

DRAFT Policy Modification Process

If approved, this language shall replace sections 8.2 and 8.3 of the SARA Policy Manual.

- a. Purpose. The purpose of this section is to provide a clear, consistent, and transparent process to amend the *SARA Policy Manual* in a manner that reflects the principles of SARA's foundational document, the Unified Agreement. Just as the Unified Agreement was signed by the four regional compacts and NC-SARA, this policy modification process is intended to provide each of those parties – as well as the many additional stakeholders to SARA – a reasonable and appropriate voice in the review and approval of SARA policy changes.
- b. Guiding principles. Proposed policy modifications shall be introduced, reviewed, and approved in a manner that reflects the following guiding principles: transparency; collaboration; consistency; and clear and open communication among regional compacts, states, institutions, NC-SARA, and other stakeholders.

Proposed policy modifications shall be evaluated based on SARA's fundamental reliance on interstate reciprocity and trust, and on the fundamental purposes of SARA, which are to support high quality distance education, resolve problems encountered by students, and simplify and support the interstate offering of distance education using a model under which an institution's home state is primarily responsible for what the institution offers under the aegis of SARA.

Other guiding principles for the review, clarification and modification of SARA policies include:

- Broad consultation with key stakeholders;
 - Maintaining consistency in policy and procedures;
 - Transparency and openness; and
 - Responsiveness to stakeholders and emerging policy issues.
- c. Requirement. Proposed policy modifications to SARA policy shall require the approval of each of the four regional compacts and the NC-SARA Board.

The approval process for each party shall be based on their respective bylaws or other internal processes.
 - d. Required steps. Proposed policy modifications must complete the following steps/ approvals prior to their adoption and incorporation in the *SARA Policy Manual*:
 1. Submission to NC-SARA or a regional compact based on the criteria outlined in subsection 8.2(f);
 2. Initial review and recommendation by NC-SARA or the regional compact to which it was submitted;
 3. Review and approval by each of the four regional compacts following a public comment period; and
 4. Review and approval by the NC-SARA Board.
 - e. Policy review cycle calendar. NC-SARA shall annually publish a policy review calendar that clearly identifies the timeline for each step of the policy modification process. Amendments to the policy review calendar shall be approved by each regional compact.

- f. Policy review process.
1. Step 1: Submission to NC-SARA or a regional compact.
 - i. Any person or entity may submit a proposed modification. Proposed policy modifications shall be submitted to either NC-SARA or one of the four regional compacts based on the below guidelines:
 1. Member institutions, State Portal Entities, regional compact staff, and regional steering committee members shall submit proposed policy modifications to their respective regional compact.
 2. All other parties shall submit proposed policy modifications to NC-SARA.
 - ii. NC-SARA shall maintain a process to collect all proposed policy modifications, distribute proposed policy modifications to NC-SARA staff or the appropriate regional compact, and maintain clarity and transparency regarding the status of such proposals throughout the entirety of the policy review cycle.
 - iii. Proposed policy modifications shall clearly specify the following information: (i) section(s) of the *SARA Policy Manual* that will be amended or impacted by the proposal; (ii) specific amendatory language for each proposed amendment; (iii) rationale for the proposal; and (iv) identification of the person or entity submitting the proposal.
 - iv. Working groups. Working groups established by the NC-SARA Board may submit proposed policy modifications to NC-SARA if any such proposals result from the working group's review of SARA policy issues. Similarly, working groups established by a regional compact may submit proposed policy modifications to that regional compact if any such proposals result from the working group's review of SARA policy issues.
 - v. The regional compacts shall conduct an inter-regional meeting prior to the submission deadline for the purpose of reviewing proposals received or anticipated and identifying opportunities for alignment.
 2. Step 2: Initial review and recommendation by NC-SARA or the regional compact to which it was submitted.
 - i. Proposed policy modifications shall be initially reviewed by NC-SARA or the regional compact to which the proposal was submitted in accordance with the timeline identified in the policy review calendar. Such proposals shall either be recommended for approval or not recommended for approval.
 - ii. Regional compacts shall review proposed policy modifications based on internal processes established by each regional compact, including any delegation of authority to regional steering committees to conduct such reviews and approvals.
 - iii. Proposed policy modifications that are recommended for approval shall be reviewed by each regional compact in accordance with the process described in Step 3 below.
 - iv. Basis for review. All proposed policy modifications shall be reviewed based on whether they are consistent with the purposes and governing principles of SARA, as established in the Unified Agreement and clarified in the *SARA Policy Manual*.

3. Step 3: Review and approval by each of the four regional compacts following a public comment period.
 - i. NC-SARA shall provide the following proposed policy modifications to regional steering committee chairs, regional compact directors, and NC-SARA Board members: (1) proposed policy modifications recommended for approval by any of the four regional compacts; (2) proposed policy modifications recommended for approval by NC-SARA; and (3) proposed policy modifications originating from NC-SARA.
 - ii. There shall be a public comment period for any proposed policy modifications reviewed during this step. NC-SARA shall collect and make publicly available all public comments received and create a summary of comments.
 - iii. NC-SARA shall provide an impact analysis that assesses the potential impact of proposed policy modifications.
 - iv. Proposed policy modifications shall be reviewed in accordance with the timeline identified in the policy review calendar.

4. Step 4: Review and approval by the NC-SARA Board.
 - i. Proposed policy modifications approved by each of the four regional compacts shall be placed on the agenda of the next NC-SARA Board meeting.

Proposed policy modifications not approved by each of the four regional compacts shall be provided to the NC-SARA Board for informational purposes but shall not be reviewed for adoption and incorporation in the SARA Policy Manual.
 - ii. Proposed policy modifications that have been approved by each regional compact and the NC-SARA Board shall be adopted and incorporated in the SARA Policy Manual within sixty days of such approval.

- g. Notices. Notices shall be provided to persons or stakeholders who submit proposed policy modifications that summarize any action taken in response to the proposed modification. Such notices shall be provided by NC-SARA or the regional compact that reviewed the proposed modification.

- h. Proposed policy modifications based on exigent circumstances may be considered and approved by each of the regional compacts and NC-SARA's Board outside of the schedule provided in this section. Such exigent circumstances may include any occasion or instance for which Federal or State assistance is needed to supplement local efforts to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States.