



State of Rhode Island and Providence Plantations
Council on Postsecondary Education
OFFICE OF THE POSTSECONDARY COMMISSIONER
560 Jefferson Boulevard Suite 100
Warwick, Rhode Island 02886-1304

Enclosure 7b1
October 14, 2015

Barbara S. Cottam
Chair

To: Council on Postsecondary Education

**Council on Elementary and
Secondary Education**

From: Commissioner Jim Purcell, Ed.D.

Date: October 9, 2015

Daniel P. McConaghy
Chair

Re: Update of NC-SARA Application

Amy Beretta, Esq.

Below is a brief outline of progress on Rhode Island's application to become a member state of the National Council for State Authorization Reciprocity Agreements (NC-SARA):

Colleen A. Callahan, Ed.D.

Karin Forbes

- Initiated application process with both NC-SARA and the New England Board of Higher Education (NEBHE) – **July and August**

Jo Eva Gaines

- Held several in-person and tele-conference meetings with NEBHE staff regarding application process – **August to Present**

Marta V. Martinez

- As part of supporting documentation, initiated legal and policy research in order to determine areas where policy amendments are needed – **August to Present**

Lawrence Purtill

Joyce L. Stevos, Ph.D.

- In addition to Chapter 231 – the new Distance Learning State Authorization Reciprocity Agreement Statute – determined that the following legal statues that must be included as part of application – **August to September:**

**Council on Postsecondary
Education**

William Foulkes
Chair

- RIGL § 16 – 40 – 16 – Student Records and School Closings – NC-SARA/NEBHE needed verification that the Council on Postsecondary Education and the Commissioner of Postsecondary Education have authority to oversee and regulate the closing of degree-granting postsecondary institutions;

Michael Bernstein

Dennis Duffy, Esq.

- Sec. 498(c) 34 CFR 668 Subpart L – Federal Financial Responsibility – NC-SARA/NEBHE needed to ascertain if Rhode Island could determine whether a school participated in the FSA programs as a means for demonstrating financial responsibility;

The Honorable Thomas Izzo

Judy Ouellette

Kerry I. Rafanelli, Esq.

- RIGL § 30-15-9 – Governor's responsibilities relating to disaster emergencies – NC-SARA/NEBHE needed to determine the executive authority in cases where a catastrophic event interfered or disrupted an institution's ability to provide on-line instruction and programs.

John J. Smith, Jr.

Dr. Jeffery A. Williams

- Determined that the following CPE policies need to be updated in order to comply with SARA guidelines – **August to Present:**

- CPE Student Complaint Procedure – Needs updating to comply with SARA guidelines – **Scheduled for first discussion at October 14th CPE meeting**
- CPE Distance Learning Policy – Needs updating to comply with SARA guidelines – **Scheduled for first discussion at October 14th CPE meeting**

The NC-SARA legal and program staff, in addition to the NEBHE program staff, reviewed Rhode Island's preliminary SARA application, and contingent upon the acceptance and passage of the needed policy changes by the Council, they deemed this application acceptable.

After the official application is submitted for final review, NEBHE will assemble a regional review committee, which will then make a recommendation to the full NEBHE board.

In anticipation that the application will be approved, the OPC staff is establishing a process for institutions to apply for approval through the RI-SARA portal agencies (OPC and CPE). In addition, they are developing the appropriate online "Student Complaint and Institutional Application" forms as part of our student/consumer protection and institutional approval obligations in accordance with the NC-SARA guidelines.