



DLAB

Distance Learning Authorization Board

Report of 2024 Activities

The Wisconsin Distance Learning Authorization Board (DLAB) was established by 2015 Wisconsin Act 208, on March 1, 2016. The Board is attached to the Wisconsin Higher Educational Aids Board (HEAB) for administrative purposes, and HEAB hosts a DLAB-related webpage on its website. The DLAB website is available at <http://www.heab.state.wi.us/dlab/index.html>. The DLAB serves as Wisconsin’s portal entity, making it possible for Wisconsin institutions of higher education, who serve out-of-state students through distance education, to participate in the State Authorization Reciprocity Agreement, or SARA. All U.S. states except California are SARA member states. The District of Columbia (DC) and the territories of Puerto Rico and the U.S. Virgin Islands are also members of SARA.

The DLAB has membership from each higher education sector including the University of Wisconsin System (UWS), the Wisconsin Technical College System (WTCS), the Wisconsin Association of Independent Colleges and Universities (WAICU) for private, nonprofit institutions, Wisconsin’s Tribal Colleges, and the Wisconsin Department of Safety and Professional Services for proprietary institutions.

As required by s. 39.87(3), *Wis. Stats*, annually by January 30, the DLAB shall submit a report “that summarizes the board’s actions taken during the immediately preceding calendar year.” This report was approved by the DLAB at its December 13, 2024, meeting for submission under s. 39.87.

Overview of State Authorization Reciprocity Agreement

In 2013, the U.S. Department of Education, states and institutions joined together to develop and establish the State Authorization Reciprocity Agreement (SARA) in response to the growing demand for distance education opportunities as well as the complexity of seeking written authorization from each state in which the institution marketed, offered and/or enrolled its citizens in a distance education program, internship, or field trip. SARA was designed to streamline regulations around distance education programs, make it simpler for states to acknowledge other states’ work and decisions about institutional authorization, and provide important consumer protections to support distance education students.

Eligible Institutions and Fees

All accredited degree-granting institutions in SARA-member states (public, private, independent, non-profit, and for-profit) are eligible to apply to participate in SARA. Institutions pay between \$2,200-\$8,800 annually to NC-SARA, based on full-time equivalent enrollment of all students, not just distance education students. For many institutions, this fee is affordable and reasonable compared to the alternative which involves each institution applying for and paying applicable “state authorization” fees to each state where an institution offers distance learning education (or other related activities that would establish a physical presence in that state).

National Participation Rate of Institutions

Currently, more than 2,400 U.S. postsecondary institutions that offer distance education programs voluntarily participate in these agreements across 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands.

2024 Meetings

The DLAB Board met three times in 2024, with meetings in May, September, and December. All meetings were held virtually and followed open meeting requirements and procedures.

At the May meeting, the Board approved and advanced the State of Wisconsin’s application to renew membership in NC-SARA. Each state must apply for renewal every two years. The Board also received updates on federal regulatory proposals, NC-SARA policy, and grant opportunities.

The primary business at the September meeting was to share updates on federal regulatory proposals, provide NC-SARA policy updates, and review grant opportunities.

At the December meeting, the Board reviewed and acted upon this annual report and elected officers for the 2025 calendar year. The annual report was unanimously approved. The officers elected for the 2025 calendar year are as follows:

- Chair: Jay Rothman, UWS President
- Vice Chair: Layla Merrifield, WTCS President
- Secretary: Dr. Eric Fulcomer, WAICU President

Additional members of the Board include Dan Hereth, Acting Secretary of the Department of Safety and Professional Services and Dr. Russell Swagger, President, Lac Courte Oreilles Ojibwe College.

Renewal of institutional applications submitted for consideration for SARA participation were reported to the Board at all three DLAB meetings in 2024.

General Activities and Discussions

DLAB state portal staff continue to work closely with NC-SARA board members and staff, as well as Wisconsin's regional compact, Midwest-SARA (M-SARA), to identify and respond to SARA-related policy. DLAB staff regularly provide input, commentary, and recommendations. DLAB member staff attend a variety of NC-SARA and M-SARA meetings and training sessions ranging from national and regional annual conferences to quarterly meetings and webinars. These meetings and training sessions better prepare DLAB member staff to assist institutions as they navigate SARA-related requirements and activities. In addition, DLAB representatives remain in touch with NC-SARA and M-SARA staff on a regular basis to stay up-to-date on NC-SARA activities and priorities.

In 2024, the NC-SARA policy modification process provided an opportunity to propose, evaluate, and approve SARA policy changes. Through the policy modification process, DLAB board members and staff continue efforts to reinforce the need for NC-SARA to stay focused on its mission and voice objection to policies that are unnecessary or duplicative of other agency regulations or accreditation requirements. In addition, DLAB staff continue to monitor federal regulatory policy and its impact on SARA and distance learning for students and institutions within Wisconsin.

Also in 2024, the DLAB received funding from an inaugural NC-SARA State and Territory Grant. The grant funded a new DLAB membership in the State Authorization Network (SAN), providing resources and training opportunities for DLAB staff.

Institutional Application Approvals, Renewals and Enrollment

As of November 2024, 50 Wisconsin-based higher education institutions are active participants in SARA. This includes 13 UWS universities, 19 private, nonprofit institutions, 16 WTCS institutions, one proprietary institution, and one tribal college.

As required by s. 39.86(3)(a)2., *Wis. Stats*, the following chart lists all the DLAB-approved SARA participating institutions. The list of approved participating institutions is also available on the NC-SARA website, and a link to this site is included on the DLAB website.

Wisconsin-Based Participating SARA Institutions

UWS:

University of Wisconsin – Eau Claire
University of Wisconsin – Green Bay
University of Wisconsin – La Crosse
University of Wisconsin – Madison
University of Wisconsin – Milwaukee
University of Wisconsin – Oshkosh
University of Wisconsin – Parkside

University of Wisconsin – Platteville
University of Wisconsin – River Falls
University of Wisconsin – Stevens Point
University of Wisconsin – Stout
University of Wisconsin – Superior
University of Wisconsin – Whitewater

Private, Non-Profit:

Alverno College
Bellin College
Carroll University
Carthage College
Concordia University Wisconsin
Edgewood College
Herzing University
Lakeland University
Maranatha Baptist University
Marian University

Marquette University
Medical College of Wisconsin
Milwaukee Institute of Art & Design
Milwaukee School of Engineering
Mount Mary University
Ripon College
Sacred Heart Seminary and School of Theology
Viterbo University
Wisconsin Lutheran College

WTCS:

Blackhawk Technical College
Chippewa Valley Technical College
Fox Valley Technical College
Gateway Technical College
Lakeshore Technical College
Madison Area Technical College
Mid-State Technical College
Milwaukee Area Technical College

Moraine Park Technical College
Nicolet Area Technical College
Northcentral Technical College
Northeast Wisconsin Technical College
Northwood Technical College
Southwest Wisconsin Technical College
Waukesha County Technical College
Western Technical College

Proprietary Institutions:

Midwest College of Oriental Medicine

Tribal Colleges:

Lac Courte Oreilles Ojibwe University

Enrollment

NC-SARA requires SARA-participating institutions to report distance education program enrollments on an annual basis. Institutions are required to report the number of students enrolled in the institution located outside the home state of the institution. Starting in 2019, institutions also reported their in-state enrollment. In Fall 2023 (the latest available data as reported by SARA-participating institutions), more than 4.2 million students were enrolled exclusively in distance education programs at SARA-participating institutions. Total national enrollments increased 5% compared to Fall 2022 and the number of out-of-state enrollments increased 7% during the same period. In Wisconsin, SARA-participating institutions' exclusively distance education enrollments increased 15% between Fall 2022 and Fall 2023 and the increase in out-of-state enrollment tracked with the national rate of 7%.

Table 1: Exclusively Distance Education Enrollments

	2022	2023	% Change
National In-State Enrollments	2,380,158	2,457,430	3%
National Out-of-State Enrollments ¹	1,659,309	1,774,780	7%
National Total	4,039,467	4,232,210	5%
Wisconsin In-State Enrollments	31,987	37,949	19%
Wisconsin Out of-State Enrollments ¹	11,249	11,984	7%
Wisconsin Total	43,236	49,933	15%

¹Includes enrollments from non-SARA participating institutions (i.e., California) and U.S. Territories

More than 11,000 out-of-state students representing all 48 SARA states (other than Wisconsin), District of Columbia, Puerto Rico and the U.S. Virgin Islands enrolled in distance education programs at Wisconsin-based SARA-participating institutions. This excludes California, the only state yet to join SARA. Conversely, 22,379 Wisconsin residents were enrolled in a distance education program at an out-of-state SARA-participating institution. Table 2 shows the top five home states of students attending Wisconsin-based SARA-participating institutions and the top five states where Wisconsin students attended SARA-participating institutions in Fall 2023. It should be noted that 682 non-SARA students (i.e., students located in California and certain U.S. Territories) attended Wisconsin institutions but are not represented in the table below because California does not participate in SARA.

Table 2: Wisconsin Incoming and Outgoing Exclusively Distance Education Enrollments, 2023

Home State	Out-of-State Students Attending Wisconsin Institutions Under SARA	State of Attendance	Wisconsin Students Attending Out-of-State Institutions Under SARA
Illinois	1,520	Arizona	3,803
Minnesota	1,505	Minnesota	2,500
Florida	902	New Hampshire	2,078
Michigan	725	Illinois	1,927
Louisiana	613	Utah	1,755

Among Wisconsin-based SARA-participating institutions, the top five institutions in terms of attracting out-of-state distance education students from SARA states are Herzing University (4,779 students), University of Wisconsin-Madison (692 students), Concordia University Wisconsin (648 students), University of Wisconsin-Milwaukee (554 students), and University of Wisconsin-Eau Claire (433 students).

Exempt Institutions

Another statutory responsibility assigned to the DLAB is that the Board “create and maintain” a list of higher education institutions that are legally authorized to operate in Wisconsin. Under federal rules (34 C.F.R. §600.9), institutions that are legally authorized in a state may be exempt from additional state approval or licensure.

The Board is required to make this list available to the public and at least annually provide the list to the Wisconsin Legislative Reference Bureau for publication in the *Wisconsin Administrative Register*. The list of exempt institutions was provided by HEAB (as the administrative agency to which the DLAB is attached) to the Reference Bureau and is to be published in the *Wisconsin Administrative Register*. The listing of exempt institutions is available on the DLAB website.

Additionally, Wisconsin has, for many years, issued a Governor’s Executive Order to document compliance for institutions that are legally authorized in the state as required by Federal law. An updated Executive Order #213 was issued by Governor Evers in October of 2023.

Student Complaints and Consumer Protections

One of the important aspects of SARA is to ensure that students are protected from illegal, fraudulent and/or misrepresented information and activities in the manner, method and means for which distance education is conducted. As a part of SARA participation, institutions are required to have a state-level process for reviewing and acting on complaints filed by prospective and current students enrolled in distance education programs conducted across state lines. All Wisconsin institutions have such a complaint process which involves DLAB’s review and action if not adequately addressed at the institutional level. To date, all institutions are in compliance with these provisions. No SARA-related complaints were filed against any Wisconsin-based SARA-participating institutions in 2024. This is due in large part to the collaborative design of the DLAB, and all sectors working together. The DLAB also relies on Wisconsin’s existing strong consumer protection laws to ensure the protection of students and to resolve consumer complaints.

2025 Anticipated Activities

For 2025, the DLAB priorities include:

- Continuing to be a source of information for SARA-participating Wisconsin institutions and stakeholders on SARA Manual and policy changes, procedures, and data requirements to ensure compliance with SARA requirements.
- Continuing to ensure that student consumer rights and protections are fulfilled under the SARA provisions for institutions within DLAB's jurisdiction.
- Reviewing and acting upon institutional renewal applications and any new applications.
- Continuing the strong cross-sector collaboration that makes the DLAB unique in how states are complying with SARA requirements.
- Continuing to serve as a technical resource for Wisconsin-based higher education institutions participating in SARA or seeking to participate.
- Continuing to advocate on behalf of the State of Wisconsin for NC-SARA's Board to remain true to the Unified Agreement and original mission of SARA.

In conclusion, Wisconsin's exclusively distance education enrollments continue to increase. While increases are larger among in-state distance education enrollments, the increase in out-of-state distance education enrollment demonstrates that Wisconsin institutions are increasingly relying upon SARA to offer distance education to students in other states. On behalf of the State of Wisconsin, DLAB has and will continue to serve an important role in overseeing SARA-related activities through which Wisconsin higher education institutions serve students from out of state. DLAB will also continue to ensure that NC-SARA holds all non-Wisconsin institutions that participate in SARA accountable to SARA standards and student consumer protections when educating Wisconsin students.