

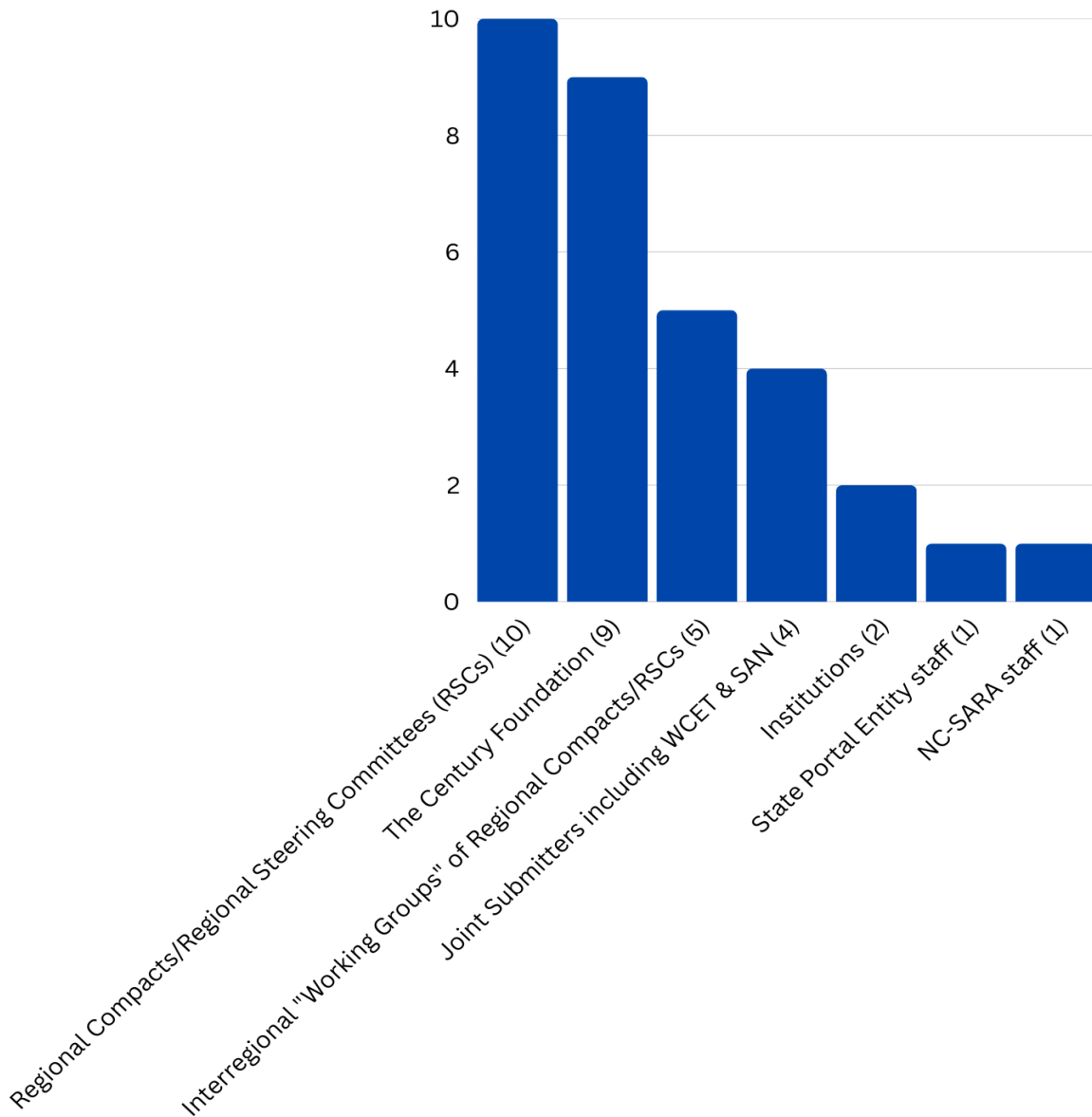
SARA Policy Modification Process 2025 Cycle Summary

The SARA Policy Modification Process reflects the guiding principles of transparency, collaboration, consistency and clear and open communication. A summary of the third year implementing the process is provided in this report.

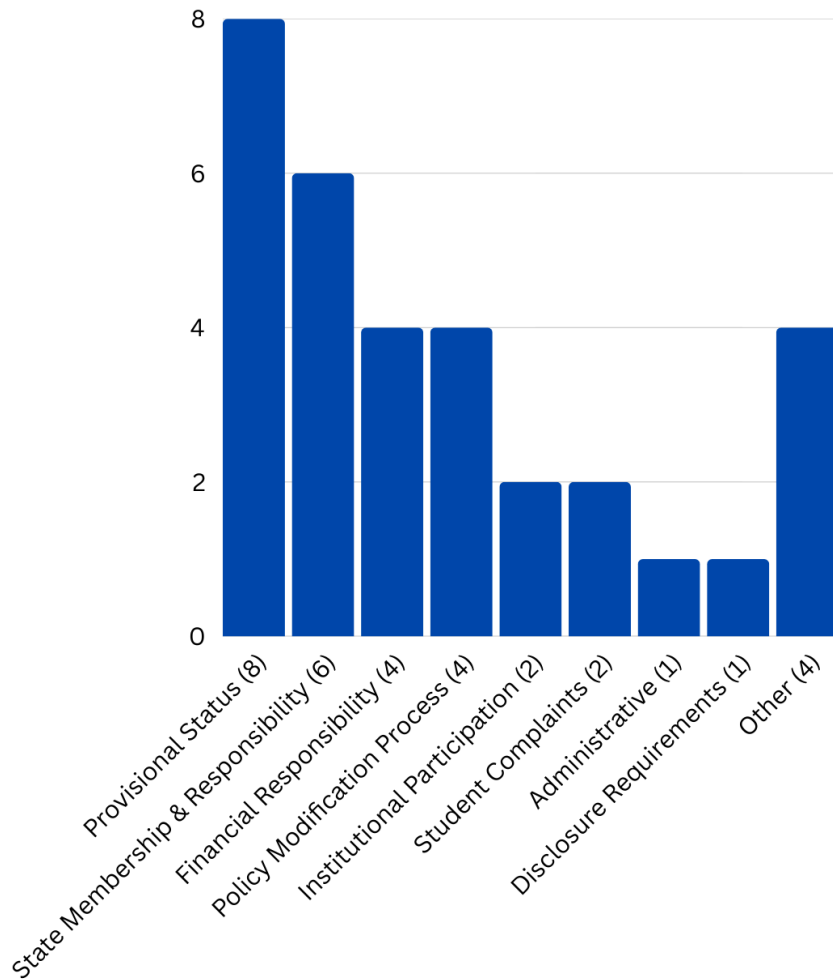
The history of all proposals, including amendments, withdrawals, public comments, and final outcomes, is available in the SARA PMP Portal: <https://nc-sara.my.site.com/Policy/s/>.

Proposal Submission: January 21 – February 7

32 proposals were submitted by the deadline of February 7, 2025, by the following groups:



The breakdown of the content (or general topic) of the proposals that were submitted was as follows:



First Period to Amend or Withdraw a Proposal: March 6 – June 2

During the period to amend or withdraw proposed SARA policy modifications:

24 proposals were amended:

- Several adjustments were made to ensure proposals with modifications to existing policy matched current manual language, aligned with remaining manual sections, and were consistent with formatting (italicizes, SARA in front of state portal entity, policy section references etc.). For proposals including new sections, similar adjustments were made as well as to clearly fit into existing policy sections.
- Adjustments were made based on feedback received through public comments, the public forum, and direct exchanges. Where applicable, working groups and co-sponsors continued to consider their submissions based on feedback and ongoing dialogue to refine and modify their ideas accordingly.
- The table of all final proposal outcomes later in this report reflects if each PMP was amended at least once during the cycle

2 proposals were withdrawn:

- [PMP25-0754: Up to Date Financial Information](#) – NEBHE-SARA RSC
 - A similar proposal was submitted by the Midwestern Higher Education Compact ([PMP25-0747: 2.5\(c\) - Process for evaluating new composite scores](#)), and an interregional effort led by these two regions determined to modify PMP25-0747 as the remaining submission.
- [PMP25-0765: Requiring evidence of compliance at certification](#) – The Century Foundation
 - The NEBHE-SARA RSC submitted a similar idea ([PMP25-0750: SPE's Ability to Review a New Institution Applicant](#)) which this submitter provided feedback on and decided to withdraw their own version.

SARA Policy Public Forum: April 25

The annual public forum for the 2025 SARA Policy Modification Process took place on April 25, 2025, and provided the opportunity for proposers to present their proposed SARA policy modification(s) publicly. Proposers were able to share the proposed policy language changes or additions, articulate the rationale for the proposal, and make the case for the proposed change. There was also an opportunity for audience Q&A. Different for this year, each proposal could be shared up to 3 minutes each (as opposed to any individual presenter having only 3 minutes to present all proposals that may fall within a single section of the policy manual).

- Presenters reviewed 28 of the 32 policy proposals during the forum
- 227 people registered for the forum (about the same as last year)

Public Comment Periods: March 6 – April 7 and June 9 – July 7

Members of the public were invited to submit comments on the outstanding SARA Policy Modification Process proposals during two comment periods. During the first opportunity 59 comments were received, and an additional 40 comments were submitted during the second period. All public comments are available in the SARA Policy Portal.

New for this year, due to a policy modification approved in 2024, a second period of public comment was put in place *after* the period for proposal amendment and withdrawal ended. In that case, proposal feedback could reflect final opinions before the regional compacts via their regional steering committees completed their final voting.

Most of the proposal comments received were within policy sections on provisional status (32), functional responsibilities of SARA states (28), and institutions and participation (11). The policy proposal that received the most comments (14) was [PMP25-0749: Education Specific Consumer Laws in Certain Instances](#). Eight other proposals received five or more comments.

SARA community stakeholders provided comments with the following breakdown: college and university staff (53); postsecondary education organizations (32); states representatives (14).

Regional Compacts via their Regional Steering Committees (RSCs) Review and Vote to Approve or Not Approve Each Proposed Policy Modification:

The deadline for regional compacts/RSCs to review and vote to approve or not approve each of the 30 proposed policy modifications was September 2, 2025. As of September 9, 2025, the results of the voting were available to the public along with a rationale for any decision not to approve a proposed policy modification. A total of 30 proposals went to regional compacts via their RSCs for review and vote.

9 of the 30 final proposals were approved by all 4 regional compacts through their RSCs

Of the remaining 21 proposals:

- **13** proposals were approved by 3 of the four regional compacts through their RSCs
 - **5** proposals were approved by 2 of the four regional compacts through their RSCs
 - **2** proposals were approved by 1 of the four regional compacts through their RSCs
 - **1** proposal was not approved by any of the four regional compacts through their RSCs
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- MHEC voted to approve **25** proposals
 - NEBHE voted to approve **17** proposals
 - SREB voted to approve **23** proposals
 - WICHE voted to approve **22** proposals

Next Steps:

- **October 23, 2025** - NC-SARA's Board, during its Fall 2025 Board Meeting, will review and vote to approve or not approve proposed SARA policy modifications that were approved by all four regional compacts through their RSCs.
- **November 17, 2025** – NC-SARA public webinar on 2025 SARA Policy cycle final results.
- **End of December 2025** - Revised SARA Policy Manual will be published on the NC-SARA website.
- **January 21, 2026** - SARA Policy Modification Process cycle for 2026 begins.

SARA Proposals with Votes of the Regional Compacts via their Regional Steering Committees (RSCs)

A complete listing of the 30 proposals reviewed and each region’s vote is located in the chart below. By clicking on the title in the “Proposal PMP” column you will be taken to the SARA Policy Portal page for that submission. Each proposal page includes the rationale for any votes to not approve, a full proposal history for the cycle, and all public comments.

Note: Am column - proposal amended once or more during the process
Outcome column - M = MHEC, N = NEBHE, S = SREB, W = WICHE

The following PMPs were Approved by 4 out of 4					
Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0741: Offerings military, language clarification	State Authorization Network and WCET - joint proposal	5.6(a) Offerings on military bases	Yes	7/1/26	Approved
PMP25-0746: Submitting Teach Out Plans to States	Teach Out Plans Working Group	Section 3. Institutions and Participation	Yes	7/1/26	Approved
PMP25-0747: 2.5(c) - Process for evaluating new composite scores	Midwestern Higher Education Compact	1. Definitions; 2.5(c) & 2.5(d) Functional responsibilities of SARA States	Yes	11/1/25	Approved
PMP25-0750: SPE’s Ability to Review a New Institution Applicant	NEBHE-SARA RSC	2.5(b) & 2.5(c) Functional responsibilities of SARA States	Yes	7/1/26	Approved
PMP25-0751: Provisional Status Disclosure	NEBHE-SARA RSC	Section 3. Institutions and Participation	Yes	7/1/26	Approved
PMP25-0752: Consistent use of “Title IV” in the SARA Policy Manual	NEBHE-SARA RSC	2.5(b) Functional responsibilities of SARA States		7/1/26	Approved
PMP25-0753: SPE Notification of Changes to FRC Scores	NEBHE-SARA RSC	Section 3. Institutions and Participation	Yes	7/1/26	Approved

Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0759: 4.5(c) - Where to Submit Student Complaints	8.2 Redo Working Group	4.5(c) Process for Resolving Complaints	Yes	7/1/26	Approved
PMP25-0766: Provisional Status - Accreditor Sanction	The Century Foundation	3.2(a) Provisional admission or renewal of an Institution	Yes	7/1/26	Approved
The following PMPs were Approved by 3 out of 4					
Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0748: Changes to Institutional Eligibility Requirements	W-SARA RSC	Section 3. Institutions and Participation		N/A	M- Approved N- Not Approved S- Approved W- Approved
PMP25-0757: 8.2 Working Group: Removing process language in Sec 8.2	8.2 Redo Working Group	8.2(f), 8.2(i), & 8.2(j) SARA Policy Modification Process	Yes	N/A	M- Approved N- Approved S- Approved W- Not Approved
PMP25-0758: 8.2 WG: Policy Submission & Revision Changes in Sec 8.2	8.2 Redo Working Group	8.2(d), 8.2(e), & 8.2(f) SARA Policy Modification Process	Yes	N/A	M- Approved N- Approved S- Approved W- Not Approved
PMP25-0761: Sec. 5.3 Field trips and seasonal residential activity	Michigan State University	5.3 Field trips and seasonal residential activity	Yes	N/A	M- Approved N- Not Approved S- Approved W- Approved
PMP25-0762: SARA Policy Manual - Non-Substantive Changes	NC-SARA Staff	1. Definitions - 10. Index	Yes	N/A	M- Approved N- Approved S- Approved W- Not Approved
PMP25-0763: Developing & Amending Guidance	State Authorization Network and WCET - joint proposal	New Section Not Already in Manual	Yes	N/A	M- Approved N- Approved S- Approved W- Not Approved
PMP25-0772: Provisional Status - Court finding of violation	The Century Foundation	3.2(a) Provisional admission or renewal of an Institution	Yes	N/A	M- Approved N- Approved S- Not Approved W- Approved

Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0773: Provisional Status - Illegal Conduct	The Century Foundation	3.2(a) Provisional admission or renewal of an Institution	Yes	N/A	M- Approved N- Approved S- Not Approved W- Approved
PMP25-0775: Provisional Status - Title IV Provisional Status	The Century Foundation	3.2(a) Provisional admission or renewal of an Institution	Yes	N/A	M- Approved N- Not Approved S- Approved W- Approved
PMP25-0776: Provisional Status - Additional Oversight Measures	The Century Foundation	3.2(c) Provisional admission or renewal of an Institution	Yes	N/A	M- Approved N- Not Approved S- Approved W- Approved
PMP25-0778: State Renewal Options	SAN, WCET, The Century Foundation & NDUS joint proposal	2.6(b) State renewal	Yes	N/A	M- Approved N- Approved S- Approved W- Not Approved
PMP25-0779: Adjusting Timing of Public Comment Period	The Century Foundation	8.2(f) SARA Policy Modification Process		N/A	M- Approved N- Not Approved S- Approved W- Approved
PMP25-0780: Institutional Mobility and Location	WICHE	1. Definitions; 3.1(f) Eligibility	Yes	N/A	M- Approved N- Not Approved S- Approved W- Approved

The following PMPs were Approved by 2 out of 4

Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0755: Amending Background & Creating a Purpose Statement	W-SARA RSC	New Section Not Already in Manual		N/A	M- Approved N- Not Approved S- Not Approved W- Approved
PMP25-0760: 2.6 State renewal: Optional Lengthening Renewal Periods	Individual	2.6(a) State renewal	Yes	N/A	M- Not Approved N- Approved S- Approved W- Not Approved
PMP25-0764: Accepting Consumer Complaints	Joint: The Century Foundation, SAN & WCET	4.5(a) Process for Resolving Complaints		N/A	M- Not Approved N- Not Approved S- Approved W- Approved

Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0774: Provisional Status - Contractor Government Action	The Century Foundation	3.2(a) Provisional admission or renewal of an Institution	Yes	N/A	M- Approved N- Not Approved S- Not Approved W- Approved
PMP25-0777: State Control of Decision-making	The Century Foundation	8.2(c), 8.2(f), 8.2(g), 8.2(j) SARA Policy Modification Process		N/A	M- Approved N- Not Approved S- Not Approved W- Approved
The following PMPs were Approved by 1 out of 4					
Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0749: Education Specific Consumer Laws in Certain Instances	W-SARA RSC	2.5(j) & 2.5(k) Functional responsibilities of SARA States	Yes	N/A	M- Not Approved N- Not Approved S- Not Approved W- Approved
PMP25-0756: Changes to Provisional Status	Provisional Status Working Group	3.2(a) & 3.2(b) Provisional admission or renewal of an Institution	Yes	N/A	M- Not Approved N- Not Approved S- Approved W- Not Approved
The following PMPs were Approved by 0 out of 4					
Proposal (PMP)	Submitted By	Policy Section	Am	Implementation Date	Outcome
PMP25-0771: 2.5, 3.2, 3.3- Options for financial responsibility	Chamberlain University, Walden University, Adtalem	2.5(c) Functional responsibilities of SARA States; 3.2(a) & 3.3. Provisional status of an institution between renewal periods	Yes	N/A	M- Not Approved N- Not Approved S- Not Approved W- Not Approved

2025 Outcomes for PMPs receiving 3 out of 4 votes in the 2024 cycle

Outcomes for proposals submitted again in 2025 after receiving approval from 3 out of 4 of the Regional Compacts/Regional Steering Committees in the 2024 cycle.

- 8 proposals resubmitted from the 2024 cycle
- 5 of the 8 proposals approved by all four Regional Compacts/Regional Steering Committees in the 2025 cycle

2024 Proposal	2025 Proposal	2024 “Not Approved”	2025 Outcome
PMP24-0623: Offerings military, language clarification	PMP25-0741: Offerings military, language clarification	N-SARA	Approved
PMP24-0631: SPE ability to review new institution applicant	PMP25-0750: SPE’s Ability to Review a New Institution Applicant	M-SARA	Approved
PMP24-0612: Provisional Status Reason and Disclosure	PMP25-0751: Provisional Status Disclosure	W-SARA	Approved
PMP24-0634: 8.2(c) - Ability to revise the SARA Policy Manual	PMP25-0758: 8.2 WG: Policy Submission & Revision Changes in Sec 8.2	W-SARA	M- Approved N- Approved S- Approved W- Not Approved
PMP24-0639: 4.5(c) - Where to Submit Student Complaints	PMP25-0759: 4.5(c) - Where to Submit Student Complaints	M-SARA	Approved
PMP24-0624: Developing & Amending Operations	PMP25-0763: Developing & Amending Guidance	W-SARA	M- Approved N- Approved S- Approved W- Not Approved
PMP24-0657: Provisional Status - Accreditor Sanction	PMP25-0766: Provisional Status - Accreditor Sanction	N-SARA	Approved
PMP24-0625: State Renewal Options	PMP25-0778: State Renewal Options	W-SARA	M- Approved N- Approved S- Approved W- Not Approved