



National Council for
State Authorization Reciprocity Agreements

A voluntary, regional approach to state oversight of distance education



WICHE Cooperative for
Educational Technologies

John B. King, Jr.
Secretary of Education
U.S Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

January 10, 2017

Dear Secretary King:

We are writing to request that the Department of Education (ED) as soon as possible provide a “technical correction” communication or a “Dear Colleague” letter clarifying ED’s definition of a “state authorization reciprocity agreement” in the recently promulgated rules on state authorization of distance education (34 CFR Parts 600 and 668 [Docket ID ED–2016–OPE–0050]).

As you are aware, there has been confusion in the field on this matter. Many people (ourselves included) interpreted ED’s language to be strongly detrimental to the use of state-to-state reciprocity as a means for institutions to demonstrate the authorization needed to allow students located in states other than that of the institution to be eligible for federal financial aid.

Recent communications with ED staff have indicated that our interpretation is not what ED intended. (See: <https://wcetfrontiers.org/2017/01/09/ed-clarifies-reciprocity/>) While that is certainly good news for the 47 states, the District of Columbia, and the 1,300 institutions participating in SARA, the country’s largest state authorization reciprocity agreement, those communications lack the official imprimatur of the Department.

Consequently, on behalf of the organizations we represent (see below), we request that ED remove uncertainty on this matter through whatever means is most expedient, while conveying the official position of the Department. If there is any way we can assist you in that process, we would be pleased to do so.

Sincerely,

Marshall A. Hill
Executive Director
NC-SARA

Russ Poulin
Director, Policy and Analysis
WCET

C: Ted Mitchell, Undersecretary of Education

About NC-SARA

The National Council for State Authorization Reciprocity Agreements (NC-SARA) coordinates a voluntary, regional approach to state oversight of postsecondary distance education. SARA is implemented by the Midwestern Higher Education Compact, the New England Board of Higher Education, the Southern Regional Education Board, and the Western Interstate Commission for Higher Education. See www.nc-sara.org

About WCET

The WICHE Cooperative for Educational Technologies (WCET) is the leader in the practice, policy, and advocacy of technology-enhanced higher education. WCET is widely recognized as one of the most informative, reliable and forward-thinking organizations regarding the role of technology and innovation in higher education. More information about WCET's institutional membership resources and services can be found on WCET's website - wcet.wiche.edu.

About WCET-SAN

The WCET/State Authorization Network (SAN) is a membership organization that provides training and support for navigating regulatory compliance for institutions' out of state activities. SAN fosters collaboration to navigate authorization regulations processes efficiently among its members that are represented by more than 500 institutions nationwide.

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