



SARA and NC-SARA Updates

SREB S-SARA Regional Steering Committee (RSC) Meeting

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Thursday, June 11, 2026



**National Council for
State Authorization
Reciprocity Agreements**

MHEC • NEBHE • SREB • WICHE

Agenda

Today's Topics

SARA Landscape

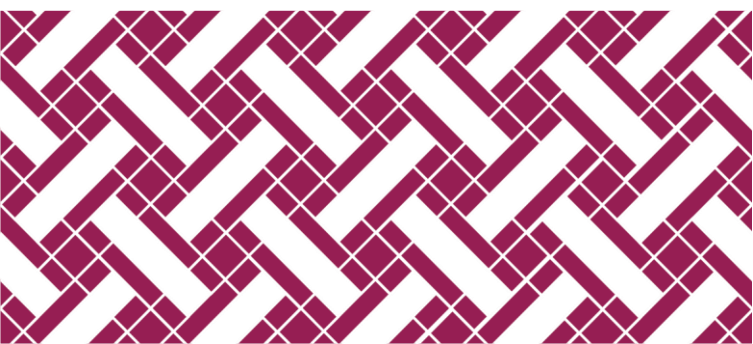
SARA State & Territory Grants and Data

Federal Developments

State Developments

SARA Policies (Including Non-Credit Disclosures)

NC-SARA Strategic Plan & Organizational
Structure



SARA Landscape

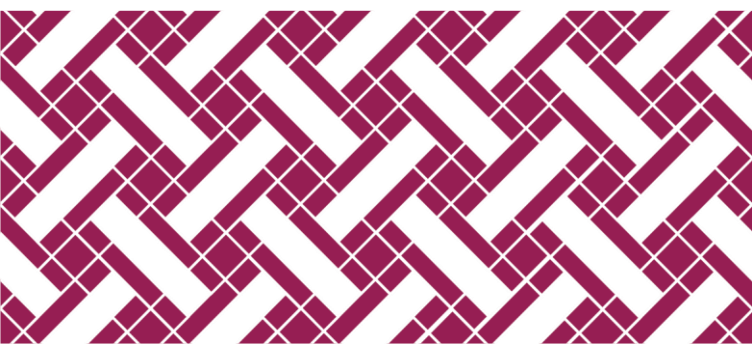
SARA Landscape - SARA Data on Membership and Participating Institutions

- There are currently 52 SARA member states, territories and districts.
- As of May 1, 2026 - 2,472 institutions participate in SARA.
- Of these, 41, or less than 2%, are currently on Provisional Status.
- Of the 3,107 Title IV eligible, postsecondary degree-granting institutions in SARA member states that offer distance education courses 73%, currently participate.
- There were 48 non-renewing institutions in 2025, and 10 in 2026 (as of April 23, 2026).
- Most non-renewals was due to a Federal Financial Responsibility Composite Score below 1.0 (19 in 2025 and 5 in 2026). Other reasons for non-renewal include no longer requiring or needing SARA participation and institution closures or mergers.

SARA Landscape – More Data!

Institution Sector	Total SARA Institutions
Public	1,190
Private Non-Profit	1,068
Private For-Profit	202
Tribal	12
Total	2,472

Regional Compact	States	SARA Institutions	Fall 2024 Total Exclusively Distance Education Enrollment	Fall 2024 Out-of-State SARA Exclusively Distance Education Enrollment
MHEC	11	658	832,610	281,846
NEBHE	8	370	535,757	250,924
SREB	20	1,147	2,011,717	508,714
WICHE	13	297	1,062,162	620,205
Total	52	2,472	4,442,246	1,661,689



SARA State and Territory Grants and Data

SARA State and Territory Grants

General Overview

- A collective pool of SARA revenue has been allocated to SARA Member State and Territories to focus directly on state support.
- Each SPE agency may apply for a grant to support SARA-related continuous education, initiatives, and enhancements.
- SPEs may request up to \$7,500 per annual application period.
- Funds are to be allocated and spent within a given fiscal year.





3 Years of Grants

	Year 1	Year 2	Year 3
Total dollars awarded:	\$192,691	\$236,424	\$269,061
Total # of grants awarded:	28	34	38
Grant sizes:	\$1,250 - \$7,500	\$1,409 - \$7,500	\$1,850 - \$7,500

In Year 3, 13% of funded awardees were first time recipients.

SARA State and Territory Grants

Potential uses for the grant funds could include, but are not limited to:

- Updating and improving digital infrastructure
- Improving data collection, including metrics used, and quality
- Multi-state regional and/or interregional collaboration
- Training and/or professional development (ex: webinar access, conference attendance)
- Membership fees
- Updating and improving authorization processes
- Assessment of current operations
- External consultants



SARA State and Territory Grants

Question- we'd like your feedback!

- If additional grant fund became available to you, how would you utilize the funding?

What projects or initiatives would you prioritize?

- How do you envision this grant cycle working or being improved in future years?

What changes would make the process smoother to you?



Changes for Future SARA Data Collection

Under consideration for 2029:

- 12-month EDEE – **change reporting dates?**
- EDEE: Student program (4/6-digit CIP), degree level, military status, dual enrollment status
- OOSLP: **Placement program (4/6-digit CIP)**, degree level, site location

Future consideration:

- In-state and virtual learning placements
- Degree or course completions
- Non-credit offerings*
- Some distance education enrollment*
- Additional student demographics (gender, age group, etc.)

*Proposed in 2026 PMP cycle

Feedback? Take our survey: <https://www.surveymonkey.com/r/NCSARAEExpandingDataCollection>



Changes for Future Data Collection

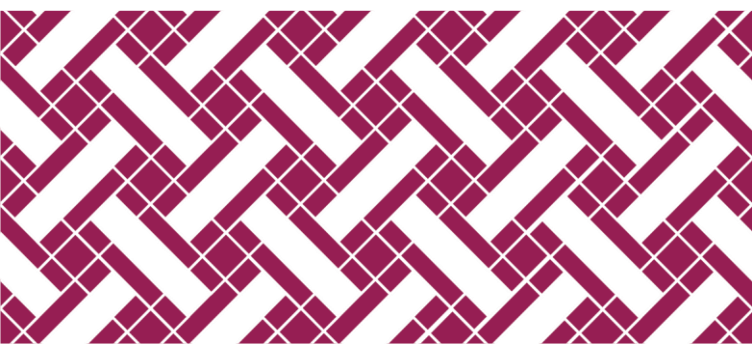
Timeline:

- 2026 – consider options; PMP to remove dates and 2-digit CIP reference
- 2027 – finalize definitions and reporting process
- 2028 – institutions begin collecting new data; pilot reporting process; report in old format
- 2029 – begin reporting new data in new format



Feedback? Take our survey: <https://www.surveymonkey.com/r/NCSARAEExpandingDataCollection>



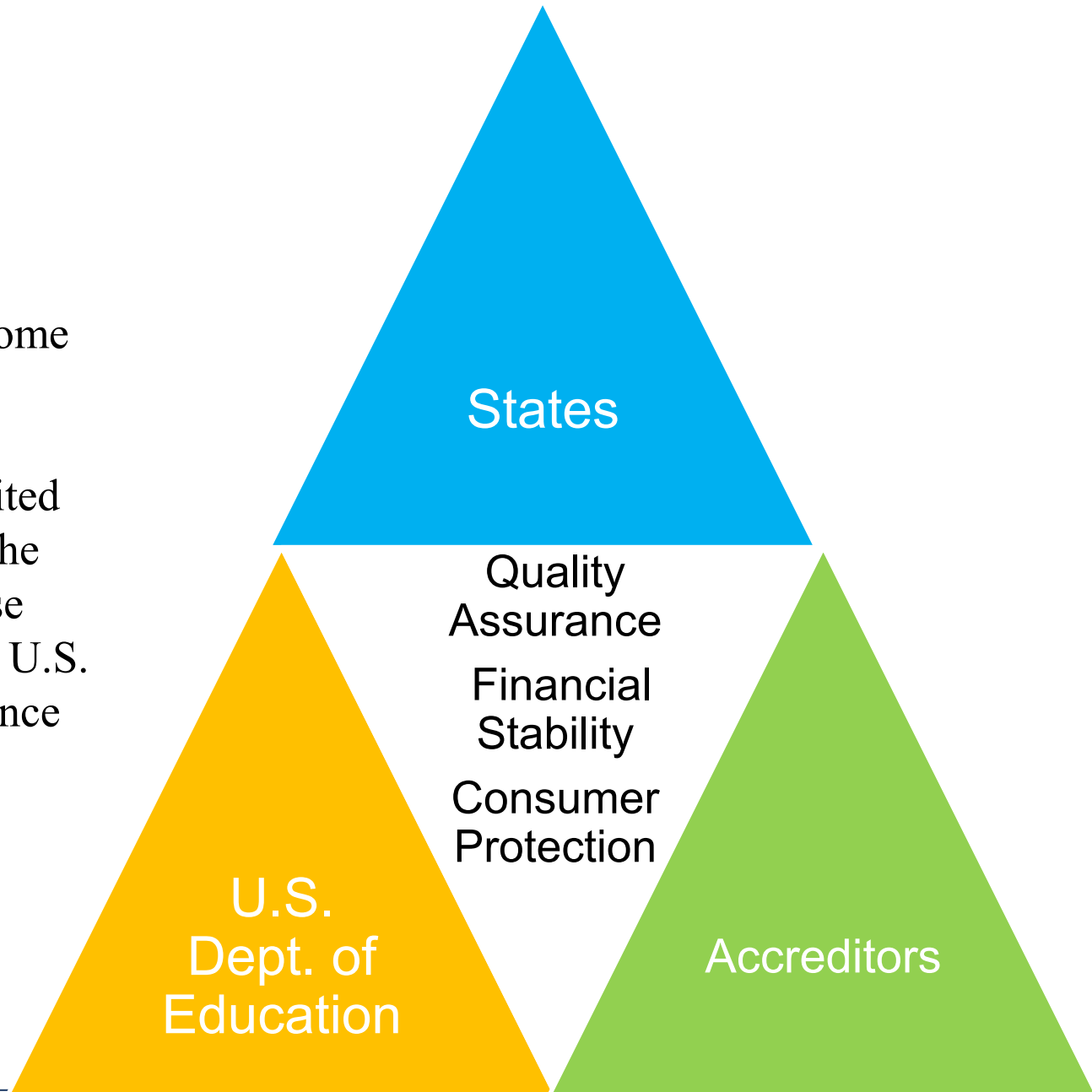


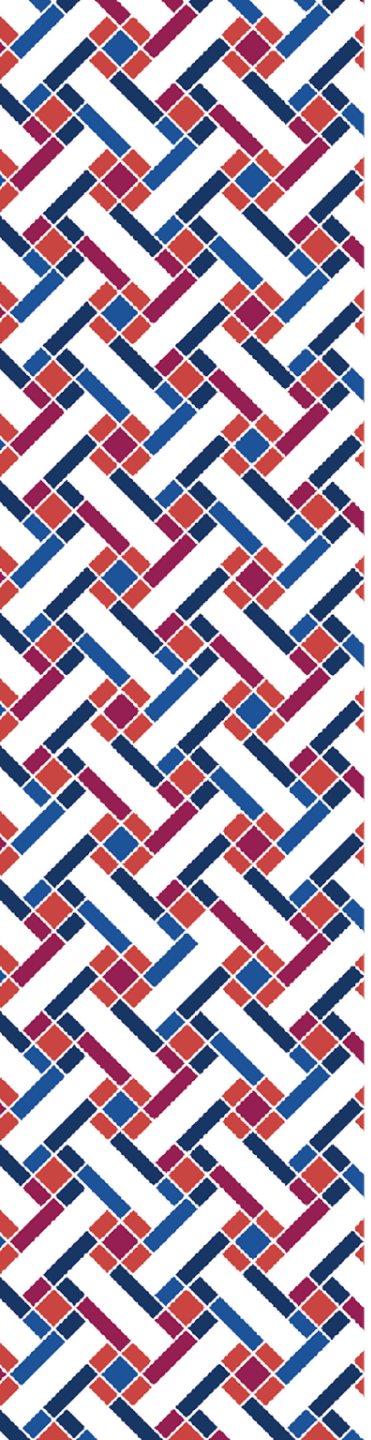
Federal Developments

The Triad

SARA-participating institutions must be authorized and then approved by their home states.

They must also be institutionally accredited by any accrediting body recognized by the U.S. Department of Education and whose scope of recognition, as specified by the U.S. Department of Education, includes distance education.



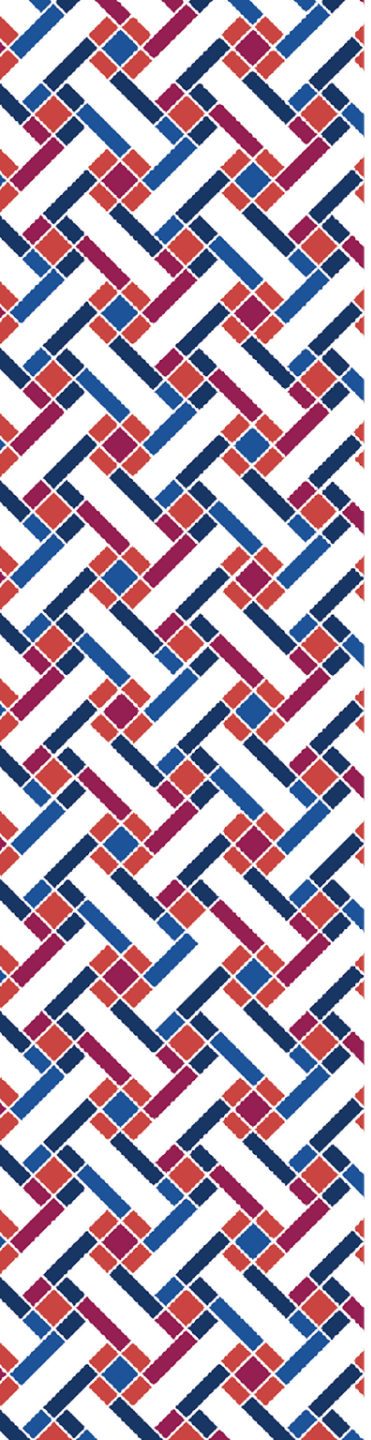


The U.S. Department of Education

What does the U.S. Department of Education do?

Core work (historically):

1. **Policy Development:** Establishing policies for federal financial aid and various educational programs.
2. **Funding and Grants:** Administering and distributing federal financial aid, including Pell Grants, student loans, and grants for programs like Title I (low-income students) and IDEA (students with disabilities).
3. **Civil Rights Enforcement:** Enforcing federal laws that prohibit discrimination in education based on race, sex, disability, or other factors.
4. **Research and Data Collection:** Collecting data on schools and educational outcomes, overseeing research, and disseminating findings to inform policy and practice.
5. **National Focus on Issues:** Identifying major educational problems and bringing national attention to them to foster dialogue and solutions.
6. **Supporting Students with Disabilities:** Overseeing programs and ensuring access to education and accommodations for students with disabilities through offices like the Office of Special Education and Rehabilitative Services.
7. **Promoting Career Readiness:** Supporting career and technical education (CTE) and adult education programs to help individuals gain practical skills for careers.
8. **Ensuring Equal Access & Equity:** Working to ensure all students, including English language learners, have equal access to high-quality education and programs.



Federal Developments

The U.S. Department of Education

- Created in 1979
- 4,400 people worked for the department in 2024 – Today 2,200
- Budget Issues (3-15% decrease).

Abolish the U.S. Department of Education? Not so fast...

- A downsizing of staff (cutting half the staff) / Freezing grants
- Shifting enforcement authority to other agencies

Only U.S. Congress has the authority to formally eliminate the Department of Education, as it was established by legislative act, requiring a potential 60-vote Senate supermajority.

U.S. Department of Education & Agency Partnerships

- **The Department of Labor** will manage the Office of Elementary and Secondary Education, Workforce Development and the Office of Postsecondary Education. Including: TRIO, GEAR UP, FIPSE, and other key programs
- **The Department of the Interior** will manage the Indian Education Division.
- **The State Department** will administer foreign language programs.
- **Health and Human Services** will manage the Child Care Access Means Parents in School (CCAMPIS) program.
- **The Department of Treasury** will manage the \$1.7 trillion student loan portfolio and will resume collections on defaulted student loans.



Meetings, Conferences, and Webinars – Oh My!

Accrediting agencies: recognized by the Secretary, and institutions of higher education should use the terms “national,” “institutional,” or “programmatic.” The Final Rule took effect on July 1, 2020, ending the Department’s recognition of accrediting agencies as “regional.”

Regulatory burden: seek to reduce administrative and compliance costs, for SARA participating institutions.

- SARA Data Portal & Data Templates (csv file)
- Electronic Forms
- Low SARA fees
- Other?

Other Items to Note:

The Commission for Public Higher Education (CPHE) - is an accrediting body dedicated to advancing institutional quality through a model built by publics-for publics.

- 6 Founding Members: State University System of Florida; Texas A&M University System; University of North Carolina System; University of South Carolina System; University of Tennessee System; University System of Georgia.

Mission:

- A focus on the public mission of state colleges and universities.
- A practice of highlighting student outcomes rather than institutional inputs.
- A process for accreditation that remains rigorous while modernizing and simplifying compliance to reduce institutional burdens and save money for students and parents.

CPHE plans to apply for recognition from the U.S. Department of Education in 2027



Other Items to Note, Continued

AIM: Accreditation, Innovation, and Modernization

- Convened negotiated rulemaking committee in April 2026.
- The committee is scheduled to convene for its second and final five-day session from May 18 to May 22, 2026.
- Heather F. Perfetti, President, Middle States Commission on Higher Education and an alternative negotiator is presenting at the **SPE Annual Conference in September 2026**.

Security Breaches (Canvas), AI, and Higher Education

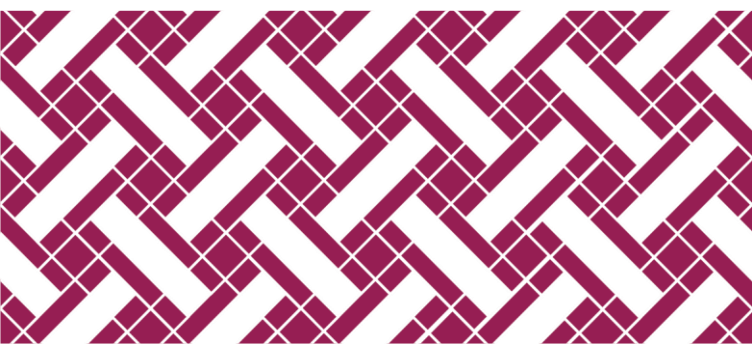
The U.S. Department of Education is Moving!

- The U.S. Department of Education will move out of the Lyndon B. Johnson building and will relocate to 500 D Street SW in August 2026.



Questions and Discussion





State Developments

SARA and Workforce Pell

Does SARA cover Workforce Pell Eligible Programs?

The proposed rules for Workforce Pell programs strictly prohibit broad, nationwide, or multilateral reciprocity agreements for distance education. Instead, the U.S. Department of Education proposes allowing bilateral agreements that are made exclusively between the Governors of two specific states. This would be an option for states providing distance education.

The Bottom Line:

SARA remains an option for institutional authorization of distance education, but approval for Workforce Pell participation requires a separate, state-to-state process.



State Legislative Updates

California SB-790

- On February 21, 2025, the bill was introduced by Senator Cabaldon
- The bill went through several amendments through various committees
- During the Suspense File hearing in the Assembly Appropriations Committee on August 29, 2025, this measure was held in committee under submission
 - *Held under submission* is an action taken by a committee when a measure is heard in committee and there is an indication that the author and the committee members want to work on or discuss the measure further, but there is no motion for the measure to progress out of committee.
- [Bill Text - SB-790 Postsecondary education: postsecondary education coordinating entity: interstate reciprocity agreements for distance education: out-of-state postsecondary educational institutions.](#)

Washington HB-1279

- Introduced by Representatives Pollet, Leavitt, Doglio, Reed, and Simmons
- Passed the House on March 7, 2025; Passed the Senate on April 11, 2025
- Governor signed on April 21, 2025
- Note: the state will assess its SARA membership in 2026 and again in 2028, with the ability to take steps to leave SARA in 2028.
- [Bill Text - HB 1279 Washington State Legislature](#)
- WSAC has included information about the legislation on its website here: <https://wsac.wa.gov/sara>





SARA Policies (Including Non-Credit Disclosures)



National Council for
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2026 SARA PMP - Initial Submission Summary

33 proposals initially submitted

Submitters:

- 12 from Regional Education Compacts / Regional Steering Committees
- 6 from Interregional “Working Groups” of Regional Education Compacts / Regional Steering Committees
- 6 from Higher Education and Advocacy Organizations
- 1 from SARA State Portal Entity staff
- 1 from an Institution
- 1 from all 4 Regional Education Compact Presidents and NC-SARA President
- 6 from NC-SARA staff

General Topic:

- Institutional Participation (6)
- Provisional Status (4)
- Definitions (3)
- Institution Appeals (3)
- Policy Modification Process (3)
- State Membership & Responsibility (3)
- Administrative (2)
- Consumer Protection (2)
- Data (2)
- Disclosure Requirements (2)
- Student Complaints (2)
- Field Trips (1)



2026 SARA PMP – PIT Team

- Represented by Regional Steering Committee (RSC) members and Regional Education Compact SARA Staff from all four regions, members of the NC-SARA Board of Directors, and NC-SARA staff
- Meet every other month during the PMP cycle, providing input and feedback and ensure engagement and bring back discussion topics and updates to the RSCs

2026 PMP Co-chairs:

- Elisa Jaden, Regional SARA Director, Office of Postsecondary Access and Student Success, Southern Regional Education Board (SREB)
- Kate McCartan, Institution Monitoring Specialist, Minnesota Office of Higher Education

S-SARA

- Laurence Blake, Director of Institutional Research Planning, University of the Virgin Islands
- Andrew Lessman, Associate Director for Quality Assurance and State Authorization: Office of Digital Education, Temple University
- Terrence Scarborough, Director of SARA North Carolina, North Carolina State Education Assistance Authority
- Elizabeth Walker, Coordinator for Academic Affairs Administration, Oklahoma State Regents for Higher Education



2026 SARA PMP – Impact Analysis Team

Pursuant to SARA policy 8.2.f.3.ii “NC-SARA, in collaboration with the four regional compacts, shall provide an impact analysis that assesses the potential impact of each proposed policy modification.”

SREB - Ron Leonard (AL SPE, RSC), Jennifer Stone (PA SPE, RSC), Elizabeth Walker (OK SPE, RSC Vice Chair)

MHEC - Jennifer Armour (KS, M-SARA, RSC Chair), Sara Appel (M-SARA Compact Director)

NEBHE - Tiamekia Cezaire (MA SPE), Michael Perry (ME SPE, RSC Chair)

WICHE - Alicia Armijo (NM SPE), Heather Delange (CO SPE)



2026 SARA PMP – Impact Analysis Team

Example - first round of review June 3, 2026 – June 11, 2026:

Institutional Participation (4)

[PMP26-0809: 3.1.d - Reasons for Denial](#)

[PMP26-0810: 3.1.f - Institutional Mobility & Location](#)

[PMP26-0813: New 3.1.d.-Eligibility Requirements](#)

[PMP26-0832: Catastrophic Events in SARA Application & New Policy](#)

Definitions (2)

[PMP26-0833: Catastrophic Events Definition](#)

[PMP26-0834: Disaster Recovery Plan Definition](#)

Policy Modification Process (2)

[PMP26-0800: 8.2.e. Policy Review Cycle](#)

[PMP26-0801: 8.2.j. Exigent Circumstances](#)



SARA PMP 2025 - What's on the Horizon

Effective July 1, 2026



- [PMP25-0746: Submitting Teach Out Plans to States](#) - SARA-participating institution that is required to submit an institutional teach-out plan or similar with an accrediting agency, authorizing entity, or the U.S. Department of Education shall simultaneously provide a copy to their SPE. (*in the application*)
- [PMP25-0751: Provisional Status Disclosure](#) - Institutions placed on SARA provisional status will be required to disclose this status on the institution's website, including the reason. (*in the application*)



SARA PMP 2025 - What's on the Horizon

Effective July 1, 2026



- [PMP25-0753: SPE Notification of Changes to FRC Scores](#) —
If an institution determines or is notified that their composite score impacts their SARA-participation eligibility, they must notify their SPE within 30 days. (*in the application*)



SARA SPEs Working Together on Student Complaints

Implementation Date – 7/1/2026

***SARA Policy Manual* reference - 4.5.c and d**

Summary: When SARA State Portal Entities receive complaints from students that are not located in the institution's home state, SPEs will work collaboratively to ensure a student's complaint is resolved, with final resolution by the institution's home state SPE, communicated to the student and SPE of the state where the student is located.

What's new on the 7/1/26 institution application?

- Primarily - New policy via the SARA PMP
- Explanation and additional space to reflect key website links (professional licensure disclosures, complaint policy)
- Clearer space to provide details on out of state branch campuses
- Adjustments to align SARA Portal (Salesforce) and application fields



SARA Disclosures

- **5.2 Programs leading to professional licensure.**
- **34 CFR 668.43(a)(v) Institutional and programmatic information.**
- **34 CFR 668.43(b)(32)(ii) Institutional and programmatic information.**

How does non-credit apply?



Questions and Discussion





NC-SARA Strategic Plan and Organizational Structure



**National Council for
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Draft Mission Statement

The National Council for State Authorization Reciprocity Agreements (NC-SARA), in **collaboration** with the four regional education compacts, supports **increased** access to postsecondary distance education for students across the United States through the State Authorization Reciprocity Agreement (SARA).

The mission will be achieved by:

- Promoting the value and understanding of SARA through engagement, collaboration, and sharing information.
- Supporting consumer protection by facilitating **state member**-led SARA policy changes.
- Enabling availability of postsecondary distance education through SARA for institutions and students.
- Aiding in the continuous improvement of the collaborative partnership within the SARA community.



NC-SARA Core Work

- Support the board, board committees, and board working groups.
- Support the regional education compacts, regional steering committees (RSCs), State Portal Entities (SPEs), SARA working groups/advisory committees, and SARA-participating institutions.
- Facilitate, with the regional education compacts and RSCs, the SARA Policy Modification Process.
- Monitor and facilitate the SARA community's response to federal and state regulatory and policy changes that may impact SARA.
- Conduct SARA research and data work (compile, analyze, and share data from SPEs and SARA-participating institutions).
- Maintain and enhance operational excellence.



NC-SARA Strategic Plan

Started working on the strategic plan in 2024 with the NC-SARA Board as a whole and the NC-SARA Strategy Committee

- Reviewed the current higher education trends
- Reviewed the Mission Statement and Core Work of NC-SARA
- Reviewed the blurb of SARA and NC-SARA
- We surveyed 5 constituent groups in June 2025: NC-SARA Board; Regional Education Compact SARA staff; SPEs; SARA participating Institutions; and NC-SARA staff
- Listening Sessions in September & October 2025: NC-SARA staff; Regional Education Compact SARA Staff; and the NC-SARA Board



NC-SARA Strategic Plan – Core Focus Areas

SARA Policy, State Regulations, and Federal Regulation: Monitoring the shifting federal and state regulatory horizons, providing clear and transparent compliance tracking, and facilitating the collaborative, state-led SARA Policy Modification Process.

Research, Planning, and Data Analytics: Exercising diligent oversight of the annual SARA data reporting, student complaints tracking, and metric-driven data dashboards that empirically demonstrate the value and national impact of SARA.

Strategic Communications and Engagement: Designing narratives that articulate SARA's value, cultivating stakeholder networks through virtual and in-person convenings. Cultivating robust inter-organizational relationships through onboarding programs, high-impact training resources, and structured stakeholder workshops and webinars.

Technology and Architectural Strategy: Building, protecting, and automating the SARA Portal (Salesforce) and electronic form submission pipelines—necessary to reduce administrative burden and optimize user experiences for regional education compacts, states, and institutions.

Internal Operations: Ensuring robust internal infrastructure, fiscal accountability, resource optimization, and workplace culture development.



NC-SARA Strategic Plan – Next Steps

Next steps:

- May 2026 – present outline of goals and objectives to Board
- August 2026 – prepare draft with Board Strategy Committee / Board
- October 2026 – Board reviews and approves the NC-SARA Strategic Plan

For more information – check out the NC-SARA
[Strategic Plan Web Page](#)



Organizational Structure

1. Prioritize Internal Functions

2. NC-SARA Organizational Guide: Who We Are & What We Do

3. Staffing and Organizational Chart - Our work should reflect our mission of supporting and serving SARA:

- Policy and Strategic Communications
- Engagement, Support, and Services
- Research and Planning
- IT & Salesforce Strategy
- Finance and Operations



Questions and Discussion



Important Upcoming Dates

Conferences & Meetings

- **SPE Annual Conference** (San Antonio, TX) – September 15-17, 2026
- **NC-SARA Board Meeting** (Westminster, CO) – October 27-29, 2026

Deadlines & Milestones

- **SARA Data Reporting Window:** May 15 – June 15, 2026
- **FY27 SARA State & Territory Grant Application Period Opens:** June 3, 2026
- **2026 SPE Annual Conference Registration Opens:** June 10, 2026
- **FY27 SARA State & Territory Grant Application Due:** June 30, 2026
- **FY27 SARA State & Territory Grant Review of Applications:** July 2026
- **FY27 SARA State & Territory Grant Award Notification:** July 29-31, 2026
- **SARA PMP Deadline:** September 2, 2026 *(Deadline for RSCs to review and vote to approve/not approve each proposed policy modification)*





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Thank You!

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 <https://www.linkedin.com/company/nc-sara>