

# What is New with State Authorization?

**June 21, 2016**

- The webcast will begin shortly.
- There is no audio being broadcast at this time.
- An archive of this webcast will be available on the WCET website next week.





WICHE Cooperative for Educational Technologies

# What is New with State Authorization?

June 21, 2016

# What is New with State Authorization?

- Welcome.
- Use the question box for questions and information exchange.
- Archive, PowerPoint, and Resources available next week.
- Follow the Twitter feed: #WCETwebcast.



Megan Raymond  
Manager, Events and  
Programs,  
WCET

[mraymond@wiche.edu](mailto:mraymond@wiche.edu)  
@meraymond

# Overview

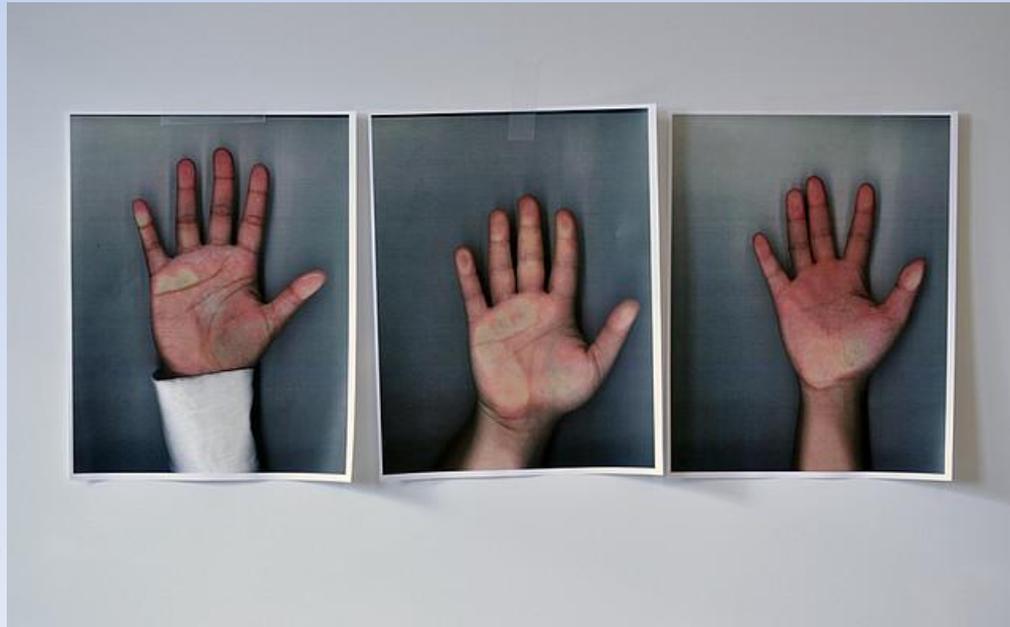
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# Questions from the Audience

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- If you have a question during the webcast, please add your questions to the chat box. We will monitor the question box and have time for Q&A at the end of the presentation.



# Moderators/Presenters

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## Russ Poulin

*Director,  
Policy & Analysis  
WCET*



## Cheryl Dowd

*Director,  
State Authorization Network  
WCET*



# Sandy Doran and Kiley Danchise-Curtis

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## Joel Tobin

*Compliance Analyst &  
Project Manager*

*University of Washington*



## Sandy Doran

*Director  
N-SARA*



## Kiley Danchise-Curtis

*Program & Outreach  
Coordinator  
N-SARA*



# State Update

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## **Cheryl Dowd**

*Director,*

*State Authorization Network  
WCET (WICHE Cooperative for  
Educational Technologies)*



# State Update

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## Delaware

- SARA State.
- Institutions offering online courses must seek authorization.
- Out of state institutions ONLY offering experiential learning but not offering courses or degrees do not need to apply for authorization.
- Questions can be forwarded to [IHE@doe.k12.de.us](mailto:IHE@doe.k12.de.us) .

## District of Columbia

- SARA State.
- To offer 100% online courses: submit answers to list of 11 questions on website:  
<http://osse.dc.gov/service/distanceonline-education-inquiries>
- To offer experiential learning: submit [Application for Conditional Exemption](#) Application is an attachment:  
<http://osse.dc.gov/publication/education-licensure-commission-elc-application-conditional-exemption>

# State Update

## Maryland

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Effective December 1, 2015, Dr. Jennifer Frank is no longer with the Maryland Higher Education Commission.

Please direct specific matters to the following:

Academic Program Approvals: Ms. Monica Wheatley -- [monica.wheatley@maryland.gov](mailto:monica.wheatley@maryland.gov)

Private Career School Inquiries and Student Complaints: Ms. Ronda Brown -- [ronda.brown@maryland.gov](mailto:ronda.brown@maryland.gov)

Religious Education Exemptions: Ms. Jackie Cade -- [jacqueline.cade@maryland.gov](mailto:jacqueline.cade@maryland.gov)

SARA/Distance Education: Ms. Koliwe Moyo -- [koliwe.moyo1@maryland.gov](mailto:koliwe.moyo1@maryland.gov)

Collegiate Student Complaint Process -- Ms. Elaine Shaw-Taylor -- [elaine.taylor@maryland.gov](mailto:elaine.taylor@maryland.gov)

Veterans Affairs: Ms. Trish Gordon McCown -- [trish.mccown@maryland.gov](mailto:trish.mccown@maryland.gov)

Please contact MHEC's main number at 410-767-3301 for other questions or concerns.

# State Update

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## Massachusetts

- Physical presence does not generally include experiential learning (unless engaging in other physical presence activity requiring board action)
- Faculty who teach from MA does not trigger physical presence
- Questions to Kristen Stone, Asst. Director for Regulatory and Veteran Affairs at [kstone@bhe.mass.edu](mailto:kstone@bhe.mass.edu)

## Michigan

- SARA State
- Institutions offering online courses must seek authorization
- Experiential learning, faculty teaching from out of state, and advertising are not activities requiring authorization
- All materials are accessible at [www.michigan.gov/pss](http://www.michigan.gov/pss). See: forms and publications: [OUT-OF-STATE INSTITUTION DISTANCE EDUCATION AUTHORIZATION \(PPS-040\)](#)

# State Update

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## North Carolina

- SARA State
- The “Teach Out” options for field experiences no longer exists.  
Exceptions:
  1. The student is in the military and transferred to North Carolina during their program of studies, or
  2. The student moves to North Carolina during their program of studies.
- Contact Terrence Scarborough [trscarborough@northcarolina.edu](mailto:trscarborough@northcarolina.edu) for more information about authorization in North Carolina

## Oregon

- SARA State
- Institutions offering online courses must seek approval and pay \$7,000 fee biennially – Exclusionary rule was repealed.
- Surety Bond requirements  
<http://www.oregonstudentaid.gov/oda-instructions-on-obtaining-surety-bond-or-loc.aspx>
- Process explained:  
<http://www.oregonstudentaid.gov/oda-degree-authorization-academic-programs-apply-outofstate.aspx>

# State Update

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## Puerto Rico

- Updated Exemption Registry Application for Higher Education Institutions
- New Contact Person  
Marta Coll-Rivera, Economic Program Analyst,  
[mcoll@ce.pr.gov](mailto:mcoll@ce.pr.gov)  
Education Support Program Area  
787-641-7100 ext. 2052

# The Long and Winding Road...

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**Joel Tobin**

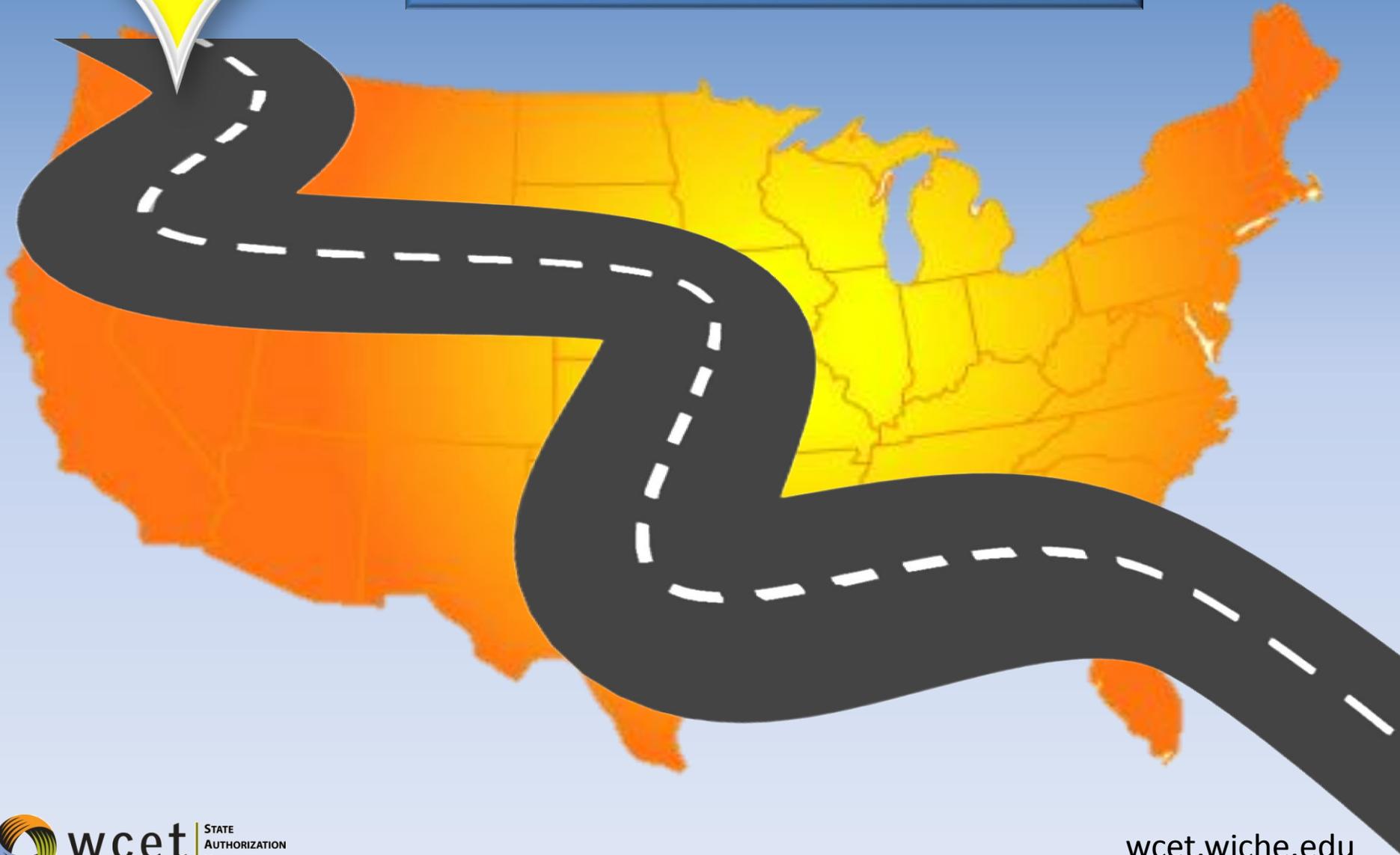
*Compliance Analyst &  
Project Manager*

*University of Washington*



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# The Long and Winding Road of State Authorization . . .



# The Long and Winding Road of State Authorization . . .

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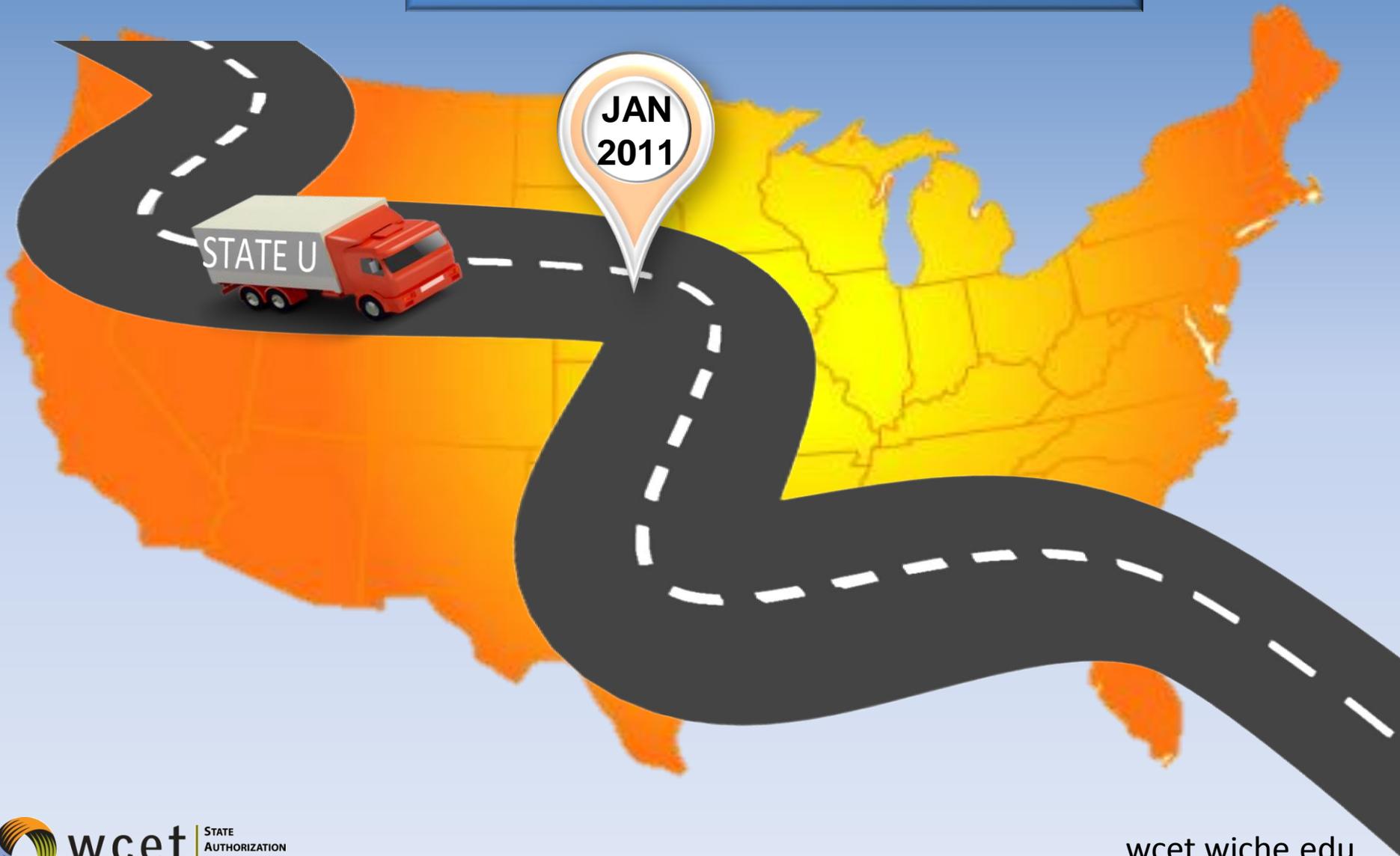
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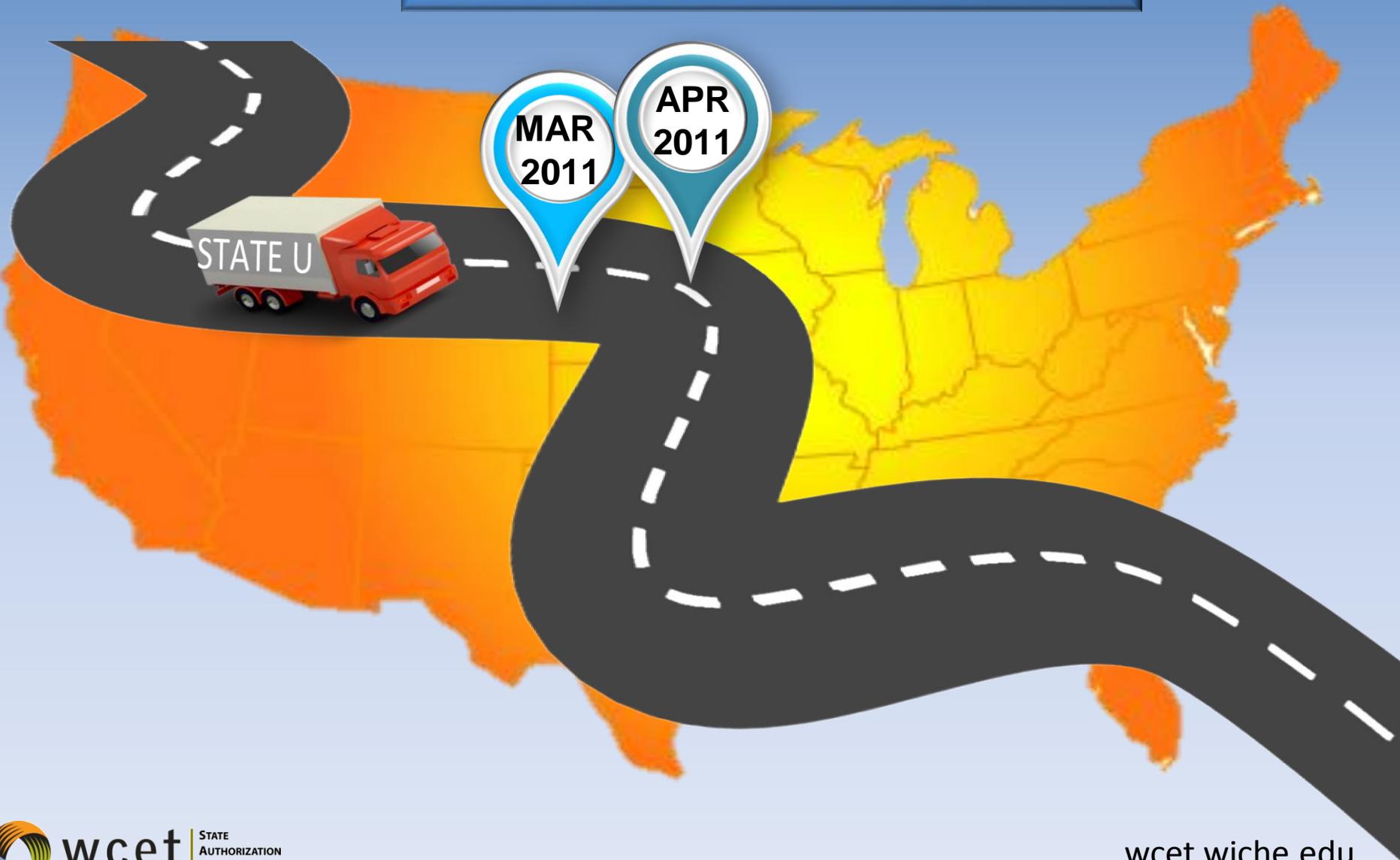
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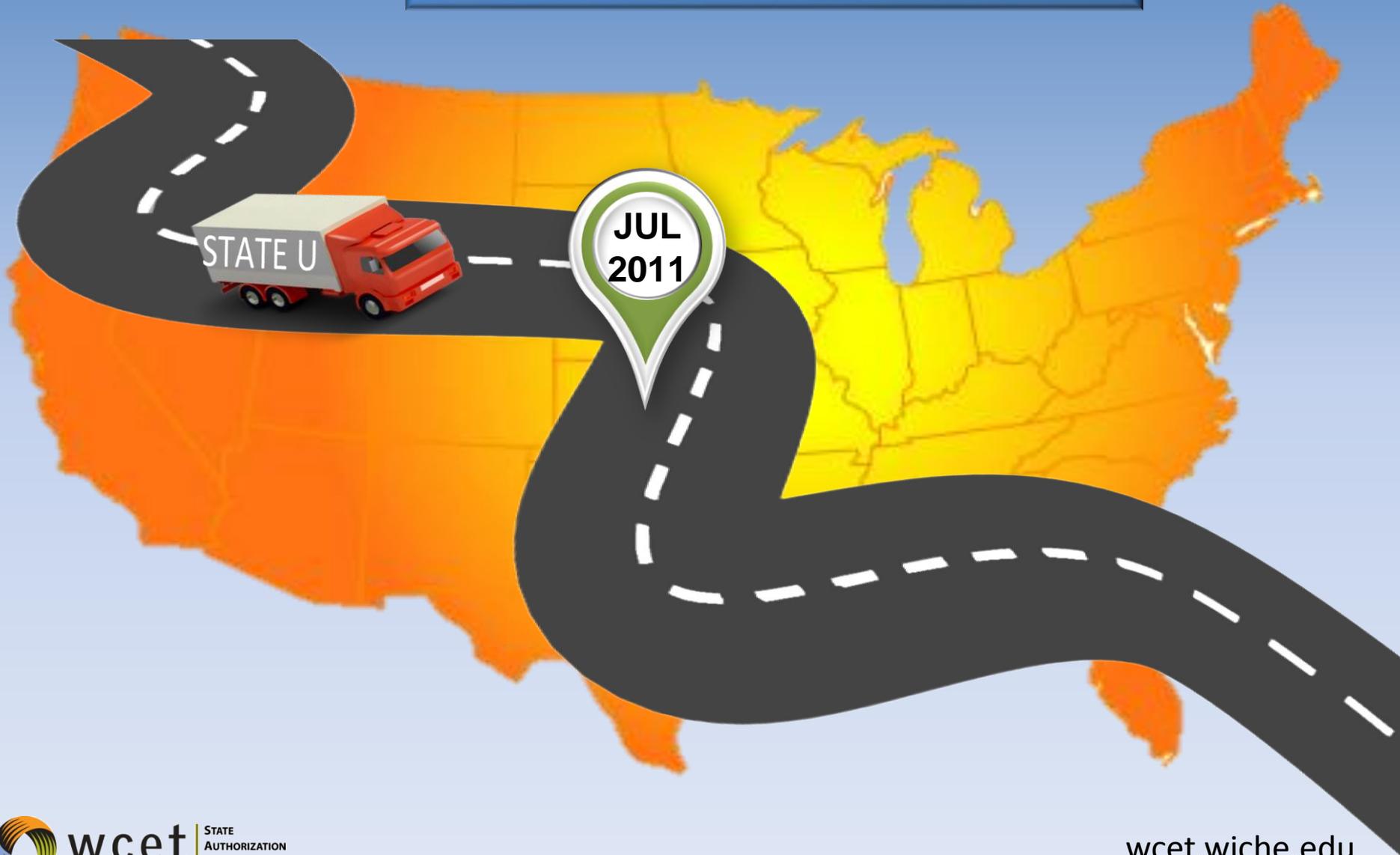
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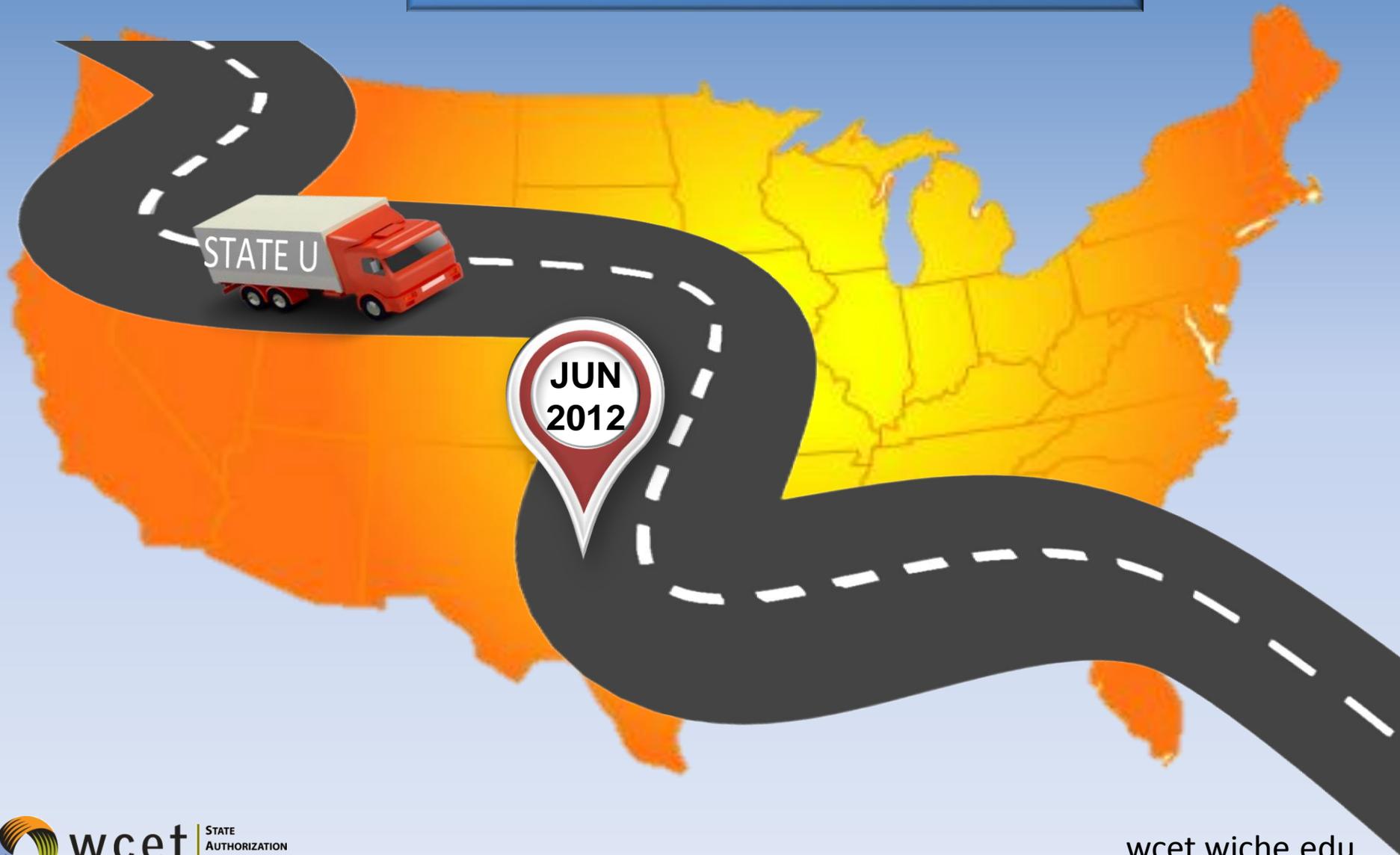
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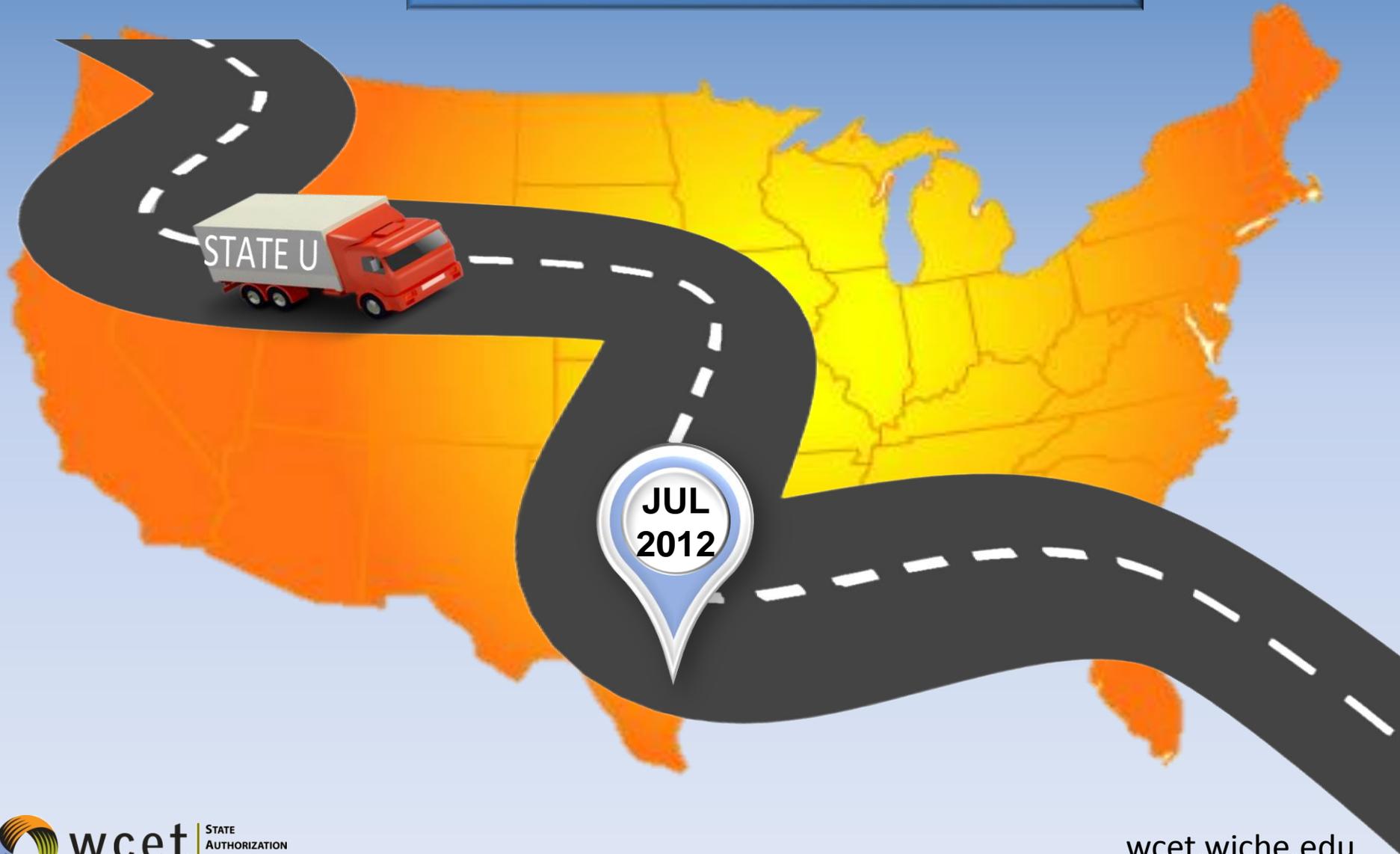
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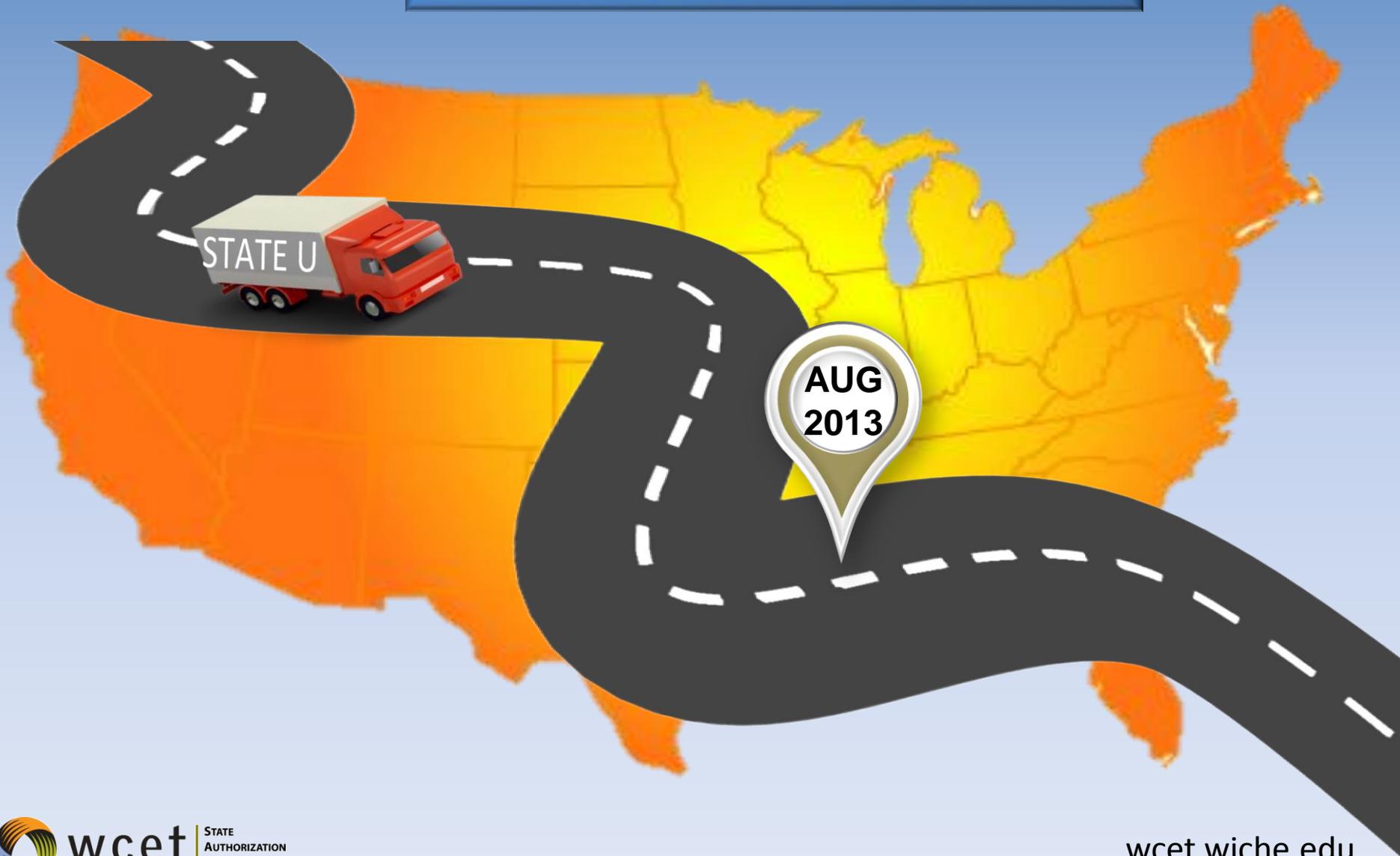
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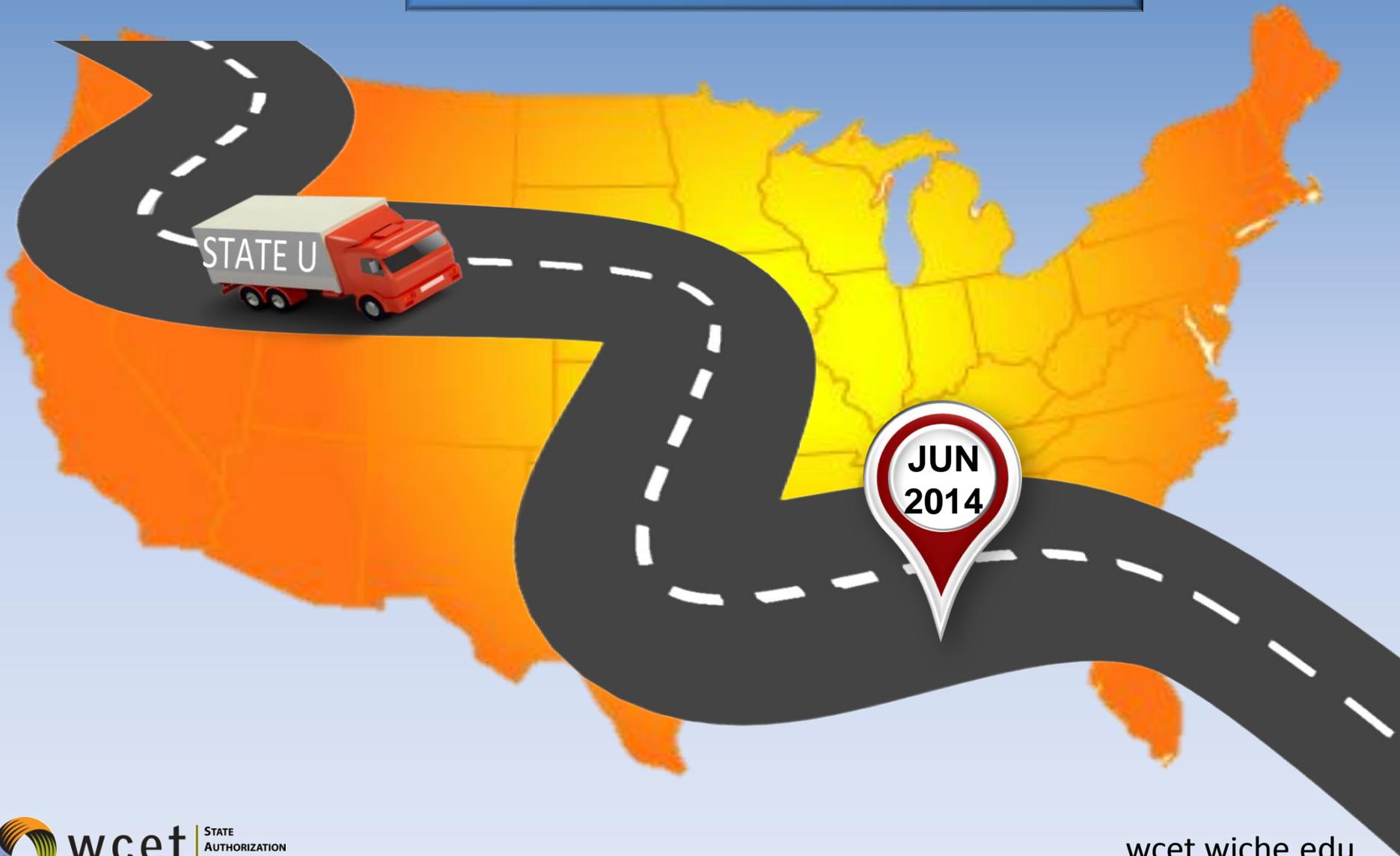
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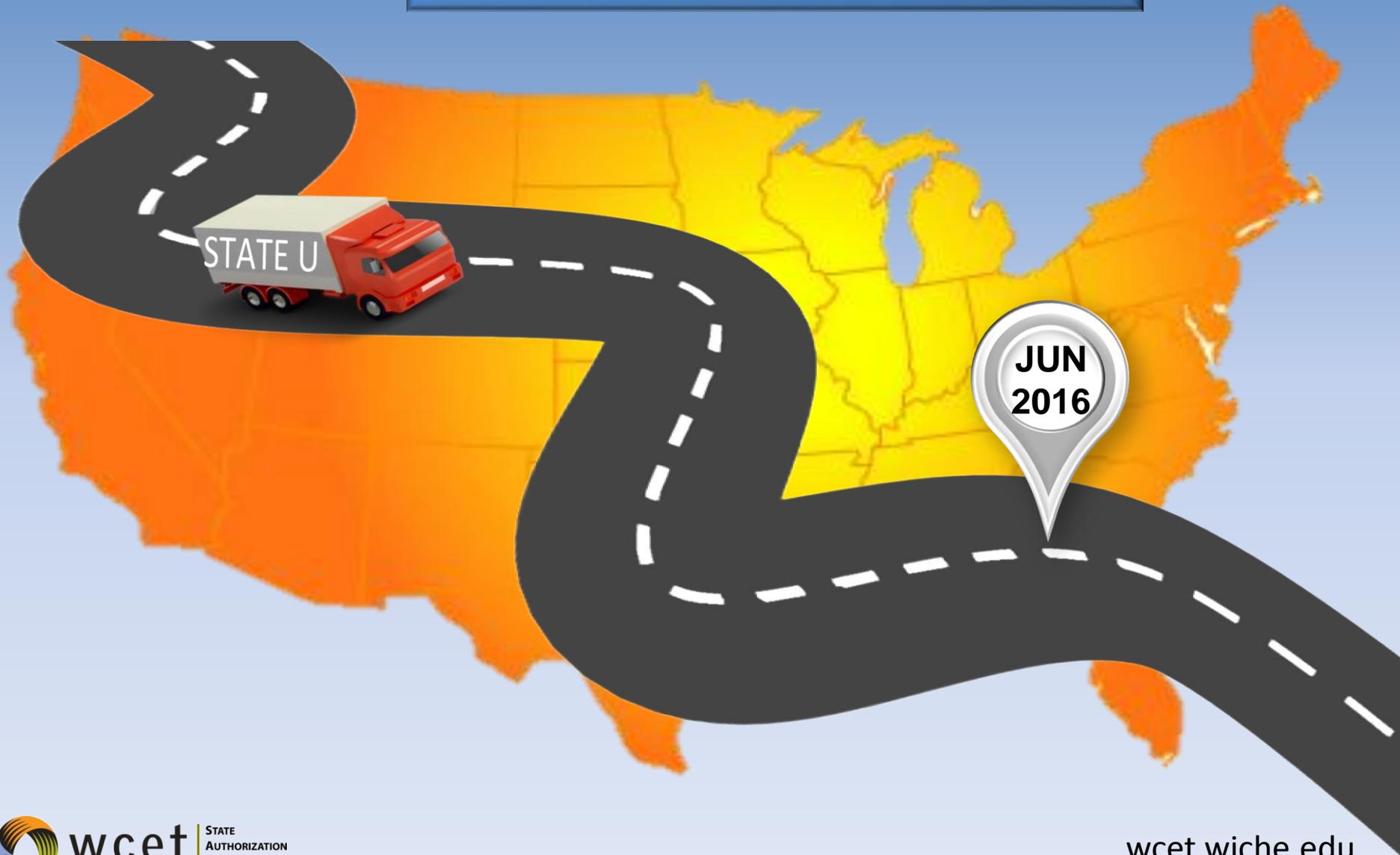
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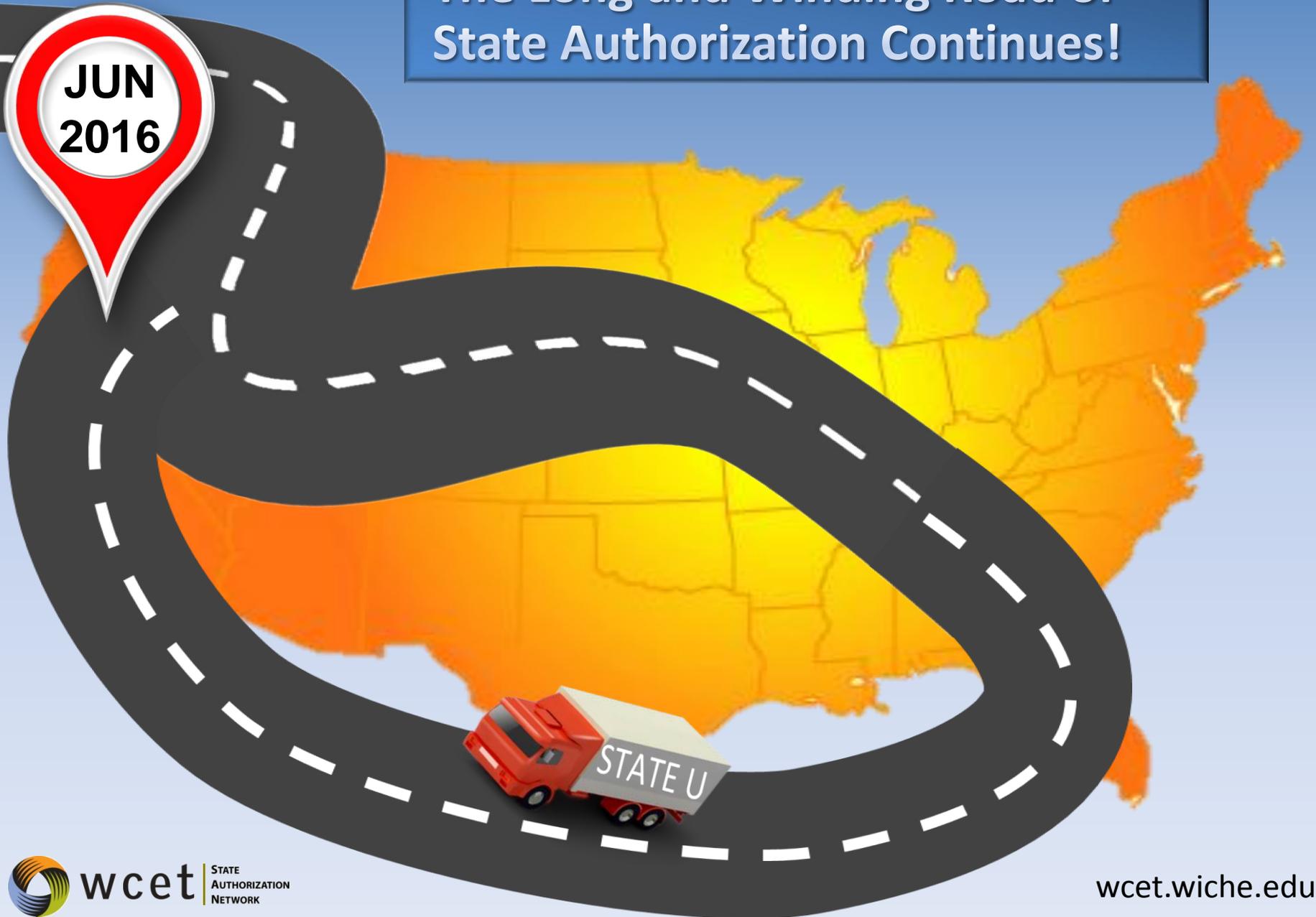


# The Long and Winding Road of State Authorization . . .



# The Long and Winding Road of State Authorization Continues!

**JUN  
2016**



# What We Know Today



- One truth remains . . .
- Careful management of all higher education compliance obligations – including state authorization – is a best practice
- State authorization is only scary if your institution does nothing
- A few tips for getting started and a few for staying in compliance

# The Best Defense #1: Know Your Institution, Its Priorities and Needs



- **Current and planned distance education activities**
- **Professional and licensure programs**
- **Internships, practica, etc.**
- **Other triggers for physical presence**
- **Related compliance concerns and priorities, e.g. accreditation**
- **Is SARA right for your institution**
- **A must: regular communication and interaction with university departments/units**
- **A must: develop strategies to document where students are located and where the institution offers/administers program-related activities**

# The Best Defense #2: Stay Connected; Get Educated



- WCET and WCET-SAN; Russ Poulin's blog: <https://wcetfrontiers.org>
- Read the Chronicle and Inside Higher Ed
- Get and stay connected to friends and colleagues at institutions in your state or with a similar profile
- Seek information that is appropriate for your job/role and your institution's profile
- Share what you know and learn widely

# Federal Update

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## **Russ Poulin**

*Director, Policy & Analysis  
WCET (WICHE Cooperative for  
Educational Technologies)*



# The Federal Regulations

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## The “Distance Ed” Regulation Chapter 34, §600.9(c)

A brief history...

- Issued in 2010
- Vacated on technicality in 2012.
- Failed rulemaking in 2014.
- Likely to be reissued in next several weeks.



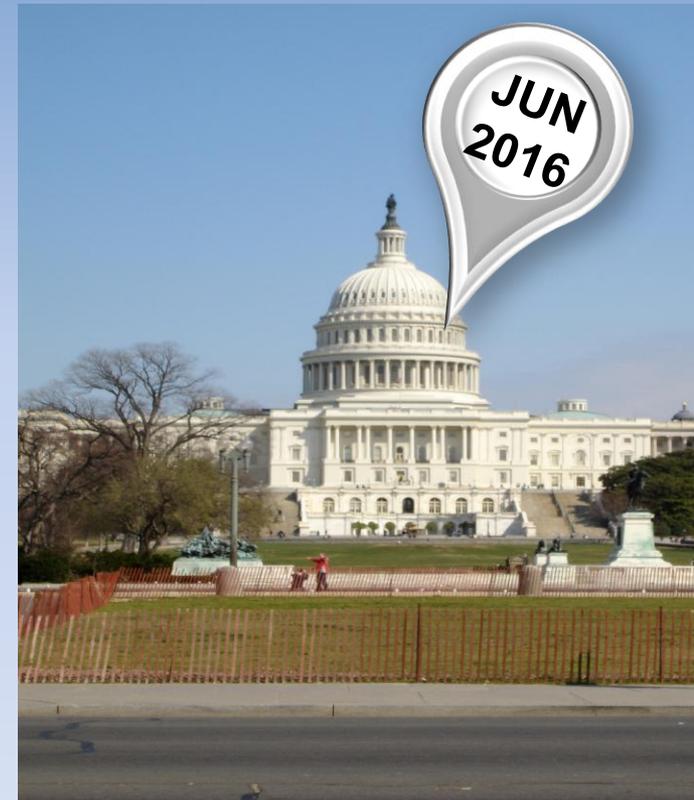
Chapter 34, §600.9(c)  
<http://tinyurl.com/lgzdvel>

# The Federal Regulations

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What might be included?

- Demonstrate compliance for financial aid purposes.
- Support reciprocity.
- Exempt military.

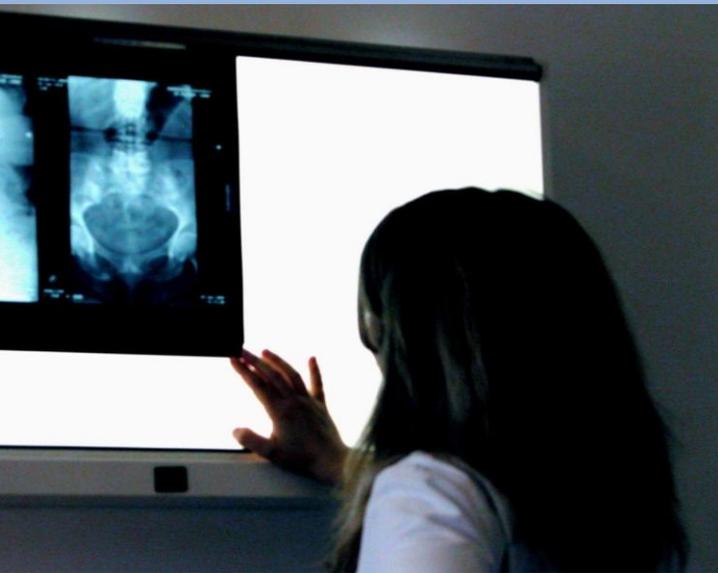


<https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/>

# The Federal Regulations

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What might be included?



- Disallow state exemptions.
- Increased notification requirements for ALL licensure programs.

<https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/>

# The Federal Regulations

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The Department of Defense is currently checking for state authorization for military students receiving Tuition Assistance.

# The Federal Regulations

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What should you be doing?

- Assess your institution's vulnerabilities.
- Inform leadership.
- Prepare to comment – opportunity might be short.



<https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/>

# State Authorization Resources

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<http://wcet.wiche.edu/initiatives/state-authorization-network>

## **WCET State Authorization Webpage**

<http://wcet.wiche.edu/focus-areas/policy-and-regulation/state-authorization>

## ***WCET Frontiers Blog***

<https://wcetblog.wordpress.com/>

# State Authorization Reciprocity Agreement (SARA) Update

**Sandy Doran**

*Director  
N-SARA*

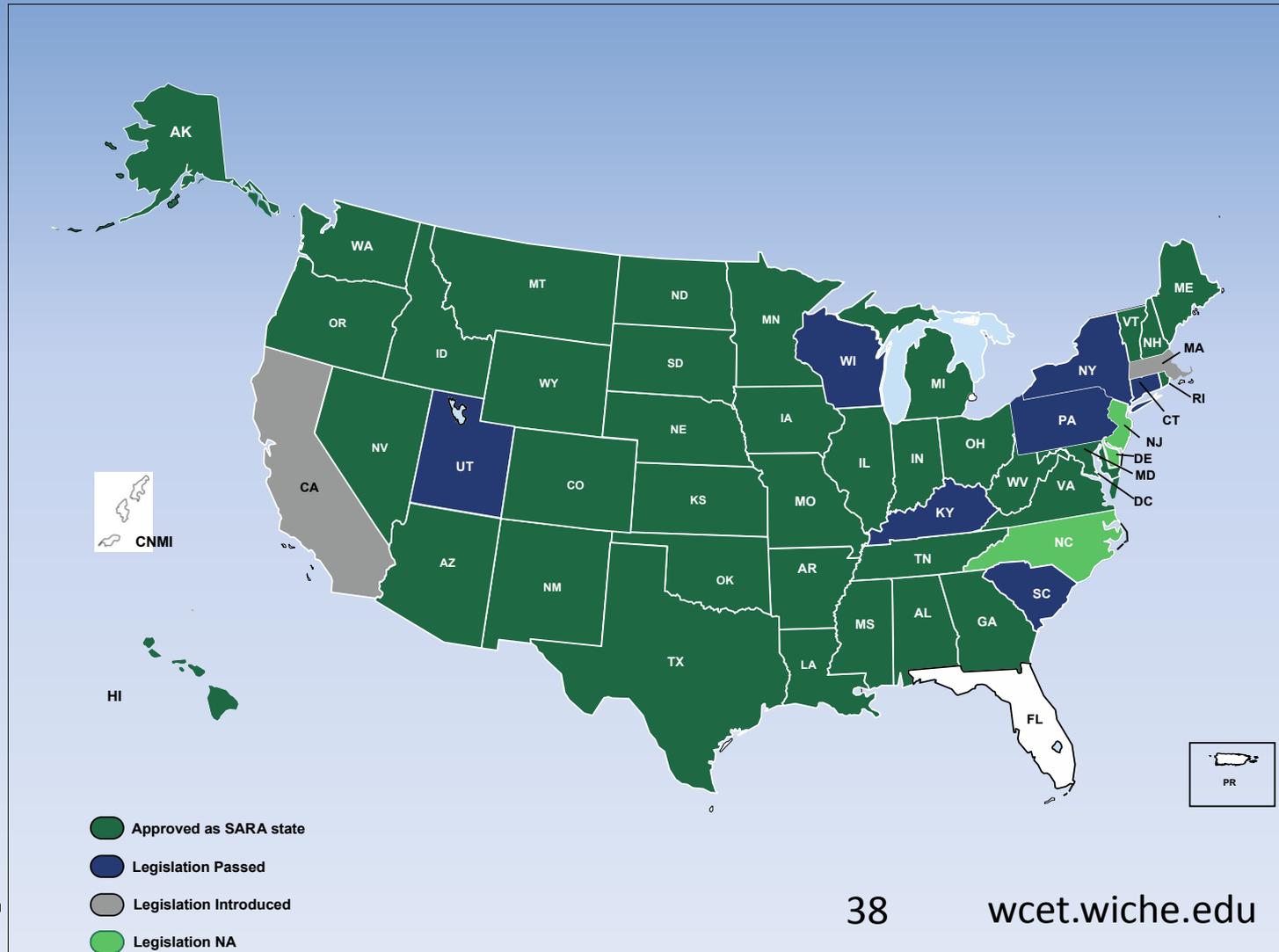


**Kiley Danchise-Curtis**

*Program & Outreach  
Coordinator  
N-SARA*



# The Current SARA Landscape



# What's Ahead for SARA?

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- Complaint and enrollment reporting and publication:
  - Continuation of complaint reporting every quarter;
  - SARA institutions now report their out-of-state enrollments (data will be published shortly);
- Continue to add states and institutions
- 501(c)(3) status for NC-SARA
  - Establish independent budgeting, accounting, auditing and IT systems.
  - Establish appropriate staffing levels.

# Questions from the Audience

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# Contact Information

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- Sandra J. Doran, [sdoran@nebhe.org](mailto:sdoran@nebhe.org)
- Cheryl Dowd, [cdowd@wiche.edu](mailto:cdowd@wiche.edu)
- Kiley Danchise-Curtis, [kdanchise-curtis@nebhe.org](mailto:kdanchise-curtis@nebhe.org)
- Russ Poulin, [rpoulin@wiche.edu](mailto:rpoulin@wiche.edu)
- Joel Tobin, [jjtobin@uw.edu](mailto:jjtobin@uw.edu)

# Learn More and Stay Connected

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## Save the Date for the WCET Annual Meeting

- October 12-14, Minneapolis, MN
- <http://wcetconference.wiche.edu/>

## Save the Date for WCET/SAN Compliance Workshop

- November 2-3, Cleveland, OH
- <http://wcet.wiche.edu/events/SAN-workshop/November-2016>

# Thank you WCET Annual Sponsors

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- **Blackboard**
- **Civitas**
- **Pearson Learning Solutions**
- **Realizelt**
- **VitalSource**
- **Ed Map**
- **Pearson Learning Solutions**
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