



Southern Regional Education Board
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December 7, 2020

National Council for State Authorization Reciprocity Agreements
3005 Center Green Drive, Suite 130
Boulder, CO 80301

RE: SARA Policy Change Recommendation

Dear Dr. Williams,

The Southern Regional Education Board (SREB) SARA staff and Regional Steering Committee recommend a change to the institutional application for initial and renewal participation. Currently, the state application addresses the need to review an institution's catastrophic events policy or disaster recovery plan to ensure students are protected in the event of an unanticipated closure. The SREB staff and S-SARA RSC members believe that item #11 on the institutional application should be more aligned with item #15 of the state application. This year, our region has been affected by hurricanes, tornadoes, floods, earthquakes, and a pandemic, as well as institutional consolidations and closures. It is more important than ever for institutions to carry on business during short or long-term campus closures, and to protect student's interests during temporary or permanent closures. We feel the specific language below reiterates the importance of having a disaster recovery plan for catastrophic events. The language also makes it very clear that the State Portal Entity may request the institution to provide this plan and/or policy when the institution renews or applies initially for participation in SARA.

We therefore recommend revising item #11 of the institutional initial and renewal application as follows:

11. The institution agrees that it has well-documented policies and practices for addressing catastrophic events or closures as follows:
 - a) The catastrophic event policy meets state requirements.
 - b) The catastrophic event policy or disaster recovery procedures address permanent and temporary closures, and may include weather-related, cyber threats, pandemic, or other health-related closures.
 - c) Students who are affected by any type of closure will receive the services for which they have paid or reasonable financial compensation for those not received. Such assurances may include tuition assurance funds, surety bonds, irrevocable letter of credit, assistance with transfer, teach-out provisions or other practices deemed sufficient to protect consumers.

- d) The institution or its home state has adequate measures to protect student records in the event of closure.
- e) The institution agrees to provide the catastrophic event policy and disaster recovery procedures to the State Portal Entity and documentation that such procedures meet federal and accreditation requirements for review if/when requested.

Should you have questions or need additional information, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Wanda Barker". The signature is written in a cursive, flowing style.

Wanda Barker, SREB-SARA Director
Southern Regional Education Board

C: Stephen Pruitt, SREB President
Angela Lee, S-SARA RSC Chair
Terrence Scarborough, S-SARA RSC Vice Chair