

WCET & SAN Member Policy Series: Practical Approaches to Compliance, Part 2

Professional Licensure

December 8, 2021

Transcript

Kim Nawrocki:

Thank you for joining us for our last webcast of 2021. This is the second part of our winter policy series for WCET and SAN members where we are exploring practical approaches to compliance. Today, we'll be discussing professional licensure. My name is Kim Nawrocki, coordinator for events and programs at WCET. As we go through today, if you have any questions, please enter them into the question box and we'll get to them during the Q and A portion. Sometimes if you put them in chat, we do lose track of them so please be sure to use the Q and A box at the bottom of your screen. We are recording, and we'll share that with you by next week, and we'll post a link to the slides so you can download those if you like. If you have any questions, again, please enter them into the Q and A. And now I'd like to introduce our moderator for today's webcast who is probably a familiar face if you've ever been to other WCET events, Megan Raymond, our senior director of programs and membership. Thank you, Megan.

Megan Raymond:

Thank you, Kim. Welcome, everybody. Good to see you back here for another session of our policy event series, and we have a great conversation today on professional licensure and practical approaches, and I'm thrilled how this came together. We had a proposal for the annual meeting and we said, "No, this is too good. We want to pull this out and share these good practices separately with the membership." So, next slide. We'll go ahead and introduce our speakers today. So, we have a WCET SAN member who is new to the team, but I'm sure many of you have gotten to know Rachael. She directs interstate policy and compliance, and we're going to be releasing a blog that she penned for us tomorrow, highlighting the state authorization network award recipients. So, look for that. And then Monica Brooks who's the associate vice president for online learning and Dean of libraries with Marshall University. So, we're thrilled to have them here today. I'll let them go ahead and get it started. Rachael, I think you're up.

Rachael Stachowiak:

Thank you. Yeah, [inaudible 00:02:13] my unmute button. Apologize for the delay there. It's a pleasure to be with everyone today. Thanks so much for making the time. I'm thrilled to present with Monica. My name is Rachael Stachowiak. I am from the State Authorization Network or SAN as many call us. We are a member network housed within WCET, and our work is focused on compliance with regulations that touch out-of-state activities for post-secondary operations. So, rules that govern things like online learning, distance education, military students, and professional licensure. You can visit us online to learn more about our topic areas and the resources displayed in this grid here today.

Rachael Stachowiak:

My job here is to set the table for Monica, and she will share a very practical example of her institution's system to manage disclosures for educational programs which lead to a professional license, and this action is tied to a federal rule. However, professional licensure has a very important tie to state oversight as does all of our post-secondary operation. So, the short of this is that states hold an important responsibility to protect the interests, health, safety, and wellbeing of citizens and citizens as

consumers, and they have respect of governments, laws, and regulations to exist or which exist to support that charge.

Rachael Stachowiak:

So, our general rule of thumb is that it's within the state's purview to regulate activities which occur within its borders, and if you're an out-of-state entity, it may also establish baseline approvals or procedures to enforce its respective laws if you wish to engage in activities or business outside of a state. So, this oversight includes education, and if an institution operates in multiple states, it should be aware of the rules pertaining to activities wherever they occur. So, we need to know the location of activities to know which law applies.

Rachael Stachowiak:

A couple areas focused in our post-secondary landscape to be aware of, and again, we manage compliance with state rules to protect us as consumers and particularly students. So, we have to remember that states grant institutions the ability to confer degrees and engage in educational activities in alignment with their respective oversight and laws, and this institution approval is really what we refer to as state authorization licensing or certification processes.

Rachael Stachowiak:

Additionally, state governmental agencies and respective state professional boards establish standards and procedures that ensure that the students and professionals are adequately trained. They demonstrate skills and abilities, and they continue to responsibly practice as experts in a given profession. These agencies and entities choose to regulate particular professions like teaching, nursing, counseling, psychology, and they provide a legal permission to practice those professions. And with all that, they will host specific requirements for educational programs which prepares students to sit for an exam and eventually practice their chosen profession. So, they may have separate and complimentary program approval processes to the first point that I spoke to on this slide about state authorization or state higher education agency approval. These provisions are intended to protect us as citizens of a particular state, and furthermore, the interest and investment of time and money for students as consumers.

Rachael Stachowiak:

One quick clarification that I'll offer. We know that thousands of institutions participate in a reciprocal agreement, the State Authorization Reciprocity Agreement, SARA. This helps to manage the first point on this slide for purposes of the delivery of distance education, like online learning, to any students who participate or are engaged in activities in a particular state or territory that's part of this framework. However, it's important to note that states maintain the authority to oversee activities which fall outside the parameters of that agreement, and that includes applicable approvals by state professional licensing agencies or boards. It could include other activities as well. So, we have to remember SARA's complementary to state institution approval for limited purposes, but it doesn't have any effect on state professional licensure requirements. So, additional steps apply.

Rachael Stachowiak:

So, I've reiterated the importance of state compliance. Specifically, I want to point out that state authorization also serves as one criterion to participation in federal programs as well. More broadly, and as this slide reminds us, compliance with federal rules is tied to participation in Title IV Higher Education

Act programs, and you can learn more about all the rules listed on the slide on SAN's website. I want to draw our attention briefly to misrepresentation which is highlighted here. This is just touching on an important point of transparency and accuracy in what institutions communicate to prospective and current students. Publishing false and misleading information about your institution or its student outcomes puts the institution at risk of investigation by a number of entities. It could result in loss of participation in federal programming, and obviously harms the reputation of the institution. In the federal language under misrepresentation, it does indicate that misleading statements can include an omission of information. So, we have to be cognizant of that in addition to the state laws in this context as we consider how we manage our professional licensure notifications.

Rachael Stachowiak:

So, that's the general context of the work and the why of what we do. I want to turn to the federal rule and that's 34 CFR 668.43 Institutional Information. There are two sections within that, that address professional licensure notifications, and you can access that specific website and a link to the federal register to review the exact language on SAN's website.

Rachael Stachowiak:

Here, I want to highlight four key elements for you. So, the first of which is that these regulations pertain to all programs and all modalities. So, the expansion to all modalities and that's online programs and programs offered at brick and mortar locations which lead to a professional license. This came into effect in 2019 and is actively effective... I apologize. It's actively effective as of July 1 2020. It was written in 2019 and published in 2019. Second, we have to look carefully at the language in the federal rule itself to determine the type of educational programs that are subject to these notifications, and we'll do that out on the next slide. The third key element here is the first portion of this rule discusses what information should be provided in a public notification. Sometimes we call these general notifications, and these can be housed on institution's website. And the fourth element addresses a direct notification, and this is a notification in addition to that public notification. So, here we have to digest what information goes in that notice and when that direct notice should be issued to a student.

Rachael Stachowiak:

So, what programs require notifications, and this is taken from the federal language, but parsed out in almost a checklist-type manner. If the program is designed to meet educational requirements for a specific professional license or certification, and that license or certification is required for employment in an occupation. So, here we have to consider how we're creating our curriculum, design matters, for what profession are we designing for, and in light of any of those state professional board rules. So, we need to know those state rules. We need to be aware of those locations of the students, where they may be enrolling in these courses which lead to a license. That's part one. The second portion of this talks about if a program is advertised as meeting educational requirements. This means we have to look closely at the institution's recruitment efforts, their marketing materials, and admissions materials in addition to that top box there.

Rachael Stachowiak:

So, institutions often ask us to give them guidance and tell them if a program requires a notification. We unfortunately can't do that for you. The institution is really the entity who is best positioned to make that determination based on the content of its program in line with the students' location and under the guidance of their leadership or general council as they consider sort of the institution's risk tolerance in

this area. You can however use these four questions to help reframe the federal language and compare the elements of the regulation as you go through and locate your programs.

Rachael Stachowiak:

Question number one, oops, here we go. Is the educational program designed to meet the educational requirements for a specific license or certification? So, remembering or recalling back from that last slide, right? Is the license or certification required for employment in the occupation? Is completion of the program sufficient to meet the state requirements, or did the institution advertise that the program meets requirements? After you've looked at your programs in light of the previous language, you can move forward in developing a public or general notification, and here the federal register specifies that the institution must consider each state in that public notification publication. So, the code of federal regulations also indicates that this can be published on an institution's website.

Rachael Stachowiak:

The minimum requirement is that institutions provide a public disclosure. You'll see the citation on this slide here listed by program and state to the effect of three different options. Yes, the curriculum meets state requirements. No, the curriculum does not meet state requirements, or the institution hasn't been able to make a determination. The federal register also indicated that for federal compliance, the institution does not have to do the research and can be in compliance tomorrow by indicating the third option that they are unsure. However, that same language also emphasizes that the department believes that making a determination could be a marketing advantage for the institution. So, just something to weigh for you at the institution level. Regardless, institutions will want to develop a systematic approach to review and make those determinations. So, once you've tackled the public disclosure, you can build upon that process to address the next piece which is the direct notification, and again, you'll see the citation there on our slide.

Rachael Stachowiak:

In the events, the institution determines no or they're unable to make a determination, it will need to take an additional action to distribute a direct notification in writing to that effect to two different types of students, the first of which is a prospective student. They should receive a notice based on where they are located prior to enrollment. Guidance from the departments via the federal register notes that this should take place prior to signing an enrollment agreement, and if the institution doesn't have an enrollment agreement, then prior to a financial commitment to the institution. Enrolled student should also receive a direct notification within 14 days of the institution making a determination or if they're unsure.

Rachael Stachowiak:

So, to support this process, we do encourage institutions to document their decisions and also write and commit to a consistent application of a policy or process. In that, we also have to think about how the institution addresses and communicates with students should the location of the student change throughout their time at the institution. So, we encourage institutions once they have these processes in place to share them with various campus stakeholders who contribute or touch on different elements of these disclosures like admissions, and in the event of a staffing change, you have something that can be turned over to the successor.

Rachael Stachowiak:

To inch forward in sort of our practical implementation procedures, here's a sample of some things that you may consider. You'll see at the base of this structure, we emphasize knowing the location of the student and the activity just as we had described early in the presentation, and aside from the notification, there could be state by state board procedures applicable here. So, once you've identified the location, the programs, you can work with your subject area experts at your institution to seek applicable approvals and/or move into that disclosure process. So, if you start with your public disclosures, you have a great set of information to work from that you can then work toward issuing those direct disclosures.

Rachael Stachowiak:

I think the other thing we'll emphasize here is we know that this is sort of a work in progress. It's a lot to manage if you are operating in multiple states and in multiple programs. It takes time and it takes patience. So, we understand what that takes. It's difficult, but please remember to be flexible in reviewing and adjusting your procedures and notices. It's just sort of a reality of this work we have to embrace. We encourage you to document your decisions, your practices, and operating a consistent and transparent process as much as possible really to serve the best interest of your students.

Rachael Stachowiak:

In the interest of time, I want to get over to Monica, but leave you with a couple of practices here, and please, access the slides after this event. Two quick points I'll just put out there. Providing context in these notifications really helps the student understand what's going on and what's at stake for them if they aren't already aware, and additionally, providing some direct contact information to someone at the students who can source and work with the student through their questions really can help to strengthen your procedures and processes and really ensures that you're supporting your students ambitions as much as you can. So, there's no one perfect way for every single institution to comply with these expectations. Your institution is unique and your staffing structures are unique. So, we're going to turn to Monica here to talk through Marshall University's approach and consider the actions that she's taken sort of in light of your own institution systems to see what you may be able to take, adapt, and adopt. So, Monica, I'll turn it over to you.

Monica Brooks:

Thank you.

Megan Raymond:

I'm going to jump in really quickly. Rachael, I just wanted to ask, there is a question in the chat, and I wanted to get to it before we move on. I think you did address it, but I think it's worth just calling out and touching on before we moved onto the Marshall University. So, does an enrolled student receive a direct notification when no determination has been made? So, if you could just clarify around that, Rachael, please.

Rachael Stachowiak:

Mm-hmm (affirmative). We have to remember that in the public notifications that we've created, those do require that the institution in those two cases they don't know and they have that made a determination that the prospective student and enrolled student receive that notification. So, an important, transparent practice for the institution.

Megan Raymond:

Great. Thank you. Monica.

Monica Brooks:

Thank you very much. I am thrilled to be able to talk to you all today. I know the title of our session is practical approaches, but in my peabrain here at Marshall University, when we submitted a proposal for the big conference, I thought, "Okay, practical approach for me really means is not going to cost me any more money." Right? And that's probably something that many of us are dealing with at our various institutions. But just to give you a little background about my school, Marshall University is located in Huntington, West Virginia. If you're not familiar with the area, it's in the crack where Ohio and Kentucky and West Virginia all touch on the Ohio river. And so, literally, many of us can look out our windows at home and we can see Kentucky or we can see Ohio. We're super, super close.

Monica Brooks:

It is one of the oldest institutions in West Virginia. There was a little discrepancy there because, at first, they thought they were the oldest and they thought I was a really amazing librarian because I said, "Uh, no, there's one school older," but I just happened to go to that other school, West Liberty University in the northern panhandle so I kind of cheated a little bit. So, I was busted, but at Marshall, we did get university status in '61, and then very recently we were upgraded to R2 status which of course really impacts libraries and labs and other areas of our STEM education.

Monica Brooks:

In spite of that, we are still able to maintain a fairly low student-faculty ratio which has been a really positive for us because that's important to our student connections. We're pleased that we have a wonderful football team and other amazing sports teams, including national champions in soccer which was kind of exciting. We have several professional degrees, and as you can see, we have numerous BAs and MAs and four doctorates, and in spite of all that, we do have 100% of the state of West Virginia residing in Appalachia, and as a result, that is one of the things that impacts our SES for our students and about 40% of our students are Pell eligible.

Monica Brooks:

Next slide, please. Go ahead to the next slide. Awesome. Woops. Okay. So, at our institution, we have 13 colleges and schools, and of those, seven of them do have professional programs, and of those, and I counted because I have to count them, 26 of those programs fit into the category of requiring the professional licensure disclosures. Of course, just like many other institutions in the country, the majority of those programs are going to be in education and health professions, and of course, our medical school is also one of those institutions or one of those schools that has several licensure programs. And if you're also not a not aware, we do have a movie about Marshall University, and so if you haven't seen it, check it out. Actually, we are that school that lost our football team in 1970, and really, my parents were in school at that time, and so interesting and actually probably not surprising, they never talked about it. So, it was not until I was an adult that I realized the connection.

Monica Brooks:

Go ahead to the next slide please. So, one of the things that has really grown out of my involvement in this process of course is my involvement in distant education at the university, and our program really has grown significantly. I have been affiliated with the program all the years that it's been in existence in

some fashion, originally as a faculty member. And what began in 1998 with only 40 classes has now grown to almost a thousand classes and upwards of 12,000 enrollments which has been tremendous. It's also been great to see the evolution of that process over the last 20-something years because I've been able to work in different capacities with the program.

Monica Brooks:

As with many other institutional distance education programs, we've kind of evolved to where we're discovering that students are more comfortable with the hybrid degrees, and we've also been able to really target graduate education. That's been where the most of our growth has come, especially with more than 20 master's degrees actually, and of course, three doctorates that fulfill the needs of our graduate students in the valley. We also have significant growth in our postbaccalaureate programs and our graduate certificates, especially as students retool themselves to be able to target certain areas in the workplace where they might have some deficits or some needs.

Monica Brooks:

Next slide. So, more than one person, even at my own institution, have asked, "Why the heck is your head librarian involved in distance education at all?" And that's not a dumb question. It's one of those situations that, again, I know I'm preaching to the choir because so many of us have experienced various budget challenges in higher education in the last decade or two, but it was one of those things that during a pretty significant exodus from the institution all at once in the middle of a school year, I was left holding the bag. I was more than happy to volunteer to assist in that area, and what was supposed to be maybe a three-year commitment is now a 13-year commitment. So, I'm still doing it, but that's what happened here.

Monica Brooks:

We also did have a decentralization of a lot of duties simply out of necessity because there weren't positions available, and also since distance learning really was on the forefront with state authorizations and some of these activities grew out of that activity, then clearly the librarian got sucked in because of what I was doing with distance ed to begin with. Also, I have a great partnership with our general counsel, and so she and I commiserate quite a lot because there are things that aren't always in her purview that she has to do just out of necessity for the betterment of the institution. So, those of you who have attended the basics workshop, at least in 2018, might remember Jendonnae. She's my buddy, and she helps me a lot, and I know that I'm very fortunate to have an attorney to rely on to help us navigate the federal regulations.

Monica Brooks:

Next slide. So, I think everyone kind has a lost year, and hopefully, none of you got COVID, God forbid, because I understand there's a COVID fog and there might be a COVID fog for people that didn't get COVID. But we had a very similar timeline to what other schools encountered, and we also had a stay at home order that was implemented by our governor, and as a result of that excitement, our distance learning team had to convert upwards of 400 faculty who were not accustomed to utilizing technology to teach. We had to convert them within a two-week period to be able to deliver virtual courses and online courses. So, we feel kind of like there was an abyss at the beginning of 2020. We knew that we had to get ready or had already been ready to meet the requirements of the license or disclosure changeover July of 2020. And so, we were ready with our public disclosure, thanks to the prep that the wonderful people at SAN provided, and then what happened with us was with a shutdown, we had a

very challenging year trying to figure out how to get the word out to our constituents on campus to make sure that they were also in compliance with the law.

Monica Brooks:

Next slide please. So, at the same time... Go back one. Yes, thank you. At the same time of Microsoft Teams... Next slide. Awesome. All this was happening with the shutdown and the stay at home order, and we were all hunkered down in our pajamas doing mostly Zoom. Our institution adopted the Microsoft 365 and implemented Microsoft Teams. We had been using Skype for Business and had every intention of training each other to make the transition to Microsoft Teams, but then poof, when we all went into the shutdown mode, the normal hands-on training that we would've provided in our various labs, especially here in my library, we weren't able to do those in face-to-face format. So, we had to make a transition very quickly in especially teaching faculty how to use this for virtual course delivery, and thus, while we were at it, we realized that this is a tremendous platform that has a very robust tool for our day-to-day operations, especially just our regular meetings and gathering for work-related purposes.

Monica Brooks:

Also, as I mentioned, practical approach for me equals free. I realize the university does subscribe to Microsoft 365 to make sure that we all have the wonderful tools on all of our devices to conduct our business, but it was free to me in my area. So, not having to pay for another subscription or another platform in order to do my job was really very attractive to me.

Monica Brooks:

Next slide. So, first thing we did was create our professional public disclosures on the web, and as I said, we utilized a lot of the resources that you all provided which really helped ease the burden for that, but then we also needed to make sure that our departments were doing their letters if they were not sure of their disclosures or they were aware that their degrees could not be practiced at a specific location. And so, we thought, "Hey, no problem. We'll start sending out emails and we'll start making the rounds at various meetings and telling people about it." And that didn't work. So, thank heavens we had the Microsoft Team platform at least as a home base for us to gather our thoughts and to meet and talk about how we were going to spread the word.

Monica Brooks:

Next slide. So, I'm sure many of you are probably familiar with Microsoft Teams. I've just did a little screenshot here to give you an idea of how populous it can be, especially if this is your number one platform for communicating with your constituents on campus and your colleagues. We created one as I said to be the landing page for our work and then gradually sort of scaled up to make it a platform where you can also be a depository for the resources, and I think that's definitely something that could work in your favor if you do not have the ability to purchase something or if you don't have any staff, for example, or you have limited staff in order to pull off this endeavor for your institution. Having a logical location where you can add all of the people who are involved in professional licensure disclosures is also very attractive because you can create groups and you can place people in there from your institution. They receive a notification they have been added to the team and then you have another platform where you can communicate with them on a regular basis.

Monica Brooks:

Next slide. So, the first thing we did was spend some time organizing, and of course, maybe this is an advantage to have a librarian involved in this process because the first thing I did was kind of map out a little org thing so I could figure out what folders are we going to need, and once we have these folders, how we're going to organize them. I am also very fortunate that I have a wonderful administrative assistant sitting right outside my door who is the kind of person who doesn't like to be idle which is great, and she assisted me in making sure that we had all of the programs of the big list that I mentioned, the 26 programs that do have some kind of licensure here at Marshall. We made sure that we had a home for each of those.

Monica Brooks:

And another great plug for librarians is, of course, we immediately wanted to have some kind of filing structure and naming convention to be able to go back and find that stuff again. If there's anything that makes me crazier out there in the world, and I'm not even a cataloging librarian, I'm a reference librarian, but in order for us to really find materials again, it is critically important that we're cognizant of how we name our files. If one day you leave your institution and somebody wants to archive the work, the great work that you did for your job, please keep in mind that one day, a little digital services librarian is probably going to be combing through your files for the archives to save that information. That's another great reason to kind of settle on some kind of naming convention in advance or some kind of indexing format so that you can find your stuff again, and really, this isn't hard. It's making sure you have some elements that help you find something later if you have to use any kind of search box for it.

Monica Brooks:

All right, next slide. So, for us, our folder structure really consisted of some logical steps of making sure that we had enough folders for each college and each program, and then, of course, academic year. We also made sure that people had instructions and sample handouts and checklists, and of course, we wanted to make sure that they had samples of licensure disclosure letters and also access to the professional associations that provide the determination as to whether or not a person can practice in those various states and/or what those requirements are. And so, we did make really good use of professional association data, but at the same time, we also used some of the wonderful resources provided by the Department of Education or the Bureau of Labor Statistics and other entities that of course track these things and make sure that they're available to consumers, and having the ability to house that material all in one place, again, super attractive and making sure that our folders are logical.

Monica Brooks:

And you're never going to do this perfect the first time. I'm making it sound like whoa, we mapped it all out really great. We did have some trial and error. We started out with one naming convention and realized that it wasn't that great and we changed it. You have to have the ability to brush yourself off and make some changes if you discover during your actual work that something that you've chosen to do is just not functional. Don't beat yourself up. If you do embark on a project like this and you realize that, oops, maybe I should have put those 30 things in this area under that name, let's just go back and change it, make sure it's more functional in practice and see if that works.

Monica Brooks:

Next slide. So, hopefully, this doesn't make people glaze over, but this is just an example of just our file management to make sure that we have each of the programs for each of the colleges. What's also

great about this is you get a timestamp automatically when somebody has gone into the folder and changed something or added something or deleted something. You can set your permissions inside the team. Currently, for our team, our permissions are pretty loosey-goosey. We've made it basically editable for anybody that is in the team, and we've made it so that anyone at Marshall can add themselves. Obviously, people outside of Marshall cannot add themselves, and actually, I don't think we can even add external people. The credentials you used to log into the system are all tied to the employment database. For us, it's Banner, and we know that that person is a legitimate user, and so we can do it both ways. We can either add you or a person can add themselves which is nice.

Monica Brooks:

And then, once they're in the system, they can choose whether or not they want to receive notifications anytime anybody touches a folder. And of course, they can say, "I only care about the people in teacher education," then they can just mark it so that they're receiving information when somebody changes something in the teacher ed folder. That's worked great for me, and also, sometimes I have to mute some of my notifications or I am selective about what notifications I want to see. But it also helps with our tracking to see if and when things disappear, and two, it's helpful to have the ability to sync to a desktop in order to do some drag and drop. That's kind of nice too.

Monica Brooks:

Next slide. So, here's just an example of what it looks like when you actually go into a folder. So, for us, for example, our counseling program is very robust, and they have students all over the country, and they are constantly sticking letters into the system, into the archives so that we have them for posterity. It's great for us too that our general counsel is also very active in this process because she can just pop in and look for somebody if she needs to verify something for the Department of Education or for any other entity.

Monica Brooks:

You're good. Go to the letters. Great. Perfect. And then as you can see, we use a template. In that way, our colleagues can simply modify what they need to modify within the template. We encourage best practices, and of course, the SAN material that we've received and what we've learned at our various trainings, super helpful. We always encourage all of our units to go with the recommended disclosure information. Don't go with the bare minimum. We want you to be as thorough as possible, and we do provide examples to make sure that they have that. So, that's worked out great for us.

Monica Brooks:

Next slide. So, okay, file management can be a little frustrating sometimes, but as I said, it's great that you're able to sync. Once you create your team, you can click the sync button, and then magically, you have the same folders on your desktop that you would have if you logged into the Microsoft Team system, and as I said, that makes it easier for a person to drag and drop. So, if you've got an administrative assistant who is doing this for you, you're fine. Basically, what's really cool is you write your letter and you save it, you can just save it right to the folder that you've synced to your desktop. So, poof, it's really cool that it's so user-friendly and you can't break it.

Monica Brooks:

That's another thing too. I'm the queen of breaking things, especially electronic things. Sometimes I can't even wear watches. I have that weird force field that kills electronic things and that emanates, who

knows, but thankfully, it's Monica-proof and I've never been able to destroy anything in this system. So, that's another reason why don't be afraid to clickety-click and try things because you really can't bring down the system, aside from maybe tripping over cords for the server. Who knows? It's probably in the cloud and you don't even have to worry about that now, except for yesterday when the cloud went down, but that's another story. As I said, timestamp, naming convention, indexing. It's so great to have that convenience for the external folks in other buildings who can just pop in and look for things when they need without having to go through us.

Monica Brooks:

Next slide. So, even though it does probably sound like a somewhat time-intensive and labor-intensive process, it really isn't that bad once you get accustomed to dragging and dropping and making sure that things are going in the right place. But one thing that we were able to automate through our student information system was the location change report, and in some of the meetings that I've attended for SAN, I've heard this is one of the things that gives everyone a significant headache because the statute does require that even if someone moves in the middle of the year, you still have to send them a new disclosure for their new location for their program, and what's great is these are spontaneously generated when the student information system, any changes are made with the address that a student might make. And so, we receive those, and then our administrative assistant makes sure that those letters go to the appropriate people. So, that's kind of neat and what's great is we are able to just drag and drop that information into the team, and then those departments are notified that there's a change.

Monica Brooks:

I can't say enough about the flexibility of the Microsoft Teams notifications and your ability to really customize what you want to see and hear at any given time from the various devices that you might use for that. And another plug is it worked great with mobile devices. I've even been able to attend meetings without any problems in my car using Microsoft Teams, and then also been able to view items and receive notifications on my cell phone or iPad very, very easily.

Monica Brooks:

Next slide. I probably should make a disclaimer and make sure that you all know that I do not work for Microsoft. In fact, I was really cranky when we were switching from Skype for Business because I'd just learned how to do all this stuff in Skype for Business, and then of course, we're in the middle of the pandemic, shut down, and had to learn a new system, but I do believe it's paid off and provided a repository and an archive with searchable indexing capabilities for us that's made this process so much more easier for us. So, I really, really can't say enough about it. For the team as well, it's been a great repository and gathering location for us to offer training, and as I mentioned, okay, so we thought it was going to be great to be able to just send emails and tell people at various meetings to do this kind of work. That wasn't enough. It didn't catch on.

Monica Brooks:

What we did find was somewhat effective or more effective than just word of mouth was offering regular training. And so, if you are tasked with doing this at your institution and maybe doing training is not your bag, find somebody in your department who's not afraid to get up in front of groups or record something on your behalf or practica, just practice and maybe turn on the charm when nobody's looking with just you and your video cam and develop something that is from your institution or institution-centric so that you can tailor that. I really think that's been the single most effective thing for us to offer

regular training and record it and use the Microsoft Team to be the content repository for that information.

Monica Brooks:

We've had several views within our system. We've had upwards of 25 people in some instances attend our training, and then of course, we've had people pop in and look at it at their leisure. And we've tried to keep it kind of short, 25 minutes. We can tell usually that people kind of glaze over after about 20, 25 minutes. So, you might want to keep it a little bit concise so you don't lose your audience.

Monica Brooks:

The other thing that we thought really, really helped was having some kind of generic email that people could just blind copy when they send their licensure disclosure letters to their prospects and to their new enrollees. That worked too because rather than force them into the team to where they have to change file names and figure out what folder to drop something in, we just eliminated that piece and said, "Copy licensure@marshall.edu and we will take care of everything else for you."

Monica Brooks:

Next. Okay, let's go back to the catalyst. So, as I said, training, training, training. That's probably what got our foot in the door as far as people actually knowing what it was that we were doing and why. What was great too is that got the interest to the point where we were able to go to chairs' meetings and associate deans' meetings and meetings of various departments to be able to have one on one, and when I say go to meetings, of course, it was all electronic. So, we were going to these meetings electronically, and then establishing a regular time that we offer the workshop so that people know that it's going to be a recurring thing, even using the same graphics that we used for the first one so that people will see it flash up on the digital signage on campus or pop over their login. When you log into the Marshall network here, you see the same slides that you would see on your digital displays everywhere on campus. So, having that also visual recognition is helpful too.

Monica Brooks:

I didn't see her on the participant list but I do think that she participates regularly, Nikki Bryant and I also took the show on the road. She's at the West Virginia Higher Education Policy Commission, and so we had fun doing some training at the state level as well. So, that's another great way to get the word out is to partner with [inaudible 00:45:30] or other people at the portal entity in your state, or maybe with your board of governors or whatever relationship your institution has at the next level in your state to make sure that colleagues throughout are aware.

Monica Brooks:

And I also want to make a plug for the SAN membership groups too. That was another wonderful way for us to get at the word out. We formed a group within our SAN network here and had at least 15 of our colleagues throughout the state join us in our membership so that we could share information that we get from the meetings and help them comply with this law, and that's also been a great way to network and to meet people at the local level and also answer questions for each other when we get things that are unique to West Virginia.

Monica Brooks:

Next slide. And so, I wouldn't be a good administrator if I didn't look at what we did and provide some pros and cons. We really feel that the fact that everybody is now on this platform was a big plus for us. So, if you're at a school where a lot of your communication is decentralized, and that might be a little bit of a thrash for you, but if you're in a place where everybody is pretty much utilizing the same thing, then woo hoo. If you can use that platform to streamline this process, then go for it. We really dug that having our training in one place, as I've said, was fab, also a place where people can go and share information and Q and A and place a chat in the box that everybody sees, also great, and then of course, doing the work for the units by archiving those materials for them was also a big plus.

Monica Brooks:

Next slide. Okay. What didn't work. Okay. Dummy me, I thought everybody would just jump on the naming convention bandwagon, and then I had to go... with the needle on the record and realize that there's a reason that there's only a set group of people at this institution that like to do organizing and indexing. Also, silly me thinking that everybody likes to play with folders. Okay, they're busy. Yes. So, okay, fine, you guys, message received. So, having a person to really help us do this has just been a godsend. I wish she were here today. She's out on medical leave right now, but I shower her with praise because my administrative assistant's really made my life better. And then, of course, it's still really hard to get people to recognize that this is a federal law. This is not something that you can blow off. And so, again, making sure that we have regular... Putting us out there with the regular training is one way that we've been able to spread that word.

Monica Brooks:

Next slide. So, okay. We're all walking a tightrope. That's why I selected this picture. It just really resonated with me. Every institution I've ever worked at, the number one complaint is that we need better campus communication. That's going to ring true for this process as well, getting the word out, as I said. I'm fortunate that I have staffing support, but at the university level, a lot of my colleagues do not have staff, support staff support. And also another thing that would probably be very helpful for Marshall and probably for all of my colleagues out there is to have more support at the administrative level to understand that at the mothership level that, yeah, this is something that is required and we need to help distance learning and our colleagues and general counsel spread the word to make sure that we're all in compliance.

Monica Brooks:

And the last slide for me, ultimate wish which would be amazing is if we had a position dedicated to this function at our institution. You guys, I'm on the mailing list, and I see the ads that you share for the compliance officers at your various schools, and I am green with envy, but also know that I have snarfed some of the verbiage that you're so kind to share, and we have developed a job ad, and we're hoping when we get a new president, which will be in January and soon a new provost which hopefully will be in April, that we'll be able to have this discussion at the university level to have a person assist us with these very, very important activities so the librarian maybe doesn't have to do it.

Monica Brooks:

But also I want to make a plug if you are in distance learning and you have to answer those questions that relate to substantive and regular interaction for Financial Aid, the team is another great place to put that material as a content repository. And so we also use it for that, and it's great for the Department of Ed to passively go in and go poof and get what they need. We don't have to worry about getting a giant

list at the end of the semester. They can go in at any time that they communicate with Financial Aid and pull the names and the activity reports for the students that they need to verify for their Financial Aid purposes. So, if you're also struggling with that then, and you want to talk to me about how we did it for federal Financial Aid, I'll be happy to talk to you all offline about that as well. And I understand from Kim, we've got some questions.

Megan Raymond:

Yes. Thank you so much, Monica. That was wonderful. And there are quite a few questions, and we have nine minutes remaining. So, I'll get to as many as we can, and then if it's okay, I'll pull those out there that we didn't have a chance to answer live, and we'll share those answers out with the attendees. But I wanted to ask more conceptually what kind of time commitment are you really looking at with this type of implementation? And there may be people here that are looking for the practical approach, but also have some budgets, especially with the federal funding, so if you could blow this all up and buy something that was more robust, would you do that? So, that's two questions in one.

Monica Brooks:

Okay. It was a little time-consuming because I kept changing the file structure and the naming convention before we went live. So, probably if I had planned better, I could have launched faster. It still probably took us about four weeks to get everything organized and not working solid on it for four whole weeks, but just hey, every day we were doing blah, blah, blah, here's some new folders. What do you think of this? What do you think of that? So, it just took us a couple weeks to get our act together. I think you could probably do it in a much shorter period of time.

Monica Brooks:

If someone said, "Hey, Monica, here's \$50,000 for a platform that would do this for you," honestly, I'm not sure that I would at this point because now we're in the groove and we're getting our letters and our blind copies and Crystal is going in every single day and popping something in the folder effortlessly. And so, we've got it down to a science and we feel pretty good about the process. So, at this point, I would say no because our practical approach is working great.

Megan Raymond:

Excellent. And there was interest in seeing the template if you're able to share that, and if that's not something you have at the ready, we're happy to pass that along too.

Monica Brooks:

I will do that after we close. I'll make sure that you all see our sample letters and anything else that you're interested in looking at. And if somebody out there would like to actually see the file, like our little team, I can also check with IT on how we can enter someone as a guest to take a peek, or if they can help me by creating a duplicate team so that you can poke around and check it out. I don't know if that's possible, but it won't hurt to ask.

Megan Raymond:

Right. Right. And that's the nice thing about SAN and WCET is the learning and sharing that goes on as a whole within the network. So, no sense in recreating the wheel, right?

Monica Brooks:

Absolutely.

Megan Raymond:

Another question, the great buy-in question. How did you get buy-in from your academic departments to be the source of the direct disclosures?

Monica Brooks:

Well, that was very difficult. I even had a couple phone calls, one phone call during the shutdown I remember vividly. I'm standing in my laundry room because you do double duty when you're at home in your pajamas working. Picked up the phone, no salutation, and a nursing chair said, "Are you in charge of this garbage?" Which I was like, "I am not. The federal government is and you got to do it. You got to suck it up. And hold on a second, I got to get my laundry out." That one, I could have been upset about it, but instead it really cracked me up. And then after, that we were able to have a really good positive conversation. But once they got past the fact that it was one more thing to do, but you got to do it, guys, and here's some ways that we can make it easier for you, that really helped us.

Monica Brooks:

But I still have a few little pockets on campus that are not a hundred percent with the buy-in, but I am proud that after we had that initial conversation, my nursing colleague got over the garbage part. She's got the best letters and she is the first person usually to drop those into the folders.

Megan Raymond:

That's great. That's a good success story. And I think we have time for one more question. How is Marshall University complying with sending those address change disclosure updates within the 14-day requirement?

Monica Brooks:

How do they? Really, I don't know that we're doing that great of a job at it, to be perfectly honest. We receive the addresses as soon as the student changes it in the SIS, and then we notify the departments and we hope that they get those in within 14 days. Sometimes they do. Sometimes they don't. So, I am a little bit on pins and needles if we do get a challenge or an inquiry that I'm not sure that a hundred percent that our dates are going to mesh with that timetable. But full disclosure.

Megan Raymond:

Fair enough. So, Monica, thank you. Any last words of wisdom you or Rachael want to share with our attendees here today?

Monica Brooks:

Well, Megan, I will just reiterate what you just said. Having this network of people and resources and wonderful association to rely on has really helped make this so much better for me and my team, and I can't say enough about what a class act the SAN group is.

Megan Raymond:

Great. I agreed. I'm always impressed with their work. So, with that, I'll go ahead and pass it off to Kim, and she can take us through the final slides. Thanks again.

Monica Brooks:

Thank you.

Kim Nawrocki:

Rachael, did you have something you wanted to say as a conclusion? Sorry, just didn't want to cut you off.

Rachael Stachowiak:

No, I appreciate that. No, I just wanted to emphasize what Monica had shared makes a huge difference. Compliance really does take a village of the institution. So, you are surrounded by people who hold important pockets of information. Utilize the people you work with. Have conversations. It's an important piece of your work and you're not alone in it. So, look around you and tap your colleagues to assist.

Kim Nawrocki:

Great. Thanks, Rachael. So, as Megan said, there are some questions we didn't get to. We'll pull those out and provide some follow-up responses for those. Thank you, everyone, our speakers, and our wonderful moderator, Megan, for sharing information with our community. As we wrap up, I do want to encourage you, if I can get the slide... There go the slides again. They're just all over the place today. Sorry about that for the jumpiness. So, I do want to encourage you to check out the SAN website for more information about their work and the upcoming SAN Basics Virtual Workshop on March 2nd, 3rd, and 4th. And we do have a newly refreshed WCET website that has a lot of great resources and I encourage you to check it out. We will be sharing the recording out with registrants in a follow-up email, and we'll also compile a couple of other resources that we alluded to today and share those as well.

Kim Nawrocki:

Please save the date for upcoming Virtual Summit on April 6th. We will be discussing the elements of quality digital learning. The program is forthcoming and registration will be announced in early January. I want to quickly acknowledge all our sponsors and supporting members that make our work here at WCET possible. Thank you for being part of this, everyone, and we hope to see you at a WCET event in 2022. We'll be announcing new webcasts and member events very soon. Take care, everyone, and happy holidays. Bye.