Jana Walser-Smith, SAN Director:

Hello, everyone. I'm Jana Walser-Smith with the State Authorization Network, Director of Interstate Compliance and Member Integration, Member Engagement. Today, I'm really happy to be speaking with our friends, Ms. Brittany Barrett and Mr. Bruce Clayton from Sinclair Community College about their location SANsational Award-winning project titled Personal Licensure Disclosure.

However, before we go further, I really want to explain a little bit about the SANsational Award to give you a better understanding of how these came about and why we are so proud of these award-winning presentations year after year. So the SANsational Awards were established back in 2015, and these awards came into place so that we could recognize the outstanding efforts by our SAN member institutions and organizations when they are developing these high quality comprehensive solutions to challenging state authorization issues.

The works that we recognize present solutions to meet the needs of regulators, of institutions, and more importantly, these solutions meet the needs of students. And that's what these projects are all about, helping us help students. So the SANsational Award project serve as models and we hope and we know that they can be duplicated or replicated by other institutions. So without further ado, I do want Brittany and Bruce to talk to us about what Sinclair is doing. Hi, Bruce. Hi, Brittany.

Brittany Barrett, Sinclair Community College:

Jana, thank you so much for those kind words of welcome. We'd like to start out by thanking SAN for acknowledgement of the hard work that we have put into our compliance work, and thank you for the SANsational Award. My name is Brittany Barrett and I am the compliance coordinator in the e-Learning Division. My co-presenter today is Bruce Clayton from our research and analytics office.

Sinclair is one of the largest community colleges in the US with about 30,000 students. We are based in Dayton, Ohio, and we have a total of five regional campuses. We have over 300 programs of study, and I think it is also important to note that we are an open enrollment college, and I think that adds another layer of complexity to staying in compliance with all of the regulations that we face.

Sinclair was founded in 1887 by David Sinclair, who was a truly remarkable and tenacious individual. Our motto, which has been woven into our mission statement, is actually a quote by David Sinclair, which is, "Find the need and endeavor to meet it." In this project, many pressures created the need to accurately identify a learner's location, including federal mandates, SARA requirements, and other rules involving professional licensure disclosures.

Looking at all of these pieces, we realized that we needed to find a way to identify out-of-state learners, identify and research qualifying licensure programs and communicate our findings to impact its students. This project is a fantastic example of a collaborative effort in which multiple offices identified the need created by all of these mandates, and then rose to the challenge, resulting in our current process to identify learner location.

Now, there were many key players, but arguably most importantly, Sinclair leadership identified this as work that must be prioritized. The provost office delegated the work to the compliance department in the e-learning division, but ensured that they were available to support the project whenever the compliance team needed assistance from other departments at Sinclair.

The e-Learning division teamed up with the provost office to identify our licensure programs and built a database with that information, which we rely on for our disclosures. Arguably, the most important piece of this project was created by our research analytics and reporting office, and I'll go ahead and step back and let Bruce introduce himself and describe the impressive work that he and his team has done for this project.

Bruce Clayton:

Thank you, Brittany. My name is Bruce Clayton. I am a predictive analytics researcher in the Office of Research Analytics and Reporting, or RAR, at Sinclair. Our office serves a traditional institutional research function, but we're a little bit unusual in that in addition to report analysts and research analysts, we have database administrators on our staff.

And they know our data systems inside and out, and they manage the extraction and integration of data across systems. At most institutions, you'd expect to find data based administrators in the IT department, but when we need access to a data field or have questions about what a particular data item means or describes, we don't have to call another department. We can just ask someone in the next cubicle over.

And I think that makes our office uniquely efficient and responsive to the data needs of the institution, and it makes us more effective in our work on projects like the one we're talking about today. I will also add that we are extremely fortunate to have a rather impressive data infrastructure on our campus.

It's one that I think would rival many you'd find at a lot of four-year institutions along with sophisticated software that lets us work with and report out data from across multiple information systems and a team of extremely smart and talented people who tame the data so that it tells us the things we need to know about nearly every aspect of our operation, enrollment management, curriculum assessment, financial aid, and of course compliance. And by the way, I'm not sure that I would count myself among those extremely smart and talented people, but I do feel awfully fortunate to have the opportunity to work alongside them.

Jana Walser-Smith, SAN Director:

Sounds like you're leading the pack.

Bruce Clayton:

We do our best. Okay. Brittany, if you want to advance the slide, I will talk a little bit about the initial challenges involved in this project. So as Brittany noted earlier, our initial challenge in this effort was to find a way to identify out-of-state learners enrolled in programs of study leading to professional licensure, and then to deliver the required disclosure language to those out-of-state learners. So really there were three pieces to the problem.

First, we had to figure out which of our students are out-of-state learners. Second, we had to figure out which of our programs lead to professional licensure. And then finally we had to figure out how to put the required disclosure language in front of the affected students. The first and last of these were actually pretty easy, and those are the only pieces for which I can take any credit.

I won't get into too much technical detail here, but essentially what we did is we created an automated process that each night scans through our student information system. It finds all students who went active in a licensure program the previous day. It checks the state associated with each student's address on file, and then it isolates those students who appear to reside outside of Ohio. Those students then receive a customized email.

And Brittany, if you'll advance the slide again, I think we have a sample of the actual email disclosure notification, which informs them that they're now attached to a program that results in professional licensure, that we think they live out-of-state, and that while the program they're in satisfies the educational requirements for licensure and professional practice in Ohio, it may not meet applicable licensure requirements in their home states.

The email includes a link to a webpage with additional information about state authorization as well as instructions to contact the department in which the program is housed with any questions the students might have. We archive a copy of each disclosure email that we send out, and we maintain a log documenting each of those disclosure notifications.

Now, the second piece of the problem, finding programs that result in professional licensure, that was a bit more difficult. Initially, we tried to survey our academic departments to compile a comprehensive list of licensure programs, but the survey results were incomplete. Departments were often confused about the distinction between certification and licensure or about whether programs that don't build the licensing exam into the curriculum should be included.

It was a messy process to put it charitably. Ultimately, we tasked the paralegal and an intern in our general counsel's office with reviewing our programs one by one and then making a research-based determination as to whether it meets the definition of a licensure program. I want to point out that those folks are not with us today, but we really couldn't have succeeded in this effort without their support and assistance.

And I want to acknowledge their involvement, not only to give them credit, but to point out that complying with the licensure disclosure mandate wasn't a problem we could solve with computer code alone. In any event, we implemented the automated disclosure process in September of 2020, and it's been chugging along ever since, but not without a few hiccups along the way. And I'm going to let Brittany tell you more about what those hiccups were and how we resolved them.

Jana Walser-Smith, SAN Director:

Bruce.

Brittany Barrett, Sinclair Community College:

After the initial launch of the system, one of the first things the compliance department noticed when direct disclosures went out, students were occasionally replying to the disclosures to let us know that their current location wasn't correct, which we refer to as false positives. If we were [inaudible 00:10:11] students that their location had changed since the time of enrollment, we realized that they were likely not sending disclosures at all to students who had changed locations and now needed a direct disclosure.

And we call those gaps false negatives. In response, we began to research how we could update student location more frequently. So we partnered with our IT department to implement a survey at the time of enrollment for a new semester. So now when students log into their portal to register for classes, they must disclose their current location. Students are not able to opt out of this question, which ensures that we are working with up-to-date learning location data.

Jana Walser-Smith, SAN Director:

Perfect.

Bruce Clayton:

Okay. So the last piece of the puzzle was really about the need for a centralized location where all the state authorization related data that we're now collecting, so this is the out-of-state licensure disclosures, the self-reported burner location data that Brittany just described, and then all other state authorization compliance information, a centralized location where all of this data could be referenced and monitored.

We needed some sort of information depot where we could store the information and where folks like Brittany could access and of course use it. Our solution to that was a custom report built on a platform called SAS Visual Analytics, which is an interactive web-based recording platform that allows users to access and manipulate data in real time through a user-friendly interface. If you're not familiar with SAS Visual Analytics, you might be familiar with some of its ilk like Tableau or Microsoft Power BI.

Again, I don't want to get bogged down in too much technical detail, but creating this tool essentially consisted of pulling data out of the databases of the various information systems we use on campus and that contain information relevant to this effort, combining that information in a series of custom tables and then using those tables to inform a client facing online tool that's capable of surfacing the data in a way that's both intuitive and meaningful. I'm not sure it makes a lot of sense for me to try to describe what the tool looks like and how it works, but I do believe Brittany can share some screenshots and then talk a little bit about how the tool supports her work in her role at the college.

Brittany Barrett, Sinclair Community College:

I would be happy to do so. So Bruce has explained some of the logistics behind the creation of our disclosure process, but I like to brag about the cool tools that he has worked into the system. As the compliance coordinator, it is very helpful to have this database and the reports that were built in. Here is an example of one of those reports. And as you can see, it is very easy to quickly identify where our out-of-state learners are located, what programs they're in and when they receive their direct notification.

And there are also multiple graphs that have been loaded into the dashboard to help us quickly understand the story that the data is telling us. One example of the graphs, and as you can see right along the top here, we can quickly establish parameters for the data that we are trying to pull. And this includes the date, department, a particular program. And we can get a very nice visualization on all of that information.

This is very helpful in reporting compliance information both within the division, but also up the chain and out to other departments in the college. So in conclusion, this was a very well-thought-out project that was a direct result of strong leadership and active engagement from all participants through each step of the project. We have reaped many benefits including an efficient process that aids the compliance team by prompting students to regularly disclose their location.

It then looks at this data to determine which students require a disclosure. Then it automatically sends direct disclosures to those students saving our team from having to do this individually. We now have access to ready to use data, including preloaded graphs that we can easily share within our division and to the rest of the college.

And above all, this project keeps us in compliance with the myriad regulations that we are all faced with and seem to be ever-changing. Now before I turn this back over to Bruce for his final thoughts, we do want to take a moment to thank the SAN team for everything that they do. We look to your resources on a regular basis for guidance and greatly appreciate everything you do, and thank so much for recognizing the promise of our project. Bruce [inaudible 00:15:16]

Jana Walser-Smith, SAN Director:

Brittany, thank you.

Brittany Barrett, Sinclair Community College:

Oh.

Bruce Clayton:

Yeah. And I just want to add that we have intentionally aimed for a very non-technical level of description in this presentation because we didn't want to overwhelm viewers who aren't particularly interested in the technical aspects of the project. But if you are curious about the technical side of the work, the data systems we use, the software we use for extracting and integrating data from those systems, the capabilities of our SAS Visual Analytics platform, those kinds of things, we'd be more than happy to talk to you about that. So feel free to reach out to us at the email addresses you see on screen.

Jana Walser-Smith, SAN Director:

Perfect. Perfect. Well, Brittany, Bruce, again, when we looked at this as a collective team, the team reviewing the projects, we knew that this was award-winning work. So congratulations on that front. This is just a spectacular way, very succinct way of how to manage these processes. So when we think about what you all have done there at Sinclair, and let's talk about this from start to finish, from the idea, the conception of this project, can you talk to me a little bit about what was the most time-consuming part of getting this thing up and running? Is that a Bruce question?

Brittany Barrett, Sinclair Community College:

I think so. Bruce, would you be able to answer that one?

Bruce Clayton:

Well, a couple of things come to mind. I think the thing that probably we were most unprepared for was how little we as an institution seem to know immediately about which of our programs result in professional licensure. I think we sort of all assumed that there would be a document somewhere that listed all of that. And the truth was the knowledge exists at our institution, but it seemed to exist mostly in the brains of individuals rather than in documents we could consult.

And so it required a lot more work than I think we anticipated to be able to work through our list of programs and figure out which one actually meets the definition of a licensure program. I think we just assumed that that would be handed to us and we could hit the ground running with that list. The truth is we had to spend many, many weeks compiling that list before we could even start on the more technical aspects of the work.

Jana Walser-Smith, SAN Director:

Perfect. And that leads into my other question. I always ask this question, what advice would you give someone or some other institution trying to implement a similar process? Where should they start?

Brittany Barrett, Sinclair Community College:

Yeah. I would say that the most important thing is to look up the chain. I think that the reason why we did have success with this project is because we had guidance and support from our provost office. That was very critical. This covered multiple offices. Obviously, the compliance department and the research analytics reporting office were involved, but we worked with departments, like educational departments. We even worked with our IT departments. So I think that having guidance from your leadership is going to be the most important thing for success with a project like this. It has a very wide scope to it.

Jana Walser-Smith, SAN Director:

Perfect. Perfect. Well, again, this is well done. We are so so very proud of you, and we thank you for sharing with members, sharing with our member institutions, our member organizations. Also, thank you for that advance in saying, "Hey, if you have incremental questions, you can reach out." So I know you're going to be hearing from people. With that being said, we appreciate you and keep up the good work.

Brittany Barrett, Sinclair Community College:

Thank you.

Bruce Clayton:

Thank you.

Jana Walser-Smith, SAN Director:

Thank you.