



April 17, 2015

RECEIVED

MAY 12 2015

South Carolina Commission
on Higher Education
Academic Affairs Division

Mr. John L. Finan
Chair, SC Commission on Higher Education
220 Holiday Road
Columbia, SC 29223

Dear Mr. Finan:

We strongly encourage the South Carolina Commission on Higher Education (CHE) to advocate that South Carolina participate in the national State Authorization Reciprocity Agreement (SARA). The state's participation in SARA will, collectively, save our institutions hundreds of thousands of dollars annually.

State Authorization is the requirement wherein any college or university that offers online degree programs to residents of another state must be specifically approved by the state in which the student resides. The application process can be extensive and costly, and for some states (e.g., North Carolina), requires an on-site visit of the authorization team. Many states have additionally used State Authorization to regulate traditional students' experiential learning activities (e.g., internships) at sites in their state if the student is enrolled in an out-of-state school. These state regulations have necessitated that each of our universities employ individuals, or protect time for current employees, at considerable expense, to ensure our institution is in compliance with the diverse requirements of each state and to maintain compliance annually.

The State Authorization Reciprocity Agreement reduces this burden through mutual agreements among participating states. Specifically, it is an agreement among member states that establishes comparable national standards around the country for offering online Distance Education, as well as interstate experiential learning. SARA is overseen by a National Council and administered by four regional education compacts. South Carolina's compact is the Southern Regional Education Board (SREB). As of March 2015, 20 states have joined the SARA agreement, and 200 institutions are now benefiting from their states' membership. Another 11 states have introduced, passed, or did not require legislative changes that would allow them to enter into reciprocity agreements with other states.

For more information: <http://nc-sara.org/files/docs/SARA-FAQs.pdf>

To allow South Carolina to avail itself of the advantages that SARA affords, it will require action by the CHE, and the

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State Legislature must grant the CHE the authority to enter into SARA on behalf of South Carolina. We urge the CHE to move quickly to initiate the procedures that would allow South Carolina to participate in SARA.

Thank you for your attention to our request.

Sincerely,



Robert H. Jones
Executive Vice President for
Academic Affairs and Provost
Clemson University



Mark S. Sothmann
Vice President for Academic Affairs
and Provost
Medical University of South Carolina



Helen Doeringhaus
Interim Executive Vice President for
Academic Affairs and Provost
University of South Carolina



James P. Clements
President
Clemson University



David J. Cole
President
Medical University of South Carolina



Harris Pastides
President
University of South Carolina

cc: Ms. Julie Carullo
Interim Executive Director, SC CHE

Dr. MaryAnn Janosik
Director of Academic Affairs, SC CHE



Francis Marion University



Mr. John L. Finan, Chair
SC Commission on Higher Education
220 Holiday Road
Columbia, SC 29223

Dear Mr. Finan:

The public comprehensive universities of South Carolina encourage the South Carolina Commission on Higher Education (CHE) to pursue the State of South Carolina's membership in the State Authorization Reciprocity Agreement (SARA). Currently, the public comprehensives conservatively estimate that not joining SARA is costing the institutions collectively in excess of \$100,000/year.

As you know, state authorization is required of all institutions of higher education in order to enroll residents from other states in any online course or program. To get state authorization, institutions that offer online classes and programs must receive authorization from the state(s) in which the students reside. In addition to online courses and programs, many states have used the state authorization process to regulate internships and clinical experiences for traditional (face-to-face) students who request out-of-state placements. Therefore, the state authorization process has become time consuming and costly for institutions, particularly smaller institutions like the comprehensives.

Joining SARA would reduce the burden for all institutions of higher education and help save the state money.

Additional information on SARA can be found at <http://nc-sara.org/files/docs/SARA-FAQs.pdf>.

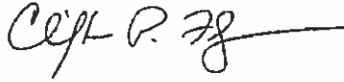
In order for South Carolina to join SARA, the State Legislature would have to grant CHE the authority to apply for membership in SARA on behalf of the state. The comprehensives urge CHE to pursue membership in SARA as soon as possible.

Please feel free to contact us if you have any questions or require further information.

Sincerely,



Jeffrey M. Priest, Ph.D.
Executive Vice Chancellor
for Academic Affairs
USC Aiken



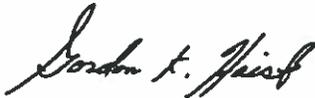
Clifton P. Flynn, Ph.D.
Interim Senior Vice Chancellor
for Academic Affairs
USC Upstate



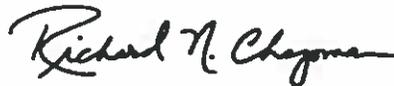
J. Ralph Byington, Ph.D.
Provost and Executive Vice President
Coastal Carolina University



Debra C. Boyd, Ph.D.
Provost and Vice President
for Academic Affairs
Winthrop University



Gordon K. Haist, Ph.D.
Interim Executive Vice Chancellor
for Academic Affairs
USC Beaufort



Richard Chapman, Ph.D.
Provost and Dean of the College
of Liberal Arts
Francis Marion University



Learie B. Luke, Ph.D.
Acting Provost
South Carolina State University



Connie L. Book, Ph.D.
Provost and Dean of College
The Citadel



S. David Mash, Ph.D.
Provost and Vice President for
Academic Affairs
Lander University

cc: Ms. Julie Carullo
Interim Executive Director, SC CHE



July 7, 2015

Mr. John L. Finan, Chair
South Carolina Commission on Higher Education
1122 Lady Street, Suite 300
Columbia, SC 29201

Dear Commissioner Finan:

With the support of President Glenn McConnell, I am writing on behalf of the College of Charleston and its component, the University of Charleston, South Carolina (hereafter, "the College"). The College wishes to join other South Carolina public universities in encouraging the Commission on Higher Education (hereafter, "CHE") to pursue membership for South Carolina in the State Authorization Reciprocity Agreement (hereafter, "SARA").

The business case for South Carolina's membership in SARA has been rehearsed in previous discussions of the Commissioners and higher education leaders in South Carolina. Since our initial conversations in 2014, the College's further review has convinced us of the likely benefits of SARA membership for the state. Briefly, SARA membership will almost certainly reduce the operating expenses for the College and for other South Carolina universities, while allowing for improved customer service for South Carolinians taking university courses in South Carolina and elsewhere. Please see <http://nc-sara.org/> for more information.

We all are concerned by the increasing burden of federal and state regulations that have the effect, whether anticipated or not, of increasing cost and reducing efficiency. I have had the personal experience of supervising senior staff in their time-consuming review of and response to a patchwork of regulatory requirements in several different states, with a resulting decline in the staff time and attention that can be devoted to other critical work of the College. I estimate that one major review of our 50-state obligations during the 2014-2015 academic year was conducted by the College at a cost of over \$10,000 in staff wages and other expenses, separate from and in addition to the costs of our ordinary, recurring work on regulatory compliance in this area. SARA membership for South Carolina should be an effective tool for counteracting one particularly onerous expansion of regulatory oversight in higher education.

I thank you and all the members of the Commission for your continued support of our public universities. Please let me know if you have any questions about the College's position.

Sincerely,

Brian R. McGee, Ph.D.

cc: Glenn McConnell, President
Debbie Hammond, Senior Executive Administrator to the President



August 4, 2015

James C. Williamson
System President

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Ex Officio

Brigadier General John L. Finan, Chair
South Carolina Commission on Higher Education
1122 Lady Street, Suite 300
Columbia, South Carolina 29201

Dear General Finan:

The South Carolina Technical College System (SCTCS) requests that the South Carolina Commission on Higher Education join the State Authorization Reciprocity Agreement (SARA). We urge the Commission, through its staff and the Committee on Academic Affairs and Licensing, to address and resolve any administrative or legislative changes necessary to allow a successful application to move forward.

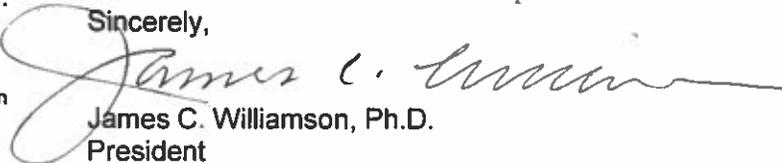
Many of the technical colleges have extensive distance learning programs that now require licensing in almost every state in which there is an enrolled student. This is a very expensive, repetitive, and time consuming process. More of colleges would consider expanding their distance education programs but for the onerous federal and state regulations.

SARA participation is voluntary. Member states and individual institutions work together through the four existing regional higher education compacts for the expressed purpose of improving the efficiency and quality assurance of distance education as a tool to increase educational attainment. Almost half of the states are members of SARA with more joining on a regular basis.

The technical colleges are aware that institutional participation in SARA – like state participation – is voluntary, and when South Carolina joins SARA, each college will have the opportunity to choose whether to participate.

Thank you very much for your consideration.

Sincerely,



James C. Williamson, Ph.D.
President

cc: Dr. Bettie Rose Horne, Chair
Committee on Academic Affairs and Licensing
Ms. Julie Carullo, Interim Executive Director





ALLEN

June 30, 2015

ANDERSON

BENEDICT

Brigadier General John L. Finan

CHARLESTON
SOUTHERN

Chair

CLAFLIN

South Carolina Commission on Higher Education

COKER

1122 Lady Street, Suite 300

COLUMBIA

Columbia, South Carolina 29201

COLUMBIA
INTERNATIONAL

Dear General Finan:

CONVERSE

ERSKINE

The twenty distinct and diverse members of South Carolina Independent Colleges and

FURMAN

Universities request that the South Carolina Commission on Higher Education join the

LIMESTONE

State Authorization Reciprocity Agreement (SARA). To that end, we urge the

MORRIS

Commission, through its staff and the Committee on Academic Affairs and Licensing, to

NEWBERRY

address and resolve any administrative or legislative changes necessary to allow a

NORTH
GREENVILLE

successful application to move forward.

PRESBYTERIAN

Many of our members have extensive distance learning programs that now require

SOUTHERN
WESLEYAN

licensing in almost every state in which there is an enrolled student. This is a very

SPARTANBURG
METHODIST

expensive, repetitive, and time consuming process that has been compared to

VOORHEES

qualifying for a driver's license in every state where one wishes to drive. More of our

WOFFORD

members would consider expanding their distance education programs but for the

onerous federal and state regulations.

SARA participation is voluntary. Member states and individual institutions work together through the four existing regional higher education compacts for the expressed purpose of improving the efficiency and quality assurance of distance education as a tool to increase educational attainment. Almost half of the states are members of SARA with more joining on a regular basis.

The members of SCICU realize that institutional participation in SARA – like state participation – is voluntary, and when South Carolina joins SARA, each of our private non-profit colleges and universities will have the opportunity choose whether to participate. Those who choose to join SARA understand that there will be some shared-costs associated with CHE's administration of the reciprocity agreements, but they expect that these costs will be far less than what they are currently facing.

P.O. BOX 12007

COLUMBIA, S.C.
29211

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Brigadier General John L. Finan

June 30, 2015

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Private institutions of higher learning who choose to join SARA understand that for SARA to be successful the institutions must agree to abide by SARA policies for their distance education operations outside of the state, that CHE has authority to confirm that they do, and that the decision to participate in SARA and come under the state's oversight would be for that limited purpose. It would not otherwise increase the state's oversight or control of the institution.

SCICU, on behalf of its members, suggests that CHE seek legislative authority to join a reciprocity agreement and our two organizations enter in to a memorandum of agreement that defines the duties, responsibilities, and limitations inherent in such a historic relationship between public and private higher education.

SCICU understands that the Advisory Committee for Academic Programs (ACAP), on behalf of the public higher education institutions in South Carolina, strongly favors South Carolina's participation in SARA. We agree with the ACAP Resolution of June 11, 2015, and similarly urge the Commission on Higher Education to take the appropriate action necessary for South Carolina and its private and public colleges and universities to participate in the State Authorization Reciprocity Agreement at the earliest possible time.

Thank you very much for your consideration.

Yours truly,

A handwritten signature in black ink that reads "Mike LeFever". The signature is written in a cursive, slightly slanted style.

Mike LeFever

Cc: Dr. Bettie Rose Horne, Chair
Committee on Academic Affairs and Licensing

Ms. Julie Carullo, Interim Executive Director

Dr. Evans Whitaker, Commissioner-Independent Higher Education