What is New with State Authorization?

June 21, 2016

• The webcast will begin shortly.
• There is no audio being broadcast at this time.
• An archive of this webcast will be available on the WCET website next week.
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What is New with State Authorization?

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

Megan Raymond
Manager, Events and Programs, WCET

mraymond@wiche.edu
@meraymond
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.
Moderators/Presenters

Russ Poulin
Director, Policy & Analysis
WCET

Cheryl Dowd
Director, State Authorization Network
WCET
State Update

Cheryl Dowd
Director,
State Authorization Network
WCET (WICHE Cooperative for Educational Technologies)
State Update

Delaware

- SARA State.

- Institutions offering online courses must seek authorization.

- Out of state institutions ONLY offering experiential learning but not offering courses or degrees do not need to apply for authorization.

- Questions can be forwarded to IHE@doe.k12.de.us.

District of Columbia

- SARA State.

- To offer 100% online courses: submit answers to list of 11 questions on website: http://osse.dc.gov/service/distanceonline-education-inquiries

State Update

Maryland

Effective December 1, 2015, Dr. Jennifer Frank is no longer with the Maryland Higher Education Commission.

Please direct specific matters to the following:

Academic Program Approvals: Ms. Monica Wheatley -- monica.wheatley@maryland.gov

Private Career School Inquiries and Student Complaints: Ms. Ronda Brown -- ronda.brown@maryland.gov

Religious Education Exemptions: Ms. Jackie Cade -- jacqueline.cade@maryland.gov

SARA/Distance Education: Ms. Koliwe Moyo -- koliwe.moyo1@maryland.gov

Collegiate Student Complaint Process -- Ms. Elaine Shaw-Taylor -- elaine.taylor@maryland.gov

Veterans Affairs: Ms. Trish Gordon McCown -- trish.mccown@maryland.gov

Please contact MHEC's main number at 410-767-3301 for other questions or concerns.
State Update

Massachusetts

- Physical presence does not generally include experiential learning (unless engaging in other physical presence activity requiring board action)

- Faculty who teach from MA does not trigger physical presence

- Questions to Kristen Stone, Asst. Director for Regulatory and Veteran Affairs at kstone@bhe.mass.edu

Michigan

- SARA State

- Institutions offering online courses must seek authorization

- Experiential learning, faculty teaching from out of state, and advertising are not activities requiring authorization

- All materials are accessible at www.michigan.gov/pss. See: forms and publications: OUT-OF-STATE INSTITUTION DISTANCE EDUCATION AUTHORIZATION (PPS-040)
State Update

North Carolina

- SARA State
  - The “Teach Out” options for field experiences no longer exists. Exceptions:
    1. The student is in the military and transferred to North Carolina during their program of studies, or
    2. The student moves to North Carolina during their program of studies.
  - Contact Terrence Scarborough trscarborough@northcarolina.edu for more information about authorization in North Carolina

Oregon

- SARA State
- Institutions offering online courses must seek approval and pay $7,000 fee biennially – Exclusionary rule was repealed.
- Surety Bond requirements
  [Link](http://www.oregonstudentaid.gov/oda-instructions-on-obtaining-surety-bond-or-loc.aspx)
- Process explained:
  [Link](http://www.oregonstudentaid.gov/oda-degree-authorization-academic-programs-apply-outofstate.aspx)
State Update

Puerto Rico

- Updated Exemption Registry Application for Higher Education Institutions

- New Contact Person
  Marta Coll-Rivera, Economic Program Analyst, mcoll@ce.pr.gov
  Education Support Program Area
  787-641-7100 ext. 2052
The Long and Winding Road...

Joel Tobin
Compliance Analyst & Project Manager
University of Washington
The Long and Winding Road of State Authorization . . .
The Long and Winding Road of State Authorization . . .
The Long and Winding Road of State Authorization . . .

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The Long and Winding Road of State Authorization . . .

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The Long and Winding Road of State Authorization . . .
The Long and Winding Road of State Authorization...
The Long and Winding Road of State Authorization...
The Long and Winding Road of State Authorization...
The Long and Winding Road of State Authorization Continues!
One truth remains . . .
Careful management of all higher education compliance obligations – including state authorization – is a best practice
State authorization is only scary if your institution does nothing
A few tips for getting started and a few for staying in compliance
The Best Defense #1: Know Your Institution, Its Priorities and Needs

- Current and planned distance education activities
- Professional and licensure programs
- Internships, practica, etc.
- Other triggers for physical presence
- Related compliance concerns and priorities, e.g. accreditation
- Is SARA right for your institution
- A must: regular communication and interaction with university departments/units
- A must: develop strategies to document where students are located and where the institution offers/administers program-related activities
The Best Defense #2: Stay Connected; Get Educated

- WCET and WCET-SAN; Russ Poulin’s blog: [https://wcetfrontiers.org](https://wcetfrontiers.org)
- Read the Chronicle and Inside Higher Ed
- Get and stay connected to friends and colleagues at institutions in your state or with a similar profile
- Seek information that is appropriate for your job/role and your institution’s profile
- Share what you know and learn widely
Russ Poulin
Director, Policy & Analysis
WCET (WICHE Cooperative for Educational Technologies)
The “Distance Ed” Regulation
Chapter 34, §600.9(c)

A brief history...

• Issued in 2010
• Vacated on technicality in 2012.
• Failed rulemaking in 2014.
• Likely to be reissued in next several weeks.
What might be included?

- Demonstrate compliance for financial aid purposes.
- Support reciprocity.
- Exempt military.

https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/
The Federal Regulations

What might be included?

• Disallow state exemptions.
• Increased notification requirements for ALL licensure programs.

https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/)
The Federal Regulations

The Department of Defense is currently checking for state authorization for military students receiving Tuition Assistance.
The Federal Regulations

What should you be doing?

- Assess your institution’s vulnerabilities.
- Inform leadership.
- Prepare to comment – opportunity might be short.

https://wcetfrontiers.org/2016/06/15/pending-federal-state-auth-reg/
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/
State Authorization Reciprocity Agreement (SARA) Update

Sandy Doran  
Director  
N-SARA

Kiley Danchise-Curtis  
Program & Outreach Coordinator  
N-SARA
The Current SARA Landscape
What’s Ahead for SARA?

- Complaint and enrollment reporting and publication:
  - Continuation of complaint reporting every quarter;
  - SARA institutions now report their out-of-state enrollments (data will be published shortly);
- Continue to add states and institutions
- 501(c)(3) status for NC-SARA
  - Establish independent budgeting, accounting, auditing and IT systems.
  - Establish appropriate staffing levels.
Questions from the Audience
Contact Information

- Sandra J. Doran, sdoran@nebhe.org
- Cheryl Dowd, cdowd@wiche.edu
- Kiley Danchise-Curtis, kdanchise-curtis@nebhe.org
- Russ Poulin, rpoulin@wiche.edu
- Joel Tobin, jjtobin@uw.edu
Learn More and Stay Connected

Save the Date for the WCET Annual Meeting
  ▪ October 12-14, Minneapolis, MN
  ▪ http://wcetconference.wiche.edu/

Save the Date for WCET/SAN Compliance Workshop
  ▪ November 2-3, Cleveland, OH
  ▪ http://wcet.wiche.edu/events/SAN-workshop/November-2016
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