Our State Authorization Journey

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Program Accessibility and Compliance Specialist - Online Learning
Areas of Oversight

- Regulatory Compliance
- Systems Accessibility
- Legal/Office of Institutional Equity Liaison
- Faculty Development
- Instructional Design Training
- Project Scoping
- Consultant to Academic Programs
- Consultant to Online Degree Launch Process
The Map for the Journey

Where we started?
What we accomplished?
What are Next Steps?
Where We Started?

...With an Evaluative, Critical Eye
Contributors to the Cause

❖ Legal Counsel
❖ Disability Services
❖ Procurement/Office of Institutional Equity
❖ Registrar
❖ Admissions
❖ Purdue Online Learning
❖ Teaching and Learning Technologies
❖ Wiley
❖ College of Education
❖ College of Veterinary Nursing
❖ Marketing
❖ Prioritization Committee
❖ Information Technology/Web Design
❖ Other
Meetings, Meetings, and More Meetings

Progress in Process
What We Accomplished?

Language to capture data in two areas:

Area 1a: Incorporating the language below into the application and registration systems for programs that lead to professional licensure to allow ORAE and the Registrar to provide accurate data for the annual NC-SARA reporting which occurs every Spring, specifically to assist in meeting Section 5.2, Item 10 in the NC-SARA manual, which states we must know where our students are physically located while enrolled in courses not just their permanent address. 2b components correspond with H: i, ii on the checklist that Amanda created in 2018.

1. You have registered for an online program offered by Purdue University. State and federal regulations require Purdue University to verify your physical location when taking online courses.
2. In which state will you be physically located while completing the online program?
3. I understand that if I move across state lines during a term, that I must update this information.

Area 1b: Incorporating the language below into the application and registration systems for programs that lead to professional licensure to allow ORAE and the Registrar to provide accurate data for the annual NC-SARA reporting which occurs every Spring, specifically to assist in meeting Section 5.2, Item 10 in the NC-SARA manual, which states we must know where our students are placed for their experiential learning (field placements) while enrolled in a professional licensing program. 2b components correspond with H: i, ii on the checklist that Amanda created in 2018.

1. The program you have applied for has a field experience, Internship, or Clinical hours requirement. We understand that this experience may take place in a state that may differ from the state in which you will be located while completing your online, or other coursework. On the other hand, it may differ from the state you permanently reside.
2. For example, you may cross a state border in order to complete your field experience, internship, or clinical hours.
3. In which state will you be physically located while completing that field experience, internship, or clinical hours?

Area 2: Disclosures on Website correspond with mandates from Section 5.2 SARA Manual/Item 10 of SARA Renewal—Disclosure requirements and State Authorization (34 CFR 608.71—608.75)

Misrepresentation; which specify as a Title IV receiving public institution, we are responsible for posting these said disclosures, which notify the students of departmental requirements before enrolling in a chosen degree program. This corresponds with H: i, ii on the checklist that Amanda created in 2018. The three disclosures are for collectively displaying on each of these departmental websites: Education, Vet Nursing, Purdue Online.

1. I understand Purdue University cannot guarantee placement within specific requested districts/schools.
2. I have been informed that this online program has pre-requisites and will be held accountable for any additional fees and placement opportunities.
3. I understand the program that I am applying for does/does not lead to state licensure.
Our Progress

The DOE Progression for Online Learners

TakeAways:
- The Foundation of Regulatory Compliance for out-of-state activities of the institution in the state...
- Liability mitigation/insurance for the institution.
- Moral obligation to the student by the institution.
- SARA participating institutions must follow the requirements acknowledged in the initial SARA application, renewal application, and SARA manual. (The alternative is individual state applications, fees, reporting, and renewals to obtain individual state compliance.)
- For courses and programs leading to professional licensure, notify current and prospective students whether the course or program meets license board requirements in the state where the student is participating in the course or program.

Future Requirements

A Combination of Both Past and Present Requirements

- The institution cannot choose whether they wish to follow the laws and regulations of the state where the institution participates in activity.
- Institutions must be compliant in the states where their activities occur.
- So, the message is simple: Keep focused on state compliance including state licensure boards for the courses and programs offered out of state.

Still In Play:

- State regulations:
  - SARA requirements (Contact #50 & Manual 5.2)
- Federal regulations currently effective:
  - 668.41(b) - Institutional information: Student Compliant location
  - 668.41(b) - Institutional information: Student Compliant location
- 668.71 and 668.72 - (c) (2) Misrepresentation—specific language about professional licensure
- (c) (2) - Misrepresentation—specific language about professional licensure
- (c) (2) - Misrepresentation—specific language about professional licensure

Past Requirements

2016-2018 Federal Regulations:

- 34 CRFR 600.2 Definitions:
- 34 CRFR 650.30 (g) - State Authorization for distance education or correspondence courses - Delayed.
- 34 CRFR 688.50 - Institutional disclosures for distance or correspondence programs - Delayed.
- Note that the Department of Ed did not delay 34 CRFR 600.30 (f) - State Authorization of non-foreign institutions. EFFECTIVE DATE REMAINS JUNE 1, 2018.

Steps of the State Authorization Journey

Step 1: Does your degree program, course, or activity take place outside of the state of Indiana?
- If No, then No Action Needed
- If Yes, then Proceed to Next Step

Step 2: Does the degree program, course, or activity take place in a SARA state?
- If No, then Call Marcelle Jones 765-496-7947 or Proceed to http://nc-sara.org/about
- If Yes, then Proceed to Next Step

Step 3: Does the degree program, course, or activity involve ANY of the 9 physical presence triggers in the NC-SARA state? Please Note: There may be restrictions in a non-SARA state like CA.
- If No, then No Action Needed
- If Yes, then Marcelle Jones 765-496-7947 or Proceed to NC-SARA http://nc-sara.org/about
- If No, then No Action Needed
- If Yes, then Call Marcelle Jones 765-496-7947 or Proceed to NC-SARA http://nc-sara.org/content/sara-and-physical-presence-standard

Step 4: Does the degree program, course, or activity require approval by the applicable out-of-state higher education agency? Please Note: Operation in a NC-SARA state is subject to Professional Licensure Notifications, Data Reporting to NC-SARA, and Specific Language used in contracted supervised fields.
- If No, then No Action Needed
- If Yes, then Call Marcelle Jones 765-496-7947 or Proceed to:
  - https://qa.purdue.edu/innovativelearning/
- Structure: Courtesy of Vanderbilt University

State Authorization, Federal Regulations, and NC-SARA

MARCCELLE JONES, MS, CADAC, CMHFA
PROGRAM ACCESSIBILITY AND COMPLIANCE SPECIALIST,
DIGITAL EDUCATION,
PURDUE UNIVERSITY
Disclaimer: The content of this slide was vetted by Purdue's legal counsel.
Professional Licensure and State Authorization

Purdue University is accredited by the Higher Learning Commission. The Higher Learning Commission is an institutional accrediting agency recognized by the U.S. Department of Education.

Purdue is committed to complying with all states’ regulations for its Purdue Online Learning programs. For specific information regarding state authorization approval, licensure or exemption, please email pro1772@purdue.edu.

This applies to Purdue Online Learning programs ONLY. Students from these states who are interested in our on-campus programs are encouraged to contact Purdue University.

Welcome to State Authorization

Purdue University participates in federal financial aid programs under Title IV of the Higher Education Act of 1965. Therefore, Purdue University is required to comply with the Program Integrity Misrepresentation rules published in 2010 and State Authorization regulations (which vary from state to state) in applying to online distance education programs. The regulations require institutions of higher education to obtain approval from the states in which they provide postsecondary education programs. The regulations allow authorization to come directly from a state or through a “state authorization reciprocity agreement.” Purdue University, located in Indiana, is currently authorized by or pursuing authorization from all states.

Purdue University participates in the State Authorization Reciprocity Agreement (SARA), which is an agreement among states that establishes national standards for the interstate offering of postsecondary distance education courses and programs. Through SARA, Purdue may provide distance education to residents of any other SARA member state without seeking authorization from each SARA member state. All states, other than California, participate in SARA, and Purdue has received approval or exemptions from them. Courses and programs incorporating an "experiential learning" experience mean the student reports directly to 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 of "experiential learning" experiences include internships, clinics, student teaching, or the like.

We urge you to review the regulations regarding authorization of your specific state if you are all of the following:

- a U.S. citizen
- do not live in Indiana
- are thinking about enrolling in a Purdue University online program

If you become a Purdue University student, you are responsible for checking program authorization and licensure requirements in your state of residence. Rules and regulations vary by state. If you move to a new state, you are responsible for ensuring your program is approved in your new state.

https://ProfessionalLicensureStateAuthorization/
Data Analytics Reports

New State Authorization Website Visits

72 WORKSHOPS; 40 FACULTY assisted in 2018-2019
What are Next Steps?

❖ Implement SPLASH notice
❖ Track student location for State Authorization and NC-SARA
❖ Track student placement across state lines
❖ Educate on DOE final rulings
❖ Implement a campus-wide Out-of-State Educational Activities Policy

▪ The policy supports, at least two of the four key pillars, outlined in our 2013 strategic plan. First, is Affordability and Accessibility and second is Transformative Education.

▪ The policy also reflects the university’s mission; particularly “we are innovators discovering new ideas and solutions that will foster a positive global impact”.

▪ The approach allows for fostering goodwill, clear understanding of requirements across academic departments, and implements the Universal Design for Learning pedagogy.
Questions

Contact Information:
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Purdue University | Teaching and Learning Technologies
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Email: Jone1772@purdue.edu
*Designated Title IX Reporter
*QPR Suicide Prevention Gatekeeper
*Quality Matters Certificate of Completion
COMMUNICATING ABOUT STATE AUTHORIZATION

Lisa Siefker, State Authorization Program Manager
The Ohio State University
Ohio State in a Nutshell

Public
Enrollment: 68,100
Decentralized
15 colleges
5 regional campuses
SARA institution
Online Program Progress

![Graph showing the number of programs approved across different fiscal years for various degrees: Certificate, Associates, Bachelors, Masters, Doctorate, and Total. The graph indicates an increasing trend in the number of programs approved from FY13 to FY19.](image-url)
CHALLENGES

Complex regulations

Changing requirements

Faculty & staff turnover

Independent academic units
# Connecting to Ohio State’s Mission

## MISSION
- ✓ Creating & discovering knowledge
- ✓ Educating students
- ✓ Preparing students to be leaders & engaged citizens
- ✓ Fostering a culture of engagement & service

## VALUES
- ✓ Excellence
- ✓ Diversity in people & ideas
- ✓ Inclusion
- ✓ Access & affordability
- ✓ Innovation
- ✓ Collaboration
- ✓ Integrity, transparency & trust

## GOALS
- ✓ Teaching & Learning
- ✓ Access, Affordability & Excellence
- ✓ Operational Excellence
- ✓ Resource Stewardship

[oaao.osu.edu/mission-values-and-core-goals](oaao.osu.edu/mission-values-and-core-goals)
DEVELOP A STRATEGY

Situation Analysis

- Audiences
- Internal Strengths/Weaknesses
- External Opportunities/Threats

Objectives & Goals
- Tactic
- Tactic

Key Messages
- Tactic
DEVELOP A STRATEGY: Key Messages

**STAFF**
- The state authorization team is here to help
- Compliance is a collective responsibility - we’re all in this together
- Regulations change

**STUDENTS**
- Your location matters
- Ohio State researches regulations to make sure a program meets requirements in your state

**LEADERSHIP**
- SA team works to maintain value of Ohio State degree, regardless of student location
- Participation in SARA streamlines compliance, but doesn’t cover everything
What is a Trigger Activity?

Lisa Siefker, State Authorization Program Manager | March 8, 2019

Whether you’re new to state authorization or could use a refresher, you may have heard the term “trigger activity” and wondered what it means. What is a trigger activity, and why is it so important to share trigger activities with the state authorization team?

What SARA Covers

Federal, state and professional licensing board regulations impact online and on-ground education offered across state lines. Compliance with these regulations means that an Ohio State degree will be recognized and that a student
TOOL: Monthly Stakeholder Newsletter

State Authorization Leaders:
Greetings, state authorization leaders! Please read below for this month's state authorization news and reminders. As always, thank you for your support, and please reach out with any state authorization questions.

Lisa Siefker & Casey Hammond
State Authorization Team
Office of Distance Education & eLearning
ODEE-stateauth@osu.edu | odeee.osu.edu | @OhioStateIT

Negotiated Rulemaking Underway
Background

- Listserv - 281 stakeholders
- Regulatory updates
- Changes in authorization status
- SARA policy updates
- Reporting deadlines
- Reminders
TOOL: Faculty & Staff Web Content

IN THE NEWS

March 8, 2019
What is a Trigger Activity?

February 11, 2019
Get Involved in State Authorization

January 11, 2019
Can Online Programs Enroll Students Outside the U.S.?

SEE MORE NEWS

QUICK LINKS

SARA
Out-of-State Educational Activities Policy
Resources
Reporting Forms
FAQs
Authorization Map
International Enrollments
Contact us

MONTHLY NEWSLETTER

March 2019

SEE NEWSLETTER ARCHIVE

EVENTS

State Authorization Advisory Committee Meeting

April 24, 2019
10 am - 11 am
Enarson Conference Rm
TOOL: Online Training Module

Choose a topic to learn how state authorization impacts students and Ohio State's out-of-state activities:

- Out-of-State Internship or Clinical
- Online Licensure Program
- Online Course or Program
- Student Financial Aid
- Tracking Out-of-State Students
TOOL: Student-focused Web

- Authorized
- Limited Authorization
- Program Not Available
**TOOL:** Data & Surveys

Bar chart showing responses to questions about newsletter content:

1. The newsletter provides me with essential regulatory information that I need to know.
2. The newsletter's regulatory updates are easy to understand.
3. The newsletter's regulatory updates are timely.
4. The amount of information provided on regulatory updates is sufficient.
5. The newsletter's regulatory updates are useful to me.

Responses:
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
Top 3 Takeaways

**OHIO STATE**

- ✓ Connect to the mission
- ✓ Complete a situation analysis to identify key messages & objectives
- ✓ Establish a regular communication schedule (and stick to it)

**PURDUE**

- ✓ Apply principles from strategic plan
- ✓ Focus message on the student
- ✓ Never give in. Never, never, never. (Churchill, 1941)