



UNIVERSITY RELATIONS

Mary R. Jeka, *Senior Vice President and General Counsel*

September 12, 2016

The Honorable James Peyser
Secretary
Department of Education
Commonwealth of Massachusetts
One Ashburton Place, Room 1403
Boston, MA 02108

Dear Secretary Peyser:

I am enclosing the testimony of Anthony P. Monaco, President, Tufts University, for the public hearing of the State Authorization Reciprocity Agreement (SARA) Special Commission on September 14, 2016.

I request that his testimony be included in the record of the hearing.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary R. Jeka".

Mary R. Jeka
Senior Vice President & General Counsel

Enclosure

cc: Katherine Lipper, General Counsel, Executive Office of Education

**Testimony of Tufts University President Anthony P. Monaco
State Authorization Reciprocity Agreement (SARA) Special Commission
September 14, 2016**

I am writing to express my strong support for Massachusetts to join the State Authorization Reciprocity Agreement (SARA). As Chair of the Association of Independent Colleges and Universities of Massachusetts (AICUM), I have heard from many institutions of the importance of this issue to our higher education sector.

In this era of global education, it is important to establish uniform policies and standards to enable colleges and universities to easily offer distance education programs and obtain the necessary regulatory approval when enrolling students in other states. SARA is an effective alternative to the current situation that requires colleges to comply with a varying patchwork of regulations in each state in which they have a students enrolled in an online program. The current system is a regulatory nightmare that can be remedied with the adoption of SARA.

The vast majority of AICUM member institutions offer some form of online education as a vital component of the educational services offered to students. The distance educational programs can often be offered at a lower cost to a diverse student body and assist students who may not have the financial resources or have other challenges that prevent them attending a brick and mortar campus. Our colleges and universities are now required to compete with more than one thousand institutions from 42 states that have joined and are benefitting from the SARA program. It is becoming a financial burden that is placing many of our higher education institutions at a competitive disadvantage with colleges in other states.

Concerns have been raised about the impact of SARA on our Attorney General's ability to apply Massachusetts laws involving consumer protection, fraudulent activities and other matters against higher education institutions located in other states. The legislature should clarify that the Attorney General would still be able to use the Commonwealth's consumer protection law against any institution that engages in unfair or deceptive business practices including any for-profit institution.

The current situation is unacceptable as it restricts Massachusetts colleges and universities from accessing potential student markets and impedes their ability to develop innovative ways to offer lower cost options for students while generating new revenue for programs. Given the importance of the higher education industry in Massachusetts, I would hope that our legislative leaders would act to remedy the problem by joining the SARA network.

Thank you for your consideration.