



TALKING POINTS

STATE AUTHORIZATION AND SUPERVISED FIELD EXPERIENCES.

STATE AUTHORIZATION: WHAT IS A SUPERVISED FIELD EXPERIENCE AND WHERE IS IT REGULATED?

INTRODUCTION

Although more and more institutions are aware of state authorization and its triggers, there continues to be a great deal of confusion and misunderstanding. Often, people want a cut and dried, yes or no answer so decisions can be made. However, anyone who has worked in state authorization for any length of time knows this just doesn't exist. Seldom is it simple; seldom is it black and white. That's why the mantra for state authorization is, "it depends". A great example of this is if and how supervised field experiences are triggers for authorization in the states.

That brings up the first issue – terminology. What is a supervised field experience? That depends! For purposes of this writing, "supervised field experience" will be the term used generically for any activity such as internship, externship, practicum, student teaching, clinical, clerkship, etc. Ultimately, it does not matter what the institution calls these experiences; that is not what determines if it is regulated. Sometimes institutions try to be creative in what they call a supervised field experience thinking that removes the trigger for needing authorization. The truth is, it is the activity itself that determines if it is a trigger. And the triggering activity(ies) vary from state to state.

It doesn't matter what the supervised field experience is called; it is the activity itself that determines if authorization is required.

DIFFERENCES IN STATE REGULATIONS

Many state regulations require authorization of an institution before its students do a supervised field experience within that state. This is where the simplicity ends. There are many different conditions to consider when evaluating whether or not a supervised field experience triggers the need for authorization. At the two opposite ends are, (1) all supervised field experiences are allowed – no authorization required; and, (2) no supervised field experiences are allowed without authorization. Between those two are the following nuances:

- ▶ All internships are allowed, but the state needs to be notified of such activity.
- ▶ No internships are allowed, but an exemption is possible.
- ▶ Religious or pastoral internships may not be regulated.
- ▶ If institutional instructor does or does not direct the supervised field experience.
- ▶ If the site supervisor is paid or not paid.
- ▶ The state determines on a case-by-case basis if authorization is required.

The following table demonstrates some of the other criteria an individual state uses to determine if an institution must be authorized for the activity of supervised field experiences.

If Supervised Field Experience Is:	Authorization Not Required	Authorization Required	Number of States
In a campus-based program. In an online program.	●	●	3
Site and supervisor is found by student independently. Is organized or arranged by, or if the site supervisor is paid by the institution.	●	●	9
Is non-credit bearing. Is credit bearing.	●	●	1
Optional – not required for program completion. Required for program completion.	●	●	3
Part of a non-professional licensure-track program. Part of a professional licensure-track program.	●	●	3



WHAT ABOUT SARA AND THE INTERNSHIP TRIGGER?

SARA (<http://www.nc-sara.org>) reduces the regulatory burden for institutions, including the supervised field experience activities across state lines. It is important to remember that the SARA standards only apply in states that are members of SARA. So, institutions participating in SARA still need to comply with the state authorization regulations (like supervised field experiences) in any of the non-SARA states.

The SARA General Policies provides this definition:

“Supervised field experience” means: a student learning experience under the oversight of a supervisor, mentor, faculty member or other qualified professional, located in the host state, who has a direct or indirect reporting responsibility to the institution where the student is enrolled, whether or not credit is granted. Examples include practica, student teaching, or internships. Independent off-campus study by individual students not engaged in a supervised field experience is exempt from requirements of this compact and does not constitute a physical presence of a postsecondary institution in a SARA member state.”

Under SARA, an institution may not place “more than ten students for an individual academic program simultaneously at one clinical or practicum site, unless approval for a larger number is provided by the host state SARA portal agency.” (<http://nc-sara.org/files/docs/FINAL%20SARA%20General%20Policies%20released.pdf>).

So, once an institution is approved to participate in SARA, it needs to track how many students in an academic program are doing a supervised field experience in another state. The limit is ten unless an exception is granted. And as stated earlier, the institution needs to proactively allow or not allow students to do supervised field experiences in non-SARA states, depending on the individual state regulations.

SUPERVISED FIELD EXPERIENCES FOR LICENSURE-TRACK PROGRAMS

If an institution offers any program that leads to a professional license (such as, nursing, education, CPA, counseling, psychology, social work), there are additional regulations with which to comply, including those pertaining to supervised

field experiences. State professional licensing boards often have requirements for how many hours, the location, the qualifications of the site supervisor, and the competencies that must be included in the supervised field experiences. These regulations are completely separate from the state authorization regulations; yet, some state authorization regulatory agencies may require institutions to have their licensure-track programs reviewed by the state’s professional licensing board before authorization will be granted. These intersections of state authorization regulations and professional licensing board regulations is presented in more detail in two previous papers written by this author: [State Authorization and Professional Licensure](#) and [Institutional Disclosures Regarding State Authorization and Professional Licensure](#).

CONCLUSION

So where does an institution go from here? First, SARA institutions should follow the guidelines above. If an institution is not a SARA participant, it is important to carefully research state authorization regulations (including definitions) alongside having a clear understanding of all of the supervised field experiences that students are or may be doing, and where. By comparing what the state regulations say with the activities the students are participating in, the institution can then determine if it will seek authorization in states where they currently don’t have it or if it will notify students of those states where they cannot complete the supervised field experience.

Sharyl J. Thompson, CEO
Higher Education
Regulatory (HER) Consulting



Sharyl Thompson has gained expertise in higher education regulatory affairs and compliance for over a decade. She is now an independent consultant, assisting institutions with all phases of state authorization and regulatory compliance, including initial strategic planning, research, training, presenting, and completion of applications.