Minutes of the W-SARA Steering Committee  
Monday, April 21, 2014 ~ 2:00 – 3:30 p.m.  
Conference Call

Steering Committee Members Present
Christopher Bustamante (AZ), president, Rio Salado College  
Laura Palmer-Noone (AZ), board member, Lumina Foundation  
Mary Ellen Petrisko (CA), president, WASC Senior College and University Commission  
Marcia Bankirer (CO), president, Denver School of Nursing  
Heather DeLange (CO), academic policy officer, Colorado Department of Higher Education  
Toni Larson (CO), executive director, Independent Higher Education of Colorado  
Jessica Brubaker (MT), staff attorney, Montana University System (MUS)  
Sona Andrews (OR), provost and vice president for academic affairs, Portland State University  
Jane Sherman (WA), vice provost for academic policy and evaluation, Washington State University

Steering Committee Members Absent
Carol Liu (CA), senator, California State Senate

WICHE Staff Present
David Longanecker, president  
Jere Mock, vice president, Programs and Services

W-SARA and NC-SARA Staff Present
Alan Contreras, SARA coordinator  
Rhonda Epper, W-SARA director  
Michelle Perez-Robles, office manager

Welcome
Rhonda Epper called the meeting to order and welcomed committee members.

Overview and discussion

Members of the steering committee requested a brief summary explaining the differences between the five WICHE states under consideration for SARA approval. Epper provided a summary of the major differences that included legislation necessary to pass the initiative in each state, timelines, and major obstacles each state is facing or has resolved. The committee reviewed and discussed each state application packet and noted they appreciated the staff analysis provided, summarized as follows:
Alaska:

Legal Authority: Alaska Statutes. Title 14, Chapter 14.48, Section 14.48.050

The Alaska Commission for Postsecondary Education (ACPE) is the designated SARA portal agency. The complaint process for ACPE covers all public and private institutions, except the University of Alaska System institutions. Regulations were promulgated in March 2014, which states the following:

\[(d) \text{Complaints from out-of-state students participating in distance education delivered by an institution governed by the University of Alaska Board of Regents and accepted for participation in W-SARA will be handled by the University of Alaska and may be appealed to the commission as the state’s W-SARA approving agency.}\]

This process is an acceptable SARA arrangement for complaint resolution. The new regulations were approved by ACPE at its March 31, 2014 meeting, and are currently with the Department of Law for review prior to the governor’s signature. Staff recommends a SARA membership effective date of July 1, 2014 to ensure the governor’s signature is in place.

The committee unanimously approved Alaska’s participation in SARA effective July 1.

Colorado:

Legal Authority: Colorado Revised Statutes: 23-2-103.1(4); and 12-59-105.3(1).

The Colorado Department of Higher Education (CDHE), staff agency under the Colorado Commission on Higher Education, is the designated SARA portal agency. The Division of Private Occupational Schools (DPOS) has a separate board, but is staffed within the same CDHE (portal) agency. The statutory authority to enter into reciprocity is included in the application. The complaint processes for CDHE and DPOS covers all public and private degree-granting institutions in Colorado. The Colorado Commission on Higher Education approved a new complaint policy for higher education institutions, which incorporates SARA standards, and voted to enter into reciprocity at its April 11, 2014 meeting.

The committee unanimously approved Colorado’s participation in SARA. Heather DeLange, State of Colorado, Department of Higher Education abstained from the vote on Colorado’s participation in SARA.

Idaho:


The Idaho State Board of Education is the designated SARA portal agency. Idaho’s authority for the Board of Education to join SARA is established by the state constitution. The agency's legal counsel has advised the agency that this is sufficient to authorize it to join SARA. The complaint process encompasses all public and private degree-granting institutions in Idaho. This process is an acceptable SARA arrangement for complaint resolution. The Board of Education voted to enter into the WICHE State Authorization Reciprocity Agreement at its meeting on December 18-19, 2013.

The committee unanimously approved Idaho’s participation in SARA.
Nevada:

Legal Authority: Nevada Revised Statutes: 341, 397.060

The Nevada System of Higher Education (NSHE) is the designated SARA portal agency. The complaint process for SARA is a shared approach between NSHE and the Nevada Commission on Postsecondary Education (NCPE), which handles complaints for private institutions. NSHE will be the final resolution point for SARA purposes, and will authorize institutional participation according to the terms of SARA. The interagency relationship between NSHE and NCPE is outlined in a Memorandum of Understanding (MOU), which is scheduled to be signed by NCPE at its May 14, 2014 meeting. This process is an acceptable SARA arrangement for complaint resolution.

The committee discussed at length two Nevada documents; those concerning catastrophic events and a draft MOU between the NSHE and NCPE. The committee requested that Nevada provide clarification on the catastrophic events document (subsequently done on 4-22-14). The committee agreed to accept the application if the MOU is adopted by NCPE on 5-14-14 without change. The committee unanimously approved Nevada’s participation in SARA, conditional on the MOU approval.

Washington:

Legal Authority: Revised Code of Washington: 28B.85.020 (1) (c)

The Washington Student Achievement Council (WSAC) is the designated SARA portal agency. The authority granted to WSAC for complaint handling is located in the Degree-Granting Institutions Act. Certain institutions are exempt from oversight requirements of the Act, but statute allows the WSAC to enter into agreements with those institutions that are exempt in order to represent them in terms of a reciprocity agreement. Exempt schools will be required to sign a Memorandum of Agreement as part of the W-SARA institutional application to the WSAC, which will require them to adhere to the Council’s complaint process for SARA purposes.

Implementing the law will not require changes to agency administrative rules. There is a provision in the current rules that allows WSAC to waive the requirement for degree authorization. WSAC plans to use that provision once accepted for SARA membership. However, they will add language to the rules specifically waiving the authorization requirement for institutions participating in SARA in order to clarify the issue for future council staff. The complaint process is an acceptable arrangement for SARA purposes.

The committee unanimously approved Washington’s participation in SARA. Jane Sherman, Washington State University, abstained from the vote on Washington’s participation in SARA.

Action Item: Epper will forward the steering committees recommendations to the full WICHE Commission for action and approval at their May 12-13 meeting in Santa Fe, New Mexico.

Draft Data Policy Review

Epper asked the committee for feedback regarding the draft SARA policies on data collection. The committee raised the following questions and concerns.
1. For both states and institutions, committee members would like to see some explanation of why the data are needed. What is the rationale for requesting this information? Who will look at the data, and what will happen based on the data?

2. For institutional reporting, the committee was interested in why NC-SARA needs the enrollment data for all students. A question was raised as to whether NC-SARA is trying to become the national database for online students.

3. Also under institutional reporting, the committee is concerned about the further disaggregation of data by program of study in 2016. Many students do not declare a program of study, but are simply taking one or more courses online for various purposes (e.g., on-campus students who need to fit an extra course into their schedule). There is concern this information could be misleading. The "programs of study" available online may not coincide with what the student is actually taking.

4. They requested clarification on how to treat military students when reporting enrollments.

**Action Item:** Epper will forward the data policy suggestions and concerns to Marshall Hill, NC-SARA executive director, prior to the May 14 NC-SARA board meeting.

**Review and confirm timeline for remainder of 2014**

Epper reviewed the 2014 timeline with the committee. All previously scheduled dates are still valid for the committee members. The committee members requested an update on the participation of other states in SARA. Epper referred the members to the chart located on the NC-SARA website, as it has the most accurate and up to date information.

Epper asked the committee members if there was a need for an in-person meeting of the Steering Committee for the October 20, 2014 meeting. The committee members agreed that a conference call was sufficient. Epper indicated she will keep the committee members apprised of developments on a regular basis.

The meeting was adjourned at 3:29 p.m.