Dodge**

Brandman University

**Lanna Dueck**

Arizona SARA Council

**\*Susan Heegaard**

Midwestern Higher Education Compact

**Angela Lee**

District of Columbia Higher Education Licensure Commission

**\*Leah Matthews**

Distance Education Accrediting Commission

**\*Demarée Michelau**

Western Interstate Commission for Higher Education

**Carlos Morales**

Tarrant County Colleges Connect Campus

**\*Patricia "Pat" O'Brien**

New England Commission of Higher Education

**\*Stephen Pruitt**

Southern Regional Education Board

**Pamela "Pam" Quinn**

Tarrant County College Connect Campus (Interim)

**George Eugene Ross**

Central Michigan University (Retired)

**Paul Shiffman**

Presidents' Forum at Excelsior College (Retired)

**Peter Smith**

University of Maryland University College

**\*Michael Thomas**

New England Board of Higher Education

**\*Larry Tremblay**

Planning, Research, and Academic Affairs Louisiana Board of Regents (Retired)

**\*Leroy Wade**

Missouri Department of Higher Education and Workforce Development

**Belle Wheelan**

Southern Association of Colleges and Schools Commission on Colleges

*\*Member of NC-SARA Executive Committee*



**National Council for  
State Authorization  
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE

June 16, 2021

The Honorable Miguel Cardona  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, D.C. 20202

cc: Rich Williams  
Chief of Staff  
Office of Postsecondary Education

Dear Secretary Cardona,

I write to submit comments to help inform the direction of upcoming virtual public hearings designed to identify policy concerns that could be addressed during future rulemaking sessions, per a recent request from the Office of Postsecondary Education.

As president and CEO of the National Council for State Authorization Reciprocity Agreements (NC-SARA), I lead our organization's efforts to promote the value and benefits of State Authorization Reciprocity Agreements (SARA), which streamline regulations for distance education programs; help expand students' access to educational opportunities; and ensure more efficient, consistent, and effective regulation of interstate distance education programs. I have appended additional information about NC-SARA to this letter for background information.

The COVID-19 pandemic has fundamentally altered the postsecondary education landscape and raised new questions about how best to support students in, and strengthen the quality assurance of, distance education programs. As the national leader in promoting quality interstate postsecondary distance education, NC-SARA has identified three priority issues that we believe should be discussed during future negotiated rulemaking sessions:



**Strengthening the Triad.** The Department of Education, states, and accreditors work together to assure postsecondary quality as part of the “Triad.” NC-SARA was founded as a complement to the Triad and serves as a valued collaborator and partner to support this shared goal of strengthening accountability and outcomes in higher education. The previous administration facilitated a summit with members of the Triad to foster discourse on opportunities to enhance quality assurance and tackle challenges facing postsecondary students and institutions. More communication and information sharing between the three parts of the Triad is needed to ensure each part is doing its best to protect student consumers. We strongly urge the Department of Education to consider hosting future convenings with members of the Triad and other relevant parties, including NC-SARA, to support the strengthening of accountability.

**Identifying Standard Financial Measures that Better Reflect an Institutions’ Financial Health.** As you may know, SARA participating institutions and states **must** meet certain requirements to support quality assurance – many of which are focused on ensuring appropriate consumer protections for students. One important requirement is that states accept an institutional federal Financial Responsibility Composite Score of 1.5 as indicative of sufficient minimum financial stability.

NC-SARA relies upon the federal Financial Responsibility Composite Score as the most common measure of financial stability of private academic institutions. Despite calls from private nonprofit colleges and universities for the Department and NC-SARA to pause the use of these scores during the pandemic, in October 2020, NC-SARA’s board voted to maintain the requirement for SARA participation.

However, we recognize the federal Financial Responsibility Composite Score is imperfect. The delay between when institutions report data and when the Department publicizes scores is significant. Higher education advocates [have expressed](#) “concerns about how [the Department of Education] treats key elements of the ratio calculations, including total expenses, endowment losses, trustee pledges, long-term debt, and net asset classification.” Additionally, the U.S. Government Accountability Office [has reported](#) that the federal Financial Responsibility Composite Score “does not reflect changes in accounting practices and standards, relies on outdated financial measures, and is vulnerable to manipulation.”

We believe that it is important for the Department to host discussions about the best avenues to more reliably evaluate institutions’ financial health. NC-SARA would like to collaborate with the American Council on Education (ACE), the National Association of Independent Colleges and Universities (NAICU), the National Association of College and University Business Officers (NACUBO), and others in support of this endeavor. It is especially important to pursue these conversations expeditiously before institutions’ scores are unduly impacted by the pandemic’s financial repercussions.

**Strengthening Distance Education Quality Assurance Reviews.** SARA also requires that all participating institutions must be accredited by and remain in good standing with an accrediting body recognized by the Department of Education. NC-SARA relies on the standards and processes used by accrediting agencies to affirm distance education quality, but the guidelines previously used by the Council of Regional Accrediting Commissions (C-RAC's *2011 Interregional Guidelines for the Evaluation of Distance Education*) were extremely outdated.

This past year, with the support of national accreditors, NC-SARA commissioned the National Center for Higher Education Management Systems (NCHEMS) to develop the *21<sup>st</sup> Century Distance Education Guidelines* in service to the field and accreditors (a copy of the new guidelines is appended to this letter). The guidelines were crafted with input from a wide array of postsecondary distance education experts, as well as accreditors, university presidents, and higher education association leaders, and are designed to help support accreditors' review of distance education programs. Members of C-RAC have since retired their previous *2011 Guidelines* and have [begun to adopt](#) the new *21<sup>st</sup> Century Distance Education Guidelines*.

NC-SARA believes these new distance education guidelines can form the basis of a stronger, better coordinated approach to quality assurance for distance education among the members of the Triad. We urge the Department to recognize and consider them as essential guidance for accreditors and states in assuring quality of and student consumer protections in distance education.

Since I became president of NC-SARA in 2019, I have striven for greater transparency and openness in NC-SARA's policy review and revision, regularly seeking input from all of SARA's stakeholders including our state members, the four regional higher education compacts (MHEC, SREB, NEBHE, WICHE), participating institutions, and consumer advocacy groups that elevate the needs of the students our participating institutions serve. We hope our insights can be valuable to the Department as you determine the priority issues and topics that will be discussed in the months and years ahead. We ask you to consider NC-SARA a participant, resource, and constructive partner in this endeavor, and for the Department to continue to support the work of NC-SARA in the future.

I would welcome the opportunity to discuss these issues further and would also be pleased to speak at the public hearings. I look forward to being helpful to you in pursuit of the shared goal of strengthening the perception and value of America's postsecondary education system. I would also be pleased to speak at relevant public hearings, and will gladly rearrange my schedule to accommodate my participation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Williams". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lori Williams, PhD  
NC-SARA President & CEO  
[lwilliams@nc-sara.org](mailto:lwilliams@nc-sara.org)

Supplemental Materials:

- National Association of Colleges and University Business Officers. (February 2020). [\*NACUBO advisory guidance 19-04 Financial responsibility standards.\*](#)
- National Council for State Authorization Reciprocity Agreements. (2021). [\*SARA cost savings.\*](#)
- National Council for State Authorization Reciprocity Agreements. (2021). [\*SARA Policy Manual 21.1.\*](#)
- U.S. Government. Accountability Office. (April 2019). [\*Higher education: Opportunities to Strengthen federal accountability.\*](#)
- Council of Regional Accrediting Commissions. (April 2021). [\*Proposed 21<sup>st</sup> century guidelines for the review of distance education.\*](#)



# Promoting Postsecondary Access, Affordability, & Quality Assurance

The National Council for State Authorization Reciprocity Agreements (NC-SARA) is a nonprofit organization that helps expand students' access to postsecondary educational opportunities and ensure more efficient, consistent, and effective regulation of distance education programs.

NC-SARA serves as a national leader in enhancing quality and consumer protections in interstate postsecondary distance education by helping states, institutions, policymakers, and students understand the value of participating in state authorization reciprocity agreements (SARA).

## What are State Authorization Reciprocity Agreements?

SARA is a set of agreements between member states, districts, and territories that establishes comparable national standards for interstate distance education program offerings. These reciprocity agreements help streamline distance education regulations, improve coordination between states and higher education institutions, and also help ensure member states and participating institutions adhere to a set of basic consumer protections for students.

All accredited degree-granting institutions in SARA member states – public, private, independent, non-profit, and for-profit – have the opportunity to participate in SARA. Institutions pay between \$2,000-\$6,000 annually to NC-SARA, based on enrollment – a starkly more affordable investment when compared to paying fees to states individually that could total upwards of 13 times this amount.

As of January 2021, roughly 90% of all U.S. postsecondary institutions that offer distance education programs (2,200 institutions) voluntarily participate in these agreements across 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. In fall 2019 (the latest available data), more than 3 million students were enrolled exclusively in distance education programs at SARA-participating institutions – a 7.5% increase over fall 2018 enrollments.

## NC-SARA'S INITIATIVES

**NC-SARA undertakes key national initiatives on behalf of its member states and participating institutions. Here are some examples of our latest work:**



### Strengthening Student Consumer Protections.

NC-SARA member states provide student protections against false or misleading information by SARA-participating institutions through investigation and resolution of allegations of dishonest or fraudulent activity. NC-SARA maintains a publicly available online database of such SARA-related student complaints.



### Improving Transparency through Annual Data Report on Interstate Distance Education Programs.

NC-SARA releases an annual distance education enrollment report and dataset, which analyzes the latest available data on distance education enrollment and out-of-state learning placements at SARA participating institutions. This information provides key insights for states, policymakers, and institutions into distance education enrollment trends across state lines.



### Reporting on Return on Investment.

States pay no fees to NC-SARA, and annual costs for institutions are as low as \$2,000 – dramatically lower than an institution would pay for state-by-state authorization. The low cost of the SARA model reduces institutional costs that might otherwise be passed down to students and taxpayers. NC-SARA will release a national study in 2021 to learn more about these institutional cost savings.



### Simplifying Access to Distance Education Program Information.

NC-SARA is developing a searchable database of verified distance education program information from SARA institutions nationwide in an effort to make it easier for current and prospective students to find the program that best fits their needs and career goals. This resource will launch in 2021.

# BEFORE & AFTER NC-SARA

## BEFORE

**EXPENSIVE:** The process of compiling and processing applications to offer distance education across state lines imposed costs on both institutions and states – costs that could be passed on to students in the form of higher tuition or fees.

**OVERWHELMING BUREAUCRACY:** Adhering to varying state requirements and regulations created enormous bureaucracy for institutions.

**LACK OF PROTECTIONS:** Because states had varying degrees of accountability requirements for institutions, students could not rely on a consistent set of consumer protections to help assure quality distance education programs.

**CONFUSING:** Institutions struggled to understand and juggle varying state requirements for distance education regulations, fee structures, and data reporting on different annual calendars.

**LIMITED OPTIONS:** Because institutions could not offer distance education programs across state lines without first obtaining specific approvals from each state, students' distance education programming options were limited.

**INCONSISTENT DATA:** States collect different data sets about higher education programs and outcomes, leading to inconsistent reporting on distance education programs.

## COST



## PROCESS



## PROTECTIONS



## REGULATIONS



## OPTIONS



## DATA



## AFTER

**AFFORDABLE:** NC-SARA has maintained low fees for states to become members and for institutions to participate in order to more easily offer distance education opportunities across state lines.

**SIMPLIFIED PROCESS:** Because NC-SARA streamlined the application process for all SARA member states, it is now easier for institutions and states to ensure adherence to state authorization requirements for distance education across the country.

**ENHANCED PROTECTIONS:** SARA member states must adhere to a consistent set of requirements to help guarantee appropriate protections for students.

**STREAMLINED REGULATIONS:** SARA establishes one uniform set of state distance education regulations, ensuring more efficient and effective oversight of distance learning programs.

**CHOICE:** Because 49 states and three territories are SARA members, and more than 2,160 institutions are participating institutions in SARA, students now have a wide variety of interstate distance education programming options.

**BETTER DATA:** NC-SARA requires institutions to annually report in-state and out-of-state online enrollments and out-of-state learning activities such as practice teaching, clinical work, etc., and compiles that information into a publicly accessible database.

## BENEFITS OF SARA

- Improves distance education program quality nationwide.
- Makes it easier for students to access distance education across state lines.
- Reduces costs and bureaucracy for states and institutions.
- Improves coordination between states on higher education opportunities.
- Provides valuable oversight of distance education programs.
- Shares out-of-state learning experience data like clinical hours, internships, and practice teaching.

To learn more about our student consumer protection efforts, visit [www.nc-sara.org](http://www.nc-sara.org).



National Council for  
State Authorization  
Reciprocity Agreements

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# Proposed 21<sup>st</sup> Century Distance Education Guidelines



National Council for  
State Authorization  
Reciprocity Agreements



March 2021

## OVERVIEW:

With the continued growth in postsecondary distance education, the assurance of quality in such programs impacts an increasingly large proportion of students. The COVID-19 pandemic has also required education at all levels to move to remote delivery, and most predictions are that overall increases will continue post-pandemic, emphasizing the relevancy of quality assurance for such programs.

The federal government, state governments, and accreditors all play important roles in assuring quality in distance education in the United States. Title IV of the HEA sets forth interdependent responsibilities for this triad to ensure program integrity. The states provide consumer protection, the accrediting agencies provide quality assurance, and the federal government's role is to provide oversight of compliance to ensure administrative and fiscal integrity of Title IV programs at institutions of higher education.

Per the federal definition, distance education includes both online learning and remote learning. To help assure quality, regional accreditors and other organizations have relied on the *C-RAC Interregional Guidelines for the Evaluation of Distance Education* that were adopted by the Council of Regional Accrediting Commissions in 2002, and were last updated in 2011. As distance education continued to develop, accreditors referenced and incorporated the guidelines into their own standards and processes. Institutional participation in State Authorization Reciprocity Agreements (SARA) includes a provision that an institution must adhere to the *C-RAC Guidelines*, so SARA member states are also reliant on this resource to ensure institutional compliance with SARA policy.

Given the numerous advancements in technology, learning sciences, competency-based programs, and distance learning pedagogy, along with the increase in distance education programs, the need for high quality credentials, and the economic realities facing families and states, it is time for a new set of guidelines. The National Council for State Authorization Reciprocity Agreements (NC-SARA) assumed a leadership role in supporting the development of this proposed new set of guidelines for institutional accreditors reviewing distance education.

These proposed *21<sup>st</sup> Century Guidelines* were developed in two key phases in a commissioned project with the National Center for Higher Education Management Systems (NCHEMS). First, NCHEMS undertook an in-depth study to determine the extent to which there were similarities in consideration of quality between the *C-RAC Interregional Guidelines for the Evaluation of Distance Education* and each accrediting organization's standards, policies, and guidelines related to distance education. This was completed through a review of publicly available documents and interviews with accrediting organizations' staff. The second phase involved the iterative development of these *21<sup>st</sup> Century Guidelines* based on that study, which involved interviews with current practitioners, researchers, and quality assurance professionals, as well as reviews and feedback by critical constituents.

Several criteria shaped the development of the proposed *21<sup>st</sup> Century Guidelines*, including that they be: developed in partnership with accreditors and other organizations and experts in the field; applicable to a wide range of institutions; congruent with the standards used by many of the institutional accreditors; relevant to accreditors and NC-SARA in assuring distance education quality; and accessible and useful to institutions for planning and continuous improvement purposes.

These *21<sup>st</sup> Century Guidelines* are therefore sensitive to the enormous variation in institutions offering distance education (e.g., in size, public/private, degree levels, programs), in students enrolled, in program design and delivery, in faculty model, and in the extent of preparedness and resources students have to study at a distance. Thus, the *21<sup>st</sup> Century Guidelines* are designed to inform, but not limit, accreditors and states in their judgment of satisfactory levels of quality in the offering of programs through distance education.

#### **PARTICIPANTS:**

A complete list of participants in this initiative is available in Appendix A. Comments from several participants are included in Appendix B, and Appendix C shares information about NC-SARA and NCHEMS.

## Proposed 21st Century Distance Education Guidelines

The following elements for assuring quality in distance education programs are proposed.

### Institutional Capacity

1. The institution offering distance learning programs regularly evaluates and demonstrates its capacity along multiple dimensions, including financial resources, technology infrastructure, data security, content expertise, instructional design, support for students and assessment of, and access to information resources.
2. Financial support for distance learning is sufficient given the scope of programming, enrollment, student body, methods of delivery, and support.
3. The institution supports diversity, equity, and inclusion through its learning environments and student support as appropriate to its mission and student body.
4. Educational quality is supported through continuing investment in technology and professional development for faculty as well as other academic, technical, and student support staff. Professional development is ongoing and includes attention to: technology, instructional design, learning science, pedagogy, assessment, and methods of using data for improvement.
5. The institution ensures that learning resources used for instruction and tools used for access to services are sufficiently supported and ensure accessibility and privacy for students. The institution provides clear policies regarding intellectual property.
6. Relevant information that orients students to their courses—such as syllabus, prerequisites, course delivery structure, class schedule, modes of communication—is provided to students on the institution's learning management platform. Students have ready access to available technical support services.
7. Online program management (OPM) and other contractual and consortial arrangements are reviewed to ensure that the institution retains appropriate authority and responsibility for the academic program and student privacy.

### Institutional Transparency and Disclosures

8. During the admissions process, information readily available to prospective students includes:
  - a. a clear description of the program, including curriculum, learning outcomes, and appropriate measures of student success (e.g., graduation rates, licensure passage rates by state, employment in the field, progression to the higher degree) disaggregated by modality;

- b. all costs, including tuition, fees (including any additional charges associated with verification of student identity), books, materials, travel for any on-site clinical or internship requirements, and refund policy;
  - c. requisite skills for using technology tools (websites, software, and hardware) that are clearly stated and reinforced through admissions, orientation, and matriculation;
  - d. processes for authenticating student identification;
  - e. information regarding what students need to be successful in the program, including pre-requisites, technology, internet connection, and expected amount of engagement per week or per term;
  - f. expectations for students' engagement as active learners with learning resources, faculty, other students, and assignments as appropriate;
  - g. support services available to students; and
  - h. information about professional licensure requirements, where appropriate, and advice on licensing in the state(s) of intended employment.
9. Students are oriented in ways suitable to the student body, in stages tailored to the backgrounds and needs of students, varying as germane by program and degree level.
- a. Orientation is provided to the learning environment; to technology; to academic resources; to support for students (including advising, tutoring, mentoring, coaching, accessibility); and to special opportunities for students.
  - b. Orientation includes opportunities for students to demonstrate their competence with the technology and learning format used in courses.

### **Academic Programs**

10. The academic team includes individuals with expertise in the subject-matter, instructional design, interaction with students, and assessment of student learning.
11. The institution collects, analyzes, and uses data on student engagement, achievement, and feedback for improvement of the academic program and of student success.
12. Institutions that offer the same program in multiple modalities ensure learning outcomes and levels of student achievement are comparable across modalities.
13. Learning activities and assessments are aligned with measurable learning outcomes. Formative and summative assessments of student learning provide feedback to students and serve as a basis for program improvement.

### **Support for Students**

14. Academic and support staff who interact with students are able to guide them to the range of support services offered by the institution.

15. Continuing support helps students develop as engaged learners, with the information and skills to seek special opportunities to enhance their success.
16. Academic and student support services are available remotely, easy to access, and available at times when students need them.
17. Collective responsibility for student success is accepted by academic, technical, and student support staff.

### **Program Review**

18. Programs offered through distance learning are reviewed on a regular cycle that includes external perspectives. Reviews are informed by empirical evidence including feedback from students and graduates about the academic program and information about graduates' success (e.g., employment and further education).
19. The institution documents improvements made as a result of the program reviews and other feedback.

### **Academic and Institutional Integrity**

20. The institution promotes a culture of academic integrity. The process for addressing academic integrity issues is clearly outlined by the institution and includes the opportunity for appeal.
21. Distance learning programs are appropriately integrated into the academic, administrative, and governance systems of the institution.
22. Learning outcomes are clear to prospective students and the public.
23. The institution demonstrates its understanding of the requirements and obligations of participation in NC-SARA, such as SARA consumer protection provisions.

*Note: This item is the responsibility of the states.*

## Appendix A: Participants and Partners

NC-SARA and NCHEMS are grateful to everyone involved in this initiative for their time and expertise in the development of these proposed *21<sup>st</sup> Century Guidelines for Distance Education*.

### Interviewees

Deb Adair, Quality Matters  
Meg Benke, SUNY Empire State College  
Melanie Booth, NC-SARA (previously WASC Senior College and University Commission)  
Deb Bushway, Northwestern Health Sciences University  
Chris Bustamante, Rio Salado College, AZ  
Myk Garn, University System of Georgia  
Dale Johnson, Arizona State University  
Leah Matthews, Distance Education Accrediting Commission  
John Opper, Florida Virtual Campus  
Hae Okimoto, University of Hawaii  
Russ Poulin, WICHE Cooperative for Educational Technologies (WCET)  
Pam Quinn, Dallas County Community College District  
Ken Sauer, Indiana Commission for Higher Education  
Kay Shattuck, Penn State and Quality Matters  
Peter Shea, SUNY Albany, NY  
George Siemens, Texas Center for Educational Technology  
Linda Smarzik, Austin Community College District, TX  
Burck Smith, StraighterLine  
Peter Smith, University of Maryland Global Campus  
Vernon Smith, American Public University System  
Karen Solomon, Higher Learning Commission  
Karen Swan, University of Illinois, Springfield  
Candace Thille, Stanford University and Amazon

### Reviewers

Deb Adair, Quality Matters  
Rob Anderson, State Higher Education Executive Officers Association  
Ulrik Juul Christensen, Area9 Lyceum  
Laurie Dodge, Brandman University  
Judith Eaton, Council for Higher Education Accreditation  
Julie Porosky Hamlin, MarylandOnline  
Leah Matthews, Distance Education Accrediting Commission  
Scott Pulsipher, Western Governors University  
Ray Schroeder, UPCEA  
Karen Solomon, Higher Learning Commission  
Linda Thor, Maricopa County Community College District Board of Governors  
Robin Walton, Thomas Edison State University, NJ  
Belle Wheelan, Southern Association of Colleges and Schools Commission on Colleges  
Darlene Williams, Northwestern State University, LA

## Appendix B: Comments from Participants

**Deb Adair**, Executive Director – Quality Matters

*Thank you for your work on this and your commitment to improve these guidelines which will enhance the quality of the student learning experience in distance education programs.*

**Laurie Dodge**, Vice Chancellor of Institutional Assessment and Planning Vice Provost, Brandman University

*Thank you for the opportunity to provide feedback on the Distance Learning Guidelines. First, I wish to thank each of you for taking this bold and needed step. Much of the world in teaching and learning and supporting technology has changed over the past 10 years in addition to the new federal regulations. So your timing is perfect!*

**Michale McComis**, Executive Director, Accrediting Commission of Career Schools and Colleges

*The 21<sup>st</sup> Century Guidelines for Distance Learning represent a comprehensive set of best practices that when woven into the fabric of educational practice yield an enhanced opportunity for quality learning and student success.*

**Scott Pulsipher**, President, Western Governors University

*I appreciate the enormity of the undertaking in which you are engaged, and your continued support of innovation.*

**Ray Schroeder**, Associate Vice Chancellor for Online Learning, University of Illinois Springfield; Senior Fellow, UPCEA

*I applaud NC-SARA and NCHEMS for the initiative to create a new list of guidelines that may take the place of the well-worn C-RAC guidelines as they apply to national standards for interstate offering of postsecondary distance education. This list is far superior to the prior aging recommendations in addressing a number of continuing considerations as well as those that have arisen in the past decade.*

**Peter Smith**, Orkand Chair and Professor of Innovative Practices in Higher Education, University of Maryland Global Campus

*These guidelines anticipate the next generation of distance education. They recognize that we are entering a time when effectiveness, learner-centered practices, and data analytics will supersede the delivery model as the determinants of quality.*

**Linda Thor**, Member, Maricopa Community Colleges Governing Board; President Emeritus, Rio Salado College; Chancellor Emeritus, Foothill-De Anza Community College District

*I have reviewed the draft distance learning guidelines and think that they are very well done, comprehensive, and generally clear . . . Thank you for the opportunity to be a small part of this important project.*

**Belle Wheelan**, President, SACSCOC

*I believe they add some much needed 'meat' to the C-RAC bones that were used in the past.*

**Frank Yamada**, Executive Director, The Association of Theological Schools

*The Guidelines address the many various forms of institutions while providing common principles of quality in distance learning. They clearly articulate areas of institutional capacity required for schools to plan for, develop, and assess the resources and processes needed to work for continuous improvement in distance learning. The guidelines integrate well-established principles of educational quality throughout. The emphasis, as well, on clear support for students in distance learning is a strength of The Guidelines . . . For accreditors, it is very helpful to read in the Introduction that they are "designed to inform but not limit accreditors in their judgement of satisfactory levels of quality in the offering of programs through distance learning." That reinforces our distinctive roles. The Guidelines also demonstrate a nice dual emphasis on institutions and students. They should prove very useful.*

## Appendix C: About NC-SARA and NCHEMS

### About NC-SARA

[NC-SARA](#) is a nonprofit organization that helps expand students' access to postsecondary educational opportunities and ensures more efficient, consistent, and effective regulation of interstate distance education. The organization serves as a national leader in enhancing quality and important student consumer protections in by helping states, institutions, policymakers, and students understand the value of and requirements for institutions participating in State Authorization Reciprocity Agreements (SARA).

### About SARA

SARA is a set of agreements between member states, districts, and territories that establishes comparable national standards for interstate distance education program offerings. These reciprocity agreements help streamline distance education regulations, improve coordination between states and higher education institutions, and also help ensure member states and participating institutions adhere to a set of important consumer protections for students. As of January 2021, roughly 90% of all U.S. postsecondary institutions that offer distance education programs (2,200+ institutions) voluntarily participate in these agreements across 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. More than 3 million students are enrolled exclusively in distance education programs offered by SARA-participating institutions.

### About NCHEMS

[NCHEMS](#) is a private, nonprofit organization whose mission is to improve strategic decision making and practices in post-secondary education for states, systems, institutions, and work-force development organizations in the United States and abroad. NCHEMS carries out cutting edge research, strategic advising, and offers technical assistance to allow for more sustainable and successful service to learners. NC-SARA commissioned NCHEMS to undertake the research and development of this initiative. The NCHEMS' team included Sally Johnstone, NCHEMS' president and a long-time distance learning practitioner and researcher; Barbara Brittingham, President Emerita of a regional accrediting commission; and Sarah Torres Lugo, NCHEMS' researcher.