

International Compliance Best Practices and Implementation

October 18, 2016

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





WICHE Cooperative for Educational Technologies

International Compliance Best Practices and Implementation

October 18, 2016

International Compliance Best Practices and Implementation

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



Megan Raymond
Assistant Director Programs
and Sponsorship
WCET

mraymond@wiche.edu
@meraymond

Overview



Questions from the Audience

- 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.



Moderator

Cheryl Dowd

Director

*WCET/State Authorization
Network (SAN)*



Cheryl Young, Ann Tornese, Terri Taylor-Straut

Terri Taylor-Straut

*Independent Consultant
Action Leadership Group*



Ann Tornese

*State Authorization Coordinator
Indiana State University*



Cheryl Young

*Assistant Provost for
Global Education
Miami University*



Presenter

Terri Taylor-Straut

- *Independent Consultant*
- *Action Leadership Group*



Getting Started with International Compliance

- Where are your students?
 - Do you have a university process for determining student location?
 - How often do you determine student location?
 - How do you use this information for reporting?
- Are you serving US Citizens or international students?

If You Have Students Studying Abroad

- What countries are you serving students in?
- What type of educational services do you offer in each country (face-to-face; online content, internships, etc.)?

International Compliance: Who's Doing It?

1. Walden U. 4,275

Canada, Caribbean Region, Ghana
& Nigeria

2. American Public U.
3,776

Majority are deployed military

3. Fort Hayes State U.
3,212 (in error)

4. Brigham Young U-
Idaho 2,624

Primarily non-credit

5. U. of Phoenix-Online
1,130

No international marketing

6. Central Texas College
1,000

Majority are deployed military

Source: 2014 Fall DE IPEDS Data

Canadian Requirements

Province or Territory	Is Registration Required for U.S. Public IHE**	Is Registration Required for U.S. Non-Profit IHE**	Is Registration Required for U.S. For-Profit IHE**	Application Fee
Alberta	No	No	No	None
British Columbia	Yes	Yes	Yes	Degree Program \$3,500/program; Use of Word University \$3,500; Exempt Status \$3,500
Manitoba	No	No	No	None
New Brunswick	No	No	No	None
Newfoundland & Labrador	Did not answer			
Northwest Territories	Did not answer			
Nova Scotia	No	No	No	

** Information provided intended to provide guidance, it does not constitute legal advise. See Spreadsheet for additional details.

Canadian Requirements

Province or Territory	Is Registration Required for U.S. Public IHE**	Is Registration Required for U.S. Non-Profit IHE**	Is Registration Required for U.S. For-Profit IHE**	Application Fee
Nunavut	No	No	No	None
Ontario	It Depends	It Depends	Yes, private institutions, in addition to program review, are subject to an organization review.	See links in response for more details.
Prince Edward Island	No	No	No	None
Quebec	No	No	No	None
Saskatchewan	It Depends	It Depends	It Depends	Private IHEs are subject to the financial security provision the Regulations
Yukon	No	No	No	None

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Presenter

Ann Tornese

- *State Authorization Coordinator*
- *Indiana State University*



Contacts in Canada & the U.S. Territories

Call Upon Your
Best Detective
Skills



Develop a Plan for Obtaining Information

- Determine what programs you want to offer
- Establish a priority for contacting the territory or province authorities
- Find websites that appear to be established by the education authority in the territory or province
- REVIEW THE REGULATIONS prior to any contact
- Search the website for the correct person to contact
- Revisit the websites periodically to update contacts and check for changes in regulations

Documentation



Documentation

- Save correct website to your “Favorites”
- Save copies of all emails and letters to authorities
- If no response within a determined timeframe –
Contact again
- Save copies of all responses
- Contact “non-responders” once a year to attempt
obtaining a response.

Implementation

- Inform management of status of responders periodically
- Determine how to proceed with “non-responders”
- Inform Admissions office of which territories and Canadian provinces are acceptable to open admissions
- Inform other pertinent institution offices of status

Examples of Territory & Province Interactions

- Puerto Rico – Must apply to be on the Certification Registry of Exempt Institutions
- Guam – Must go through the University of Guam
- Be persistent in obtaining responses
- When sending letters – Always send certified with Return Receipt
- Tell them how you interpret their regulations

Presenter

Cheryl Young

- *Assistant Provost for Global Education*
 - *Miami University*



- A coeducational public research university located in Oxford, Ohio, founded in 1809
- Current student enrollment: 23,983
 - 2 domestic regional campuses + 1 center
 - European campus in Luxembourg
- Emerging e-learning degree opportunities
- #2 public university in the percentage of students who study abroad by the time of graduation
- 2,590 international students (87% Chinese)

The Way Back...

- 2008-2011
 - E-learning decentralized between Continuing Education at main campus and regional campus center
 - State Authorization Committee – MUDESA
 - General Counsel
 - Representatives from all academic divisions, IT, Registrar, Provost
- 2011-2013
 - E-learning Advisory Council (ELAC) charged with developing institutional e-learning strategy
 - Transition to further decentralization of e-learning
 - E-Learning Miami (ELM)
 - Regional Campus eMiami
 - Continuing Education (transitioning to Global Initiatives)

International Higher Education

- Partnerships
 - Educational institutions
 - American non-profit providers of study abroad
 - Ministries of Education
 - Professional organizations with legal counsel (e.g. AACUPI)
- Expertise
 - Global partnership agreements
 - Study Away
 - Cultural
 - Geographic
 - Clery Act reporting
 - Communicating across borders and institutions

August SAN Coordinator Call Summary

Notes from International Compliance discussion lead by:

Paul Thompson, Associate, [Cooley, LLP](#)

Cooley Approach

- Collaboration with local counsel in about 12 countries
- Completed detailed survey

Five Compliance Areas

- Authorization
- Data Privacy
- Tax Implications
- Consumer Protection in student recruiting
- Disclosures

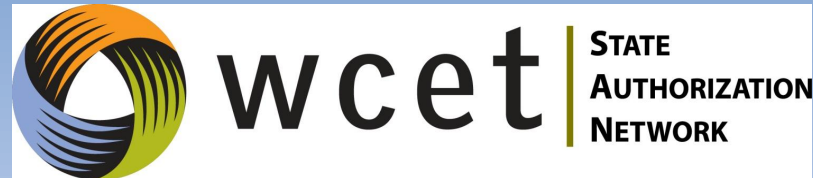
Export Controls and Foreign Corrupt Practice Act (FCPA)

- Restricted Countries

Contact Information

- Cheryl Dowd, Director, State Authorization Network, WCET | cdowd@wiche.edu
- Terri Taylor-Straut, Independent Consultant, Action Leadership Group | terri_straut@msn.com
- Ann Tornese, State Authorization Coordinator, Indiana State University | ann.tornese@indstate.edu
- Cheryl Young, Assistant Provost for Global Education, Miami University | youngcd@miamioh.edu

State Authorization Resources



<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/>

Learn More and Stay Connected

Register now for WCET/SAN Compliance Workshop

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

Sold Out

Save the Date for NASASPS Annual Meeting (partnership with SAN)

- April 2-5, Lexington, KY
- <http://www.nasasps.org/registration-materials>

Save the Date for WCET/SAN Advanced Topics Workshop

- June 20-21, Boulder, CO

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