



SARA
*Navigating State Authorization
Amidst Emerging Reciprocity
Spring 2014*

April 16, 2014
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Midwestern Higher Education Compact (MHEC)

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How Does SARA Fit in to all of this?**




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**Institutional Expert answering questions
and chiming in as she sees fit**



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Structure of the Webinar 

Total Webinar Time = 120 minutes

Part I: History and role of federal involvement
Part II: From Clueless to Confidence
Part III: How SARA fits in to all of this
Part IV: Questions and Answers

- ▶ All of us will be responding to "chat" questions during the webinar
- ▶ We will follow up with answers to any questions we don't address today

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MHEC

PART I:

The History and Role of Federal Involvement in State Authorization

Marianne and Sharmilla


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Agenda

- Basic Principles of State Authorization
- Federal Regulation
- State Regulations

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State Authorization – Basic Principles



Basic Principle 1:
If your institution is in one state and you are serving a student residing in another state, then you should check for authorization.

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State Authorization – Basic Principles

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Basic Principle 2:

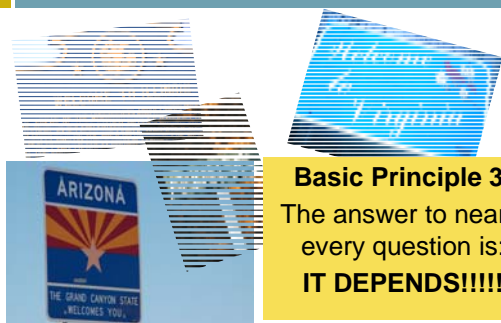
There are two types of authorization in each state:

- 1) **Institutional** – all activities you do in a state.
- 2) **Licensure** – professional programs.

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State Authorization – Basic Principles

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Basic Principle 3:

The answer to nearly every question is:
IT DEPENDS!!!!

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Federal Regulations

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- **October 29, 2010** - the U.S. Department of Education issued a broad package of regulations, including state authorization & visibility of the complaint process.
- **March/April 2011** - Dear Colleague Letters.
- **July 12, 2011** - The United States District Court for the District of Columbia struck down the distance education portion of the USDOE's 'state authorization' regulations. The U.S. Department of Education appealed the ruling.
- **June 5, 2012** - The U.S. Court of Appeals agreed with a lower court ruling to 'vacate' the distance education portion (§ 600.9(c)) of the U.S. Department of Education's 'state authorization' regulation.

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Federal Regulation – Chapter 34, §600.9(c)

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"If an institution is offering postsecondary education through **distance or correspondence education** to students in a State in which it is not physically located or in which it is otherwise subject to State jurisdiction as determined by the State ...

... **(then) the institution must meet any State requirements** for it to be legally offering distance or correspondence education in that State. An institution must be able to document to the Secretary the State's approval upon request."

<http://www.tinyurl.com/mazquyl>

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Federal Regulation – Chapter 34, §600.9(c)

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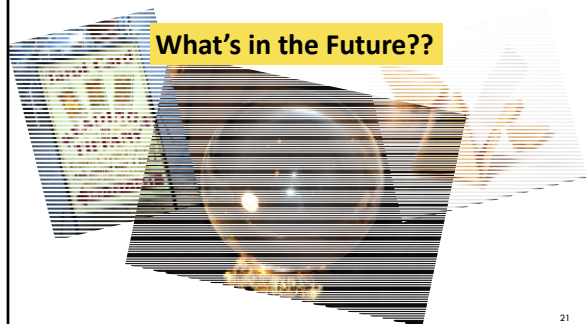
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Federal Regulation -- Chapter 34, §600.9(c)

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What's in the Future??



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Federal Regulation -- Chapter 34, §600.9(c)

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The federal regulation is probably coming back!!!

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Federal Regulations

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- **The U.S. Department of Education's Program Integrity and Improvement Negotiated Rulemaking Committee**
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2012/programintegrity.html>
 - Important Topics:
 - Exemptions
 - Complaint Process (home state, institutional state, state of residence)
 - Military students
 - Reciprocity
- **U.S. Department of Defense**

If your institution participates in the DoD Tuition Assistance program, look for a final version of the new MOU (MOU 3) in the upcoming months. This version will most likely include state authorization.

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Federal Regulations

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- **Complaints**

Institutions must provide prospective and current students with contact information for filing complaints with its accrediting agency and with the appropriate state agency. **This requirement was NOT vacated by the court and institutions are expected to be in compliance as of July 1, 2011.**
- **Good Faith Effort...**July 1, 2011, July 1, 2013, July 1, 2014.

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State Regulations

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Now that the Federal Regulations were vacated, I don't need to worry about state authorization for distance education, right?

WRONG!

State regulations are still in place. The state regulations predated federal regulation § 600.9(c). Those regulations are unaffected by the rulings and are still in force.

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State Regulations

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Question:
Where can I find the state regulations?

Answer:
State Higher Education Executive Officers (SHEEO) provides a **FREE** listing of all state regulations:
<http://www.sheeo.org/node/434>

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State Regulations

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- **What is in the SHEEO Survey?**
 - Unit of analysis is **AGENCY**, not state
 - Over 70 agencies surveyed (50 states & 9 territories); scope was all state agencies authorizing all institutions in the US (not just online)
 - SHEEO resource was created using agency write-ups in September 2011 – subsequent updates have been completed in 2012 and 2013
 - Provides contact information for each agency, including a directory of contacts across all agencies
 - Provides information about regulations, rules, physical presence triggers, fees, applications and timelines
- **Next Steps – The SHEEO Survey Moves Online!**

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State Regulations

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- **Selected Findings:**
 - 38 state agencies required accreditation as part of the authorization process (degree).
 - 8 state agencies require authorization without regard to physical presence.
 - 6 state agencies require an institution to register for an exemption.
 - Several state agencies do allow for an exemption:
 - Religious
 - Non-Degree
- **Data Summaries?**

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State Regulations

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Eight agencies require that you **seek authorization** with them even if you are ONLY offering for-credit courses via distance education in their state(s):

Alabama	Arkansas
Iowa	Maryland
Minnesota	Montana
Wisconsin	Wyoming

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State Regulations

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Six agencies require that you **seek an exemption or register** with them even if you are ONLY offering for-credit courses via distance education in their state(s):

Alaska	Illinois
Nebraska	North Dakota
Oregon	Utah

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State Regulations

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However, many more agencies do employ physical presence triggers:

- Physical Location
- Administrative Office
- Practical Experiences (clinical, student teaching)
- Required Proctoring
- Contracted Services
- Having an Employee in a State
- Direct Marketing
- Localized Advertising

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State Regulations

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□ **What Does It Cost?**

- ▣ The fee for authorization varies widely among agencies, from \$0 to \$10,000+ per agency.
- ▣ Some agencies require a fee for a waiver/exemption.
- ▣ There can be other fees involved:
 - Site Visit
 - Surety Bond
 - Tuition Recovery Fund
- ▣ Some agencies require a fee for renewal.

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State Regulations

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□ **What are the risks?**

- ▣ Call from Regulator
- ▣ Cease and Desist Letter
- ▣ Public Accountability
- ▣ Student ability to work...
- ▣ Potential Lawsuit
- ▣ Special Case – The Maryland Letter

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Final Thoughts

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- **Why should we care about state authorization?**
 - ▣ Because it is the law (State).
 - ▣ Protecting students.
- **Federal Regulations are probably coming back:**
 - ▣ Compliance window might not be long.
 - ▣ States won't do you any favors.

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PART II:

From Clueless to Confidence

Danielle and Joe

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State Authorization: The Institution's Perspective

How to go from clueless to confident in your
 "good faith effort"



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A Little About Us...

Franklin University

- Private, nonprofit, 4-year institution, 6,886 students (FA 12)
- Founded 1902 in Columbus, Ohio
- Early adopter of online education (1990s)
- All degree programs designed for online delivery
- State authorization began with Community College Alliance program in 1990s
- Enroll students from all U.S. states and some territories (Not all programs available in all states)

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Where to begin?

“A journey of a thousand miles must begin with a single step.”
-Lao Tsu

“Perplexity is the beginning of knowledge.”
-Kahlil Gibran

“The beginning is the most important part of the work.”
-Plato

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Know your institution

- Different factors may impact which states are prioritized
 - Have you received any Cease and Desist letters from states?
- First, create a state triage list
 - How many students are enrolled in each state?
 - Risk analysis; likely focus on high enrollment states
- Second, what programs are active in each state? What are the components of program? (e.g., internships, clinicals, in-person meetings, etc.)
- Third, what other departments at your institution are active in other states? (e.g., marketing, recruiting, testing, etc.)

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Know Your Institution, Part 2

Triggers

- **Definition:** Any activity that a given state would recognize as “operating” under its laws/regulations, and would thus prompt the need for authorization from that state’s approval agency.

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Possible Triggers May Include:

- Enrolling students in online or face-to-face courses, or full degree programs
- Employing faculty or staff
- Staff visiting with potential students (e.g., recruiters)
- Owning or leasing property where education (or related activity) takes place (e.g., classrooms, advising space)
- Contracting with an institution to provide access to resources (e.g., library, computer labs)
- Television, radio, print, or internet advertising
- Maintaining an in-state address, phone/fax number, or internet server
- Proctored exams
- Internships, externships, field experiences, clinicals, practica, etc.

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Know your institution, Part 3

“Okay, I’ve got my triage list, and I understand triggers. Now what?”



- The research begins
- Start with SHEEO (www.sheeo.org)
 - Surveys of state agencies provide essential info like:
 - Type of institution they oversee
 - Contact info for state higher education agency representatives
 - Direct links to applicable statutes
 - What types of activities trigger the need for authorization

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Know your Institution, Part 4

- Basic state law research skills
 - Be a good researcher: use primary and secondary sources
 - Statutes can be lengthy; keep a few key areas in mind: Definitions section; Online education section; Tuition refund policies
- If you've exhausted all available sources of information and things are still unclear, call the state agent with your question

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Start Applying!

- You will need information from a variety of areas across your institution in order to complete initial applications. A sampling:
 - Audited financial statements
 - Academic program descriptions, syllabi, assessment info
 - Faculty CVs
 - Proof of regional and specialized accreditation
 - Marketing materials
 - Administration/Board of Trustees information
 - Library, Student Services, Testing
 - Advising, Career Placement

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Don't Lose Hope

I'm an office of one and I found out we have students doing internships in 47 states.

I think I'm going to call in sick for the next year or so.



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Remember...

...our old friend, Lao Tsu, who said:
 "A journey of a thousand miles must begin with a single step."

- Both state agencies and higher ed institutions are working with limited resources and staff
- Chip away at the work one application at a time

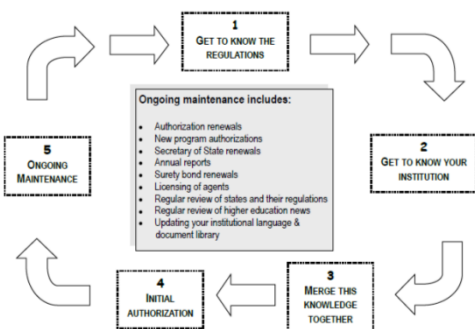
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The Maintenance Phase

- Believe it or not, there will come a time when you've completed the majority of your required state authorizations. Then what?
- The "maintenance phase" begins
- Annual reporting to state agencies from whom you've received approval. Reporting can include:
 - Student enrollment data, assessment, graduation data, tuition collected from state residents, job placement data, surety bond renewals, and full authorization renewal applications.
- Keep the maintenance phase in mind when budgeting for state authorization

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The Whole Process



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The Good Faith Effort

- The key to making a good faith effort is documentation
- Different state agencies prefer different modes of communication
 - Save emails and letters, document phone conversations
 - Document all of your efforts to communicate with a state agency
- Different institutions document their good faith efforts in different ways
 - Internal vs. External

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Develop Resources for Recordkeeping

What's worked for us:

- Spreadsheets for:
 - ✓ State Authorization Status
 - ✓ Triggers
 - ✓ New programs/state authorization
 - ✓ State level summary
 - ✓ Budgeting/planning/timelines
- State binders (physical copies of approvals, important state docs)
- University Intranet: sharing state approval info to the University departments that need it
- Document Library (internal shared drive)

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Example: Program Status by State

Program Authorization Status by State_1.31.2014

Program Name	Degree	States and U.S. Territories										
		AL	AK	AZ	AR	CA	CO	CT	DE	DC	FL	
Communications	A.S.	A	A	A	P	A	A	A	A	A	A	
Computer Science	A.S.	N	A	A	A	A	A	A	A	A	A	
Financial Management	A.S.	N	A	A	A	A	A	A	A	A	A	
Forensic Accounting	A.S.	N	A	A	A	A	A	A	A	A	A	
Information Technology	A.S.	N	A	A	A	A	A	A	A	A	A	
Public Relations	A.S.	N	A	A	A	A	A	A	A	A	A	
Accounting	B.S.	A	A	A	A	A	A	A	A	A	A	
Allied Healthcare Management	B.S.	A	A	A	A	A	A	A	A	A	A	
Applied Management	B.S.	N	A	A	P	A	A	A	A	A	A	

State Authorization Codes:
 Fully authorized in the state **A**
 Pending authorization in state **P**
 No longer enroll students/Not seeking authorization **N**

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Example: Department-specific Triggers

Marketing Requirements and/or Restrictions based on Current Authorization Status		
State	Status	Current Requirements and/or Restrictions
Alabama	Authorized	No restrictions on non-targeted marketing activities. Targeted efforts should note that the following programs only are approved in AL: AS Communications, BS Accounting, BS Allied Healthcare Management, BS Applied Psychology, BS Business Administration, BS Computer Science, BS Healthcare Management, BS Human Resources Management, MBA.
Alaska	Exempt by confirmation	No restrictions on non-targeted marketing activities. Targeted efforts require specific disclaimer language; consult with AIE prior to the planning of any such
Arizona	Exempt by confirmation	No current restrictions on targeted marketing activities.
Arkansas	Authorized	No current restrictions on targeted marketing activities.
California	Exempt by confirmation	No current restrictions on targeted marketing activities.

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Stay Informed

- Maintenance of state authorizations and “good faith effort” requires ongoing research, work, and documentation
- State regulations are changing continuously
 - Ways to stay informed: regular state review cycle, networking with colleagues through organizations, conferences, workshops & webinars
- Institutions of higher education are multi-faceted organizations, and any number of activities can trigger a change in authorization/exemption status

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Questions?

I'm feeling so much better!



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One College's Experience in Good Faith

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- We Searched for Context and Understanding of Urgency and Complexity:
 - ▣ Researched What Others Have Said And Done About CFR 600.9(c)
 - ▣ Contacted The Association Of Independent Collages And Universities In Ohio
 - ▣ Contacted SHEEO And Spoke (At The Time) To Paul Lingenfelter.
 - ▣ We Concluded That Prayer (We Are Faith Based) And Hope Were Insufficient To Count As Good Faith

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Good Faith – Accreditation

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- We Searched for Resources to Help Us Work to Solve the Problem:
 - ▣ SHEEO Site Was Great Start
 - ▣ Began Seeing Institutions Explain State Authorization Efforts In Their DL Change Requests (In Role As Peer Reviewer)
 - ▣ Attended The HLC Annual Meeting And Met Pam Shay / Franklin University – Listened To Presentation
 - ▣ Paid To Attend A Detailed Presentation By Franklin University On “Navigating The Chaos”

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Good Faith – Recommendation

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- Name a Cross-functional Team at Your University With Representatives in Areas of The “Triggers”,
 - ▣ Marketing, PR, Admissions, Outreach, Advancement
 - ▣ Academics Including Those Who Know About Externships/Internships Placements, Practica Student Teaching Correspondence DL Or OL DL
 - ▣ Finance
 - ▣ Name an Operation Leader Who Can Help The Institution Speak With One Voice And Coordinate Efforts – Often In Accreditation
 - ▣ Name A VP Level Champion To Assure Cooperation

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Recommendation (Continued)

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- Create a budget with a separate number to track authorization
 - ▣ This helps after the fact in showing good faith by tracking funding of authorization activities
- Create strategies unique to your situation for identifying highest risk states and start,
 - ▣ - get some authorizations!
- Hold regular meetings of the State Authorization Team Keeping Notes / Minutes.
- Any College can implement these ideas easily and quickly documenting "Good Faith"

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PART III:

How does SARA fit in to all of this?

Jenny and Alan

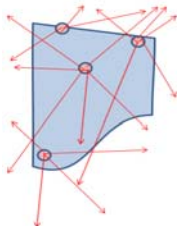
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The Current Process:

Institutions seek authorization from every other state or territory where they hope to serve students

****Sample state with 4 institutions of higher education, with all offering on-line degrees in other states****

- ▶ 4 institutions (>4000 in the US)
- ▶ x 54 states/territories
- ▶ x number of programs (*sometimes*)
- ▶ x number of students (*sometimes*)
- ▶ x amount of revenue (*sometimes*)



MANY COSTS TO INSTITUTIONS AND STUDENTS

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The SOLUTION:

A nation-wide system of reciprocity administered by the four existing regional compacts

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The SARA Process:

Institutions seek approval from their home states which have joined SARA, and the state agency then regulates those institutions with regard to the export of on-line education across state lines to host states

- ▶ 4 institutions (>4000 in the US)
- ▶ x 1 state/territory
- ▶ x number of programs (*sometimes*)
- ▶ x number of students (*sometimes*)
- ▶ x amount of revenue (*sometimes*)

REDUCED COSTS TO INSTITUTIONS AND STUDENTS

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National SARA Progress Update

<http://www.nc-sara.org/content/sara-state-status>

United States and Territories	Legislation introduced	Legislation passed	Application to regional compact	Approved as SARA state
Alabama				
Alaska				
American Samoa				
Arizona				
Arkansas	✓			
California				
Colorado				
Connecticut	✓	✓		
Delaware				
District of Columbia				
Florida				
Georgia				
Hawaii	✓	✓		
Idaho	✓			
Illinois				
Indiana	✓	✓	✓	✓
Iowa	✓	✓	✓	✓
Kansas	✓	✓	✓	✓
Kentucky				
Louisiana	✓			

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Regional SARA Progress Update

State	Status
Illinois, Minnesota, Missouri, Ohio	Bill in legislature
Indiana	1 st state to join; 8 member Institutions already
Iowa, Kansas, Nebraska	Bill passed; developing SPA
Michigan	Working on drafting legislation
North Dakota	2 nd state to join; 4 member Institutions already
Pennsylvania	Working on drafting legislation
Wisconsin	Working on drafting legislation and identifying SPA

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- ### SARA KEY ELEMENTS
- #### Academic and institutional integrity
- > National accreditation
 - > Adherence to C-RAC Guidelines
 - > Authorization in home state
- 66

SARA KEY ELEMENTS 

Consistent standards of financial responsibility

- Public IHEs are assumed to have the backing of the state
- Private institutions must have a USDE score of 1.5 or above (or if they have a FRS of 1.0 to 1.4, they must meet other criteria as determined by the state)


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SARA KEY ELEMENTS 

Consistent triggers of "physical presence" – SARA allows

- More types of marketing and recruiting
- More types of clinical and experiential learning
- Some limited on-the-ground learning
- Servers, instructors in other SARA states
- Proctored exams


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SARA KEY ELEMENTS 

Consistent and transparent complaint process with additional leverage and more venues for resolving complaints between states

*Already required under **Program Integrity Rules** and **DOD** with more requirements likely from USDE in 2015*


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SARA KEY ELEMENTS 

More consistency and accountability for institutional catastrophes

- Student records
- Teach-out plans
- Financial compensation when appropriate

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SARA KEY ELEMENTS 

Consistent data collection and sharing

(Draft of data requirements Spring 2014)

A request annually for the number of students in on-line programs in each state and a list of on-line programs offered by the institution


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Costs to Institutions 


- **SARA COSTS**
 - **\$2,000/yr.** for IHEs with <2,500 FTE
 - **\$4,000/yr.** for IHEs with 2,500–10,000 FTE
 - **\$6,000/yr.** for IHEs with >10,000 FTE
- **STATE COSTS VARY**

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More Information?




- ▶ NC-SARA website: www.nc-sara.org
- ▶ Regional Education Compacts:
 - MHEC – www.mhec.org
 - NEBHE – www.nebhe.org
 - SREB – www.sreb.org
 - WICHE – www.wiche.edu



**National Council for
State Authorization Reciprocity Agreements**
A voluntary, regional approach to state oversight of distance education


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Questions?



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PART IV:

Question and Answer Time

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