



March 14, 2022

Dear Negotiated Rulemaking Committee:

This letter is in response to the March 8, 2022 Issue Paper 6: *Certification Procedures – Session 3* regarding § 668.14 Program Participation Agreement, Subsection (32)(iii) (on page 7) that may be considered during your committee’s Session 3 on March 14-18, 2022.

Our organization, the Association of Schools Advancing Health Professions (ASAHP), is very concerned that should the proposed language move forward, the impact and efficacy of the gains from state authorization reciprocity under State Authorization Reciprocity Agreements (SARA) will be nullified, and that postsecondary institutions and their out-of-state distance education students – as well as prospective students – will be negatively impacted as a result.

ASAHP is a national association whose membership consists of over 125 nonprofit universities offering 175 different academic programs and more than 930-degree programs focused on allied health and the health sciences. BLS indicates that allied health occupations, which comprise a minimum of one-third of our nation’s health care workforce and range from certificate to doctoral level degrees in health related sciences, are among the fastest growing in our economy. Clinical experience is a core requirement of many allied health programs for graduation, and many of our members place students in out of state clinical rotations. State authorization reciprocity agreements have been vital in allowing our member institutions to provide these necessary clinical experiences.

As an organization working in this space, since SARA engaged its first member state in 2014, we have appreciated and valued the SARA policies regarding quality and student consumer protections that all states and SARA institutions must abide by; these consistent policies help raise the bar for quality distance education nationally. The proposed change in language in this subsection would **significantly and negatively impact the efficacy of reciprocity** among the 52 states and territories that are members of (SARA), and for the more than 2,300 SARA-participating institutions and students they serve.

If Subsection (32)(iii) is not withdrawn prior to finalization, NC-SARA has recommended the following language replace (32)(iii) in order to preserve the value and benefits of State Authorization Reciprocity Agreements (SARA):

*(iii) Complies with all State consumer protection laws, including both generally applicable State laws and those specific to educational institutions, except where inapplicable pursuant to a State authorization reciprocity agreement.*

We agree with this recommended replacement language so that the value and efficacy of SARA remains intact on behalf of states and distance education institutions and students nationally.



Thank you for your consideration,

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Executive Director