



WCET State Authorization Network (SAN) Statement of Work & Call for Participation – Year 9

July 1, 2019 – June 30, 2020

<https://wcetSAN@wiche.edu>

The Problem

Before an institution offers any out-of-state activities such as: online courses; field experiences; faculty teaching online courses out of state; and recruiting or marketing, an institution is legally mandated to follow the other state's laws and must obtain any necessary authorization to operate in that jurisdiction prior to conducting the activity. Additionally, institutions must provide notifications indicating whether a course or program meets prerequisites for professional licensure or certification in the state where the current or prospective student will participate in the activity.

In 2010, the U.S. Department of Education released the first version of a federal regulation in which it expected each institution to demonstrate that it had the proper approval in each state in which it serves students. That regulation was vacated on procedural grounds. A new version of the federal regulation was released in December 2016, was to be effective July 1, 2018, and then was delayed until July 1, 2020. The 2019 Negotiated Rulemaking reviewed and came to consensus on language for new regulations. The Department will offer proposed language by Summer 2019. Note that federal regulations for misrepresentation and notifications are currently effective and enforceable. Additionally, each state requires compliance with that state's laws. In the last few years the Department of Defense began tying state authorization to an institution's ability to offer Tuition Assistance funds to military students.

Our Mission:

To navigate regulatory requirements for out of state post-secondary activities by working collaboratively.

How Do We Do This?

SAN sponsored analysis, best practices, training, timely updates, and resources are provided for SAN Members who serve students in other states or countries. These SAN sponsored activities allow members to be better equipped to manage compliance with state and federal regulations, reciprocal agreements, and requirements that exceed reciprocal agreements. SAN's close work with SARA (the State Authorization Reciprocity Agreement) assures that SAN provides services that complement and do not duplicate the benefits of SARA membership. In addition, other higher education issues are addressed as they arise and relate to compliance requirements (e.g. complaint requirements, regular and substantive interaction, data protection).

Activities and Benefits for Year 9 (July 1, 2019 - June 30, 2020):

SAN Coordinators.

- Each State Authorization Network (SAN) membership (whether an organization, state system, consortium of colleges, or individual institution) appoints **one to three SAN Coordinators**, depending on the number of institutions within the membership, to manage the membership.
- SAN Coordinators must supply contact information about the institutions that are part of their membership including: institution name, contact person with email, FTE range, WCET membership status, and SARA membership status.
- **Coordinator are expected to share the information with other institutions within their membership.**

Activities reserved solely for the SAN Coordinators:

- **Monthly Calls.** Monthly phone calls with updates (federal regulations, state regulations, and reciprocity), guests (providing insight on regulations or practical advice on compliance), and conversations with state regulators.
- **Coordinators' Email List.** A list facilitating questions and announcements between meetings.
- **In-person Coordinators' Meeting.** A full-day pre-conference session at the WCET Annual Meeting in Denver, CO in November 2019.
- **Website Access.** Coordinators will receive a personal log in to the new password protected SAN website. Coordinators are responsible for distribution of the membership log in (which will be provided to the coordinators) to the institution contacts within their membership.

Staff benefits. Everyone employed by a SAN participant may take part in the activities listed below. If the SAN member is an institution, all employees of the institution may participate. If the SAN member is a state system or consortium of institutions, employees of the institutions designated by the coordinators of the membership are eligible to participate.

- **SAN Website.** The SAN website includes member only content. The Coordinator for the membership will supply staff members with the institutional log in. SAN will continue to review and add new content.
- **Open Forum.** Monthly 30 minute Q & A opportunity for all members to discuss the identified topic of the month and ask questions of the expert of the month.
- **eNewsletter.** Monthly summary and updates of news, resources, and events.
- **Network Email List.** The SAN Network email list is very useful for those responsible for compliance. The Network email list helps members share information about changes to state regulations or processes, obtain advice on tactics that others have successfully used in working with a state, and receiving notices about upcoming webcasts, workshops, or conferences on state authorization topics.
- **Compliance Training.** SAN will provide compliance training in a variety of ways, including:
 - Webcasts – SAN Exclusive and public webcasts provide advice for both new and experienced compliance officers as well as information for other key stakeholders at the institution.
 - Face-to-face meetings such as the NASASPS Conference (with collaboration from SAN); the 2020 meeting with state regulators will be held in New Orleans, LA. The integrated sessions and meetings are vital to establishing relationships with regulators across the nation.
 - State Authorization Basics Compliance Workshops. These workshops are held on topics focused on the foundation of state authorization. As a SAN member, the cost to attend the workshops is substantially reduced.
 - State Authorization Advanced Topics Workshops – These workshops are held to provide a more in-depth analysis and direction for managing complex aspects of state authorization. As a SAN member, the cost to attend the workshops is substantially reduced.
- **Reciprocity Advice.** Updates on the State Authorization Reciprocity Agreement (SARA) including: steps that institutions can take to join and renew participation in SARA, updates on states joining SARA, support and clarification regarding the institution's compliance requirements under SARA, and any changes to SARA policy.
- **Revised State Regulations.** Track each state's regulations. SAN will inform members of any changes and details for implementation.
- **Emerging Federal Regulations.** Track the Departments of Education and Department of Defense state authorization regulations as well as other related Federal regulations. SAN will inform members about ways to provide input to the process and implementation of any regulations.
- **Reauthorization of the Higher Education Act (HEA).** HEA touches nearly every aspect of federal higher education policy. SAN will keep members informed of the new proposed changes to state authorization and related regulations.
- **The Guide.** The state tool formerly known as the SHEEO State Surveys is now being curated and managed as a joint venture by WCET|SAN and NC-SARA.
- **SAN Advisory Group.** Panel of SAN members serve the membership by making recommendations on programmatic issues of interest to the membership at-large.
- **Special Interest Teams.** Small working groups performing research and providing deliverables on the issue areas to benefit the network.

- **Focus Areas.** SAN will provide research and training on issues identified by members.
For Year 9, SAN will provide avenues for sharing information, research, and training on the following:
 - Continuous direction to members to utilize the SAN website for resources and attention to the routinely updated SAN website homepage for timely notices of events and new resources.
 - Develop charting for comparisons of compliance with Federal regulations and SARA requirements.
 - Direction for managing and understanding the variety of student complaint options.
 - Develop strategies for institutions to coordinate and manage international authorization compliance.
 - Interactions with Institutional Stakeholders to provide good messaging and creation of compliance collaboration.
 - Develop strategies and best practices to manage new and existing Federal regulations.
 - Provide updates and direction for policy issues ancillary to state authorization compliance.
 - Direction for managing and understanding the variety of student complaint options.
 - Develop strategies to work with institutional research to report activity location as an address field.
 - Professional Licensure Board Research and Best Practices.
 - Developing contacts with the various boards.
 - Strategies to work with the academic departments with programs leading to professional licensure.
 - Prepare updates and revisions to current Talking Points white papers.
 - Creation of Peer Support Unit.
 - Continued support to new State Authorization compliance staff members.

Membership & Renewals – view the current list of [SAN participants](#).

Higher Ed. Offices, State Portal Entities, Companies & Organizations* (office only)	1 Coordinator	\$3,000
1 Institution	2 Coordinators	\$4,000
2-15 Institutions	2 Coordinators	\$6,000
16+ Institutions	3 Coordinators	\$8,000

*Higher Ed Offices and State Portal Entities, Companies, and Organizations may choose from the larger memberships if they wish to include institutions.

- **Coordinators are responsible for sharing information with the other institutions/organizations within their membership.**
- **Coordinators are responsible for sharing the SAN Website log in with institution contacts.**
- At least one institution/organization within a membership must be a [WCET member](#).
- Memberships held by more than one institution must designate a single point of contact for the invoice; management of the division of the payment will be the responsibility of the institutions involved.

How to Join?

NEW MEMBERSHIPS -

- Step 1: Review the Statement of Work and Call for Participation Invitation for SAN Year 9.
- Step 2: New members must complete a short online application: <http://stateauthorization.org/>
- Step 3: An Invoice for payment will be emailed after receipt of the online membership application.
- Deadline for new member application submission: June 1, 2019 with payment due by July 1, 2019.

RENEWALS -

- Step 1: Coordinators will consult with all member institutions to update contact information.
- Step 2: If there are changes, ONE COORDINATOR will contact [Dan Silverman](#) with the changes.
- Step 3: If there are no changes, the membership automatically will be renewed and the invoice sent.
- Deadline for changes: June 1, 2019, with payment due by July 1, 2019.

Beyond the Deadline?

Contact us about the possibility of a partial year membership!

Questions and Contact Information					
<p>WCET SAN Website: https://wcetSAN.wiche.edu</p> <p>WCET blog with updates and recommendations: https://wcetFrontiers.org</p> <p>WCET Website: https://wcet.wiche.edu</p>	<p style="text-align: center;">WCET SAN Team</p> <table><tbody><tr><td>Cheryl Dowd WCET SAN Director cdowd@wiche.edu 303-541-0210</td><td>Dan Silverman WCET SAN Asst. Director dsilverman@wiche.edu 303-541-0285</td></tr><tr><td>Russ Poulin Senior Director; Policy, Analysis, & Strategic Analysis rpoulin@wiche.edu 303-541-0305</td><td></td></tr></tbody></table>	Cheryl Dowd WCET SAN Director cdowd@wiche.edu 303-541-0210	Dan Silverman WCET SAN Asst. Director dsilverman@wiche.edu 303-541-0285	Russ Poulin Senior Director; Policy, Analysis, & Strategic Analysis rpoulin@wiche.edu 303-541-0305	
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