

Tracking and Data Reporting Webinar - Transcript

Dan Silverman: (silence) My name is Dan Silverman. I'm the assistant director of WCET's state authorization network or SAN. I am pleased to welcome you to today's collaborative webcast with our colleagues from NC-SARA. Today's topic is tracking students, planning, compliance, and data reporting.

The state authorization network is a national organization of more than 800 institutions and agencies. Our goal is to support navigation of state and federal compliance requirements for out-of-state activities, postsecondary institutions. You can review the website for lots of useful materials.

Today, we will discuss requirements tracking students. We are pleased to have three SAN member institutions sharing their methods with the tracking of students for the purposes of institutional planning, compliance, and data reporting. We will also take a closer look at strategies for the tracking of military students and experiential learning places. We will take questions from the audience after the presentations. That's when you can [inaudible 00:02:11] as well. Please use the Q&A box. Any questions that we are not able to address will be saved and we will answer those questions to share after the webinar.

This webinar is being recorded. The recording, slide deck, presenter biographies, transcript, and other resources will be available at the NC-SARA and SAN websites next week. Presenters bring a wealth of experience so please review their biographies in a document we will provide to you in just a little bit.

Speaking of experienced presenters, it is my pleasure to turn this over to my colleague Cheryl Dowd. Cheryl, take it away.

Cheryl Dowd: Thank you very much, Dan. I appreciate that introduction and the introduction to our webinar today. We're very excited to have a very large audience today. We saw that we've had many registrants and we're wanting to move ahead with this wonderful set of information that we're going to be providing.

First, what we're going to see here with my colleagues Marianne and Jeannie is we're going to set the stage for you. Just why we do this kind of tracking but we want to move quickly ahead to our examples from our institutions. So, I'm going to start with just a little bit of the foundation. So, Dan, could you do the next slide, please?

Okay. So, why should we track? And so, there are different reasons why it's important for us to track where our students are located. The first reason is the benefits to the institution. We know that the institution can benefit from being able to know where the students are located so they can develop what their strategy is to support those students where they're located and also to be able to make budget considerations, perhaps marketing or other reasoning to be able to support where the students are located or to consider pursuing more students in a variety of locations.

Second is state compliance. We know that institutions are to be in compliance with the state laws and regulations of the states where their students are located. First is the state higher education agency requirements. Those are the institution's requirements that are a part of institutional approval. So, institutional approval is done either state by state where the students are located, you apply to the state agency following their requirements or participation in a reciprocity agreement for the specific distance education type of activities that are subject to SARA policy and when we talk about reciprocity requirements, I'm glad to have Jeannie and Marianne here to share more specifics about SARA requirements.

But in addition to institutional approval, there could be other approvals that are required from other state agencies within that state. For example, we could have a situation where you need program approval. So, if you have a program that leased professional licensure, you may be subject to the program approval with the specific laws, regulations, practice acts of the state where the student is located. And so, an institution needs to be aware of those and be in compliance with any requirements in that situation. Another state agency could be if the activities in the state rise to what is typically framed as doing business in a state. Then, the institution may need to be registered with the secretary of state, so there are requirements for that as well.

So, again, there could be other state agencies. The one I said is most prominent of course is those state licensure boards for professional licensure. Be aware of what their requirements are, if there are program approval requirements be in compliance with that.

And then, finally, we have federal compliance and so, with federal compliance, very similar to the state compliance, that the federal, the department of education, through its regulations, have indicated that an institution must have state institutional approval where their students are located or participate in a reciprocity agreement.

The specific thing to add to that, that an institution should be aware, is having a documentation structure at the institution, to have a process to know where your students are located, because that documentation should be an internal document for which your institution could then share with the secretary upon request as is designated in the regulation and so we point to that regulation to show you that what they're talking about is time of enrollment in the program or upon formal receipt of information from the student from the institution's processes and procedures, so again, hearkening back to what are your institution's processes to be able to share with the department.

And I should highlight again back to what I said about other state agencies because the professional licensure state boards are going to be important for you to have that understanding of where your student is located so that you know what the requirements are, what are the educational requirements in the

states where your students are located. So, those are the reasonings why. And I'm going to turn it over now to Jeannie Yockey-Fine.

Jeannie Yockey-...: All right. Thanks, Cheryl. I have this slide not because I want to get into anything seriously about professional licensure disclosures, which I know everyone's dealing with but that's not why we're here but I have it up because it's one of the reasons for SARA purposes that you need to be paying attention to tracking students and especially when you look at the second paragraph, which is that after all reasonable efforts have been made to determine whether a program will meet requirements, then you need to give the students the contact information for the applicable licensing boards.

So, in order to be able to meet that requirement, you would need to know where those students are to know which board applies to them. So, that's one area where it's important for tracking for SARA purposes.

There are a couple other things on here that aren't on the slides that are super important. One is very obvious, because California is a state that is not in SARA. So, you would certainly need to know any students that are in California.

One more thing Cheryl talked a little bit about, placements or clinical experiences. Anything like that that you must be tracking for some of the examples that Cheryl gave but also specifically to SARA, you need to know where your students are to make sure that you do not exceed the requirements of SARA, which is if you have more than 10 students in one placement, then SARA does not apply, so that would kick you back out into the traditional authorization. So, it's super important to make sure you're monitoring where those students are so that you can ensure that at no time are there more than 10 students in one location per program.

Those are really the top three things that are top of mind regarding tracking and SARA. And, with that, I'm going to hand it over to Marianne to talk about how that impacts data.

Marianne Boeke: Thank you, Jeannie, and thank you Dan for switching the slide. So, along the same lines that Jeannie just talked about, I'm going to talk very quickly about data reporting, but how tracking will help that and so that tracking is really to inform your SARA data reporting.

And just as a quick reminder, we are asking all SARA institutions to report this coming May 15th through June 15th on two things, distance education enrollment. That's the institutions report their exclusively distance education enrollments. These are the Fall EF report that you go to IPEDS and we just ask that you just aggregate that by state.

And also there's out-of-state learning placements. Those are the ones that are for teachers or nurses, we're talking internships, practicums, that sort of thing.

So, those are the two pieces that you'll be reporting on, and it'll be important to be able to track your students to be able to actually do this reporting quickly and efficiently. Next slide. I'd now like to turn this over to our colleagues and good friends over at Mount St. Mary's.

Michele Starkey:

Thank you, Marianne. So, hello everyone. I am Michele Starkey. I am the associate provost at Mount St. Mary's University and I will be presenting today with my colleague, Cairesse Grimes. She is the office of the provost coordinator and together, we tag team our state authorization efforts to remain in compliance.

So, first, we're going to tell you a little bit about Mount St. Mary's just so if you haven't heard about us, we are a Catholic liberal arts university primarily for women and we are located in Los Angeles, California and as Jeannie and Marianne mentioned, California is a little different because we are not part of SARA. So, we do have to go individually to each state and work out whether or not we can allow distance education and other educational activities in that state. We are about 90% female, even though we do have males in nursing and are adult ed and graduate programs, and we have six fully online programs, which is about maybe 80 to a hundred students but we track all of our students where all of our students are located because like mentioned there are many other activities besides just distance education that will trigger a need to be approved or authorized in the state.

And we do have, a lot of our students do take online courses, even though they're not fully online. They will take online courses and they may want to take online course while they're in another state doing an internship or practicum or while they're studying abroad or something like that, so we do need to know where all of our students are.

And so we will be taking today about both normal in normal times how we track our students and also during the pandemic, during COVID times, how we had to track our students. Okay, Reese will start us off here.

Cairesse Grimes:

Thanks, Michele. So, typically outside of COVID, this is our status and our process. We're allowed to offer distance education in 36 states and be allowed to encompass the states that we're authorized in, the states that we have extension status in as well as states that we're just not in their jurisdiction.

And so, back in 2017, 2018, I believe, we developed and implemented this physical location policy which was geared towards currently enrolled students and applies to fully online students, students who are participating in a study away program and they may want to take an online course while they're away in whatever location they are and then students who are planning to complete their clinical or internship in a state outside of California.

And the way that we collect this information is through our registration process. There's a screen that students have to ... Oh, I'm sorry. I didn't explain that. The physical location policy essentially requires students to let us know where they're located during their enrollment or while they're enrolled.

So, the way that we collect this is, like I said, through registration where they're required to update this information on a screen called or we called update physical location. Then, on this screen and you'll see in a second that we collect, the students enter their registered term, their state, and the state that they'll be taking their courses in. And then, if they will be located in a foreign country, they'll indicate foreign country there. But this process is mandatory for students. They will receive a hold on their account if they do not complete this and it's required for students to complete at least once a semester and our system, student planning, does provide the students with frequent reminders throughout the year so that they won't hopefully contact any bumps when it comes time to register.

And we monitor this information through a weekly informer report that we receive. We review this information. This report includes their information such as their student ID, their program, the current term that they're registering for, the registered residency and a few other fields as well. The one that we mainly focus on is the registered residency column, which shows us which state they indicated on that update physical location screen. So, if there's a state that we're not allowed to offer our online programs in, then that automatically jumps out to us. And then we go through a follow-up process where we look up the courses that the student is registered in. We confirm those courses and the student's location with the advisor and then kind of work from there. Next slide please, Dan.

So, this is a screenshot taken from our state authorization and professional licensure web page, which visually shows us where we're allowed to offer online courses and programs that are in, where we have a few restrictions and then where we're just not allowed to offer any sorts of things at all. And this particular screen has been, or this particular web page has been a good resource for our admissions offices, particularly our grad admissions and our weekend, evening, and online college admissions office as well as a program, so for example, if an applicant applies with a state or with an address outside of California, our admissions office automatically knows to go to this site to review and say like, "Okay. Would it be a problem to admit this student? If there is a problem, let's reach out to the provost office, Michele and I, to see if there's anything that we can do."

So, they have taken this on as a really reliable resource for them. And so, for our face-to-face programs, it's just slightly different and Michele's going to touch quickly on that.

Michele Starkey: Yes. I wanted to give you a couple examples of how our face-to-face programs utilize the diagram there, the web page. So, first of all, for one extreme, we have our doctorate of physical therapy program, which requires a practicum, their final semester, basically. I think it's a 24-week practicum they have to do or two 12 weeks and they have policies set in place already that a student may request to do that practicum outside of California and their policy is that the students have to request it at least a year in advance. And we work with the department, Caireese and I, to set up their own version of that colored state, because some of their rules are slightly different because they're on-ground program and so they know which ones they're allowed to and not. And some of them we haven't explored yet because no one's asked. So, we went with the ones they already had contracts in. And then if the student asks for a new one, they reach out to us in plenty of time, we have time to look into it and see whether or not the student is allowed to go there. So, that's one extreme. The perfect extreme.

And then, we have other departments. I will pick on our film department in particular. We have an MFA in film and television and the students are required at the end to do a final project. So, their last semester, they take this one class where they do a project and they are not so good about making sure students are aware they can't just go anywhere because they're allowed to do it anywhere, really, not just in the United States, even. They can go to another country, do it. Some are making documentaries or whatever they're working on, and so we have luckily through that other system that Caireese described, we have found out about it because the students have told us. I'm going to be located in New York while I'm doing this project. And so then, we are able to follow up but unfortunately, we don't always have a lot of time to spend and see and do the research to see if they are allowed to do it or not. We have had to tell some people, "No," unfortunately, but for the most part, we've been able to work it out.

But I share that as an example, that even though we have really good systems in place, it doesn't always work. We do rely on our colleagues to spread the word and make sure that the programs are aware and the students are aware of the rules.

Caireese Grimes: Just, Michele and Dan, you can progress the slide, please. Okay. So, this was just a screenshot of what the update physical location screen looks like from the student's perspective and the registered term state and, like I said, country here, if applicable, shows up on our informer reports. And from here, I believe Michele's going to take it over.

Michele Starkey: Yeah. So, quickly, I just want to tell you about, during COVID time, because we all had to go online quickly in March. You can go to the next slide, please, Dan. We had to, all of our students went online, so we really had to check quickly whether or not we were okay to allow distance education to all of our students. Luckily most of the states were flexible and gave exemptions during that time, but a lot of those expired at the end of summer or the end of December. And in

California, in Los Angeles in particular, we were mandated that we were not allowed to come back to campus, so we could not have students on campus even though we wanted to.

So, we had to get a report from our IT department that gave us all of our students' home addresses. We just assumed most students would go home to wherever their home address was and we were able to sort that by state and identify, we had five states that were not already green, that we were not allowed to offer distance education in. And so we then followed up, we verified that those students actually were living in those states and not actually staying somewhere else, and then we had to work to get approval or see if there's an exemption or things like that.

So, I will admit Caireese did the heavy lifting on that part. It was a bit of a process to get through. We actually just found out this week that Maryland, we were approved in Maryland for our three students that happened to be living in Maryland. So, it took a long time. We weren't approved early but anyway, at least we were doing our due diligence.

And then, the last slide, I know we're running out of time here, so I'm not going to go into it a lot but we just wanted to list some of the benefits that we at Mount St. Mary's in particular have in knowing where our students are and I will go turn it over to Embry Riddle Aeronautical University next.

Bree Meinberg: Thank you so much, Michele. Good afternoon, good morning to those of you in different time zones. My name is Bree Meinberg and I'm with my associate, Rachel Durrance and we're going to talk to you a little bit today about tracking military students. We're with Embry Riddle Aeronautical University and Dan, could you go ahead onto the next slide for me, please?

So, Embry Riddle has a three campus structure. We have two residential campuses, which are more like your traditional universities with dorms and then we have the third campus, which is actually, we call it worldwide, and it's a combination of online and our non-residential campuses and that's about 125 campuses at any given time and that's throughout the US and about 15 other countries. Of those 125 campuses, approximately 90 are located on US military installations. Within the worldwide division of our university, our student body is made up of about 22,000 students and over 75% of those students are either active duty, veterans, or military family members.

So, we do support a large number of military-affiliated students and one thing that I would emphasize above all else when it comes to the location tracking is the rules are exactly the same for military students as for any other student. I know that, with military students, something that comes up frequently is home of residence, because it's very much drilled into the military mentality that when you relocate, you don't lose your home of residence because you got transferred with the military, but when it comes to state authorizations, home

of residence is completely irrelevant. The regulatory bodies want to know where a student is physically located for the reporting period. I have yet to come across any regulatory body, whether that be federal, state, NC-SARA, anything that treats military students differently when it comes to location monitoring. Now, that doesn't mean that, as an institution, that you have to have a fully one-size-fits-all mentality but it does mean the same rules apply.

So, if managing the process is something that your institution has struggled with, from our purposes, we found the first thing you need to do is to get leadership and other stakeholders buy-in. And then, once you've kind of communicated with the leadership and stakeholders, you have to look at how you're communicating with them.

One of the things we've noticed is that we go in there and we start talking our own state authorization's language and we use legalese and the next thing you know, everyone is staring off somewhere else and not listening to anything we say.

So, one of the things we try and do is speak in plain English. Use analogies to say, "Well, it's kind of ... Think of it like this." And make sure that they're really truly understanding where we're coming from.

But one of the things that I think is one of the most important is to keep those lines of communications open on an ongoing basis, not just when you've got a process change or problem to deal with. At our institution, our chancellor and provost both know an incredible amount of information about state authorizations and because of that, when we communicate to them that we need to put into place a process change or there's a struggle that we need to address, we immediately have their support. We don't have to convince them of why it's important. So, doing that on an ongoing basis has really made our lives easier when it comes to when we do have challenges.

Now, when it comes to the process itself, we have found that combining automation with a hands-on support worked best for our student body, and what that means is that we've built an automated process for prompting students to review their address, notifying our office of conflicts, et cetera, but when it comes to the student communications, we bring in their advisor and they work with the student to address individual circumstances and resolve the conflict in a way that supports the students' needs. There's a lot of things that an advisor can do that we can't do with our computer systems. Like, for example, a student is in the middle of a move and we don't need to transfer them to a different campus, because in a week, they'll remove it. You do these things in a line with the process, the requirements, and the student's needs. And so, it's really not just a fully automated, check the box if you see an address that doesn't match, the student gets reassigned. You do that, you're just going to end up with angry students for the most part. So, we work with our advisors

and have them communicate with the student, get their needs, and find a resolution that will keep us in compliance but also support the students' needs.

Now, at Embry Riddle, we do have such a high number of military-affiliated students that every single one of our advisors are well-versed in military terminology, understanding the unique needs of a military student, that sort of thing. But, if you're a school that deals with a smaller population of military students, one of the recommendations I would make is to set aside a group of advisors that are your military team. They've learned about the unique needs of these students and they know how to support them, and so the process isn't going to look exactly the same at your institution as in ours, but the best practice for us has been that balance of automation and personalization.

So, with that, I'm going to have Rachel take over and talk a little bit about the specifics of the process that we developed and how we implemented it. So, if you can go onto the next slide, Dan. Thank you.

Rachel Durrance:

So, at Embry Riddle, we created a clear policy and, like Bree talked about, communicating with the stakeholders, communicating with leadership is super important to us. So, the policy, we wrote the policy and then we brought in a committee of everyone who thought we would need to be involved. So, for us, we have a fairly large physical footprint, so we have to bring campus staff members and VA advising all of those people that need to be a part of this to really build this procedure so that we've covered everyone and no one felt like they were being left out.

So, under our procedures and operations manual that's for our institution, we implemented the policy and it is out there for everyone to see. It's very clear and concise and made it easier for us to hold everyone accountable to follow the same policy. It made, for us tracking students and holding people accountable for making sure they were tracking students easier because it streamlined that process for us. Once the policy was finalized and published, we made sure it was sent out to all of our campus staff, all of the advisors, admissions, anyone who needed to have a copy of it and, in there, we also made sure to put who to contact if they had questions.

So, we gave them a policy and we also gave them solutions, so if they did have questions or things came up that they thought weren't covered under the policy or was confusing, they could reach out to us and ask those questions.

We also used our existing student support system, so at our institution, we used campus solutions. So, we used that to build our address verification process. And so this obviously includes military students because we don't differentiate students here. All of them are just Embry Riddle students. There's nothing civilian, no military. So, it allows for them to have multiple addresses in the system. And so, for state authorizations purposes, we look at physical address. That's what we're looking at for tracking purposes. So, the other addresses that

are included, so like if there's state of home resident or mailing address, those can all be included in the system but aren't what we're looking at when we're looking at tracking.

As well as part of the automation process, just like that at Mount St. Mary's, we also use address verification in the registration process. So, the two big terms a year, so twice-a-year students are required during registration to verify their address. And, to make it easier for them, because talking about using plain language and not using state authorization specific, we ask students where are you going to be physically located this term? So, that helps students know, "Okay, I don't need to know my home address. I need to say, 'Oh, I'm going to be in Florida for this term,'" so we can know exactly where their students are going to be so that we can report them accurately.

And then, just knowing that their military students do have unique needs. So, with PCS, TDY, just any other changes they have going on, making sure advisor or student services offer your institution kind of sorts that out is really communicating with new students.

We also saw this as a retention tool, so we kind of look at it twofold, that yes, we're helping to make sure we're tracking students so we know where they are, but we're also using it to keep in contact with these students and help them to progress in their degree. So, for a lot of our military students, we've found that it's easy for them to just, "Oh, I'm busy. I have a lot going on with ...", "I'm PCSing," or, "I'm on a temporary duty assignment and I'll just come back and I'll take classes later."

So, this kind of personalization of the advisor reaching out to say, "Hey, I know you have a lot going on with your PCS, but we have this class at this term that'll work with you because you'll be settled in your new duty station and these are the things that will be there for you."

So, we've found that that really helps our students and really helps the advisors to really get to know the students, so they can really help them get to the end of their degree and get to graduation, which is the goal. So, okay. Now, we're going to turn it over to our colleagues at the University of Kentucky.

Emily Woods:

Thank you, Rachel. So, yes. We're from the University of Kentucky. This is my fabulous team that works with me and Christina Walker will also be sharing a little bit as well. Dan, if you can go to the next slide. All right. So, key elements that we were considering as we were developing a tracking process for experiential learning. The first was using technology and processes that may have already existed at our institution, to track student location. So, using survey tools such as Qualtrics or our course registration system, the course registration was already asking students about their home and current addresses but we want achieve further, asking question about physical location. So, we added an additional question and I will show the example of that later.

The second is once we have that information, then researching and disclosing the authorization information, so that means researching the statutes and regulations of the relevant licensure boards, if it's a licensure program. That means obtaining any authorizations that are required and working with the programs to even decide is this a state that they want to offer this program. And then, also just being able to disclose to students, we have a compliance database that can be used by both students, faculty, staff, anyone on campus to see if a placement is authorized to happen in a given state for a given program.

And then, building a relationship with the program. So, part of it is an educational campaign of explaining to programs why experiential learning and tracking where our students are for those placements is important, but also giving them the tools and resources to do their own monitoring, even though we work with them and review the placements at least once a year, the authorization information. We also want to get programs the empowerment to be able to monitor their own compliance before they even place the student.

And then, getting to the end of the year, looking back and saying, "How can we keep improving this process? Are there no tools we can add to make this quicker, more efficient?" You'll see my colleague Christina has developed a really amazing survey tool to gather this information, but just constantly looking at the process and saying, "How can we make this better?" Dan, if you could go to the next slide.

So, this is an example of our course registration question. So, students are required to tell us where they will be physically located while taking courses. They are not able to register for courses for a term until they answer this question. We also have it where, if they are located internationally, there's a spot for that under state and then the list of countries will appear. So, we can also track where our students are internationally in addition to states. And I will now pass this onto my wonderful colleague, Christina.

Christina Walke...:

Thank you so much, Emily and hello everyone. I'm Christina Walker. I use she, her, and hers pronouns, and to continue, as you know, like many fields, this area requires collaborative effort and the continued exchange of information and not only do we, of course, as compliance administrators need to know where our students are located when enrolled but equally, we need to have a method of identifying of those locations outside of state borders and internationally where students are completing educational activities, to insure the institution is legally operating and complying with the applicable laws and regulations in those places.

So, now I actually want to point out this quote that I've included and it states that assumptions are dangerous things to make and, like all dangerous things to make, bombs, for instance, or strawberry shortcake, it can make even the tiniest mistake, you can find yourself in terrible trouble.

So, one of the things that we notice early on, which I'm sure you can relate to is that, because these laws and regulations were fairly new, we had many faculty and staff making these assumptions about completing out-of-state activities.

So, for instance, some of the things we would hear would be like, "Hey, I've been scheduling these placements for the last eight years," or, "Hey, I'm a licensed professional for 20 years. I've even served on a state licensing board, so if anything was required, I would know."

So, essentially, these assumptions that our institutions and students can just head over into the next jurisdiction without anything additional being required. And, of course, we know from working in this industry that that's not always the case.

And so, some of the examples that we found were, "Hey, there are recurring fees or applications before you can do this activity or maybe we need a waiver or actually this activity is not permitted." And we also found that sometimes programs would just be doing things in international borders without us having knowledge. Also, some programs had to pay fines for being in a jurisdiction where they were not authorized.

So, with that stated, next slide, please, it was very important that in concert with our other automated tools, we leverage data through our Qualtrics surveys, which you see here. So, excuse me, Emily and I work with separate colleges and programs and we adapt our surveys accordingly based on the type of program. And for this survey, this is for a licensure program that also has out-of-state activities. Next, please.

And the contact that's completing the survey essentially just selects their college, the program that they are reporting for. Next, please. And if their college or program is not listed, maybe it's a new program. Maybe it's a program that we have not identified yet. They would put that information here. And we can see on the next two questions is we are getting at trying to see if a college or program is engaged in any of these physical presence activities in another state. That's really important to know and then we're also looking at where they actually engaged in this activity. Next, please.

And then we see here that we have actually an option for international locations as well. This was a very big thing. This past summer and this past year, especially in mid-COVID-19, so it was really important for us to note those locations whether they were occurring at the moment or anticipated. And then our next question here, we are tracking the enrollment of students. It's important to note here that we have included where students are permanently or temporarily, again, a lot of assumptions made that maybe if a student is somewhere physically located for two months versus the whole semester, the whole year, it makes a difference. We know that's not always the case. Next, please.

And then, these questions here, essentially, we are trying to determine if our program or college has already worked with UK legal or our legal department to establish an agreement for conducting an out-of-state activity or if they have a consortium agreement. As we know, if they have already gotten a clearance through legal or if they have some type of consortium agreement which offers an exception, then we would save time and the headache of trying to mitigate a situation when there's actually not a problem in the first place. Next, please.

Now, this question here is getting at whether the student is already licensed in the state where they are completing a clinical or practicum. Of course, we know, for example, if it's a post-licensure program and say we weren't otherwise authorized in a state, if that student is actually licensed while they're engaging in that activity, generally we would be able to have an exception here. Not always but in most circumstances and so, again, it's about saving time and energy and effort, trying to mitigate a problem that doesn't exist in the first place.

And then, finally, we end with the question of has a program or college worked with our legal department to already coordinate activities that are occurring internationally? For instance, if a program lists that they are completing on-the-ground activities internationally, typically, that wouldn't be authorized, but if they've already received a clearance from our legal department, then we can kind of check that off the list and ensure that they are already legally compliant.

So, in sum, writing these surveys to elicit specific responses has allowed us to gather the needed data that assists us not only with tracking but with annual reporting, ensuring legal compliance, and then last, identifying needed mitigation when it's appropriate. So, I will go ahead and pass this along and thank you so much.

Cheryl Dowd:

Great. I think, this is Cheryl, I'm going to take it from here to do some Q&A. We've had a lot of good questions added to the Q&A section, so thank you very much for that. I think what you'll see here is we were fortunate to have different types of institutions. We had a California private non-profit. We had a private non-profit in Florida that also relies on reciprocity and has physical presence in some states, so they have to manage in that regard. And then, finally, we had our public institution and one thing that I found consistent through all of the institution's presentations is the amazing collaboration they have at their institutions to get this work done and they spearheaded wonderful structure for that. First question I'd like to go back to. Jeannie or Marianne, if you could do the first. There were a lot of questions about the whole 10-person rule in regard to field experiences. There were several questions. So, if you could just state to that and maybe direct them to more resources on that, I think they would really appreciate it.

Jeannie Yockey-....:

Sure, and I did answer several of those questions but to recap that, the policy is about having no more than 10 students in a placement per program at the same

location. So, what that could mean is you could have a nursing program that has placements at a certain hospital. At the same time, you could have occupational therapy students at that same hospital in a whole other department because those are two separate programs. There was also a question that came up, too, that could we have some students that are on a Tuesday and then a different group of students from the same program, they're on a Thursday? No. The intent, again, is per program, so how that program runs, if it's per semester or however you are set up. Hopefully, that helps.

Cheryl Dowd: Thanks, Jeannie.

Jeannie Yockey-...: Sure.

Cheryl Dowd: Another question we have because on our call today, we have institutions that are not necessarily participating in SARA. Either, they're in a state that is not a member of SARA California, or they're an institution who was chosen not to participate in SARA.

So, this question I think will go to our friends at Mount St. Mary's University, please. If a student has moved to a state for which the institution is not authorized, what is the process to remove them? What are you doing because I think institutions will probably handle this differently but how are you addressing that at your institution?

Michele Starkey: Yes. Thank you. First, we do try to capture that information before the class starts, before the students actually start the courses and then, in that case, we work with the advisor and the student and let them know the rules and the regulations and advise them on what their options are, and that can vary.

For example, if they're going to be in Washington DC, it's possible that they, when they're actually taking their courses, doing their online work, they'll be in Virginia while they're ... And so, there could be a neighboring state that they'll actually be living in and be able, and then it will work.

Other times we have had to say, "I'm sorry. We're not allowed to let you take that class while you're there." And so, then I know we have some study away or because we have exchanges with our other CSJ institutes around the country in the United States. And so, there will be some people doing a semester abroad but they want to take an online course from us while they're there because the institution doesn't offer the course they need or something and we'll have to tell them, "Sorry. You're going to have to wait and take it till you come back."

We've also had instances, though, of during the semester where someone moves, especially now during COVID where everything's online. People have been moving a lot for various reasons. And so, our general rule is if it's for less than half the semester, we allow it. If it's temporary, we kind of allow it but we also then know that we can generally teach out somebody so we can finish your

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course, but then you're not allowed to take any other courses online from that location from us.

Cheryl Dowd: That was [inaudible 00:48:42], Michele.

Caireese Grimes: If I could also add, Cheryl.

Cheryl Dowd: Sure.

Caireese Grimes: We really involve our advising department and our programs, in this entire process, so we work with ... What's Jamie's title again, Michele?

Michele Starkey: Director of academic advisement.

Caireese Grimes: Yes. So, her office, we share a lot of this information, essentially all the information that's necessary particularly for her and the students that they advise. We share this information with them and make sure that they understand our processes. We ensure that they have the information at hand and know that we are the resource if they aren't able to get the information that they need off of the state authorization and professional licensure web page that they can always come directly to us if they have any questions so their office knows to look out for students who might want to move temporarily or take another course somewhere for the semester, the information and the communication between our office and theirs really helps to kind of monitor those situations.

Cheryl Dowd: Great. Thanks for that additional context. I think this is for Marianne. "Should hybrid programs be included in SARA reporting of student location?"

Marianne Boeke: So, no. You don't need to worry about hybrid courses for the distance education enrollment portion and that's because you don't report those in the IPEDS EF report. So, that's helpful. Good question.

Cheryl Dowd: Okay. "In normal times, my institution offers experiential learning credit outside of our state lines. For example, faculty members may travel with a group of students to another state to engage in a hands-on learning project for credit. It sounds to me like this could very well fall under I guess SARA policy or state authorization." I think I'm going to give this to Jeannie in terms of how would you address an institution that has faculty members who travel with a group of students to another state to engage in a hands-on learning project?

Jeannie Yockey-...: Sure. So, a lot of things would come into question. One, is it truly new learning? It sounds like maybe it would be, so that would certainly be different than an internship or a clinical experience where you might have preceptors there or faculty that just drop by just to check on things.

And another question then to look at is if it is new learning, then you would need to make sure that you follow SARA policy to not step outside of SARA, which would be that faculty member and the students would not be meeting more than six hours per semester face to face.

Cheryl Dowd: Great. Okay. Next question. I'm not completely sure but I think Marianne and Jeannie, you can address this. "Is there a place on the SARA website that shows reciprocity among states for NC-SARA states?" Do you want to perhaps explain what states are member states, please?

Jeannie Yockey-...: Sure. So, we have 49 member states and three territories. So, of the states, California is the only state that is not a member of SARA and institutions are participants in SARA. So, there is that distinction there and the states, of course, must either be a member of a regional compact or they must affiliate with a compact in order to be members of NC-SARA and then, again, that distinction for participation in SARA will be that the institutions participate. I hope that helps.

Cheryl Dowd: Great. Okay. This, for our Embry Riddle folks, "What about military students who serve on a ship that moves around for months? It is based on state of residence or where the base is located?" Could you talk about location of student, please?

Bree Meinberg: Sure. So, yeah, in going back to our presentation, definitely not home of residents. As a general rule, that does not apply pretty much for anything when it comes to state authorizations. So, with the way we handle students that are out on ship, which is a pretty regular occurrence in particular at some of our campuses in the Pacific Command, because there's a lot of Navy bases there and so this is pretty common.

So, the way we handle it is that we report as the station that the ship departed from as their base location, because generally, when you're on a ship, you're in international waters and so the last US territory you were at was the place that your ship departed from. So, generally, that's the base they're stationed at and that's what we use for that. Anything you want to add to that, Rachel?

Rachel Durrance: No. And that's typically where students' addresses are, like their APO address that they record for their boxes where they're getting mail and that kind of stuff. That's the address that they're using.

Cheryl Dowd: Okay. Let's see. Caireese and Michele, the map that you shared with us, "Is your map, is all of this approval that's required such as the color code? Is it just for programs that led to professional licensure or was it the states for which you are approved to off-track activities for institutional approval?"

Michele Starkey: That particular map, which we do have the link for it, too, on the slides, so if you want to be able to go to it, it is an interactive map. It is just for state

authorization purposes, distance education purposes. Professional licensure, we have a different button on the web page that you would go to to find out more about those approvals.

Cheryl Dowd: Great. Thank you. Marianne, to clarify-

Dan Silverman: Cheryl? May I interrupt for a second, Cheryl?

Cheryl Dowd: Of course. Yes.

Dan Silverman: I think this probably be our last question.

Cheryl Dowd: Okay. Thank you. I appreciate that, Dan. So, this is a Marianne question. To clarify an earlier question, the asker is looking for NC-SARA data reporting purposes. "Are you saying you don't really need to ask students physical location other than fall term?"

Marianne Boeke: Okay. Good question. So, when we're talking about reporting, we do have two different pieces and so for the distance education enrollment reporting, we are asking to look at what you report to, kind of what we call your file snapshot. So, we are just looking for that EF IPEDS report that your IR director does in the spring, but based on fall.

However, when you think about the out-of-state learning placements, that's going to be all year, so you're going to have to do all of them, get started between January 1st and December 31st, you'll be tracking those students year-round.

And I would just also say that I think it'd be hard not to track students all the way around because you're going to need to do that for other purposes related to the federal regulations, SARA policy and state policy as well and that's in terms of notifications and disclosures.

Cheryl Dowd: Thank you, Marianne.

Marianne Boeke: Sure.

Cheryl Dowd: Well, I'm going to turn it over to Dan, but I first want to thank everyone for their very good questions, and we're not going to be able to finish these questions. There are 57 questions left. We are banking them, that's in the Q&A. The questions in the Q&A, we will share with our presenters and get some answers. And those will be posted along with the recording and the slide deck and the biographies and a transcript. So, I'm going to turn it over to Dan now. Thank you, everyone.

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Dan Silverman: Thanks, everyone. We're just about done here, but here's the contact information for our wonderful presenters, should you like to reach out to them and, again, you will receive this information.

And please do stay more connected with SAN. We've got great resources for you on the website and if you're not a member, we would encourage you to join.

Coming up, if you want to get involved, this is for members and non-members alike, we have an advanced topics workshop coming up in March and a basic workshop coming up in the summer. And another great resources is Russ Poulin wrote a blog post on our Frontiers blog about IPEDS and some new information on recording distance education data for that purpose. As always, please do check out our website.

I would like to thank all of our wonderful presenters from NC-SARA and Marianne Boeke and Jeannie Yockey-Fine with NSF and Cheryl Dowd. From Mount St. Mary's, we had Caireese Grimes and Michele Starkey. From Embry Riddle, we had Rachel Durrance and Bree Meinberg. And from University of Kentucky, we had Christina Walker and Emily Woods. Thank you all so much for coming. Cheryl, would you like a last word?

Cheryl Dowd: Just to thank you, Dan. Thanks for being our host and I hope everyone has a nice day.

Dan Silverman: Thanks, everybody.