



# Postsecondary Equity & Economics Research Project

A joint initiative of  
George Washington University,  
Columbia University and Student Defense

## The Experiences of Higher Education Authorizing Agencies with Implementing State Authorization Reciprocity

REBECCA S. NATOW, HOFSTRA UNIVERSITY

FEBRUARY 2024

*The views expressed in this report are solely those of the author.*

---

### EXECUTIVE SUMMARY

State authorization reciprocity gives higher education institutions in participating states authorization to provide online postsecondary education in other participating states without having to undergo those states' own authorization process. To date, 49 states plus the District of Columbia, Puerto Rico, and the Virgin Islands participate in the State Authorization Reciprocity Agreement (SARA). Though SARA provides a minimum standard for authorization and requires states to have a process for receiving student complaints about institutions, there have been criticisms of SARA, including that it does not allow states to enforce higher standards for authorization than what is provided in the reciprocity agreement. Moreover, with state resources being limited, there is a concern that SARA imposes additional burdens on state governments that they may not have the capacity to meet.

The purpose of this study was to investigate state agencies' experiences with state authorization reciprocity, and specifically with SARA. Data sources included a standardized questionnaire, interviews, and document analysis. Between interviews and the questionnaire, a total of 20 states participated in this research.

Findings indicate that in general, existing employees of state agencies were given SARA responsibilities in addition to their already-assigned job duties, and that the number of staff dedicated to SARA issues was small. State-level SARA implementers reported that they have received satisfactory training on SARA at no cost to their agencies. Moreover, states' complaint processes have not appreciably changed as a result of SARA, and complaints reaching the state level remain rare. State agency staff's engagement with other states to resolve complaints has generally been limited. The most frequently mentioned cost of joining SARA was the additional staff time needed to implement the agreement, although other costs have included administrative expenses and a reduction in revenues from out-of-state institutions seeking authorization. States are also unable to enforce their own higher education-specific consumer-related regulations against out-of-state SARA institutions. State-level benefits of joining SARA include saving time due to fewer out-of-state inquiries, receiving free training, and developing relationships with their counterparts across states. Respondents frequently mentioned that institutions benefit substantially from not having to spend time and money obtaining authorization from numerous states. Several respondents also mentioned that students benefit indirectly from having a larger number of educational opportunities and having all SARA institutions meet a minimum requirement for authorization, because some states did not require authorization for out-of-state institutions prior to joining SARA.

Based on these findings, recommendations for policy include the following:

- States should build capacity for SARA implementation by providing additional staff to administer the agreement.
- States should be permitted to enforce their own higher education-specific consumer protection policies, should any exist beyond the authorization process.
- SARA should provide for students' home states to play a more active role in resolving complaints that reach the state level.
- To encourage students to pursue unresolved complaints at the state level, information should be provided to them about the process for appealing a complaint through the state.

## INTRODUCTION & BACKGROUND

State authorization of higher education institutions—that is, state government approval for a college or university to operate and confer credentials within the state—has been a key component of higher education accountability for decades (Natow et al., 2023). Comprising one third of the Higher Education Act's "Program Integrity Triad," state authorizing agencies are assumed to require a minimum standard of consumer protection for students, and institutions are required to have state authorization—as well as accreditation and compliance with federal regulations—to be eligible to receive federal student financial aid (Hegji, 2023; McCann & Laitinen, 2019).

But following the proliferation of fully online higher education in the early 2000s, it became apparent that some states' standards for authorizing higher education institutions were far less stringent than others (Longanecker & Hill, 2014; McCann & Laitinen, 2019). This contributed to an environment where institutions offering fully online programs could "venue shop for the state most likely to be lenient and with the least oversight of higher education" (Perry & Cochrane, 2018, p. 8). A 2012 report by the United States Senate's education committee identified problems with state authorization for higher education, claiming that some states "rubber-stamp for-profit colleges' standing to operate" (U.S. Senate Committee on Health, Education, Labor, & Pensions, 2012, p. 23).

In recognition of these issues with postsecondary state authorization, in the 2010s, the U.S. Department of Education issued a series of regulations that, among other things, required all higher education institutions to obtain authorization from every state in which they enrolled students, even if the institution had no physical location there, to remain eligible to receive federal student financial aid (Natow et al., 2023). Recognizing that the requirement to obtain authorization from potentially 50 states, the District of Columbia, and other territories would likely lead to states engaging in reciprocity agreements—that is, agreements across states to approve institutions that are already approved in a partner state—the Department of Education specifically allowed for such agreements in its regulations (Hegji, 2023). Indeed, the State Authorization Reciprocity Agreement (SARA)—administered by the National Council for State Authorization Reciprocity Agreements (NC-SARA)—emerged in 2014 (Longanecker & Hill, 2014). To date, SARA has 52 signatories—49 states (all except California), the Virgin Islands, the District of Columbia, and Puerto Rico (NC-SARA, n.d.-a). This agreement allows participating institutions physically located in participating states to have their home state's authorization recognized in other participating states, so that the institutions can enroll distance learning students across state lines without first having to gain authorization from every state in which their students are located.

State authorization reciprocity through SARA has substantially reduced the burden on higher education institutions, who would otherwise need to identify every state in which their students in fully online classes are located and take necessary steps to obtain authorization in all of those states. But membership in SARA requires certain conditions for both states and institutions (Tandberg et al., 2019). For example, colleges that join SARA must have institutional accreditation that is approved by the U.S. Department of Education, abide by certain reporting mandates, and certify they are following the Council of Regional Accrediting Commission's distance education guidelines (NC-SARA, 2023; Tandberg et al., 2019). For

their part, states must join SARA through a regional higher education compact, which is a formal alliance with other states in the same geographic region to share resources and collaborate on higher education matters (Longanecker & Hill, 2014). Moreover, states participating in SARA must have in place a system for reviewing and addressing student complaints that complies with certain requirements, including requiring students to first pursue relevant complaint processes within their institution before proceeding with a state-level complaint (NC-SARA, 2023; The Institute for College Access & Success, 2023). According to the State Higher Education Executive Officers Association, SARA “has created, for the first time, baseline standards for authorization” of higher education institutions at the state level (Tandberg et al., 2019, p. 14).

Critics of SARA have claimed that certain aspects of the reciprocity agreement may harm consumer protection. Although SARA allows states to enforce their own “*general-purpose* criminal or consumer protection laws against an institution that violates those laws” (NC-SARA, 2023, p. 41), member states may not enforce higher education-specific consumer laws against institutions (The Institute for College Access & Success, 2023). States whose own laws would permit stricter consumer protections for higher education identified this restriction as a concern that contributed to the state’s decision either to join SARA later than most or, in the case of California, not join SARA at all (Natow et al., 2023). Another concern is that, because SARA requires students to proceed with their institution’s full internal complaint process before pursuing their complaint with the state, the potentially long and bureaucratic nature of this procedure may dissuade or delay students from ever filing complaints with the state (The Institute for College Access & Success, 2023). Additionally, given the often-limited resources of state higher education agencies (Hall-Martin, 2021; Natow et al., 2023), there is concern that SARA imposes additional burdens on state governments that they may not have the capacity to meet.

Interstate reciprocity agreements exist in other contexts. For example, occupational licensure reciprocity allows professionals in such fields as audiology and physical therapy to practice across state lines (National Center for Interstate Compacts, 2020). Lawyers admitted to the bar in certain states and who meet certain conditions may receive admission to practice law in another state without having to pass that state’s bar exam (Siek et al., 2013). In the context of education, the National Association of State Directors of Teacher Education and Certification (NASDTEC)’s Interstate Agreement facilitates the movement of teachers across state lines by allowing states to recognize or reduce requirements for teachers who are certified or have graduated from a teacher education program in another state (NASDTEC, n.d.). SARA is another example of an interstate reciprocity agreement in the field of education, and it has emerged as the only reciprocity agreement on the issue of postsecondary state authorization.

There have been a few studies of higher education state authorization policies in recent years (e.g., Boatman & Borowiec, 2021; Hall-Martin, 2021; Hutchens et al., Forthcoming; Natow et al., 2023; Ness et al., 2021). However, no prior studies have examined how reciprocity has affected state governments with regard to its implementation. Yet understanding the experiences of state agencies with reciprocity is important. To the extent that reciprocity involves states trusting other states to enforce quality standards (Kahan, 2003), understanding how state agencies have been influenced by joining SARA can provide more information about the benefits, costs, and other consequences of investing this trust in other states. Relatedly, little is known about specific aspects of SARA, such as its requirements regarding the resolution of student complaints, or about how state agencies experience the implementation of reciprocity.

Given the important implications for consumer protection in higher education, as well as the significant role played by states as one third of the Program Integrity Triad, it is important to understand how state authorization reciprocity has influenced state-level higher education agencies and the extent to which that influence has been positive or negative. Therefore, the objective of this study was to investigate state agencies’ experiences with state authorization reciprocity, and specifically with SARA, by addressing the following research questions:

1. How have staffing and staff time at state agencies changed after the state joined SARA?
2. How have states’ handling of student complaints about higher education institutions changed after the state joined SARA?

3. What do state agency employees identify as the (monetary and non-monetary) costs incurred by the state as a result of joining SARA?
4. What do state agency employees identify as the (monetary and non-monetary) benefits obtained by the state as a result of joining SARA?

## OVERVIEW OF SARA

At its core, SARA allows member-institutions who are located in and have received authorization from SARA member-states to be granted authorization reciprocity from other member-states in which they enroll students in distance learning programs without having to go through that state's own process for institutional authorization (Longanecker & Hill, 2014; NC-SARA, 2023; Natow et al., 2023; Tandberg et al., 2019). In exchange for this reciprocity, institutions must agree to both their home state's and NC-SARA's conditions for maintaining membership in SARA. These include holding institutional accreditation from an accrediting body recognized by the U.S. Department of Education, and for private institutions, maintaining a minimum acceptable score of financial responsibility as set forth by the Department of Education (Longanecker & Hill, 2014; NC-SARA, 2023). Institutional members pay a fee to NC-SARA, and depending on the state, may also pay an additional fee to their state (NC-SARA, 2023; Natow et al., 2023). To join SARA, institutions must meet standards set by the reciprocity contract, which incorporates provisions of the Council of Regional Accrediting Commission's guidelines for online education (NC-SARA, 2023).

States that are members of SARA must meet certain obligations as well. These include having a "State Portal Entity" (NC-SARA, 2023, p. 21) to oversee matters relating to SARA and having clear policies for handling "catastrophic events," including natural disasters and sudden institutional closures (p. 20). States must be authorized by their own government to join SARA, which generally means that an act of the legislature must take place to allow this (Tandberg et al., 2019). Another important requirement is for states to have a policy in place for handling consumer-related student complaints regarding a SARA member-institution (NC-SARA, 2023; Tandberg et al., 2019). This complaint procedure must require that students first follow their institution's procedures for handling such complaints, and students may file complaints with the State Portal Entity only after not reaching a resolution within the institution (NC-SARA, 2023; The Institute for College Access & Success, 2023). Also, while SARA specifically allows for states to enforce general-purpose consumer protection laws against out-of-state institutions—including those who are members of SARA—it does not allow states to enforce additional consumer laws that are specific to higher education institutions (NC-SARA, 2023; Perry & Cochrane, 2018). States must also provide quarterly reports about the status of student complaints to NC-SARA (NC-SARA, 2023).

## RESEARCH METHODS

This study employed multiple methods to understand how state authorization reciprocity has influenced the state agencies charged with implementing it. In particular, this study sought to examine the influence of SARA on state agency staff (e.g., the extent to which staff spend their time learning about and implementing SARA), how states have experienced student complaint processes under SARA, and what the state officials who work closely with SARA view as the costs and benefits (both monetary and nonmonetary) of the agreement. Data sources included a standardized questionnaire, semi-structured interviews, and an analysis of relevant documents.

### Participants

Participants in this study were state agency personnel who worked closely with NC-SARA to implement SARA in their state. Table 1 provides an overview of characteristics of states that participated in this research. All staff identified as directly responsible for SARA in every SARA-member state or other jurisdiction (e.g., Puerto Rico and the Virgin Islands) were invited to participate in this research. As explained below, a total of 20 states participated in this study. Participating states

are not identified in order to protect confidentiality of participants: Because most states have only one or two dedicated SARA staffers, identifying the states that participated in this research would make individual participants easily identifiable. However, Table 1 provides useful contextual information about participating states, including geographic region, how many had higher education-specific consumer protection laws in place prior to joining SARA, the states' total population, the number of higher education institutions in the states, and the percentage of institutions within the states that participate in SARA. As demonstrated in Table 1, participants represented a variety of geographic regions as well as both large and small states as measured by state population and the number of higher education institutions in each state. Participating states had between 62% and 93% of their institutions as members of SARA. Seven states indicated on the standardized questionnaire that they had higher education-specific consumer protection laws in place prior to joining SARA.

**Table 1: Context of States Participating in This Study (“Participating States”)**

Geographic Region	Number of Participating States Located in the Region <sup>a</sup>
Northeast	4
Southeast	1
Midwest	7
Southwest	2
West	6
Range of State’s Total Population as of 2022	Number of Participating States Within the Range <sup>b</sup>
Under 1 million	3
1 million – 5 million	8
5,000,001 – 10 million	7
10,000,001 – 15 million	1
Over 15 million	1
Range of State’s Number of Higher Education Institutions as of 2021	Number of Participating States Within the Range <sup>c</sup>
20 or fewer	3
21 – 50	6
51 – 100	9
More than 100	2
Range of State’s Percentage of Institutions Participating in SARA	Number of Participating States Within the Range <sup>d</sup>
62% – 72%	7
73% – 82%	6
83% – 93%	7
Number of participating states that reported having higher education-specific consumer protection laws in place prior to joining SARA	7

a Source for geographic region: National Geographic (2009).

b Source for state population information: U.S. Census Bureau (2023).

c Source for total number of institutions in each state: U.S. Department of Education (2022).

d Sources for percentage of SARA-participating institutions per state: NC-SARA (n.d.-b) and U.S. Department of Education (2022). This calculation was made by dividing the number of SARA-participating institutions in a state (according to N.C.-SARA) by the total number of institutions in the state (according to the U.S. Department of Education).

## Standardized Questionnaire

Standardized questionnaires are research instruments that “contain an invariable set of questions that are always asked in the same order” (Díaz-Oreiro et al., 2019, p. 2). A standardized questionnaire containing 14 closed-ended questions and 16 open-ended questions was emailed to individuals at agencies responsible for implementing state authorization reciprocity at all 52 SARA-participating states and other jurisdictions (e.g., Puerto Rico and the Virgin Islands). Representatives from 16 states responded electronically to the standardized questionnaire, and representatives from four additional states responded to this instrument’s questions during interviews (more detail on interviews is provided in the next subsection). Thus, a total of 20 states responded to the questions asked on the standardized questionnaire, for an overall state-level response rate of 38 percent. Closed-ended questions inquired about SARA staff, training, time spent administering SARA, student complaint procedures, and how those practices have changed since the state joined SARA. Open-ended questions asked participants to provide additional information about their responses to closed-ended questions, and also asked about additional costs and benefits (both monetary and nonmonetary) of joining SARA. See Appendix Table 1 for information about how many participants responded to different questions in the online questionnaire, via interview, and in total.

Data responding to closed-ended questions were analyzed quantitatively with descriptive statistics, as has been done in other small-*n* research on state authorization issues (see Hall-Martin, 2021). Data responding to open-ended questions were thematically analyzed (Swain, 2018), by exporting those responses into spreadsheets and reviewing all responses to the same question concurrently with an eye toward identifying common patterns and themes that responded to the study’s research questions.

## Semi-Structured Interviews

Semi-structured interviews involve a flexible protocol of questions and discussion points while also allowing for follow-up on unanticipated topics and emergent concepts related to a study’s research questions (Adeoye-Olatunde & Olenik, 2021). State officials who received the questionnaire were invited to also provide an individual interview. Interviews followed a semi-structured protocol and were conducted virtually using an internet-based video conferencing platform. A total of 14 individuals (representing 14 different SARA member-states) participated in the interviews. Interview questions asked participants to confirm, clarify (if needed), and provide additional information about their responses to the survey questions. The interview protocol also probed for additional details about student complaint procedures, perceived costs of and downsides of implementing SARA, and perceived benefits of implementing SARA.

Interview data were analyzed thematically (Swain, 2018), via two cycles of analysis (Miles et al., 2019). In the first cycle, interview transcripts or notes were examined to code data responsive to this study’s research questions. In the next cycle, all data coded as responsive to Research Question 1 were exported into a spreadsheet for further analysis of data coded in response to that research question. The same was done for data coded as being responsive to Research Questions 2, 3, and 4, respectively. Once exported, data in each spreadsheet were analyzed together to identify patterns and themes.

## Document Analysis

The analysis of documents is useful to supplement data obtained from other sources (Bowen, 2009). Documents reviewed in this analysis included the SARA policy manual and other documents on the NC-SARA website about SARA policies and procedures. Interview data collected for a prior study about state authorization policies were also analyzed, as some were relevant to this study’s research questions. That study included data from three SARA member-states that did not participate in the present study (in addition to two other states), increasing the number of states for which there are relevant data in this analysis to 23. Finally, additional data were reviewed regarding each participating state for background information about when the state joined SARA and how many SARA-participating institutions are physically located in the state. These documents were analyzed to gain additional perspective on each state’s context as well as to understand current SARA policies and procedures.



## FINDINGS

### Staffing and Staff Time

The first research question asked: *How have staffing and staff time at state agencies changed after the state joined SARA?* This study produced findings about state agency staff dedicated to SARA implementation, training on SARA, and the extent to which agency staff’s time spent on institutional authorization changed after their state joined SARA. Responses to standardized questions on these matters are reported in Table 2.

**Table 2: Standardized Questionnaire Responses About Agency Staff Time Spent on SARA\***

	Yes	No		
Does your state have dedicated SARA staff?	68.4%	31.6%		
Were those staff hired after your state joined SARA?	45.5%	54.5%		
Median reported number of dedicated SARA staff in the state		2		
	Yes	No	Not Sure	
Are your staff trained on SARA standards?	88.9%	5.6%	5.6%	
	Increased	Decreased	Remained About the Same	Not Sure
After your state joined SARA, did the amount of time it takes the state to authorize a new institution of higher education offering online education in your state increase, remain about the same, or decrease?	23.5%	23.5%	35.3%	17.7%

\*Of those who responded to each question. Totals may not add to 100% due to rounding to the nearest tenth.

### SARA-Dedicated Staff

Once a state joins SARA, state agency personnel must decide how to allocate staff to work on SARA implementation. Of respondents who responded to the question, “Does your state have dedicated SARA staff?,” 68.4% responded yes and 31.6% responded no. The median reported number of dedicated SARA staff (among those who responded to the question) was two. More frequently (54.5%), these staff were not hired after the state joined SARA but were existing employees whose roles changed to include SARA administration. Several interviewees described how SARA responsibilities were added to their jobs without taking many, if any, of their previously existing tasks away. Two interviewees described taking on SARA responsibilities specifically as, “Other duties as assigned.” Another said that some agency personnel were “individuals who were already here, but they were identified as being responsible for those NC-SARA responsibilities.”

Related to this point was the fact that state offices administering SARA have been quite lean, with few employees working on a variety of different matters. One interviewee described the state office responsible for state authorization as being “a very small office” and “small, but mighty.” In a different state, an interviewee self-identified as “the only one” working on SARA issues, and “a staff of one.” As a result, many agencies found themselves with few employees able to take on another employee’s responsibilities so they could focus on SARA implementation. As one interviewee explained, “we’re such a small office,” and “there really wasn’t anybody to shift [my] responsibilities to” after this employee took on SARA administration.

Another related point is that state employees dedicated to SARA issues have not focused solely on SARA. Indeed, none of the questionnaire respondents indicated that SARA staff were dedicated full-time to SARA issues, and on average among those who reported this information, less than 20% of their work time dealt with SARA. Interviewees confirmed this finding. One explained that state personnel who administered SARA were “not dedicated only to SARA, but SARA is one of the

responsibilities that those individuals have.” Another self-identified as a SARA-“dedicated” employee, but also added that “it’s not my full-time job.”

### Training on SARA Standards

In response to the questionnaire, nearly 90% of respondents reported that state agency staff have received training on SARA standards, a finding that was supported during interviews. State agency personnel reported receiving training from NC-SARA or their state’s regional higher education compact. Interview respondents spoke about webinars and conferences funded by NC-SARA that provided training regarding SARA policies and procedures. One participant described these trainings as covering matters such as “the SARA manual, any changes, because there’s revisions that happen all the time, or refinement of the manual,” as well as any needed clarifications. Another described the training as “consistent,” saying: “There’s always something new, especially with federal regulation proposals and all the rest. I think it’s a constant movement of where are we trying to be and how can we make this better.”

Trainings occurred frequently—as often as once per month, according to some respondents—and state agency personnel often expressed satisfaction with the training they’ve received. For example, one interviewee said:

NC-SARA has what I think is really a great training program. They have videos. They have examples. You can even take little kind of mini quizzes within there, like, “How would you answer this?” So I am very pleased with how much training they have out there and the details that they have in the policy manuals and things like that.

Another interviewee said that the training “has been really great,” and that both NC-SARA and the regional compact “have been really good about being responsive, helping in those just one-off situations happen, [when] you’re like, ‘What do I do in here?’”

### State Authorization Process Time

One standardized question asked: *After your state joined SARA, did the amount of time it takes the state to authorize a new institution of higher education offering online education in your state increase, remain about the same, or decrease?* A plurality of those responding to this question—35.3%—reported that the amount of time it takes to authorize an institution remained about the same since joining SARA. Just under a quarter of respondents to this question (23.5%) reported that the time it takes to authorize a new institution increased after their state joined SARA, and the same number reported that this time decreased.

Among those who reported that the amount of time it takes a state to authorize an out-of-state institution did change following SARA, responses to open-ended questions and interviews indicate that this may have occurred for a few reasons. Regarding an increase in time, some states prior to SARA did not require any authorization at all for out-of-state institutions offering online education to the state’s students. Therefore, after joining SARA, time spent approving such institutions increased from no authorization work to some. In the words of one interviewee, “As far as approving out of state, we [didn’t] really do that. We [didn’t] do the authorization. Anything to do with SARA was all new.”

Other states did take steps to authorize out-of-state institutions seeking to provide distance education to students located in the state. Some respondents from those states indicated that the time it takes to authorize out-of-state institutions decreased after the state joined SARA because the reciprocity that SARA provided meant the state spent less time than it previously did authorizing out-of-state SARA institutions. As one interviewee explained:

If we’re looking at other institutions out-of-state that are offering programs to [this state’s] students, we, in the past, treated those not dissimilar to on-ground programs in the state being offered by other institutions... So with us, it’s changed ... in the sense that NC-SARA provides us with the knowledge that that evaluation has already been done by those states that are approving those applications for NC-SARA. So it’s definitely cut down our time in that respect. We’re relying on those states with the understanding that there’s integrity in that NC-SARA evaluation process.



Some respondents said that there was no difference in time spent authorizing out-of-state institutions following SARA because their process stayed the same as it was beforehand. Other interviewees said that any additional time spent approving authorization of SARA institutions was offset by a decrease in the amount of time they spent responding to out-of-state institutions' inquiries about how to gain authorization to offer distance learning in the state, the volume which was substantial following the adoption of federal regulations requiring institutions to be authorized in all states where their students were located. One response to an open-ended inquiry on the questionnaire stated that prior to SARA, the state did not authorize out-of-state institutions providing education online. However, the state "had to respond to hundreds of inquiries about authorization" from institutions in other states. The respondent went on to state, "There are many fewer inquiries now but additional work in approving our own SARA institutions."

### Student Complaint Processes

The second research question asked: *How have states' handling of student complaints about higher education institutions changed after the state joined SARA?* Findings indicate that it has been rare for student complaints to reach the state level. Additionally, state-level complaint numbers have largely remained the same after states joined SARA. Moreover, state-level complaint processes are often the same for SARA and non-SARA institutions because many states are applying SARA-complaint compliant policies to all institutions, regardless of whether the institutions themselves are members of SARA. Findings also demonstrate that states' engagement with other states in the complaint resolution process has occurred, but it has involved only limited interaction. Table 3 summarizes responses to the standardized questionnaire regarding student complaint issues.

**Table 3: Standardized Questionnaire Responses About Student Complaints\***

	Increased	Remained About the Same	Decreased	
After your state joined SARA, did the number of student complaints about online higher education programs increase, remain about the same, or decrease?	0%	94.1%	5.9%	
	Increased	Remained About the Same	Decreased	Not Sure
After your state joined SARA, did the amount of time it takes the state to resolve student complaints about higher education institutions increase, remain about the same, or decrease?	0%	76.5%	11.8%	11.8%
	Yes	No	Not Sure	
Has your state investigated, in response to a student complaint, a SARA institution located in another state but enrolling students in your state?	29.4%	64.7%	5.9%	

\*Of those who responded to each question. Totals may not add to 100% due to rounding to the nearest tenth.

### Complaints Reaching the State Level are Rare

Student complaints under the purview of SARA are complaints related to consumer-protection issues, such as accuracy in an institution's marketing or provision of statistics about student outcomes and the extent to which distance learning offerings are consistent with the Council of Regional Accrediting Commission's guidelines (NC-SARA, 2023). Examples of student complaints that would not be consumer-related include those "regarding student grades or student conduct violations," which would be "governed entirely by institutional policy and the laws of the SARA institution's home state" (p. 45). Interviews

and responses to open-ended standardized questions indicate that students' consumer-protection complaints rising to the state level have been rare: two-thirds of the state agency personnel who responded to this standardized question and a clear majority of interviewees said that the number of student complaints reaching their office have been few to none. For example, an interviewee said about complaints, "If I get one a year, [it's] kind of a surprise... So it's kind of crickets around here." Moreover, one questionnaire respondent wrote, "during my tenure, the number of complaints observed has been null to minimal," and another wrote, "We have not received any appealed complaints since joining SARA." Notably, the latter respondent wrote about "appealed complaints," because SARA requires that students first exhaust their institution's own complaint procedures, and only if the complaint remains unresolved at that point may the student file the complaint with the state (NC-SARA, 2023). Thus, the fact that student complaints are not often reaching the state level is not an indication that students have not been filing consumer-related complaints with their institutions.

Most respondents did not speculate as to why student complaints rarely reach the state level. The few who provided possible reasons for this had differing perspectives. One interviewee credited the institutions' process for resolving complaints before they reach the state agency, saying, "When we talk about the volume of complaints received, we're talking about a fairly low volume... so that really points to the complaint process working at the institutional level, I think." However, another interviewee presented a quite different view—that students may be too frustrated to follow through with state-level appeals after engaging in their institutions' complaint procedures. This interviewee said, "Just because the student's exhausted the [institutional] complaint process, they might be emotionally or physically exhausted, it doesn't mean that there isn't a violation of statutes or regulations. It just means that they can't carry on." The same interviewee also made the point that students may not be aware that a state appeal is available after exhausting institutional complaint processes, saying that for complaints to reach the state level, "it has to be a state that has a very strong culture of students being aware of complaint processes, not just internally at their institution, but at the statewide level as well as the SARA level."

#### *Handling Complaints at the State Level is Largely the Same Before and After SARA*

Findings from both the standardized questionnaire and interviews indicate that the handling of student complaints at the state-level, meaning *after* a student submits a complaint to the state, did not change much, if at all, after a state joined SARA. SARA requires that students first file complaints with their institutions and only file complaints with the state if they are not first resolved at the institutional level (NC-SARA, 2023). Respondents in this study indicated that students are, in fact, required to exhaust institutional complaint processes before filing their complaints with the state, although the questionnaire did not ask whether this requirement existed prior to the state joining SARA, or make a distinction between this requirement and other state-level student complaint policies.

One standardized question asked: *After your state joined SARA, did the amount of time it takes the state to resolve student complaints about higher education institutions increase, remain about the same, or decrease?* Zero respondents to this question reported that the number of complaints about online higher education increased after the state joined SARA, and zero respondents to the question about the time it takes the state to resolve student complaints indicated that it increased since the state joined SARA. Instead, the vast majority of respondents indicated that the number of student complaints received by a state and the time it takes a state to resolve student complaints have remained about the same.

Once a student unsuccessfully attempts to resolve a complaint through the institution, the student may file that complaint with the state. Interview data indicate that those state-level processes—which occur after a student has already exhausted the institution's complaint processes—have generally not changed since states joined SARA. One interviewee said the state-level process was "formalized" by "putting it in writing" after the state joined SARA, but that "it was pretty much the same." A different interviewee said, "the way that we handled complaints under the SARA policy is how I was handling complaints previously." Likewise, respondents generally indicated that the state-level process for resolving complaints was largely the same for their SARA and non-SARA institutions. In the words of one interviewee, the complaint process for both types of institutions "follows basically the same" procedure. When differences were noted, they were minor. For example, one

interviewee reported that the main differences related to recordkeeping. This respondent said the only differences were “who’s contacted and who’s notified about certain things. I may keep a little different documentation for SARA just so that I can keep that separate for reporting purposes. But, really, it’s the same process.”

### *Working with Other States to Resolve Complaints*

State officials implementing SARA reported engaging with their counterparts in other states when a student complaint reached the state level about an institution located in a different state. However, the work these officials did with personnel from other states was fairly limited. Under SARA policy, an institution’s home state investigates student complaints against that institution that are not resolved at the institutional level (NC-SARA, 2023). It is perhaps for this reason that less than 30% of respondents indicated, in response to a question asking about this, that they have investigated an institution located in another state in response to a complaint filed by a student in the respondent’s state.

Interviewees often reported that the extent of their work with other states on resolving student complaints has involved notifications of state SARA representatives about complaints filed by a student or against an institution located in their state and keeping that same SARA representative apprised of developments in the complaint investigation. One interviewee said the following about notifying another state about one of that state’s students who had filed a complaint about an institution in the interviewee’s state:

If we have out-of-state students attending [in-state] institutions, we always notify those state[-level] ... NC-SARA folks [about] what’s going on. We keep them in the loop on any developments with the complaints in [this state] for [this state’s] institutions and let them know what the outcomes of those complaints are. As far as involving them in the process, it’s more just keeping them in the loop from an informational standpoint.

Another interviewee made similar comments about situations in which students in the interviewee’s state seeking to file complaints against institutions located in other states. This respondent said, “Most often it’s handed off [to the institution’s home state]. There are times that we do keep in touch just to make sure the student is taken care of and that nothing accidentally dropped through the cracks.”

### *Monetary and Nonmonetary Costs of SARA*

The third research question asked: *What do state agency employees identify as the (monetary and non-monetary) costs incurred by the state as a result of joining SARA?* More than any other factor, respondents identified staff time implementing SARA as a cost of reciprocity. Other costs include administrative costs, loss of revenues, and not being able to enforce higher education-specific consumer protection laws.

#### *Staff Time*

The most frequently mentioned cost of joining SARA was the dedication of staff time to implementing the agreement. As explained above, SARA administration was typically added to an agency staff member’s job duties, often without removing existing duties from their responsibility. As a result, questionnaire and interview respondents identified this additional use of staff time as the primary cost of joining SARA. One respondent on the standardized questionnaire wrote that the cost of joining SARA was “Primarily staff time” because “In addition to processing applications, there are webinars, Zoom meetings, and in-person meetings” required of state-level SARA staff. Another questionnaire respondent reiterated that SARA duties were combined with existing responsibilities of the state agency, including those required by state policy. This respondent wrote, “The only cost has been limited amounts of staff time. NC-SARA duties are combined with other legislated duties within the agency.” An interviewee reported that after the state joined SARA, there was “more attention spent, resources and time ... because ... now we’re focusing on SARA-related activities.” One respondent described this use of staff time as “opportunity costs” because “my time dedicated to SARA... takes away from my time working on other projects.”

Several participants also described how some agency personnel have served on NC-SARA regional steering committees. These committees involve state-level officials with their regional interstate compacts to oversee SARA member-states within the region, discuss SARA-related issues, and play a role in proposing and approving changes to SARA policy (NC-SARA, 2023; Western Interstate Commission for Higher Education, n.d.). One interviewee underscored the importance of serving on the steering committee, saying, “It’s part of the transparency of the organization ... to have that transparency between the states, between the regions, and connecting with SARA” nationally. But this interviewee went on to explain how involvement on the steering committee takes time: “There’s a lot of reading that’s involved in studying things. Right now, we’re working on a policy modification process, and reading a lot of proposals... It is a lot of work.”

### Administrative Costs

Another cost identified by respondents was the administrative costs incurred as a result of joining SARA. When a state agency does not charge an additional fee for institutions to participate in SARA, the administrative costs are absorbed by the agency. As one interviewee described this, “managing SARA is a service we do for our institutions.” Thus, any costs incurred from implementing SARA are not passed on to institutions but borne by the state agency.

Some states do charge an additional fee to SARA-participating institutions to help cover the state’s costs of administering the agreement. As demonstrated in Table 4, about 61% of states responding to the question charge fees to their SARA-participating institutions. This figure is not too different from the 69% of states and other jurisdictions that charge fees as shown on NC-SARA’s website (see NC-SARA, n.d.-c). Also as shown in Table 4, 40% of those responding to the question indicated that these fees were insufficient to cover the costs associated with SARA administration. When the fees are insufficient to cover administrative costs, it may be challenging for states to raise those fees. In the words of one respondent, “Well, I’ll put it this way. If we were to increase the fees, that would be a politically sensitive topic.”

**Table 4: State-Level SARA Fees for Institutions\***

	Yes	No
Do SARA-participating institutions headquartered in your state pay any additional fees to the state in order to participate in SARA?	61.1%	38.9%
If you responded yes to the question above, are those fees sufficient to cover the costs associated with administering SARA?	60.0%	40.0%

\* Of those who responded to each question.

### Reduction in Revenues

A few respondents reported that their state lost revenues after joining SARA because out-of-state institutions were no longer required to apply for authorization—and pay an authorization fee—directly to the state. Initial authorization fees vary by state, but as of 2021, such fees ranged from \$100 to \$25,000 (NC-SARA & NCHEMS, 2021). One interviewee explained:

When we joined SARA, of course we lost a lot of revenue from that joining. We lost from the direct authorization. We lost that income from [institutions] that wanted to enroll [this state’s] students. But that’s, kind of the benefit to joining SARA is it saves [institutions] money from direct authorization in individual states.

Similarly, another interviewee reported after the state joined SARA, “it was a loss of revenue,” because the state was processing fewer authorization applications. This respondent noted that “the savings definitely got passed on to the institutions.”

### *Inability to Enforce Higher Education-Specific Consumer-Related Standards*

Per NC-SARA policy, states participating in SARA are not able to apply their own higher education-specific consumer-related standards to out-of-state institutions participating in SARA, but instead apply SARA's standards (NC-SARA, 2023; The Institute for College Access & Success, 2023). As noted in Table 1 above, seven states responding to that inquiry on the standardized questionnaire had such standards in place by the time they joined SARA. Thus, a cost of reciprocity has been states' inability to enforce such standards.

Some state officials recognize this as a limitation of SARA. For example, a respondent in the earlier study of state authorization said, "regulations directed specifically at for-profit schools, you can't enforce." This fact gave the state pause before joining SARA because, from the same respondent's perspective, SARA's standards were "not very high" compared to the state's own standards. Nonetheless, the state did join SARA following pressure from institutions.

Moreover, as explained above, a SARA institution's home state oversees student complaints that are not resolved at the institutional level, meaning that students located in SARA member-states taking online classes with institutions in other states will have their complaints resolved under that other state's process. As another respondent in the previous study pointed out, a student's:

recourse is to complain to a state agency in [another state], and just commonsense and politically, I don't think it's very likely that the state agency in [the other state] is going to care very much about the complaints of an out-of-state student.

### **Monetary and Nonmonetary Benefits of SARA**

The fourth research question asked: *What do state agency employees identify as the (monetary and non-monetary) benefits obtained by the state as a result of joining SARA?* Benefits at the state level included less time spent answering inquiries from out-of-state institutions, developing working relationships across states, and receiving additional information through training. Respondents also identified benefits for institutions and, indirectly, students.

### *Saving Time Due to Fewer Inquiries from Out-of-State Institutions*

When asked about the benefits of joining SARA, several respondents reported that a key benefit was the reduced need to spend time on inquiries from out-of-state institutions about how to gain authorization. One participant wrote the following in response to the question about benefits on the standardized questionnaire: "State participation in SARA allows staff to spend more time on [this state's] institutions' authorization and those out-of-state institutions that don't meet the SARA requirements." An interview respondent similarly said that a benefit to states was no longer "getting all those calls from out-of-state institutions. You know, there are hundreds and thousands of them. It just, it takes a lot of your time, your staff time." Another interviewee confirmed:

Prior to SARA... I probably wrote a thousand letters to institutions, you know, and thus receiving a thousand emails like, "Hey ... we have some online students in your state. Do we need to get authorized?"

No longer having to field such inquiries was viewed as a benefit to state agencies.

### *Working Relationships Across States*

Several respondents appreciated the good working relationships they have developed with personnel in other states as a result of participating in SARA. As one interviewee said, "Certainly, the states... I think it's created a better relationship between all of us... I think it really emphasized how much we can rely on each other." Other interviewees shared this sentiment about improved working relationships with other states. For example, a respondent to the standardized questionnaire wrote that a benefit of joining SARA was "positive working relationships with authorization/SARA staff in other states." Similarly, an

interviewee reported that SARA staff in other states have been a great resource of information and assistance, saying they are “super smart and know way more than I do, so it’s lucky for me.” Some respondents made similar statements about having a positive working relationship with NC-SARA staff.

### Information and Training

Several respondents voiced appreciation for the additional information they receive through SARA training, particularly with regard to NC-SARA and federal policies. Respondents explained that NC-SARA and regional compacts deliver training in the form of webinars and conferences, which provide useful information for state officials charged with implementing SARA. Respondents also noted that training costs are covered by NC-SARA or the regional compacts, including travel costs for in-person conferences. In the words of one interviewee, “NC-SARA covers everything, including the in-person meetings.” A different respondent described this fact as “awesome” because the agency’s budget is tight, and without this outside funding, agency personnel would not be able to attend. Participants also appreciated information available from NC-SARA apart from formal training. One interviewee said, “there is the SARA database, you know a lot of the reminders and things like that, and the ledgers and tracking things and updating contacts. That’s all done with SARA through SARA... It greatly helps.”

### Benefits for Institutions

Respondents frequently mentioned that institutions benefit from SARA in several ways, with some perceiving that institutions benefit more than states. In the words of a respondent to the standardized questionnaire, “The benefit is primarily to our institutions. It took a huge amount of time and money to obtain authorization in every state.” Another survey respondent concurred: “Institutions are able to save money in fees, and in staff time through SARA.” Interview participants reiterated this point as well, with one saying:

It actually has bigger impact on the institutions... One institution told us, it was easily back then... It easily exceeded over a hundred thousand dollars a year for them just in fees, not in staff time... I had other institutions tell me that some states were, well, some were difficult to work with, but some were just backlogged, and it was taking forever to get approved. So [SARA] was, it was mostly a benefit to those institutions.

### Indirect Benefits for Students

Several respondents also mentioned that students are indirect beneficiaries of SARA. One reason is because some states did not require out-of-state institutions providing distance education to students within the state to obtain state authorization. Indeed, as indicated in Table 5, eight states responding to that question on the standardized questionnaire indicated they did not have pre-SARA laws or regulations requiring such authorization. As one interview respondent in such a state said, the state “didn’t and doesn’t require any institution without a physical presence to do any sort of registering or seeking authorization.” Thus, joining SARA necessarily raised authorization standards for those states because it meant that the state’s authorization standards for out-of-state institutions went from nothing to SARA’s contractual standards. In the words of one interviewee, for some states, SARA “lowers the ceiling,” but in others it “raises the floor.”

**Table 5: Pre-SARA Requirements for Out-of-State Institutions to Obtain Authorization\***

	Yes	No	Not Sure	Did Not Respond
Prior to joining SARA, did your state have in place laws or regulations that required out-of-state institutions that offered online postsecondary education to your state’s residents to be authorized by your state?	7	8	2	3

\* Of those responding to the question.



Another way students have benefited indirectly from SARA was by having a larger number of distance education programs in which they could enroll, particularly in rural states where there was not a large number of higher education institutions. As an authorizer in one such state reported:

In-person opportunities are not always accessible for many of our residents. And so if an individual is looking for a really unique or specified program... we may or may not offer it. And so, having the resources through SARA provides an additional opportunity for our residents to reach out to explore programs.

While distance education existed before SARA, state authorization reciprocity made it easier for a larger number of institutions to offer their programs in a larger number of states, including states with smaller populations for which the out-of-state institutions may not have gone to the trouble of seeking authorization otherwise.

## DISCUSSION & IMPLICATIONS

This study analyzed the experiences of state agency personnel with implementing state authorization reciprocity for higher education. Specifically, this research examined the influence of the State Authorization Reciprocity Agreement—also known as SARA—on state agencies' staff time and student complaint processes and identified the key costs and benefits of joining SARA as perceived by study participants. The findings were as follows:

- In general, existing employees of state agencies were given SARA responsibilities in addition to their already-assigned job duties, and that number of staff dedicated to SARA issues was small.
- State-level SARA implementers reported that they have received satisfactory training from NC-SARA and regional compacts, and that the costs of training are covered by those organizations.
- State-level student complaint processes have not appreciably changed as a result of SARA, and complaints reaching the state level remain rare. State agency staff's engagement with other states to resolve complaints has been generally limited to referring complaints to the home-states of the institutions and keeping the students' states updated on how the complaint process proceeds.
- The most frequently mentioned cost of joining SARA was the additional staff time needed to implement the agreement, although other costs have included administrative expenses and a reduction in revenues from out-of-state institutions seeking authorization.
- States are also unable to enforce their own higher education-specific consumer-related regulations against out-of-state SARA institutions.
- State-level benefits of joining SARA include saving time due to fewer out-of-state inquiries, receiving free training and information about state authorization reciprocity, and developing relationships with counterparts across states.
- Respondents frequently mentioned that institutions benefit substantially from not having to spend time and money obtaining authorization from numerous states. Several also mentioned that students benefit indirectly from having a larger number of educational opportunities and having all SARA institutions meet a minimum requirement for authorization, because some states did not require authorization for out-of-state institutions prior to joining SARA.

For reciprocity to be effective, parties to a reciprocity agreement must trust others to uphold their side of the bargain (Kahan, 2003). States participating in SARA must trust not only that other participating states will abide by the contract's terms, but also that the agreement's authorization standards and processes for revising them have—in the words of one study participant—"integrity." As noted above, even some states that were concerned about having to give up their ability to enforce higher education-specific consumer laws ultimately joined SARA. Thus, for state authorization reciprocity to succeed in a way that protects the interests of students and states with stringent consumer protection policies, the reciprocity agreement must hold all participants to high standards. Respondents in this study expressed faith in SARA and NC-SARA's process for reviewing and updating its standards. However, for all affected parties to maintain trust in SARA, it is important to ensure

that all states, federal regulators, and consumer protection organizations to share confidence in the substance and process of state authorization reciprocity.

There are several recommendations for policy based on this research. First, states should build capacity for SARA implementation by providing additional staff to administer the agreement. When states joined SARA, they typically assigned SARA responsibilities to existing staff, who were still expected to perform many or all of their other job duties. Respondents often reported working with a small number of staff or being the sole SARA administrator in their agency. This finding aligns with prior research of state authorization agencies reporting limited staff capacity (Hall-Martin, 2021; Natow et al., 2023). Evidence from the present study shows that limited staff capacity remains problematic. For state authorization reciprocity to be implemented efficiently, and to guard against disruptions to consumer protection that would result should a staff member doing all or most SARA administration leave the agency, states should increase funding and personnel for these agencies.

Additionally, under SARA, states remain unable to enforce their own higher education-specific consumer protection regulations against SARA member-institutions (NC-SARA, 2023). Although SARA does provide a minimum standard for member-institutions to meet, it also provides a limit—or in the words of one of this study’s respondents, a “ceiling”—on states’ ability to enforce stronger consumer protection laws (see also The Institute for College Access & Success, 2023). To enable states to enforce a higher standard of consumer protection for distance learning providers educating students within their states, NC-SARA or federal policy should be amended to remove the “ceiling” on state-level higher education-specific consumer protection enforcement for participating states when those policies exist beyond the initial authorization process.

Regarding student complaints, this study found that a student’s state of residence has little engagement with the institution’s home state when resolving complaints made by a student in their state beyond being kept apprised of how the complaint has resolved. To encourage greater oversight of out-of-state distance education providers, SARA should provide for students’ home states to play a more active role in resolving complaints that reach the state level. Moreover, the finding that the volume of student complaints is low at the state level may be cause for concern. Consumer advocates warned that SARA’s requirement that students first undergo their institution’s own complaint process before filing a complaint with the state could “slow[] the flow of potentially critical information to the home state” (The Institute for College Access & Success, 2023, p. 2). A respondent in this study voiced a similar concern that students may not file appeals with the state because “they might be emotionally or physically exhausted” after going through their institution’s procedure, or because they may not be aware that filing a complaint with the state is an option. Students may be even less likely to file a complaint with a state in which they do not reside, even if the institution they attend is physically located there. However, it is also possible that students are not filing appeals with the state because their complaints were adequately resolved at the institutional level—a perspective shared by another respondent in this research. The issue of why student complaints are rare at the state level was beyond the scope of this study, but future research should investigate this question, as additional data on students’ experiences with institutional and state-level complaint processes can help inform policy recommendations for how these processes could be improved to better protect students. In the meantime, to encourage students to pursue unresolved complaints at the state level, information should be provided to students about the process for appealing a complaint through the state, and students should be permitted to file complaints with their own states even when their institution is located elsewhere.

Finally, respondents of this study expressed overall satisfaction with SARA, and with NC-SARA and regional interstate compacts as coordinators of state authorization reciprocity. Specifically, state-level SARA staff tend to be satisfied with the training and information they have received from these entities, as well as the working relationships they have developed with NC-SARA staff and their counterparts in other states. NC-SARA has a process for modifying SARA policy, which includes a public comment period and the involvement of SARA member-states in the decisions for modification (NC-SARA, 2023). Respondents in this study also spoke about being part of NC-SARA’s regional steering committees and having a voice in SARA policy processes. Given NC-SARA’s widespread adoption, general popularity with state-level staff, and internal process for revision of SARA policy, parties wishing to propose changes to SARA may find it effective to pursue such change via NC-SARA’s own modification process.

## REFERENCES

- Adeoye-Olatunde, O. A., & Olenik, N. L. (2021). Research and scholarly methods: Semi-structured interviews. *Journal of the American College of Clinical Pharmacy*, 4(10), 1358-1367.
- Boatman, A., & Borowiec, K. (2021). *State authorization for short-term career-oriented credentials: evidence from five states*. State Higher Education Executive Officers Association. [https://sheeo.org/wp-content/uploads/2021/08/Boatman\\_Borowiec.pdf](https://sheeo.org/wp-content/uploads/2021/08/Boatman_Borowiec.pdf)
- Bowen, G. A. (2009). Document analysis as a qualitative research method. *Qualitative Research Journal*, 9(2), 27-40.
- Díaz-Oreiro, I., López, G., Quesada, L., & Guerrero, L. (2019, November 20). Standardized questionnaires for user experience evaluation: A systematic literature review. *13th International Conference on Ubiquitous Computing and Ambient Intelligence UCAmI 2019*. <https://doi.org/10.3390/proceedings2019031014>
- Hall-Martin, M. E. (2021). *Capacity to protect: A survey of state authorization agencies and offices*. State Higher Education Executive Officers Association. <https://files.eric.ed.gov/fulltext/ED614978.pdf>
- Hegji, A. (2023). *Institutional eligibility for participation in Title IV student financial aid programs* (CRS Report R43159, Version 18. Updated). Congressional Research Service.
- Hill, M. A. (2015, July). *A more uniform way of recognizing online degree programs across state lines, with SARA as a focus*. American Council on Education.
- Hutchens, N. H., Fernandez, F., & Edmondson, M. (Forthcoming). State law and protecting students from predatory for-profit colleges and universities. *Education Law Reporter*.
- Kahan, D. M. (2003). The logic of reciprocity: Trust, collective action, and law. *Michigan Law Review*, 102(1), 71-103.
- Longanecker, D., & Hill, M. A. (2014). The State Authorization Reciprocity Agreement (SARA): A good idea whose time has come. *Change: The Magazine of Higher Learning*, 46(3), 45-52
- McCann, C., & Laitinen, A. (2019, November). *The Bermuda Triad: Where accountability goes to die*. New America.
- Miles, M. B., Huberman, A. M., & Saldaña, J. (2019). *Qualitative data analysis: A methods sourcebook* (4<sup>th</sup> ed.). Sage.
- NASDTEC. (n.d.). *Interstate Agreement*. <https://www.nasdtec.net/page/Interstate>
- National Center for Interstate Compacts. (2020, April). *Occupational licensure: Interstate compacts in action*. National Center for Interstate Compacts. [https://compacts.csg.org/wp-content/uploads/2020/11/OL\\_Compacts\\_InAction\\_Update\\_APR\\_2020-3.pdf](https://compacts.csg.org/wp-content/uploads/2020/11/OL_Compacts_InAction_Update_APR_2020-3.pdf)
- National Geographic. (2009). *United States regions*. <https://images.nationalgeographic.org/image/upload/v1645695678/EducationHub/files/us-regions-no-state-names.pdf>
- Natow, R. S., Reddy, V., & Ioannou, V. (2023). State-level responses to US federal policy on state authorization for higher education. *Education Policy Analysis Archives*, 31(4), 1-29.
- NC-SARA. (n.d.-a). *About NC-SARA*. <https://www.nc-sara.org/about-nc-sara>
- NC-SARA. (n.d.-b). *SARA-participating institution directory*. <https://nc-sara.org/directory>
- NC-SARA. (n.d.-c). *State fees for in-state institutions*. <https://nc-sara.org/state-fees-state-institutions>
- NC-SARA. (2023, June). *SARA Policy Manual Version 23.1*. National Council for State Authorization Reciprocity Agreements.
- NC-SARA & NCHEMS. (2021, April). *Institution cost savings study: Technical report*. [https://nc-sara.org/sites/default/files/files/2021-04/InstitutionCostSavingsTechnicalReport\\_4-13-21.pdf](https://nc-sara.org/sites/default/files/files/2021-04/InstitutionCostSavingsTechnicalReport_4-13-21.pdf)
- Ness, E., Baser, S., & Dean, M. (2021). *State authorization landscape and process: An inventory, classification, and analysis*. State Higher Education Executive Officers Association. [https://sheeo.org/wp-content/uploads/2021/09/StateAuthorizationLandscape\\_NessBaser.pdf](https://sheeo.org/wp-content/uploads/2021/09/StateAuthorizationLandscape_NessBaser.pdf)
- Perry, A., & Cochrane, D. (2018). *Going the distance: Consumer protection for students who attend college online*. Institute for College Access & Success.

- Siek, A., Lah, B., Marquez, D., & Redmond, P. (2013). Executive summary on reciprocity. *Supreme Court of the State of New Mexico*. [https://digitalrepository.unm.edu/cgi/viewcontent.cgi?article=1210&context=law\\_facultyscholarship](https://digitalrepository.unm.edu/cgi/viewcontent.cgi?article=1210&context=law_facultyscholarship)
- Swain, J. (2018). *A hybrid approach to thematic analysis in qualitative research: Using a practical example*. Sage Research Methods. <https://doi.org/10.4135/9781526435477>
- Tandberg, D. A., Bruecker, E. M., & Weeden, D. D. (2019, July). *Improving state authorization: The state role in ensuring quality and consumer protection in higher education*. State Higher Education Executive Officers Association.
- The Institute for College Access & Success. (2023, March). *Understanding state authorization, reciprocity, and NC-SARA to protect distance education students*. The Institute for College Access & Success.
- U.S. Census Bureau. (2023). *Annual population estimates, estimated components of resident population change, and rates of the components of resident population change for the United States, states, District of Columbia, and Puerto Rico: April 1, 2020 – July 1, 2022 (NST-EST2022-ALLDATA)*. U.S. Census Bureau. <https://www2.census.gov/programs-surveys/popest/datasets/2020-2022/state/totals/NST-EST2022-ALLDATA.csv>
- U.S. Department of Education. (2022, February). *Table 317.20. Degree-granting postsecondary institutions, by control and classification of institution and state or jurisdiction: 2020-21*. U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS). [https://nces.ed.gov/programs/digest/d22/tables/dt22\\_317.20.asp](https://nces.ed.gov/programs/digest/d22/tables/dt22_317.20.asp)
- U.S. Senate Committee on Health, Education, Labor, & Pensions. (2012, July 30). *For profit higher education: The failure to safeguard the federal investment and ensure student success*. United States Senate. [https://www.help.senate.gov/imo/media/for\\_profit\\_report/PartI-PartIII-SelectedAppendixes.pdf?](https://www.help.senate.gov/imo/media/for_profit_report/PartI-PartIII-SelectedAppendixes.pdf?)
- Western Interstate Commission for Higher Education. (n.d.). *W-SARA regional steering committee (RSC)*. <https://www.wiche.edu/collaboration-leadership/w-sara/staff-and-steering-committee/>

## APPENDIX

Appendix Table 1: Questions and Number of Responses to Closed-Ended Standardized Questions

Text of Closed-Ended Question	Number of Responses Online	Number of Responses via Interview	Total Number of Responses
Does your work in a state-level higher education agency involve the State Authorization Reciprocity Agreement (SARA)?	16	4	20
Prior to joining SARA, did your state have in place laws or regulations that required out-of-state institutions that offered online postsecondary education to your state's residents to be authorized by your state?	15	2	17
Does your state have in place any education-specific consumer protection laws or regulations that existed prior to the state joining SARA?	15	3	18
Are your state's staff trained in NC-SARA standards?	15	3	18
Does your state have dedicated SARA staff?	15	4	19
Were these staff hired after your state joined SARA?	9	2	11
After your state joined SARA, did the amount of time it takes the state to authorize a new institution of higher education offering online education in your state increase, remain about the same, or decrease?	14	3	17
Does your state have in place any laws or regulations that permit students to directly file complaints about higher education institutions with the state without first exhausting their institution's internal complaint process?	14	4	18
Has your state investigated, in response to a student complaint, a SARA institution located in another state but enrolling students in your state?	13	4	17
After your state joined SARA, did the number of student complaints about online higher education programs increase, remain about the same, or decrease?	14	3	17
After your state joined SARA, did the amount of time it takes the state to resolve student complaints about higher education institutions increase, remain about the same, or decrease?	14	3	17
Do institutions (SARA and non-SARA) authorized in your state pay an annual fee to the state to remain authorized?	14	3	17
Do SARA-participating institutions headquartered in your state pay any additional fees to the state in order to participate in SARA?	14	4	18
If you responded yes to the question above, are those fees sufficient to cover the costs associated with administering SARA?	9	1	10