

Fall 2025 NC-SARA Compliance Checklist for Universities of Wisconsin SARA Coordinators*
Office of Compliance and Risk Management
Universities of Wisconsin Administration
Effective July 1, 2025

How to Use This Checklist:

This checklist is designed to help UW institutions track compliance with the July 1, 2025, revisions to the [NC-SARA Policy Manual](#). Each section includes the relevant policy text, what changed in the new manual, specific requirements, deadlines, and a space to indicate whether your campus is currently fulfilling the requirement.

Note: Within the [SARA Policy Manual version 25.1](#), Section 9.2 Revisions to the Document: Revisions to the SARA Policy Manual highlights corrections and revisions implemented within the policy. The following is a high-level summary of the December 16, 2024 and July 1, 2025 revisions:

Date	Section(s) Affected	Key Change Description
December 16, 2024	1.39	Removed term "Rule" (not used as defined in manual).
December 16, 2024	1.41	Added definition of "SARA Policy" to distinguish from other manual content.
December 16, 2024	3.2.a.-f., 3.3	Expanded reasons for provisional status; required public notice of status and reasons.
December 16, 2024	3.2.e	Gave SPE authority to remove institution after 2 years of continuous provisional status.
December 16, 2024	3.8.c.-d.	Expanded criteria for removal from SARA; clarified state-specific requirements after loss of eligibility; ensured student protections.
December 16, 2024	4.4.a	Required complaint policy on website and in catalog/equivalent.
December 16, 2024	5.2	Clarified disclosures for programs leading to professional licensure.
December 16, 2024	7.1.a.-b., 7.2.a.	Added complaint data elements collected and shared by NC-SARA.
December 16, 2024	8.2.f.2, 8.2.f.4	Increased flexibility in policy review cycle calendar.
December 16, 2024	General edits	Corrected formatting/copy errors without changing policy substance.
July 1, 2025	3.2, 3.3, 3.7.b.6, 3.8.c-d, 5.2	Removed temporary "effective through June 30, 2025" and "effective beginning July 1, 2025" statements.

Instructions:

1. Review each topic area and confirm alignment with campus policies and practices.
2. Fill in the 'Deadline' column with the specific date for your institution.
3. Mark 'Yes' or 'No' under campus fulfillment. If 'No,' explain gaps or planned actions.
4. Use this document as a working record for institutional compliance.



Topic	Section & Text from Policy Manual	What Changed (Revisions / New Expectations)	Requirements (Checkpoints)	Deadline	Is Your Campus Fulfilling This Requirement? If 'No,' please explain.
Institutional Eligibility	Section 3.1 – Institutions and Participation: Institutions may be eligible ... including but not limited to: located in a SARA member state; degree-granting; accredited ... scope includes distance education.	No major changes — reaffirmed eligibility criteria.	• Confirm campus is in a SARA state. • Confirm authorization to grant degrees. • Confirm accreditation with distance education scope.	Ongoing; verify annually during SARA renewal	Yes / No
Financial Responsibility Composite Score (FRCS)	Section 2.5 – Financial Responsibility: Non-public institutions must have latest FRCS ≥ 1.5 or provide documentation if 1.0–1.49.	Clarified expectations and documentation flexibility for institutions in the 1.0–1.49 “provisional” band.	• Verify FRCS score. • Provide documentation if below 1.5. • Monitor future changes.	Annually, during SARA renewal or upon receipt of updated FRCS from US DOE	Yes / No
Provisional Status & Home State Notifications	Section 3.8, 3.2.e – Expanded reasons for provisional status; requires public notice when imposed.	New inclusion on public posting of provisional status required; expanded list of triggers for provisional status.	• Check if campus is on provisional status. • Ensure SPE publishes status and reasons. • Reflect status on institutional site if required.	Within 30 days of provisional status determination	Yes / No
Disclosure Requirements / Professional Licensure	Section 3.1 & 5.2 – Programs leading to licensure must disclose whether they meet requirements in each state.	Strengthened language; direct disclosure to students when program “does not meet” requirements in their state.	• List licensure programs, while providing accurate professional licensure requirement disclosures for each program. • Publish disclosures by state. • Send direct disclosures when needed.	Prior to student enrollment and updated as regulations change	Yes / No
Student Complaint Process	Section 4 – Institutions must handle complaints fairly and publish SPE process.	Clarified responsibility for timeliness and fairness; reaffirmed requirement to post SPE complaint info.	• Effective through 12/31/25: Provide university and SARA complaint resolution policies and	January 1, 2026 And within 30 days of policy	Yes / No



			procedures to all students taking courses under SARA policies. • Effective 1/1/26: Provide university and SARA complaint resolution policies and procedures to all students via the university's website and in the catalog (or equivalent information provided in print or electronically when they enroll). • Maintain campus complaint policy (update and ensure it includes clear procedures for resolving complaints, as per the new requirements). • Post SPE complaint process. • Ensure timely resolution.	implementation or update	
Marketing, Recruitment & Accuracy of Information	Section 4 – Institutions must provide accurate marketing and recruitment information.	Strengthened emphasis on accuracy in job placement claims, tuition, fees, accreditation, licensure.	• Audit marketing and recruitment. • Verify accuracy of tuition, accreditation, placement info. • Update outdated content.	Ongoing; conduct audits at least annually	Yes / No
Data Reporting	Section 6 – Annual reporting of distance education enrollments and out-of-state placements.	Clarified requirements to use NC-SARA Data Reporting Handbook and new reporting elements.	• Collect distance education enrollment data. • Track out-of-state placements. • Submit by deadlines.	Annually, EDEE and OOSLP annual data reporting each April/May	Yes / No
Arbitration Agreements	Section 4.4.g – Mandatory arbitration agreements not permitted for SARA students.	Clarified prohibition applies across all SARA students; required disclosure if any exist.	• Review student agreements. • Remove mandatory arbitration for SARA students. • Publish disclosures if applicable.	Immediately, remove existing agreements and publish disclosures if applicable	Yes / No
Institutional Compliance with Closure Laws	Section 3 – Must comply with closure laws in states where distance education is offered.	Clarified language to align with consumer protection laws and teach-out requirements.	• Identify states with DE students. • Ensure compliance with teach-out, refund, and recordkeeping laws. • Document protections.	Ongoing; ensure compliance at all times	Yes / No

*This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Board of Regents. Any decisions made by the Board of Regents in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

Additional Resources:

- Professional Licensure Directory: <https://nc-sara.org/professional-licensure-directory/>
- Quick Start Guides: <https://nc-sara.org/sara-quick-start-guides/>

References

NC-SARA Policy Manual, version 25.1, "SARA Policy Manual," NC-SARA, accessed Sept. 3, 2025.

Sarah Levy, senior director of policy and regulatory affairs at NC-SARA, email to the author, Sept. 15, 2025.