



**WCET State Authorization Network  
Statement of Work & Call for Participation – Year 7  
July 1, 2017 – June 30, 2018**

**The Problem**

Before an institution offers any out-of-state activities such as: online courses; field experiences; faculty teaching online courses out of state; and recruiting or marketing, an institution is legally mandated to follow the other state’s laws and must obtain any necessary authorization to operate in that jurisdiction prior to conducting the activity.

In 2010, the U.S. Department of Education (US ED) released the first version of a federal regulation in which it expected each institution to demonstrate that it had the proper approval in each state in which it serves students.



That regulation has since been vacated on procedural grounds and a new version of the federal regulation was released in December 2016, to be effective July 1, 2018. Note that federal regulations for misrepresentation and proper notifications are currently effective and enforceable. Additionally, each state requires proper compliance with that state’s laws. In the last few years the Department of Defense began tying state authorization to an institution's ability to offer Tuition Assistance funds to military students.

The process of obtaining compliance in each state is difficult because:

- The rules and regulations regarding authorization vary greatly from state to state.
- Deciphering the approval/licensure regulations takes significant analysis. Institutions do not have the staff available to perform all the necessary analyses.
- States change their regulations, interpretations, and procedures from time-to-time.

**The Solution**

Working collaboratively, institutions can navigate the state regulations processes more efficiently than working on their own. WCET’s State Authorization Network (SAN) provides access to experts and networking through members. WCET's SAN provides:

- Training and updates on state authorization issues and the state and federal regulations.
- Strategies on effective processes and strategies for complying.
- Networking among participants to share what they learn when exploring each state’s regulations and to serve as an "early warning system" on changes in states.

*Expecting each institution to research, interpret, and act upon the approval and licensure regulations of each state is a highly inefficient use of staff time and misinterpretations could put an institution at risk.*

**What about Reciprocity?**

The State Authorization Reciprocity Agreement (SARA) is currently accepting member states and institutions. Forty-seven states plus the District of Columbia are members of SARA. More than 1200 institutions operate under SARA through their state. While SARA provides many benefits to its member institutions, it does not give carte blanche for all activities that an institution might wish to conduct in other states. SAN updates members on SARA's processes and gives advice on how to comply with activities outside SARA’s purview.

### **Activities and Benefits for Year 7 (July 1, 2017 - June 30, 2018):**

**SAN Coordinators** Each State Authorization Network (SAN) member (whether a state system, consortium of colleges, or individual institution) appoints **two SAN Coordinators**. SAN Coordinators must supply contact information about the institutions that are part of their membership including: institution name, contact person with email, FTE range, WCET membership status, SARA membership status.

The following activities are reserved solely for the Coordinators. **Coordinator are expected to share the information with other institutions within their membership.**

- **Monthly Calls.** Monthly phone calls with updates (federal regulations, state regulations, and reciprocity), guests (providing insight on regulations or practical advice on compliance), and conversations with state regulators.
- **Coordinators' Email List.** A list facilitating questions and announcements between meetings.
- **In-person Coordinators' Meeting.** A full-day pre-conference session at the WCET Annual Meeting in Denver, CO in October 2017.
- **Wiki Access.** Coordinators are invited to obtain access to an online site which is a repository for SAN resources and research. Coordinators may be asked from time to time to share information from the wiki with contacts within their SAN membership.

**Staff benefits** Everyone employed by a [SAN Participant](#) may take part in the activities listed below. If the SAN member is an institution, all employees of the institution may participate. If the SAN member is a state system or consortium of institutions, employees of the institutions designated by the coordinators of the membership are eligible to participate.

- **Network Email List.** The SAN Network email list is very useful for those responsible for compliance. The Network email list helps members share information about changes to state regulations or processes, obtain advice on tactics that others have successfully used in working with a state, and receiving notices about upcoming webcasts, workshops, or conferences on state authorization topics.
- **Compliance Training.** SAN will educate those responsible for compliance issues by providing:
  - Webcasts with advice for both new and experienced compliance officers.
  - Face-to-face meetings such as the NASASPS Conference (with collaboration from SAN). This meeting with state regulators was held April 2-5, 2017 in Lexington, Kentucky. The integrated sessions and meetings were vital to establishing relationships with regulators across the nation. Information for 2018 is to be determined.
  - State Authorization Compliance Workshops. These workshops are held throughout the year on topics focused on the management of state authorization. As a SAN member, the cost to attend the workshops is substantially reduced.
  - State Authorization Advanced Topics Workshops – These workshops are held throughout the year to provide a more in-depth analysis and direction for managing complex aspects of state authorization. As a SAN member, the cost to attend the workshops is substantially reduced.
- **Reciprocity Advice.** Updates on the State Authorization Reciprocity Agreement (SARA) including: steps that institutions can take to join and renew participation in SARA, updates on states joining SARA, support and clarification regarding the institution's compliance requirements under SARA, and any changes to SARA policy.
- **Revised state regulations.** Continue to track each state's regulations. SAN will inform members of any changes and details for implementation.
- **Emerging federal regulations.** Continue to track the Departments of Education and Defense state authorization regulations. SAN will inform members about ways to influence the process.
  - Ongoing monitoring and reporting of the status of the 2016 Federal regulations for State Authorization.

- **Reauthorization of the Higher Education Act (HEA).** HEA touches nearly every aspect of federal higher education policy. SAN will keep members informed of the proposed changes to state authorization or related regulations.
- **Focus Areas.** SAN will provide research and training on issues identified by members. For Year 7, SAN will provide avenues for sharing information, research, and training on the following:
  - Interactions with Institutional Stakeholders to ensure compliance.
    - How to identify the key institutional stakeholders.
    - How to reach out to these stakeholders and coordinate ongoing communication.
    - How to train key stakeholders to understand state authorization.
  - More intuitive access on the Wiki to find and share SAN resources and research.
  - Professional Licensure Board Research and Best Practices
    - Developing contacts with the various boards.
    - Strategies to work with the academic departments with programs leading to professional licensure.
  - General International Authorization information.
    - Revised list of Ministry of Education Departments.
  - Secretary of State Research.
    - Revised list and interaction with each state's Secretary of State office.
  - Determination of other possible state requirements and how to comply.
  - Management of institutional compliance when working with vendors.
  - Continued support to new State Authorization compliance staff members.
    - Collection of tools including: short videos, white papers, webinars.

## Membership – view the current list of [SAN participants](#).

Membership may be by: Individual Institution, Partnership, Consortium, or System.

- Each membership allows for **2 designated coordinators** who may participate on the monthly coordinator calls and attend the fall annual meeting.
- **Coordinators are responsible for sharing information** with the other institutions/organizations within their membership.
- At least one institution/organization within a membership must be a [WCET member](#).
- Annual cost per membership: \$5,000 (cost may be shared by a partnership, consortium, or system).

## How to Join?

### NEW MEMBERSHIPS -

- Review the Statement of Work and Call for Participation Invitation for SAN Year 7.
- New Members Must Complete Short Online Application: <http://stateauthorization.org/>
- An Invoice for payment will be sent shortly after receipt of the membership online application survey.
- Deadline for new member survey submission: June 1, 2017, with payment due by July 1, 2017.

### RENEWALS

- Submission of the online renewal is the responsibility of Coordinator #1 for each membership.
- Coordinator #1 will receive, by email, the online renewal process and unique user log in.
- Coordinator #1 will consult with all member institutions to update contact information.
- Coordinator #1 will submit online renewal with updated information to inform WCET/SAN to provide an invoice.
- Deadline for renewals: June 1, 2017, with payment due by July 1, 2017.

## Beyond the Deadline?

Contact us about the possibility of a partial year membership!



WICHE Cooperative for Educational Technologies

## State Authorization Network Questions and Answers

### **How will this benefit my institution(s)?**

Members will receive extensive support for the analysis, organization, and compliance maintenance for state authorization at both the state and federal levels. Training, research, and ability to have discussions through face to face meetings and email discussions (listserv), provides members with the ability to be well-versed in the latest developments.

### **Is there really any benefit to networking?**

Our experience indicates that networking is the greatest benefit. People faced with the same task are provided an opportunity to share and learn from each other. They are speaking the same language and facing the same obstacles. Networking aids in the exchange of ideas and collaborative problem-solving. Institutions will get an early warning about problems they might not have otherwise anticipated or changes in state regulations or processes.

### **If I am part of a partnership, a system, or consortium, do all of my member institutions have to join WCET?**

No. However, at least one member institution of a partnership (2 or more institutions) must be a [WCET member](#).

A system or consortium needs to be a [WCET member](#). WCET membership remains tied to the employees of the central system or consortium office, but it does let you join SAN on behalf of all your system or consortium members. Therefore, all of the employees of your institutions will be eligible to join the SAN email list and participate in SAN events. We do encourage institutions to join [WCET](#) to enjoy the benefits of the organization's expertise in practice, policy, and advocacy of technology-enhanced learning in higher education.

*“WCET’s SAN is an invaluable resource for those of us struggling to deal with the ever-changing complex world of state authorization. Not only does the SAN provide us with resources, a very active email list, contact with experts, and working meetings (virtual and face to face), but it has helped influence policy. The first reaction of two staff who recently attended the State Authorization Compliance Workshop for those new to this issue was to ensure that we would do anything necessary to remain members of the SAN.”*

Diane Goldsmith  
University of Rhode Island

### Questions and Contact Information

#### WCET Updates on State Authorization

Website with history and updates:  
<http://wcet.wiche.edu/learn/issues/state-authorization>

WCET blog with updates and recommendations:  
<http://wcetfrontiers.org>

#### WCET’s State Authorization Team

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