NC-SARA Webinar – May 28, 2020
May 2020 NC-SARA Board Actions

Frequently Asked Questions

General

1. It was a welcome addition to have the ability to call in and hear the policy discussion during the NC-SARA Board meeting. Many thanks for making that possible. Does NC-SARA plan to continue this practice for future Board meetings?
   The NC-SARA Board is reviewing this possibility.

Branch Campus

2. Will NC-SARA create a Working Group to address the policy modification dealing with the Home State's jurisdiction over a branch campus? If so, who will serve on those groups?
   At this time NC-SARA is focusing on training to ensure all stakeholders have a firm understanding of current policy related to branch campus policy. NC-SARA is working with WCET/SAN on a white paper and we plan on hosting a webinar on this topic in late summer 2020. NC-SARA is working closely with our legal counsel and the regional compact staff in striving for an understanding by all constituents of the current policy.

3. Can someone define "branch campus"? We have two campuses, but both have State Authorization to operate in those states.
   The SARA *Manual* defines "Branch Campus" to mean a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers full programs of study, not just courses. (Integrated Postsecondary Education Data System (IPEDS)). For SARA purposes, a Branch Campus that operates under the accreditation of a Main Campus is not considered a separate Institution for purposes of SARA (see section 3.1(h)(2)).

Federal Financial Responsibility Composite Scores

4. Has NC-SARA considered using other metrics in addition to the composite score to determine a school's financial viability? Most individual states themselves do not use only the composite score when considering authorization eligibility.
   Yes, in the past, NC-SARA considered alternatives to the federal financial responsibility composite scores, but in the absence of a common, consistent formula or set of formulas, we believe it is best to use the U.S. Department of Education (USED) scores at the current time. We have heard from representatives at the USED that they are planning to share new guidelines soon, but we have not yet seen them.

Accreditation and NC-SARA

5. Why doesn't NC-SARA rely on regional accreditors monitoring of CFI and associated financial review processes, rather than creating a separate process that may be applied/interpreted differently across states?
   Rather than duplicate the triad requirements, NC-SARA relies upon them to ensure consistency across SARA participating institutions.

6. Can you speak to the accreditation language the feds are supposed to be shifting to? Dropping the regional vs national designations from the recognized accreditors info.
   Yes, NC-SARA requires that its participating institutions be accredited by an accrediting agency that is recognized by the U.S. Department of Education (USED) to approve

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distance education. This means more accreditors than the institutional accreditors formerly known as regional are accepted.

7. This is off topic…I heard a rumor NC-SARA may one day become the acknowledged 4th arm of the current Regulatory Triad. Any thoughts?
   We would like to disabuse folks of this notion. States play their part in the triad by providing authorization to operate in their states. NC-SARA, in collaboration with the states, provides the reciprocity across states for authorization for distance education across states. So no, no fourth arm.

Date Reporting
8. Were states portal entities sent a copy of the email for data reporting that went out to institutions?
   Yes, institutional data reporting emails were sent to all states via the Regional Compact SARA Directors in early May.

9. With regard to students who have become "distance learners" due to COVID situation and moving to online, if an institution has determined to continue to offer main instruction on line for Fall 2020, will the institution have to track locations and provide notice of distance learning compliance for these "new distance learners", beyond June 1, 2020?
   NC-SARA will be working with Regional Compact SARA Directors, States, the SARA Data Advisory Committee, and institutions to determine how we will conduct data reporting for next year.

Professional Licensure Directory
10. Is there a possibility that NC-SARA will list all boards instead of just the few that are currently listed?
    NC-SARA does not have any plans to list all boards, as there are over 1,300. However, starting in 2021 staff will be reviewing data gathered on SARA institutions to determine if, in the future, other boards will be added to the directory. https://nc-sara.org/professional-licensure-directory

Professional Licensure
11. Please list the reference to number in federal regulations.
    Section 34 CFR 668.43

12. Please list the difference in general and direct disclosures.
    General disclosures will be a "yes," "no," or "we do not know" whether your program curriculum will meet the requirements in each of the 50 states and will be listed on your website.

    Direct disclosures must be in writing (electronic is fine) directly to the student. Direct disclosures are required when you know your program will not lead to a license in a particular state and when you have not yet made the determination.

13. What is the difference in current and proposed SARA disclosures requirements?
    Current SARA policy does not include general disclosures. The requirement to notify students in writing when a program **will** lead to a license in another state will be

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removed. The requirement for direct notifications when the institution knows or does not know whether the program will lead to a license remains.

14. What is the difference in the Federal Regulations and proposed SARA disclosures?
The proposed language will align with the new federal regulations that will be effective July 1, 2020 so will include general disclosures which SARA policy has not required. In addition, the proposed SARA language will also retain the current SARA requirement to provide licensing board contact information to students when a determination cannot be made whether the program will meet requirements.

15. Can institutions reference NC-SARA professional licensure directory and fulfill the disclosure requirements?
No. The directory is provided to help institutions have contact information to make it easier to contact the licensing board to determine whether your programs will meet requirements in other states.

16. What determines enrollment?
An enrolled student is one who is registered at your institution.

17. Do disclosures apply to both online and face to face students?
Yes, the new federal regulations will apply to both modalities.

18. I guess I was wondering about the requirement to make a good faith effort to determine whether the programs meets the requirements.
The idea behind "effort" is to ensure that institutions have reviewed regulations and reached out to state licensing boards to make the determination. It may not be possible to get a clear answer and that could be a reason for the "we do not know" response.

19. Will institutions be required to provide the prof. lic. agency contact information when the institution chooses the third option of "no determination has been made," in addition to the "does not meet" determination?
Yes.

20. May the direct disclosure letter point to my institution's list of licensing boards under our General Disclosures webpage, or do we have to list the specific licensing board in the specific state?
Direct disclosures would be specific to the particular student and course or programs so the information will need to be for a specific state board.

21. With the proposed SARA Professional disclosure policy, Are we to provide board information for face-to-face programs or just Online programs?
You will align with the federal requirements for all modalities, and for SARA purposes this will also include contact information provided directly to the student or prospective student when you know that the program will not meet requirements or you do not know.

22. Do you recommend adding a statement to indicate that there are other requirements that lead to licensure - such as background checks or work exp - just to be clear for students.
Good practice recommendations should be discussed with your general counsel.

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23. Could someone clarify why the RN-BSN program would be included with licensure disclosures?
    Some state nursing boards may have additional requirements so your institution should confirm same.

24. Community colleges have basic law enforcement training, cosmetology, dental assisting, radiography, nurse aide, etc. So they would have to report on all of those, correct?
    If the program would lead to a license or certification or is advertised as such, then disclosures are required.

25. Are we required to respond to students IN WRITING if they have a follow-up question regarding the disclosure we send them?
    The requirement is for the initial disclosures. How you respond after that will be a practice determined by the institution.

Web Links:

NC-SARA Professional Licensure Directory & Information
https://publish.smartsheet.com/6e3fb27658f443588ff16ad36ccf5a94

https://nc-sara.org/resources/professional-licensure

WCET/SAN is also working on issues related to professional licensure:

https://wcetsan.wiche.edu/resources/professional-licensure