



CONNECTICUT STATE  
COLLEGES & UNIVERSITIES  
BOARD OF REGENTS FOR HIGHER EDUCATION

**Testimony by Ed Klonoski, President  
Charter Oak State College**  
Board of Regents for Higher Education  
Before the Higher Education and  
Employment Advancement Committee  
February 10, 2015

Good Morning Chairs Willis and Bartolomeo, Ranking Members Betts and Witkos, and members of the Committee. My name is Ed Klonoski, and I am president of Charter Oak State College, the state's only public distance learning institution. Charter Oak is one of the 17 institutions governed by the Board of Regents for Higher Education, and I am here today on behalf of the CSCU system to testify in support of **H.B. No. 6715: AN ACT REQUIRING CONNECTICUT TO PARTICIPATE IN THE STATE AUTHORIZATION RECIPROCITY AGREEMENT REGARDING DISTANCE LEARNING.**

Charter Oak State College, as well as other institutions in our system, have been disadvantaged by the lack of a national reciprocity agreement for years. Currently, any online educational program — regardless of whether it has a physical presence in another state — must register in any state or U.S. territory in which it has students. Since approximately 30% of Charter Oak's students come from other states, we have registered in all 50 states for the past several years. This process is expensive, time consuming, and sometimes, arbitrary. Years of working to comply with these individual state requirements leads me to no other conclusion.

Let me stress the key reasons that the Board of Regents encourages the legislature to adopt the reciprocity agreement:

- The status quo is unworkable and restricts the ability of Charter Oak and other institutions to offer educational opportunities nationwide.
- The agreement is voluntary. No institution in a state that adopts SARA will be forced to participate. All institutional participation is optional, and the current regulatory structure will remain in place for institutions that do not participate.
- States join for free, and institutions pay much smaller fees to SARA than they do to each of the individual states.
- The consumer protection role required by the SARA agreement will be played in Connecticut by OHE, which has that role currently.
- The SARA standards, while not identical to Connecticut's current standards, are so similar as to guarantee no reduction in quality here at home..

This is the second year that we have supported a bill authorizing the state to participate in State Authorization Reciprocity Agreement (SARA). This year we have evidence from states that have already adopted SARA—several of whom have dramatically more home institutions than does Connecticut—that the oversight required by SARA does not place a significant fiscal burden on their respective state higher education offices (see attached Cost Compilation document).

As you may know, Vermont and New Hampshire have already authorized SARA for their state's higher education institutions, and the other New England states are making substantial progress toward adoption. With 19 states already approving participation in SARA, it also leaves Connecticut in the position of appearing unwilling to place its distance learning products on the national stage.

For any online program, a national reciprocity agreement such as the SARA offers both a simpler approach to protecting students from inferior service and a higher bar for that service. Now it is true that Connecticut has both a competent higher education consumer protection service — the Office of Higher Education — and high standards for the performance of its licensed institutions. But it is equally true that every online program exports a product and brings revenue back into the state, and, as such, has a strong interest in consistent, efficient, and standardized approaches to registering in other markets. The nature of this online market is that it is disadvantageous for Connecticut to behave as if it is a special or unique market. For Charter Oak, just like for any institution similar to ours nationwide, the market is any student, anywhere.

Distance education is not a local industry. By definition, it defies geography and offers institutions the opportunity to sell their education products to the world. That means that quality assurance and consumer protections are more critical than ever, but should be just as borderless. SARA accomplishes both of those purposes — it raises the quality bar for many states and it creates a single national process for registration for those institutions that serve students beyond a physical campus structure.

I am happy to answer questions you may have about the inner workings of the agreement and its effect on our institutions.



## New England Board of Higher Education State Authorization Reciprocity Agreement

*A voluntary, regional approach to state oversight of distance education*

The following data was collected from national State Portal Agencies in authorized SARA states. Participants were emailed a link that allowed N-SARA to collect information around SARA positions and procedures. While some respondents note that they have yet to formally accept applications, it's clear that the institutional application process is streamlined, as proven through low estimated review times. Another key trend to note from respondents is that SARA duties have either been assigned to an existing position, or to part-time personnel. As SARA enters its first full official year, more data will be available as institutions apply to their State Portal Agencies.

### **Minnesota Office of Higher Education**

- Manager, Institutional Registration & licensing
- Assigned to an existing position
- No Specialized SARA training, have not received any applications

### **Louisiana Board of Regents**

- Deputy Commissioner for Planning, Research & Academic Affairs
- Assigned to an existing position
- No Specialized SARA training, have not received any applications

### **West Virginia Higher Education Policy Commission**

- Director of Academic Programming
- Assigned to an existing position
- Estimated total time to review each institutional application, 2 hours
- No Specialized SARA training
- Student complaints are stabilized, state typically does not receive many complaints

### **Washington D.C.**

- Executive Director, DC Education Licensure Commission
- Assigned to an existing position, Compliance Specialist Salary
- No training as "the skills required by the Education Compliance Specialist for the work they currently perform in the review of institutional applications would be comparable"

### **Iowa College Student Aid Commission**

- Compliance Officer
- SARA position is part-time, will hire or reassign an existing staff person
- Currently do not receive any appreciable complaints from the Iowa schools, and don't expect SARA to have an impact on Iowa complaints

### **Nebraska's Coordinating Commission for Postsecondary Education**

- Academic Programs officer
- Assigned to an existing position (estimate 5% of current position will be SARA work)
- Estimated total time to review each institutional application, 1 hour
- No Specialized SARA training

- Complaints have neither increased nor decreased

**Missouri Department of Higher Education**

- Deputy Commissioner/Research Associate
- Assigned to existing position (estimating 1/3 FTE)
- Estimated total time to review initial institutional application, less than one hour
- No Specialized SARA training