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U.S. Department of Education
34 CFR Parts 600 and 668
Docket ID ED-2018-OPE-0041
RIN 1840-AD39
Program Integrity and Improvement
Comments on Notice of Proposed Rulemaking
Submitted via regulations.gov

Dear Education Department Colleague:

I am writing on behalf of the University of Wisconsin (UW) System. The UW System is made up of two doctoral universities (UW-Madison and UW-Milwaukee), 11 comprehensive four-year universities, 13 two-year campuses, and statewide UW-Extension. The UW System serves approximately 170,000 students each year with about 39,000 faculty and staff.

The following comments are in response to the May 25 Notice in the Federal Register indicating that the U.S. Department of Education plans to delay implementation of the final state authorization regulations until July 1, 2020.

Wisconsin is one of eleven states participating in the Midwestern State Authorization Reciprocity Agreement (M-SARA). Similar agreements exist for the four regional higher education compacts to create an inter-regional agreement overseen by the National Council for State Authorization Reciprocity Agreements. This includes about 1,750 institutions from the current 48 SARA member states (plus the District of Columbia and the Virgin Islands). This nationwide framework ensures interstate reciprocity and simplifies the state authorization process for interstate offerings of postsecondary distance education courses and programs.

SARA was created for the specific purpose of streamlining the regulatory process while maintaining compliance with reasonable and consistent standards relating to financial scores, consumer protections and disclosure requirements. Institutions of higher education, including the UW System, are particularly concerned about additional federal regulation in this area – especially regulation that is not thoroughly vetted by stakeholders – which may diminish the

benefits of SARA and create additional regulatory burdens on institutions that SARA was designed to streamline.

The UW System supports delaying the final regulations. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Ray Cross". The signature is written in a cursive, flowing style.

Ray Cross
University of Wisconsin System