



# DLAB

Distance Learning Authorization Board

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December 23, 2025

To: The Honorable Tony Evers, Governor  
Cyrus Anderson, Chief Clerk, Wisconsin State Senate  
Edward A. Blazel, Chief Clerk, Wisconsin State Assembly

From: Jay Rothman, Universities of Wisconsin President, and 2025 Chair of the Wisconsin Distance Learning Authorization Board

Re: 2025 Annual Report of Distance Learning Authorization Board Activities

On behalf of the Wisconsin Distance Learning Authorization Board (DLAB), I am pleased to provide you with the attached report summarizing the Board's 2025 activities. The report was approved by DLAB at its December 12, 2025 meeting for submission pursuant to Wis. Stat. § 39.87(3).

If you have any questions about the report, please contact me at (608) 262-2321.

cc: Distance Learning Authorization Board  
Layla Merrifield, President, Wisconsin Technical College System  
Eric Fulcomer, President, Wisconsin Association of Independent Colleges and Universities  
Karen Breit, Wisconsin Tribal Colleges Representative  
Daniel Hereth, Secretary, Department of Safety and Professional Services



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## 2025 Annual Report of DLAB Activities

The Wisconsin Distance Learning Authorization Board (DLAB) was established on March 1, 2016, pursuant to 2015 Wisconsin Act 208. 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 is under the administrative arm of 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 is comprised of representatives from the Wisconsin higher education sectors 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 Education Approval Program, 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 12, 2025, meeting for submission under s. 39.87.

### Overview of State Authorization Reciprocity Agreement

In 2013, the U.S. Department of Education collaborated with states and institutions to create the State Authorization Reciprocity Agreement (SARA) in response to increasing demand for distance education and the challenges associated with obtaining written authorization from each state where institutions marketed, offered, or enrolled citizens in distance education programs, internships, or field trips. SARA was established to standardize regulatory requirements for distance education programs, facilitate mutual recognition among states regarding institutional authorization, and implement comprehensive consumer protections for distance education students.

## Eligible Institutions and Fees

All accredited degree-granting institutions in NC-SARA-member states, including public, private, independent, non-profit, or for-profit, are eligible to apply for participation in SARA. Institutions are required to pay an annual fee to NC-SARA ranging from \$2,200 to \$8,800, determined by the full-time equivalent enrollment of all students, not limited to those enrolled in distance education. This fee structure is considered economical when compared to the alternative system, which demands institutions apply for and remit “state authorization” fees individually to every state where they provide distance learning or related activities constituting a physical presence. Additionally, Wisconsin does not impose an extra state application fee for participating institutions, increasing affordability, especially in comparison to other state portal entities that do require such fees.

## 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.

## 2025 Meetings

The DLAB Board met three times in 2025, 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 received updates on the NC-SARA policy modification process and federal regulatory proposals. It also received updates from the staff representatives on renewal applications for institutions that had expiring participation terms.

At the September meeting, the Board received updates on NC-SARA activities, reviewed grant opportunities, and learned of the plans for hosting the first Wisconsin State Portal Entity (SPE) Summit in December. It also received updates from the staff representatives on renewal applications for institutions that had expiring participation terms.

At the December meeting, the Board reviewed and acted upon this annual report and elected officers for the 2026 calendar year. The annual report was unanimously approved. The officers elected for the 2026 calendar year were as follows:

**Chair:** Layla Merrifield, Wisconsin Technical College System (WTCS);

**Vice Chair:** Dr. Eric Fulcomer, Wisconsin Association of Independent Colleges and Universities (WAICU);

**Secretary:** Jay Rothman, Universities of Wisconsin (UW).

Additional members of the Board include Dan Hereth, Acting Secretary of the Department of Safety and Professional Services, and a representative from the Wisconsin tribal colleges (pending Governor’s appointment).

## General Activities and Discussions

DLAB staff representatives from each sector continue to work closely with NC-SARA executive staff, as well as Wisconsin's regional compact, Midwest-SARA (M-SARA), to discuss NC-SARA initiatives and activities regional compact priorities and potential SARA policy changes. DLAB staff regularly provide input, commentary, and recommendations by attending a variety of NC-SARA and M-SARA meetings and training sessions ranging from national and regional annual conferences to quarterly meetings and webinars.

In 2025, the M-SARA Regional Steering Committee (RSC) was heavily engaged in the consideration and approval of proposed policies through the SARA Policy Modification Process (PMP). It worked closely with other RSC from the other three regions to determine what proposals would align with NC-SARA's mission, benefit SARA-participating institutions and support student rights and protections. There were certain policies deemed valuable while others were considered unnecessary or duplicative of other agency regulations or accreditation requirements. Since 2024, Paige Smith has served as DLAB's representative on the M-SARA RSC. In this role, she continues to advocate and promote both Wisconsin priorities and interests as well as their students.

Also in 2025, the DLAB used funding from the NC-SARA State and Territory Grant to support continued membership in the State Authorization Network (SAN) and a new membership in the National Association of State Administrators and Supervisors of Private Schools (NASASPS), providing resources and training opportunities for DLAB staff. The NC-SARA State and Territory Grant also supported costs associated with the first Wisconsin SARA SPE conference, which gathered institutional SARA coordinators from each sector to for a series of presentations from NC-SARA leadership and subject matter experts.

## Institutional Application Approvals, Renewals and Enrollment

As of December 2025, 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 SARA-Participating 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 University  
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 participating institutions to annually report distance education enrollments, including both in-state and out-of-state students. In Fall 2024, over 4.4 million students were enrolled exclusively in distance programs at SARA institutions, a 5% increase from Fall 2023, while out-of-state enrollments rose by 4%. In Wisconsin, total distance-only enrollments declined, but out-of-state enrollments grew by 6%.

**Table 1: Exclusively Distance Education Enrollments**

	2023	2024	% Change
National In-State Enrollments	2,457,430	2,602,686	6%
National Out-of-State Enrollments <sup>1</sup>	1,774,780	1,839,560	4%
National Total	4,232,210	4,442,246	5%
Wisconsin In-State Enrollments	37,949	36,893	-3%
Wisconsin Out of-State Enrollments <sup>1</sup>	11,984	12,679	6%
Wisconsin Total	49,933	49,572	-1%

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

Over 12,100 out-of-state students from all 48 SARA member states (excluding Wisconsin), as well as the District of Columbia and Puerto Rico, enrolled in distance education programs offered by Wisconsin-based SARA institutions. California is not included, as it remains the only state not part of SARA. In 2024, there were 532 non-SARA students attending Wisconsin institutions, including those from California and certain U.S. Territories. On the other hand, 21,904 Wisconsin residents participated in distance education at out-of-state SARA-participating institutions. Table 2 lists the top five home states sending students to Wisconsin-based SARA institutions, along with the top five states where Wisconsin students pursued distance education in Fall 2024.

**Table 2: Wisconsin Incoming and Outgoing Exclusively Distance Education Enrollments, 2024**

Home State	Out-of-State Students Attending Wisconsin Institutions Under SARA	State of Attendance	Wisconsin Students Attending Out-of-State Institutions Under SARA
Illinois	1,601		4,211
Minnesota	1,528		2,688
Florida	1,094		2,187
Louisiana	778		1,820
Michigan	775		1,076

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 (5,843 students), University of Wisconsin-Madison (708 students), Concordia University Wisconsin (702 students), University of Wisconsin-Milwaukee (550 students), and University of Wisconsin-Eau Claire (438 students).

## Exempt Institutions

According to section 39.87(3) of Wisconsin Statutes, the Board is required to create and maintain a list of higher education institutions that are legally allowed to operate within Wisconsin. Federal regulations (34 C.F.R. §600.9) state that institutions authorized by a state may not need additional approval or licensing from the state. Following this law, Governor Evers released Executive Order #123 in October 2023, officially naming the institutions that are legally permitted to operate in Wisconsin.

To fulfill its legal duties, DLAB—through HEAB, which serves as DLAB's administrative agency—has sent this list to the Wisconsin Reference Bureau for publication in the *Wisconsin Administrative Register*. You can also find the list of exempt institutions on the DLAB website.

## Student Complaints and Consumer Protections

An integral component of SARA is the safeguarding of students from illegal, fraudulent, or misrepresented information and activities associated with distance education activities. Per SARA policy, institutions are required to maintain a state-level procedure for reviewing and addressing complaints initiated by prospective and current students enrolled in interstate distance education programs. All Wisconsin institutions have established such complaint processes, which include referral to DLAB for review and action should the matter not be sufficiently resolved at the institutional level. To date, all institutions remain compliant with these requirements.

In 2025, there were three complaints filed against SARA-participating institutions. Based on initial review, two of those complaints did not fall under DLAB's jurisdiction or authority. The third complaint is still under review to determine whether one or more issues raised satisfies one or more of the required criteria under SARA Policy. DLAB staff are working closely with the student complainant and the university to review all outstanding issues and concerns. DLAB staff will update the DLAB Chair if the complaint falls under one or more of the criteria required for DLAB consideration.

## 2026 Anticipated Activities

For 2026, the DLAB priorities include the following:

- Act as the primary resource for Wisconsin SARA-participating institutions and stakeholders by providing updates and guidance on SARA Manual changes, policies, procedures, and data requirements for compliance.
- Protect student consumer rights and ensure institutions adhere to SARA provisions within DLAB's jurisdiction.
- Review and process both renewal and new institutional applications for SARA participation.

- Sustain effective cross-sector collaboration, which sets DLAB apart in helping states meet SARA obligations.
- Serve as a technical support hub for Wisconsin higher education institutions involved in, or seeking to join, SARA.
- Advocate for Wisconsin's interests, urging NC-SARA's Board to uphold its mission as outlined in the Unified Agreement.

Representing the State of Wisconsin, DLAB plays a vital role in overseeing SARA-related activities that enable Wisconsin higher education institutions to serve out-of-state students. DLAB will also maintain its commitment to ensuring that NC-SARA enforces SARA standards and student consumer protections for all non-Wisconsin institutions participating in SARA when providing education to Wisconsin students.