SREB

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SREB SARA Regional Steering Committee

Guidelines and Procedures

Southern Regional Education Board

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SREB-SARA Guidelines and Procedures

I. Definitions of Terms

Home State: A SARA Member State where an institution holds its legal domicile, authorization, and accreditation. To operate under SARA an institution must have a single Home State.

Host State: A SARA Member State in which an institution operates under the terms of SARA, other than the Home State.

NC-SARA: **National Council for State Authorization Reciprocity Agreements**. A non-profit organization that exists to coordinate the SARA work of the regional compacts, ensure that SARA has consistent nationwide coverage, and maximize efficient operations of the SARA initiative.

NC-SARA Governing Documents: The Unified State Authorization Reciprocity Agreement, SARA Policy Manual and the Interregional Guidelines for the Evaluation of Distance Education as updated periodically, and any document specifying SARA policies and practices that supersedes or amends these documents.

Regional Compact: Regional education compacts serve the states in their regions through improving education. There are four Regional Compacts: the Midwestern Higher Education Compact (MHEC), the New England Board of Higher Education (NEBHE), the Southern Regional Education Board (SREB) and the Western Interstate Commission for Higher Education (WICHE).

RSCs: Regional Steering Committees of the regional education compacts. Regional Compact Regional Steering Committee makeup varies by region and may include educators, regulators, legislators, and State Portal Entity representatives.

SARA State Authorization Reciprocity Agreements is an agreement among member states, districts, and territories that establishes comparable national standards for interstate postsecondary distance education, thus providing a means for participating institutions in member states to offer distance education in other member states without having to obtain separate authorization from each state.

S-SARA or SREB-SARA: Acronym for the Southern Regional Education Board SARA initiative, to include the SARA Director, staff and Regional Steering Committee. The other regional acronyms are N-SARA, M-SARA, and W-SARA.

S-SARA Regional Steering Committee: The regional steering committee to administer SARA for the SREB Region.

Regional SARA Director: The S-SARA supervisor of the SARA program for that regional compact.

SPE: State Portal Entity. The state higher education agency or other state body designated by each SARA Member State to carry out SARA responsibilities for the state

and to serve as the interstate point of contact for SARA questions, complaints, and other communications.

SREB: Southern Regional Education Board.

SREB-Affiliated Members: a state, district or territory that affiliates with a regional compact, as a member of the regional steering committee, under the terms of SARA in order to join SARA but is not a full member of that compact. Pennsylvania, Washington, D.C., Puerto Rico and the U.S. Virgin Islands are affiliated with SREB.

SREB Members: 16 states that constitute an interstate compact, and are members of the regional steering committee, including Alabama, Arkansas, Delaware, Florida, Georgia, Kentucky, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, Virginia and West Virginia.

SREB Executive Board: The Board includes the governor and four gubernatorial appointees from each member state, including at least one state legislator and one educator. The Legislative Advisory Council of legislators from each state advises the Board.

SREB Leadership: The SREB President or designee.

II. S-SARA Regional Steering Committee Purpose

The S-SARA Regional Steering Committee works with the Regional SARA Director to approve state membership in SARA for the SREB Region. The S-SARA Regional Steering Committee may recommend policies, procedures and actions for both regional and national purposes. A state that seeks to join SARA through SREB will submit the SARA State Application and supporting documentation to the Regional SARA Director.

III. Regional SARA Director Role and Responsibilities

The Regional SARA Director acts as the subject matter expert and main point of contact for regional SARA State Portal Entities, as well as the primary liaison to NC-SARA. The Regional SARA Director schedules and plans the S-SARA Regional Steering Committee meetings and may arrange and facilitate working group meetings and teleconferences. The Regional SARA Director will:

A. Work with the SREB President as the President determines the status of states that have application renewal dates within the next six months. States in good standing will be notified of upcoming state renewal 90 days prior to the renewal date. States deemed not in good standing will be notified of their status with SREB and their options.

B. Distribute state applications and related documentation.

C. Review state applications and renewals for required components and documentation.

D. Ensure proper signatures are obtained on applications.

E. Monitor development of the Regional Steering Committee's documents and procedures.

F. Plan the agenda, speakers and content for each meeting in coordination with the RSC Chair.

G. Plan logistics, meals, etc., for each meeting and reconcile travel reimbursements, invoices and budgets.

H. Provide meeting minutes and distribute them to the Regional Steering Committee following each meeting.

I. Work with the Regional Steering Committee Chair to manage S-SARA Regional Steering Committee Nominations, Elections and Terms of Office in Section V.

IV. S-SARA Regional Steering Committee Composition

The S-SARA Regional Steering Committee will be composed of:

A. The SREB President or designee.

B. Five at-large members selected by the SREB President and staff to serve as committee representatives. These individuals will represent various stakeholders and communities of interest, including but not limited to state regulators, state government, accreditors and institutions from all sectors of higher education.

C. One member who represents the SARA SPE from each SREB member state.

D. One member who represents the SARA SPE from each affiliated state or district that affiliates with SREB for SARA purposes.

E. One non-voting representative from any non-SARA state or SARA state that has indicated commitment to affiliate with SREB to seek membership in SARA and is actively pursuing the development of a new state application.

V. S-SARA Regional Steering Committee At-Large Members

A. The SREB President will determine the terms of service for at-large Regional Steering Committee members.

B. At-large members of the S-SARA Regional Steering Committee will be appointed to staggered three-year terms.

C. Individuals may be reappointed by the SREB President or designee to serve additional terms.

D. At-large members of the S-SARA Regional Steering Committee who are unable to

complete their terms may be replaced with another at-large representative. Such replacement members shall assume the remainder of the original member's term and subsequently may be appointed for a new term.

VI. S-SARA Regional Steering Committee Officers

A. **Officer Designations**:
The officers of the Regional Steering Committee shall be the Chair, Vice Chair, and Parliamentarian.

B. **Role and Responsibilities of the Chair**:
The Committee will elect a Committee Chair to serve for two years, to facilitate the committee meetings in concert with the Regional SARA Director, sign requisite documents on behalf of the S-SARA Regional Steering Committee and undertake responsibilities as determined by the S-SARA Regional Steering Committee.

C. **Role and Responsibilities of the Vice Chair**:
The Committee will elect a Committee Vice Chair to serve for two years, to stand in for the Committee Chair when the Committee Chair is absent or when the Committee Chair's state is under review. The Vice Chair will facilitate the committee meetings in concert with the Regional SARA Director, sign the requisite documents on behalf of the S-SARA Regional Steering Committee in the absence of the Chair and on behalf of the Committee when the Committee Chair's State is under review and shall undertake other responsibilities as determined by the S-SARA Regional Steering Committee.

D. **Role and Responsibilities of the Parliamentarian**
The Committee will elect a Committee Parliamentarian to serve for two years to advise the presiding officer, committees and members on matters of parliamentary procedure and Robert's Rules of Order. The Parliamentarian contributes to meeting preparation, provides real-time guidance during committee meetings and contributes to maintaining committee governing documents.

E. **Qualifications of Officers**:
Officers must represent a State Portal Entity from an approved SARA state on the S-SARA Regional Steering Committee.

F. **Terms of Office**:
Each officer shall hold office for a two-year term beginning November 1 following the close of the fall meeting of the Regional Steering Committee at which (s)he is elected. An officer who has served two consecutive two-year terms in the same office shall become eligible for two additional terms in the same office, after a two-year period of not serving in said office. Terms of office for Vice Chair and Chair shall be staggered in accordance with the election procedure described herein.

G. **Nominations of Officers:**
Nominations for Chair, Vice Chair and Parliamentarian are to be submitted by SREB or Regional Steering Committee members to the Regional SARA Director no later than 30 days prior to the next election. The deadline for nominations may be extended at the discretion of the Regional SARA Director.

H. **Election of Officers**:

Elections for Chair, Vice Chair and Parliamentarian shall take place at the fall meeting of the Committee. Elections for Chair shall take place in even-numbered years. Elections for Vice Chair shall take place in odd-numbered years. The method of voting (e.g., anonymous, voice, ballot, etc.) will be determined during the meeting where the vote is scheduled to occur. However, the process for voting (e.g., majority vote, majority plus one, etc.) is determined by the process outlined in section X of these Guidelines and Procedures.

I. **Vacancies in Officer Positions**:
In the event of a vacancy in the Chair, Vice Chair or Parliamentarian positions prior to the end of a term, the Regional SARA Director, in consultation with the Regional Steering Committee, will appoint a qualified Regional Steering Committee member to serve in the officer position for the remainder of the term. Such an appointment shall not alter the eligibility of the appointed member to be elected and serve two complete two-year terms in the same office.

J. **Removal of Officers**:
An officer may be removed on a 2/3 majority vote of the Regional Steering Committee.

VII. S-SARA Regional Steering Committee Member Commitment of Participation

Members will:

A. Dedicate approximately 8-12 hours per calendar quarter to committee-related preparation and activities.

B. Share personal and professional expertise with the committee in reviewing issues, resolving conflicts and making recommendations.

C. Provide professional objectivity in all actions associated with committee work.

D. Participate in scheduled state application review meetings. The number of S-SARA Regional Steering Committee meetings will depend upon application submissions. No more than four meetings a year are anticipated.

E. Participate in any other S-SARA Regional Steering Committee meetings and consider Working Group participation as assigned by the Chair.

VIII. S-SARA Regional Steering Committee Working Groups

Working groups may be formed to work on processes, recommendations to NC-SARA, or other topics as determined by the needs of the Regional Steering Committee. The Regional SARA Director or working group leader will arrange and facilitate the group meetings, and either the working group leader or a designee will preside over the meetings. Members of the working groups will be selected by the Regional SARA Director and Chair, or volunteers will be solicited. Recommendations from the working groups will be reported to the full Regional Steering Committee for consideration or further action.

IX. S-SARA Regional Steering Committee Role and Responsibilities

A. The S-SARA Regional Steering Committee's roles and responsibilities are determined by SREB and may include the following:

   i. Meet at least twice a year to review state compliance with the SARA Governing Documents and, as necessary, make recommendations to SREB Leadership and the Regional SARA Director regarding:

      a. SARA membership of a state after determining whether the applicant state meets the eligibility requirements of SARA membership as listed in the application as developed and distributed by NC-SARA.

      b. Renewal of the SARA membership of a state after determining whether the applicant state meets the eligibility requirements of SARA membership as listed in the application as developed and distributed by NC-SARA.

      c. Sanctioning or removing any state that is not compliant with the SARA Governing Documents.

   ii. Review the SARA Governing Documents and if necessary, make recommendations or comments to NC-SARA regarding any proposed changes.

   iii. Address any other matters properly raised before the S-SARA Regional Steering Committee and within the purview of the S-SARA Regional Steering Committee as listed in this document and the SARA Governing Documents.

B. Individual Regional Steering Committee members will declare any conflict of interest and recuse themselves as needed to prevent the perception of impropriety. Members representing a SARA SPE will recuse themselves from decisions and recommendations related to their individual home states' applications to participate in SARA.

X. S-SARA Regional Steering Committee Procedures for Actions

At the time of this publication (July 2022), all states and territories in the SREB Region have been approved initially for SARA membership; therefore, initial approval is not covered in these procedures.

When the S-SARA Regional Steering Committee must act on any matter requiring a vote (excluding votes held within Working Groups), a quorum of 2/3 of eligible voting S-SARA Regional Steering Committee members shall be present to conduct official business and move action items forward. Once a quorum has been established, 50% plus one of all eligible voting S-SARA Regional Steering Committee members present will carry an action item vote. If it is determined that a quorum is no longer established, all voting must cease until a quorum is reestablished.

A. Renewal Process

   i. Renewing

      a. The state or territory will be notified at least 90 days in advance of the renewal date to submit a renewal application and supporting

documents. The Regional SARA Director will review the application and work with the state on revisions until the Director can recommend the state application for approval at the next Regional Steering Committee meeting. The Regional SARA Director will respond within two weeks of receipt of the application.

b. If the Regional Steering Committee has determined that the state or territory's application is adequate and complete, the Regional Steering Committee will vote whether to accept the renewal application for SARA membership. The Regional Steering Committee may approve or deny the application, request additional information from the state or territory, and/or request changes to the state's application.

c. If the review of and vote on a state application is positive, the Regional Steering Committee will make a recommendation for renewal of membership for the applicant state.

d. Renewal applications that are recommended for approval must be signed by the S-SARA Regional Steering Committee Chair, the Regional SARA Director and SREB President. Approval is effective on the date all signatures are obtained, and the Director will notify the state or territory of its renewal status.

e. In the event that the Regional Steering Committee decides not to recommend renewing a state or territory for membership in SARA, the application will be returned with comments and requested information within two weeks of the Regional Steering Committee meeting. The state or territory may resubmit the application and respond to the comments and information requests or appeal the decision within 30 days. The response or appeal should be addressed to the Regional SARA Director and mailed to the S-SARA office (SREB, 592 10th Street NW, Atlanta, GA 30318) or emailed to SARA@SREB.org.

B. Renewal Considerations

In reviewing renewal applications, the Regional Steering Committee will consider the following as evidence of compliance with the requirements for renewal outlined in the *SARA Policy Manual*. The Regional Steering Committee reserves the right to question the applicant state or territory on these issues or request additional documentation on these issues:

i. Maintains eligibility through membership in or affiliation with SREB. (See Section 2.1)

ii. Has legal authority under state law to enter into an interstate agreement that covers all the elements of SARA

iii. Maintains membership in or affiliation in good standing with the SREB for purposes of SARA participation that is verified per recommendation of the

SREB Board

iv. Timely submits a complete Application for Renewal of Membership or a request for extension. See Section 2.2

v. Works cooperatively with other SARA states, regional compacts and NC-SARA to enable success of the SARA Initiative

vi. Affirm its willingness and ability to maintain continued compliance with SARA Governing Documents

vii. Meets SARA requirements under Section 2.5 of the *SARA Policy Manual* in the performance and management of its duties including those for:

a. Considering initial and renewal applications
b. Evaluating institutions granted initial participation, subsequent renewal or denied participation
c. Monitoring institution's data reporting of enrollments and clinical placements
d. Monitoring to ensure timely renewal of institutions
e. Having a process for considering applications for provisional status
f. Timely review and final adjudication of SARA-related complaints
g. Adjudicating appeals from institutions that are denied initial participation or renewal of participation in SARA.
h. Applying all policies in the SARA Policy Manual equally to institutions that participate in Title IV federal financial aid programs and those that do not.

C. Submitting Policy Recommendations to NC-SARA

i. Any entity, person, or state wanting to propose a policy modification to the *SARA Policy Manual* shall do so in accordance with section 8 of the *SARA Policy Manual*.

ii. The S-SARA Regional Steering Committee will review and formulate recommendations on *SARA Policy Manual* proposed modifications submitted in accordance with section 8 of that Manual and the current Policy Modification Process Calendar as follows:

a. If the S-SARA Regional Steering Committee has submitted proposed policy modifications, any decision to amend or withdraw a proposal shall be an action item vote of the S-SARA Regional Steering Committee.

b. The S-SARA Regional Steering Committee shall meet following the final deadline to amend or withdraw proposed modifications with adequate time to communicate recommendations to the SREB President. Each policy modification proposal submitted using the process outlined in section 8 of the SARA Policy Manual shall be placed on the agenda as an action item vote. The S-SARA Regional Steering Committee Director will communicate the recommendations in writing to the SREB President and request the President's consideration of, and feedback on, all policy changes, clarifications and/or modifications recommended by the S-SARA Regional

Steering Committee and/or other stakeholders from the SREB Region before any recommendations are submitted to NC-SARA.

D. SARA Participating Institution Noncompliance

i. First Warning

If a SPE determines that an institution is noncompliant, through either its own investigation or notification from the Regional SARA Director, the SPE should give the institution a First Warning and provide an opportunity to address all areas of noncompliance. The notice should list the areas of noncompliance and require that the institution provide a response, including a timeline for compliance, to the SPE within 30 days of the date of the notice. If an adequate response is received, the matter will be considered closed.

ii. Second Warning

If there is no response to the First Warning, the problem persists, or additional complaints relating to the same matter are received, the SPE shall send the institution a Second Warning that includes a request for the institution to provide a plan to address the areas of noncompliance, a timeline and a follow-up process. If individual students are involved, the plan must include a plan to address their individual concerns. The Second Warning should also notify the institution that it will be removed from SARA pursuant to *SARA Policy Manual* section 3.8c. if a plan to achieve compliance is not proposed. The response should be submitted to the SPE within 30 days of the date of the notice of the Second Warning. If an adequate response is received, the matter will be considered closed.

iii. Notice of Removal

If a complete response to the Second Warning is not submitted, the SPE will send the institution a Notice of Removal. The Notice of Removal should reference *SARA Policy Manual* section 3.8d. and state the effective date of removal. The SPE shall copy the Regional SARA Director on the Notice of Removal. States shall notify their regional compact and NC-SARA of the withdrawal, loss of eligibility or removal of any institution pursuant to *SARA Policy Manual* section 3.8g.

E. Appeals to the S-SARA Regional Steering Committee

i. Provisional Status — Institutional Appeal

When considering an application for participation, whether initial or renewal, the SARA State Portal Entity shall review the application and supporting documentation to determine if the institution meets SARA requirements. Under certain conditions, a state may approve an institution's participation in SARA under provisional status. A SPE may place an institution on provisional status for the following reasons: (1) provisional or probationary accreditation status; (2) cash management or a federal financial responsibility score between 1.0 and 1.5; (3) a government investigation related to academic quality, financial stability or consumer protection; (4) a current investigation by its Home State for academic quality, financial stability or consumer protection, or (5) the institution is on

provisional or probationary status or the equivalent with its institutional accrediting agency or is subject to a sanction or "show cause" order. If an institution determines or is notified that its composite score has changed such that it crosses a participation eligibility threshold, it will have a maximum of 30 days to notify its State Portal Entity and provide any documentation relating to its composite score. An institution admitted or renewed for participation in SARA on provisional status shall be required to disclose such status on its website, including a reason for the status, in a format and manner acceptable to the SARA State Portal Entity, within 10 days of the institution's notification. Any references to the institution's participation in SARA on its website shall include a disclaimer that such institution's participation is provisional (e.g., web pages that include SARA complaint information, state authorization pages that bear the NC-SARA approval mark, etc.) along with the reason category.

An institution may appeal a SPE decision to the S-SARA Regional Steering Committee within 30 days of notice of the decision granting provisional status, to ensure SARA policies were followed during the review process (SARA Manual Section 3.7b.7). The appeal proceeding will conclude within 90 days of receipt of the written appeal.

a. The institution shall provide a written appeal addressed to the Regional SARA Director, which will be provided to all S-SARA Regional Steering Committee members and placed on the agenda of the next Regional Steering Committee meeting. The written appeal shall clearly state the grounds for the appeal and, where applicable, cite the sections of the *SARA Policy Manual* that the SPE may have failed to follow.

b. The Regional SARA Director shall separately notify the SPE of the appeal and provide the SPE an opportunity to submit a written response.

c. The institution may send two delegates to the Regional Steering Committee meeting to appeal the provisional status.

d. The S-SARA Regional Steering Committee will hear the appeal and vote at that meeting on whether the SPE followed the SARA policies during the review process. The Regional Steering Committee may confirm that the SPE was correct in its decision regarding provisional status, recommend to the SPE that it remove the provisional status, or request additional information.

e. If additional information is requested, the hearing will conclude at the next S-SARA Regional Steering Committee meeting.

f. If provisional status is confirmed by the S-SARA Regional Steering Committee, there is no further appeal for the institution.

If the S-SARA Regional Steering Committee determines that the state did not uphold SARA policies, the S-SARA Regional Steering Committee may recommend adverse action against the SPE as provided for in Section X. S-SARA Regional Steering Committee Action Against S-SARA Member States of these Guidelines and Procedures.

ii. Institution Renewal Denial Appeal

If institutional participation renewal is denied, the SPE will provide the applicant institution a written reason for the denial. The institution may appeal the denial to the Regional Compact within 30 calendar days, to ensure SARA policies were upheld by its Home State during the review process. (*SARA Policy Manual* Section 3.7b.9)

a. The institution shall provide a written appeal addressed to the Regional SARA Director, which will be provided to all S-SARA Regional Steering Committee members and placed on the agenda of the next Regional Steering Committee meeting. The written appeal shall clearly state the grounds for the appeal and, where applicable, cite the sections of the *SARA Policy Manual* that the SPE may have failed to follow.

b. The Regional SARA Director will separately notify the SPE of the appeal and provide the SPE an opportunity to submit a written response.

c. The institution may send two delegates to the Regional Steering Committee meeting to appeal the denial decision.

d. The S-SARA Regional Steering Committee will hear the appeal and vote at that meeting on whether the SPE followed the SARA policies during the review process and may recommend to the SPE that it reconsider the institution's status, request additional information or confirm that the SPE was correct in its decision regarding denial.

e. If additional information is requested, the hearing will conclude at the next S-SARA RSC meeting.

f. If denial is confirmed by the S-SARA Regional Steering Committee, there is no further appeal for the institution. If the S-SARA Regional Steering Committee determines that the state did not uphold SARA policies, the S-SARA Regional Steering Committee may recommend adverse action against the SPE, as provided for in Section X. S-SARA Regional Steering Committee Action Against S-SARA Member States of these Guidelines and Procedures.

iii. Home State Designation Appeal

In the event that a state or an institution disagrees with the SPE determination of a Home State, the following will apply:

a. If the state under consideration is in the SREB Region, the appeal will be made to the Regional SARA Director. Appeals will be reviewed by the Regional SARA Director, the SREB President and NC-SARA staff. Affected states and the institution will be given an opportunity to file written comments before the SREB President makes a final decision. After this decision no further appeal is permitted.

b. If the state in question is in a different Regional Compact and SREB leadership

disagrees with the other Regional Compact on the Home State assignment, NC-SARA will make a final determination in consultation with the affected Regional Compacts. Affected states and the institution will be given an opportunity to file written comments at the discretion of NC-SARA.

iv. Supervised Field Experience Appeal

If a Host State objects to a Supervised Field Experience or clinical placement under SARA on the grounds set forth in section 5.11d.2. of the *SARA Policy Manual*, the Regional Steering Committee of the affected Regional Compact(s) shall determine whether the placement is allowable under SARA (*SARA Policy Manual* 5.11d.3). If states outside of the SREB Region are involved, the Regional SARA Director will include other Regional Compact staff in the resolution process.

a. The objection to field experience shall be submitted in writing within 30 days to the Regional SARA Director and Regional Steering Committee for consideration.

b. The Regional SARA Director will distribute the objection to members with a suggested resolution, requiring comment from members within two weeks of distribution.

c. If all members agree with the resolution by email, the determination will be communicated to the Host State immediately.

d. If members do not agree initially, the item will be placed on the agenda at the next Regional Steering Committee meeting for discussion and voting.

e. The Regional Steering Committee determination for resolution is the final decision, with no further appeal.

XI. S-SARA Regional Steering Committee Action Against S-SARA Member States

As per Section 4.3 of the Unified State Authorization Reciprocity Agreement, the S-SARA Regional Steering Committee will monitor participating states' compliance with SARA and may:

i. Expel a state from SARA
ii. Sanction and outline corrective actions for states that fail to meet the requirements for participation
iii. Dismiss any states that fail to respond to concerns and plans for improvement

A. Sanctioning States

Level I: Initial sanction will be a written reprimand from the S-SARA Regional Steering Committee, with a request for documentation of corrective actions within a specified time period, depending on the corrective actions required.

Level II: If corrective actions are not achieved within the specified time, the S-SARA Regional Steering Committee will forward the reprimand to the state's Education Commissioner, Governor or legislative body and copy the state's institutions.

Level III: Removal from SARA membership.

i. State Removal or Dismissal and Appeal

a. If an unsatisfactory outcome or no response is received from sanctions, the matter will be placed on the next S-SARA Regional Steering Committee meeting agenda to consider whether to recommend removal to the SREB Executive Board. The SPE may submit a written comment concerning removal at least 30 days prior to the meeting date and shall be afforded an opportunity to present oral comments at the meeting.

b. If the S-SARA Regional Steering Committee recommends removal to the SREB Executive Board, the Regional SARA Director will notify the SPE of the date and time of the SREB Executive Committee meeting. The SPE may submit written comments concerning removal at least 30 days prior to the meeting date and will be given an opportunity to present oral comments at the meeting. The SREB Executive Board shall notify the SPE of its decision within 30 days of the meeting.

c. In the event a state is removed from SARA, all SPEs and NC-SARA will be notified by the Regional SARA Director of the removal. In addition, the SPE of the removed state shall notify all institutions participating in SARA located in the removed state that the institutions are no longer allowed to participate in SARA and that the institutions should start teaching out online students located in states other than their Home State or seek authorization to operate in the other states where it has students. The teach-out process may not extend beyond six months or the end of the current term (*SARA Policy Manual* 2.3 and 2.4).

d. In the event of removal, affiliated states/territories will not receive a refund of the affiliation fee for a portion of the term.