



**Compliance Worldwide:
Institutional Approaches to International
Compliance**

February 16, 2022

Welcome!

Use the Chat box for questions.

Recording, Slide Deck, and Resources will be available next week on the WCET/SAN website.



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Who we are

The State Authorization Network (SAN) empowers its members to successfully resolve postsecondary regulatory compliance challenges.

We provide expert analysis, resources and training to prepare for emerging issues, collaborate on compliance strategies, develop solutions and evaluate their efficacy.

Our members are digital learning and compliance professionals representing 800+ institutions and organizations nationally and across all sectors.

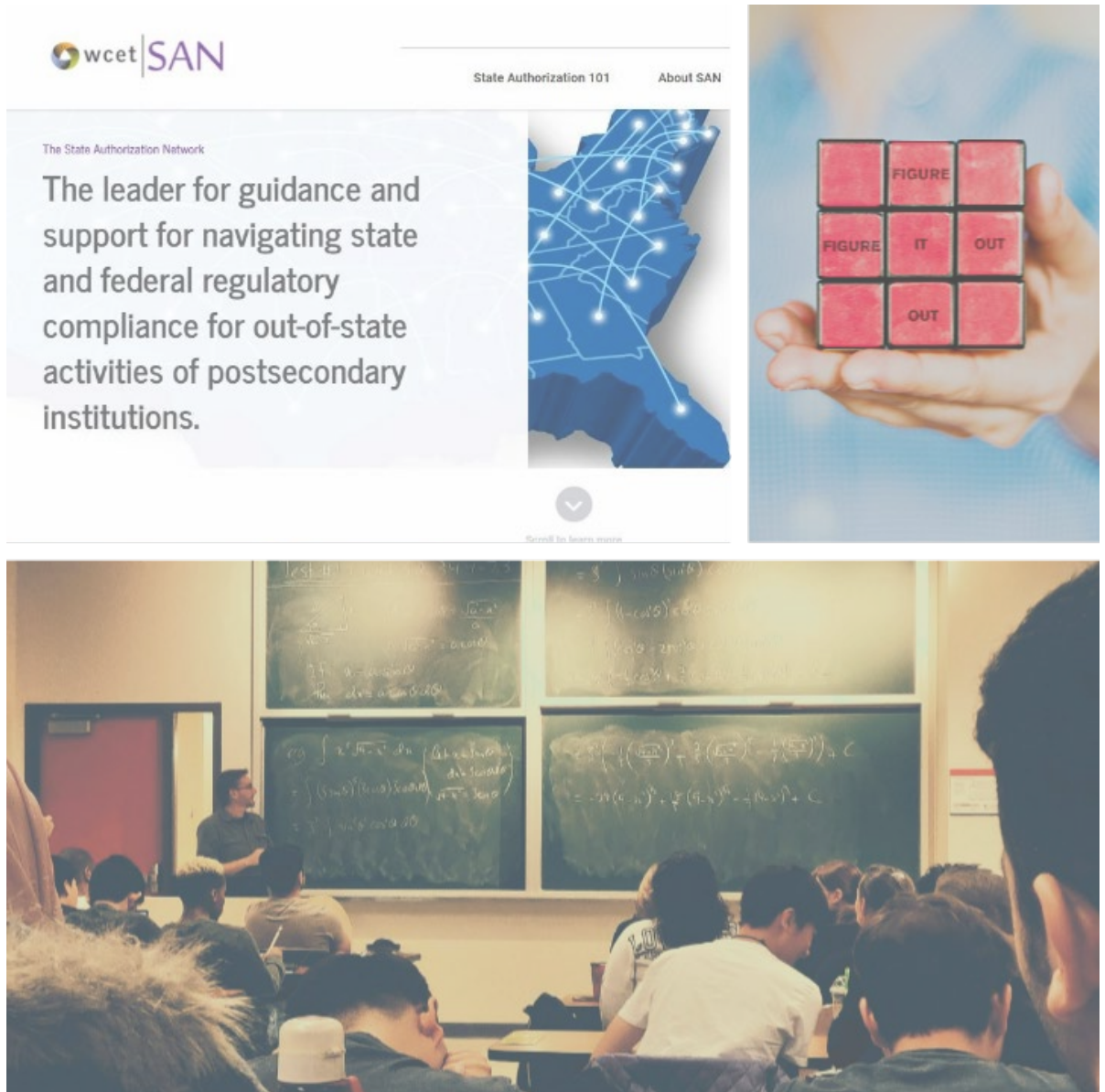


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Questions from the Audience

Please do not hesitate to use the chat box for questions and comments as we move through today's event.

Agenda

01

Overview

02

Presentation
from Embry-
Riddle
Aeronautical
University

03

Presentation
from University
of Kentucky

04

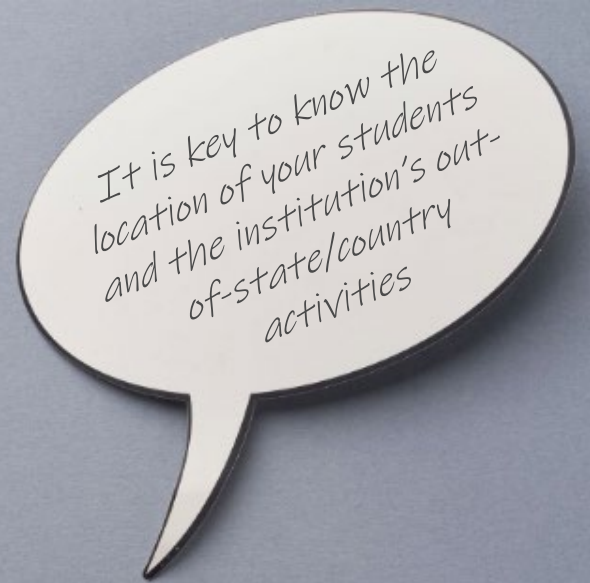
Panel
Discussion

05

Questions

Key Points

- Similar to authorization in the United States, institutions that offer courses and activities outside of the United States should determine if the activity is regulated in the country where the activity occurs
- An expansion of the institution's out-of-state/country footprint may increase its regulatory obligations pursuant to the respective country's procedures and laws.
- Issues to consider may include, but are not limited to:
 - institutional approval, professional licensure, consumer protection, marketing/recruiting, website accessibility, export controls, recognition of degrees, taxes, data privacy



International Compliance Resources

Check out these resources for implementation tips, strategies, and discussion!

- [Doing your homework when offering online programs internationally](#) (March 25, 2020) - Hogan Lovells US LLP
- [International online education programs: A global regulatory perspective](#) (May 19, 2020) - Hogan Lovells US LLP
- [Online Education and Digital Services Tax: A Mexico Case Study](#) (July 1, 2020) - Hogan Lovells US LLP
- Institutions may wish to seek outside counsel to assist. Here is one option: [Education GOES International](#) - service available by Hogan Lovells.
- Talking Points - White Paper: [Military-Affiliated Students: Managing International Compliance When Duty Calls](#). Prepared for WCET/SAN by our colleagues at Hogan Lovells: Bill Ferreira, Stephanie Gold, and Megan Wilson.
- SAN members, by membership login, may wish to review the contact list of the SAN collated [International Ministries of Education](#) for countries worldwide.

Office Name

Source for...

General Counsel	Legal questions, interpretation of regulations, sourcing of local legal representation, etc.
International Admissions	SEVIS rules, sanctioned countries, internships outside the U.S., university international student policies, etc.
Controller's Office	Tax questions, consumer protection regulations, etc.
IT Security	Data privacy, GDPR, firewalls, access to course materials, OPM vetting, etc.
State Authorizations / Compliance Office	Professional licensure, certification, disclosures, recognition of degrees.
Registrar	Transfer of credit, evaluation of international credentials, etc.
Study in the States by the DHS	https://studyinthestates.dhs.gov/

Institutional Resources

Presenters



Rachel Durrance

Associate Director
State Authorizations & Workforce
Development
Embry-Riddle Aeronautical University

Bree Meinberg

Director
State Authorizations & Workforce
Development
Embry-Riddle Aeronautical University



Assessing Your Scope of Activities

- *Online or on-site activities?*
- *If on-site are they U.S. Military or Non-Military?*



Getting Started

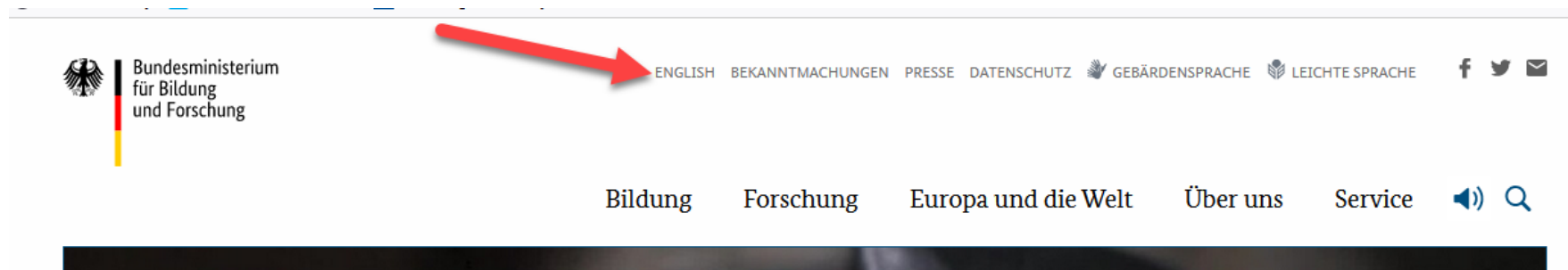
- GOOGLE is your friend!
- First step is to identify the educational oversight body. For most of the countries submitted in advance of the webinar, we will provide a handout that has identified the oversight body and a POC at each.
- Try to translate the page if it is not in English.
- If POC is non-responsive, make several efforts, and document those efforts.
 - If in-person, do not proceed without express approval.
 - If strictly seeking confirmation that online is ok, then consult your General Counsel, but our practice is to send an inquiry specifically stating that “x” activity will begin on “x” date unless they formally object.



Helpful Hints

- English language pages will often not be available.
 - As a starting point, you can just use the “translate this page” option.
 - But the best cost-free translation resource you have is your faculty members.
- Utilize all your available resources if you’re on a small team with limited resources. We even have student assistants conduct the initial research to find the ministry(s) of education for batches of countries, and then a senior staff member do the higher-level research.
- Watch for sanctions. Found at Federal Regulation Section 214.5 (8 C.F.R. 214.5). Check with your international admissions office for tips.

Example:
German Federal Ministry
of Education & Research



Presenters

Compliance for 200+ programs

80 licensure programs,
both online and face-to-face

Tracking International Authorization for
over 100 countries

University of Kentucky
Distance Learning Compliance



Christina S. Walker, Esq., J.D.
Compliance Analyst

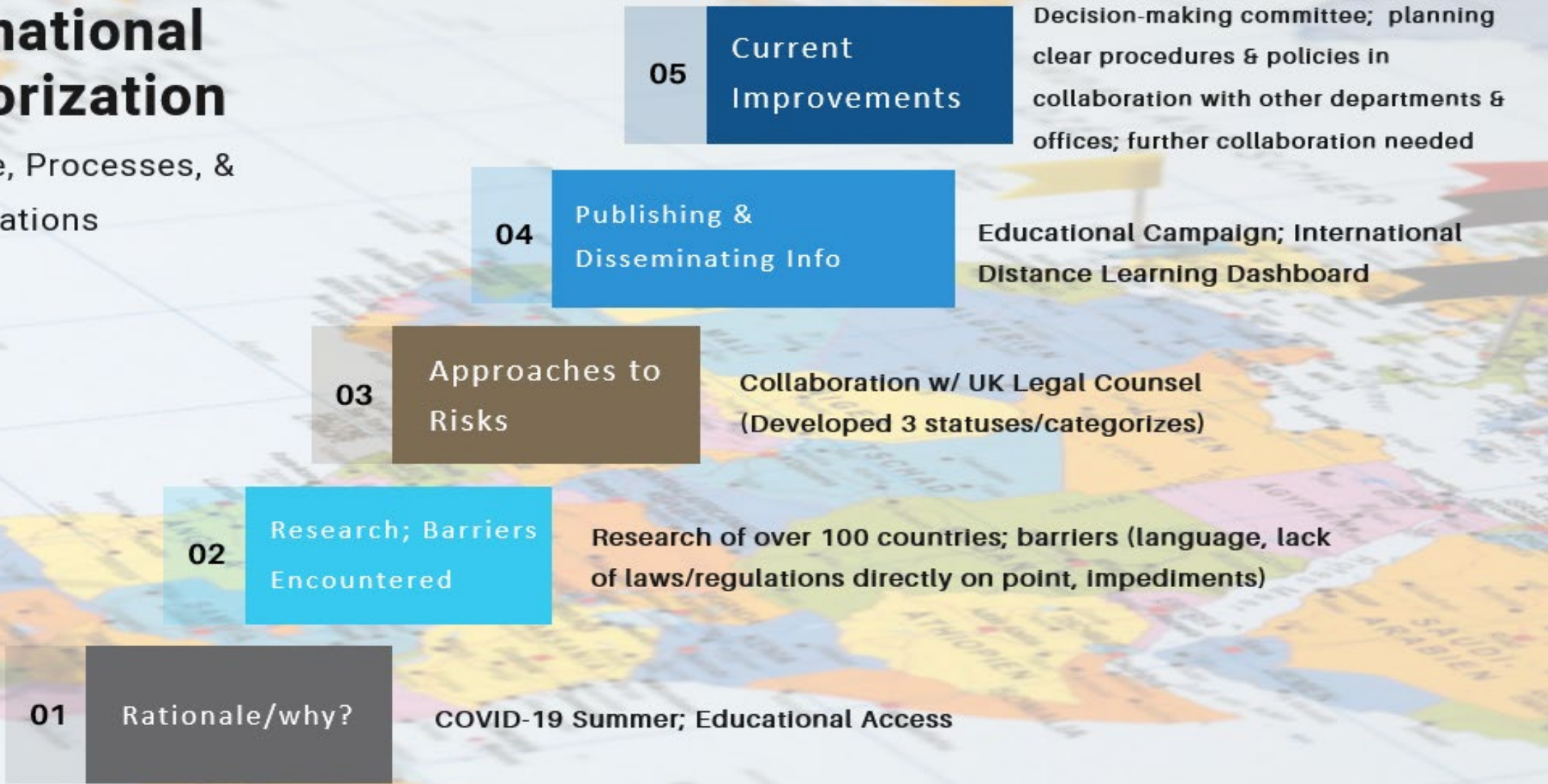


Emily Woods, MEd
Compliance Coordinator



International Authorization

Rationale, Processes, & Considerations



University of Kentucky Distance Learning Compliance

[UK INTERNATIONAL DISTANCE LEARNING DASHBOARD](#)



Panel Discussion + Your Questions!



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Resources for those new to the topic



State Authorization 101

Compliance management for out-of-state activities

First time here? Try these quick links.

- How it works >
- Why comply? >
- Resources >

Scroll to learn more

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How it Works - Resources

Are you relatively new to compliance requirements for out-of-state activities? Start Here!

- [Foundational Principles for State & Federal Out-of-State Activity Compliance - One page overview](#)
- [State Authorization and Crossing State Borders, Part 1: Institutional Approvals for Out-of-State Activities](#)
- [State Authorization and Crossing State Borders, Part 2: Additional Approvals and Professional Licensure](#)
- [10 Steps You Can Take to Begin the State Authorization Process](#)
- [State Institutional Approval Quick Chart - Chart to start research of state requirements.](#)
- [Professional Licensure Disclosures - Implementation Handbook & Flowchart](#)
- [WCET & SAN Webcast: Professional Licensure Notifications Now Required! See the recording, transcript, and Webcast Summary Document](#)
- [Out-of-State Student Complaint Options White Paper & Chart](#)
- [SAN Virtual Seminar 2020 HEA & Federal Rulemaking: The Impact on Institutional Compliance](#)
- [SAN Virtual Seminar 2018](#)

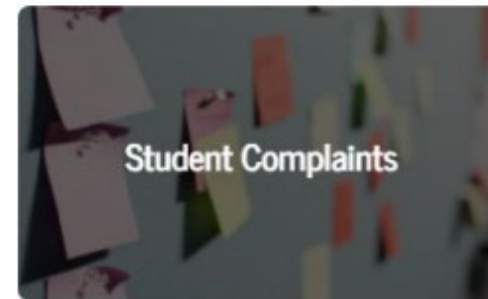
Resources by topic

- Research
- Regulation summaries
- Handbooks
- Talking points
- Sample tools
- More



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Topic Areas



Upcoming Events

Open Forum – March 8, 2022

- Open Forum is an opportunity for a 30 min Q & A with the expert(s) and is not recorded. *2nd Tuesday of each month. Time: 10AM Alaska, 11AM Pacific, Noon Mountain, 1PM Central, 2PM Eastern.*
- **March Topic:** *Considerations for Internships – State Department of Labor Requirements*

NASASPS Conference in Collaboration with SAN -April 24-27, 2022

- *The conference will be held in New Orleans, LA; Opportunity to learn with the state regulators! SAN half day meeting included! SAN member rate available. Several SAN members are presenting sessions! [Register and review more about the conference here!](#)*

Look for future events on cybersecurity, the foundations of state authorization, and more!

More information available on the [SAN website!](#)



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The background of the slide is a blurred, high-angle view of a multi-lane highway with several cars driving. The image is faded and serves as a backdrop for the text.

Thank you

to our speakers
Rachel Durrance, Bree Meinberg, Christina S. Walker, Emily Woods,
and to all our attendees today!

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Note: The information and resources presented are for consideration when an institution wishes to develop a process to manage compliance. The information should not be considered legal advice. Legal questions should be directed to general counsel.