SARA Overview: The State Authorization Reciprocity Agreement (SARA) provides approval of distance education courses and programs offered across state lines by postsecondary institutions that already have degree authorization in at least one state, the “home state” of the institution. SARA is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state. Field experiences (internships, clinical rotations, practicum, student teaching, etc.) are also considered distance education under SARA policy. SARA has no effect on professional licensure or certification; therefore, there are other approvals needed and requirements that must be met for programs leading to professional licensure (PLC) such as nursing, education, accounting, and audiology. SARA is overseen by a National Council, referred to as NC-SARA, and is administered by four regional education compacts. Pennsylvania has affiliated with a compact, the Southern Regional Education Board (SREB), for SARA purposes only. Bloomsburg University became an approved SARA institution on January 23, 2017. Annual renewal for approval to participate in SARA is required through the Pennsylvania Department of Education (PDE) and includes a fee to both PDE and NC-SARA.

The office of Bloomsburg University’s Institutional Compliance Program Coordinator (ICPC) has developed and implemented a procedure for the system as follows, and the actions apply to the ICPC:

1. Distance Education – Programs that Do Not Lead to Licensure
   a. Online Programs - Covered by SARA
      i. Track and report student location annually to NC-SARA.
   b. Field Experiences - Covered by SARA
      i. Alert programs to cap head count at 10 students per program per site participating at one time. A head count of more than 10 students requires prior approval with the state’s portal entity or board of education. This may or may not be the same entity, depending on the state. This rule does not limit the number of students that may be placed in a state, but rather at a single placement site.
      ii. Track and report student location annually to NC-SARA.
   c. Methodology of Implementation
      i. Renew SARA membership on an annual basis for uninterrupted opportunities to allow student participation in online courses and programs from states other than PA as well as for BU students’ supervised experiences in states other than PA. The renewal process encompasses the following steps:
         1. Receive email renewal notification from NC-SARA ninety (90) days prior to the institution’s individual anniversary date.
         2. Locate, download, and print the application forms. Find the NC-SARA renewal form on the NC-SARA website and the PA supplemental form through PDE.
         3. Collaborate with the IR Director and VP of Finance to determine annual fees:
a. Determine PDE fee based on BU’s distance education tuition revenue. (New fees beginning July 1, 2018. Distance education tuition revenue under $9,999: $1,000 fee; $10,000-4,999,999: $2,000 fee; $5,000,000-19,999,999: $4,000 fee; $20,000,000-39,999,999: $6,000 fee; over $40M: $8,000 fee)

b. Determine NC-SARA fee according to the full-time enrollment of BU undergraduate and graduate students. (Under 2,500: $2,000; 2,500-9,999: $4,000; 10,000 or more: $6,000)

4. Collect signatures for sign-off of the application on a designated signature page. Required signatures include Provost, Director of Distance Education, Distance Education Coordinator, Asst. VP of OPA, and ICPC.

5. Collect BU President’s initials/signature for sign-off of the application after his/her review and approval of the application.

6. Send the completed application, including NC-SARA renewal form, state supplemental form, and PDE fee, to PDE. Upon receipt of application, PDE decides if the institution is in compliance with SARA policies. PDE renders decision and notifies institution and NC-SARA.

7. Receive invoice for NC-SARA fee via email after NC-SARA receives notification from PDE that BU is able to continue to meet institution membership criteria. (If institution loses eligibility to participate in SARA, it may reapply when it can demonstrate that it meets SARA requirements.)

8. Pay NC-SARA fee. Upon receipt of fee from BU, NC-SARA emails letter to ICPC stating effective renewal date, which is the anniversary of the original approval date.

ii. Track and report annually the location (state only) of exclusively online students residing in states other than PA for NC-SARA participation. The following steps are taken for completion:

   1. Collaborate with IR Director to retrieve congruent IPEDS data.
   2. Collect signatures for the sign-off process on a designated signature page. Required signatures include President, Provost, Director of Distance Education, Associate VP of Library and Technology Services, Asst. VP of OPA, and ICPC.
   3. Submit data through a secure portal provided by NC-SARA in May of each year. The link is active during a three-week window period. (Submit the PLC and non-PLC data together.) Asst. VP of OPA and ICPC complete this step.

iii. Track and report annually the location (state only) of students participating in field experiences in states other than PA for NC-SARA participation. The following steps are taken for completion:

   1. Retrieve data through the 509 Form collected by Office of Alumni and Professional Engagement regarding students who are in field experiences outside of PA. This step is in the process of being developed in collaboration with the Office of Alumni and Professional Engagement.
   2. Retrieve data for programs that do not funnel through Office of Alumni and Professional Engagement on a college by college, program by program basis. This step is in the process of being developed.
3. Retrieve CIP code information regarding how BU classifies its programs through IR.

4. Disaggregate data by state/territory and two-digit CIP code.

5. Collect signatures for the sign-off process on a designated signature page. Required signatures include President, Provost, Director of Distance Education, Associate VP of Library and Technology Services, Asst. VP of OPA, and ICPC.

6. Submit data through a secure portal provided by NC-SARA in May of each year. (Submit the PLC and non-PLC data together.) The link is active during a three-week window period. Asst. VP of OPA and ICPC complete this step.

2. Distance Education – Programs that Lead to Professional Licensure or Certification (PLC)
   a. Online Programs
      i. Receive further approval, if required, of “Subject Matter Expert” agencies/boards (e.g. Board of Nursing, Department of Education, Board of Accountancy) to offer online programs in a state or territory.
         1. Contact the pertinent board if an out-of-state student would like to participate in a PLC program to determine if there is an approval process and if BU is able to fulfill the requirements of the board.
         2. Collaborate with the PLC program head, department chair, and/or dean as necessary to make determination.
      ii. Track and report student location annually to NC-SARA.
   b. Field Experiences
      i. Receive further approval, if required, of “Subject Matter Expert” agencies/boards (e.g. Board of Nursing, Department of Education, Board of Accountancy) to allow a student to participate in a field experience out-of-state.
         1. Contact the pertinent board if a BU PLC student would like to participate in a field experience in a state other than PA to determine if there is an approval process and if BU is able to fulfill the requirements of the board.
         2. Collaborate with the PLC program head, department chair, and/or dean as necessary to make determination.
      ii. Alert programs to cap head count at 10 students per program per site participating at one time. A head count of more than 10 students requires prior approval with the state’s portal entity or board of education. This may or may not be the same entity, depending on the state. This rule does not limit the number of students that may be placed in a state, but rather at a single placement site.
      iii. Track and report student location annually to NC-SARA.
   c. Disclosures
      i. Inform all current students, applicants, and potential students who have contacted the institution about the PLC course/program, as required of any institution operating under SARA (5.2 of the SARA Manual - pg.29 of 2018 manual) that offers courses or programs potentially leading to professional licensure (PLC), as to whether such offerings meet state licensing requirements. These disclosures reach the following populations in the stated method:
1. Public, current students, applicants, potential students - Website disclosures on home page of each PLC program.
2. Applicants – individual email disclosures sent to students flagged for PLC programs through automated IT system.
3. Current students - disclosure letter made available in “To Do” task section in MyHusky account for students enrolled in PLC programs.
4. Public, current students, applicants, potential students - BU State Authorization website (active) and Professional Licensure website (in progress) provide state board contact and licensure information for each PLC program.

   ii. Monitor current federal regulations such as the misrepresentation regulation (34 CFR 668.71 & 668.72) and delayed regulations (34 CFR 668.50 - last 2 pages; delayed until 7/1/20) to confirm sufficiency of current disclosure letter.

   d. Methodology of Implementation

   i. Create licensure/certification requirements document for each profession requiring a license for which BU has a program. This process is done using the following steps:

      1. Research state board contact information and state licensure prerequisite information program by program, state by state.
      2. Email completed research to program heads for their review of information and provision of verification of the BU program meeting/not meeting license eligibility prerequisites in each state.
      3. Create PDF containing state board contact information, licensure information, and a determination of the PLC program meeting state educational prerequisites for licensure to publicly post on BU’s State Authorization and Professional Licensure websites, making information available to prospective and current students.
      4. Disclose if BU cannot confirm whether a program meets state educational prerequisites for licensure in states other than Pennsylvania. In progress.
         a. Provide students with current contact information (through a national board website link or a created document) for applicable licensing boards:
            i. If research for a program has not yet been completed, or
            ii. If after making all reasonable efforts to make a determination whether the program meets requirements, one cannot be made.

   ii. Provide disclosures through the following methods:

      1. Prospective students:
         a. Have access to the State Authorization website disclosure information.
         b. Have access to PLC website. In progress.
         c. Have access to PLC program website containing a short disclosure on its website. In progress.
      2. Applicants:
         a. Have access to all disclosure information on program, State Authorization, and PLC websites. In progress.
b. Are flagged to receive disclosure email through an automated system maintained by Administrative Applications division of the Office of Technology, sent on a nightly basis (Monday through Friday) to capture new applicants as their applications come through.

3. Current students:
   a. Have access to all disclosure information on program, State Authorization, and PLC websites. In progress.
   b. Are flagged to receive a “To Do” task in MyHusky account. This is maintained by Administrative Applications division of the Office of Technology.
      i. This task is:
         1. Not required, but encouraged.
         2. Completed by the student by checking a box with the statement “I have reviewed the disclosure information”.
      ii. Students who have not completed task receive a reminder email sent one month after the start of the spring and fall semesters.
      iii. Query is available to ICPC to view list of those who have and have not completed task.

3. Communicate with key stakeholders and collaborate with internal and external Subject Matter Experts to confirm information provided to students, faculty, and staff.
   a. Communicate and confirm with deans, department chairs, and program heads for their review and approval of all disseminated information regarding individual programs and disclosures.
   b. Communicate with program heads to review all research done by the ICPC regarding individual programs.
   c. Update BU offices and departments on the following topics:
      i. Federal rules and regulations
      ii. State laws
      iii. NC-SARA policy revisions
   d. Maintain the State Authorization, Professional Licensure, and Distance Education websites to include the following topics:
      i. SARA updates
      ii. Professional licensure board contact information
      iii. Professional licensure prerequisites
      iv. Required student complaint information on each site (also on Dean of Students Complaints and Grievances website)
   e. Present to campus populations as needed (e.g. AALC, Forum, department chair meetings).
   f. Create a bi-annual State Authorization newsletter/FAQ for campus-wide dissemination. Director of Media Relations and Content Strategy reviews newsletter prior to dissemination.