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1. Virginia: distance education originating from out of state has no standing in Virginia regulation. Thus, most of the SARA provisions relating to other states' institutions are "easy."
2. Legal/logistical context within Virginia.
 - a. Categories of Institution:
 - i. Publics, 2- and 4-year
 - ii. Regulated Privates
 - iii. Exempt Privates
 - b. SCHEV is the single agency that ranges over all three categories of institution. But, participating in SARA will require
 - i. Regulating in some fashion institutions that are officially "exempt;"
 - ii. Regulating the other institutions in ways that are not explicated in the Code of Virginia;
 - iii. Money.
 - c. Legislative approach
 - i. Keep as simple as possible: SCHEV authorized to "sign" for Virginia; to develop guidelines for Virginia institutions and implement via *voluntary* agreements; and to collect fees.
 - ii. SARA as "adjunct" to existent governance/regulatory relationships, all of which remain the same as before.
3. Institutional Experiences
 - a. Convened Task Force (precursor to Advisory Committee)
 - b. A number of institutions want SARA very much. Most do not need authorization in 50 states.
 - c. Discovery: substantial lack of capacity at some institutions to gain authorization in other states.
 - d. SARA, if implemented robustly, will help some Virginia institutions in realizing important institutional aspirations.
4. "Philosophical" Reflections
 - a. The entire situation in which we are enmeshed is *misguided*.
 - b. Critical mass—we need it, but we (or I?) don't know what it is.
 - c. Differences in regulatory schemes and political environments will make SARA-participation a heavy lift for some states, even if their SHEEO agency is willing.
 - d. I'm in it to help Virginia institutions—will be monitoring to see how level the playing field becomes for them....
 - e. SARA should plan for its own demise. We do not need a permanent regulatory superstructure dedicated to distance education.