



# SARA Quick Start Guide

## INSTITUTION APPLICATIONS

### Overview:

This Quick Start Guide for Institution Applications may be used by SARA State Portal Entity (SPE) staff and institutional staff engaged in the annual institutional application process. It is intended to provide general guidance and does not include any state-specific guidance. This guide includes descriptions of potential documentation required, the goal of each requirement related to SARA policy, and the SARA policy reference. This tool was created using existing SPE materials and tools from several states, along with reviews and feedback from SPEs and regional compact staff.

### Confirm Your State's Requirements:

SARA State Portal Entities have the responsibility and authority to hold institutions in compliance with SARA policy. This information is intended to serve as general guidance; institutions should be in regular contact with their [SARA State Portal Entity](#) for state-specific requirements, directions, and guidance.

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**About SARA Quick Start Guides:** When institutions participate in SARA, they agree to a set of compliance requirements as detailed in the [SARA Policy Manual](#). SARA Quick Start Guides are intended to help institution personnel understand a particular requirement to help them maintain compliance, communicate with colleagues regarding SARA requirements, and explain the requirement to students and other stakeholders. Institutions should always check for any state-specific requirements with their [SARA State Portal Entity](#).

**Section 1-Verification of Requirements for Institution Participation in SARA**

Requirement Number	Requirement Description	Is Documentation Required?	Documentation Examples	Goal of this Requirement (What are SPEs looking for?)	Policy Manual Sections Addressing the Requirement
1.	Documentation of legal domicile in home state	Yes	<p><i>Most recent</i> documentation of institution’s authorization to operate in the state, such as the following example documentation:</p> <ul style="list-style-type: none"> <li>• Code of state legislation</li> <li>• Copy of enabling statute</li> <li>• Letter of Authorization (or equivalent) from home state’s governmental entity responsible for business registration</li> <li>• 990 PF Form (first page)</li> <li>• Articles of Organization most recently filed with the state.</li> </ul>	Confirmation that the institution has legal domicile in the state.	Subsection 3.1, Eligibility
2.	Documentation of Accreditation Status	Yes	<p><i>Most recent</i> action letter from institution’s primary accrediting agency (or equivalent that specifies current accreditation status).</p>	Confirmation that the institution is currently accredited.	Subsection 3.1, Eligibility

3.	Agree to notify home state's SPE of any negative changes to accreditation status	It is the state's purview to determine what, if any, documentation is required after initial application review.		Confirmation that the state and NC-SARA are aware of any negative change to the institutions' accreditation status that might impact SARA participation.	Subsection 3.2.a.1, Provisional admission or renewal of an institution  Subsection 4.3.e, Examples of consumer protection issues
4.	Federal Financial Responsibility Composite Score	Yes (if the institution is not public)	<ul style="list-style-type: none"> <li>• Letter from US Dept of Education with calculated FRSC Score</li> <li>• Copy of US Dept of Education spreadsheet row containing most recent FRCS Score</li> </ul> <p><i>Institutions controlled or owned by another entity should include the FRCS of the parent entity.</i></p> <ul style="list-style-type: none"> <li>• Non-Title IV institutions must provide the FRCS score calculated by a certified, independent accountant using the USDOE methodology. Review the requirements in the current <i>SARA Policy Manual</i>.</li> </ul>	Confirmation that the institution has the financial resources to carry out the mission and appropriately serve students and that they have the minimum score required for SARA participation.	Subsection 2.5.c, Functional responsibilities of SARA states

5.	Abide by C-RAC Guidelines	It is the state's purview to determine what, if any, documentation is required after initial application review.		Confirmation that the institution adheres to policy and practices to facilitate the delivery of high-quality distance education courses and programs.	Subsection 4.7, Incorporation and use of C-RAC Guidelines
6.	Does not enforce Arbitration Agreements	It is the state's purview to determine what, if any, documentation is required after initial application review.		SARA-participating institutions are not permitted to enforce arbitration agreements on students enrolled under SARA provisions, and such agreements must not be applied. Institutions that utilize mandatory arbitration agreements for the resolution of non-SARA complaints or disputes shall provide a disclosure that such agreements must not be applied towards a complaint or dispute that falls within the scope of the <i>SARA Policy Manual</i> .	Subsection 4.4.c, Responsibilities for resolving complaints

7.	Responsible for institution activities	It is the state's purview to determine what, if any, documentation is required after initial application review.	Agreement/contract with Third party provider.	Confirmation that third-party providers meet the standards that the institution has agreed upon for SARA participation.	Subsection 5.5, Third-party providers
8.	Will resolve complaints	Yes	<ul style="list-style-type: none"> <li>• A copy of the student complaints policy/procedures applicable to distance education students</li> <li>• A copy of the policy/procedure that explains which students are eligible to file a SARA complaint</li> <li>• Other complaint types addressed in policy/procedure</li> </ul>	Confirmation that complaint policies are in place and can be easily found by students or others who believe they have a complaint against the institution.	<p>Subsection 4.4, Responsibilities for resolving complaints</p> <p>Subsection 4.5, Process for resolving complaints</p> <p>Subsection 4.6, Oversight of complaint investigation</p>
9.	Application signed by CEO or CAO	No	<p>Requirement of initials and signature on application.</p> <p>In some states, applications not signed by CEO or CAO are returned for the appropriate signature.</p>	Confirmation that the leadership of the institution is aware of and agrees with the requirements for SARA participation.	Institution Application form instructions, first paragraph

10.	Disclosure Requirements – Adverse Actions	No, unless the institution has adverse action(s) to disclose.	Institutions shall disclose to their home state any adverse action against the institution and any investigation by an oversight entity related to the institution’s academic quality, financial stability, student consumer protection policies or practices, or compliance with any state or federal requirements within 30 days of the institution’s first knowledge of the action or investigation and provide the disclosure.	Institution disclosure includes: a. The notice of adverse action provided by the oversight entity, b. A summary of steps the institution will take to resolve the issue(s) or concern(s) leading to the adverse action, and c. Any additional documents or materials requested by the home state.	Subsection 3.9.a, Disclosure requirements
11.	Disclosure Requirements – Changes in Institution Operations	No, unless the institution has change(s) in institution operations to disclose.	Institutions shall disclose to their home state any changes in the institution’s operations that are inconsistent with the requirements contained in the <i>SARA Policy Manual</i> or that may impair the institution’s ability to satisfy any requirement of the <i>SARA Policy Manual</i> within 30 days of the institution’s first knowledge of the change and provide the disclosure.	Institution’s disclosure must include information about the nature of the changes in the institution’s operations and any additional documents or materials requested by the home state.	Subsection 3.9.b, Disclosure requirements

12.	Agree to professional licensure disclosures	It is the state's purview to determine what, if any, documentation is required after initial application review.	<p>Per <a href="#">34 CFR 668.14(b)(32)(ii)</a></p> <p>By entering into a program participation agreement, an institution agrees that—</p> <p>In each State in which: the institution is located; students enrolled by the institution in distance education or correspondence courses are located, as determined at the time of initial enrollment in accordance with 34 CFR 600.9(c)(2); or ...each student who enrolls in a program on or after July 1, 2024, and attests that they intend to seek employment, the institution must determine that each program eligible for title IV, HEA program funds...</p> <p>(ii) Satisfies the applicable educational requirements for professional licensure or certification requirements in the State so that a student who enrolls in the program, and seeks employment in that State after completing the program, qualifies to take any licensure or certification exam that is needed for the student to practice or find</p>	Confirmation that students are aware of how the program they are matriculated in or considering does or does not prepare them for professional licensure in the state where they are located.	Subsection 5.2, Programs leading to professional licensure
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			<p>employment in an occupation that the program prepares students to enter</p> <p>*** **</p> <p>Example: <b>individualized direct disclosure</b> required to be provided to a <b>prospective student</b> per <a href="#">34 CFR 668.43(c)(1)</a>:</p> <p>If the institution has made a determination under <a href="#">paragraph (a)(5)(v)</a> of this section that the program's curriculum does not meet the State educational requirements for licensure or certification in the State in which a prospective student is located, or if the institution has not made a determination regarding whether the program's curriculum meets the State educational requirements for licensure or certification, the institution must provide notice to that effect to the student prior to the student's enrollment in the program.</p> <p>Example: <b>individualized direct disclosure</b> required to be provided to an <b>enrolled student</b> per <a href="#">34 CFR 668.43(c)(2)</a>:</p>		
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		<p>If the institution makes a determination under paragraph (a)(5)(v)(B) of this section that a program's curriculum does not meet the State educational requirements for licensure or certification in a State in which a student who is currently enrolled in such program is located, the institution must provide notice to that effect to the student within 14 calendar days of making such determination.</p> <p>Per 34 CFR 668.43(c)(3), the disclosures must be made directly to the student writing, which may include through email or other electronic communication.</p> <p>*** **</p> <p>Example: <b>general public disclosures</b> required per <a href="#">34 CFR 668.43(a)(5)(v)</a></p> <p>If an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements,</p>		
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			<p>information regarding whether completion of that program would be sufficient to meet licensure requirements in a State for that occupation, including—</p> <p>(A) A list of all States for which the institution has determined that its curriculum meets the State educational requirements for licensure or certification;</p> <p>(B) A list of all States for which the institution has determined that its curriculum does not meet the State educational requirements for licensure or certification; and</p> <p>(C) A list of all States for which the institution has not made a determination that its curriculum meets the State educational requirements for licensure or certification</p>		
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13	<p>Agree to provide complaint resolution policies: Institutions shall provide their and SARA's complaint resolution policies and procedures to all students taking courses under SARA policies on the institution's website and in the institution's catalog or equivalent information provided either in print or electronically to students when they enroll.</p>	<p>It is the state's purview to determine what, if any, documentation is required after initial application review.</p>		<p>Confirmation that institution agrees to provide its and SARA's complaint resolution policies and procedures on its website and in its catalog or equivalent information either in either print or electronically to students when they enroll.</p>	<p>Subsection 4.4, Responsibilities for resolving complaints</p>
14.	<p>Instruction: Institution agrees that in cases where the institution cannot fully deliver instruction as contracted, a reasonable alternative or reasonable financial compensation will be provided.</p>	<p>It is the state's purview to determine what, if any, documentation is required after initial application review.</p>		<p>Student consumer protections in case a program or institution closes or is unable to deliver instruction as promised to the student.</p>	<p>Subsection 2.5, Functional responsibilities of SARA states</p>

15.	Catastrophic events: Well-documented policies and practices for addressing	It is the state's purview to determine what, if any, documentation is required after initial application review.	A copy of the institution's disaster recovery plan, procedure, policy, or affirmation which includes the institution's procedures for preserving student records in the event of institutional closure in accordance with the institution's accrediting body's standards for institutional closure.	Student consumer protections: confirmation that institution has a plan to manage catastrophic events.	Subsection 2.5, Functional responsibilities of SARA states
16.	Agree to Provisional status, if applicable	It is the state's purview to determine what, if any, documentation is required after initial application review.		Confirmation that the institution understands that provisional status will have requirements that must be met for continued participation in SARA.	Subsection 3.2, Provisional admission or renewal of an institution
17.	Agree to Pay State fees, if applicable	It is the state's purview to determine what, if any,		Confirmation that states requiring fees are able to collect them.	Subsection 3.6, Participation fees

		documentation is required after initial application review.			
18.	Agree to pay SARA fees	No	Affirmation Only	Confirmation that NC-SARA is able to collect annual fees to participate in SARA.	Subsection 3.6, Participation fees
19.	Agree to share data	No	Affirmation Only	Confirmation that the institution will share data annually with NC-SARA as required by SARA policy.	Subsection 6.1, Data submission by participating institutions

## Section 2 - Institutional Designation and Action, and Information

When providing “Institution FTE (latest IPEDS)” on the application, please use the most recently [released/published](#) IPEDS data.

On page 9 of the application, please only include out-of-state branch campuses, as defined in the *SARA Policy Manual*, Section 1, Definitions, with distance education activity covered by SARA policies.

### Still Have Questions?

1. SARA State Portal Entities have the responsibility and authority to hold institutions in compliance with SARA policy. This information is intended to be general guidance for institutions; institutions should be in regular contact with their [SARA State Portal Entity](#) for specific requirements, directions, and guidance.
2. Feel free to email NC-SARA: [info@nc-sara.org](mailto:info@nc-sara.org)

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