STATE AUTHORIZATION & REGULATORY IMPLEMENTATION: BEST PRACTICES

Presented by: Allison S. Levin, Esq. Compliance Associate and Attorney at Post University

INTRODUCTION: CONTEXT

- State Authorization Background
  - Responsibilities
- Achieving State Authorization at Post University
  - Application submissions
  - Processes and Procedures
- NC-SARA members vs. non NC-SARA members

TODAY’S DISCUSSION

- Best practices and tips for creating transparency and accountability at your university
  - Submitted Initial Applications
  - Application Chart
  - Renewals
  - Renewal Calendar
  - Implementation of State Specific Requirements
    - Audit Compliance Chart
    - Closing Remarks
SUBMITTED INITIAL APPLICATIONS

- Handling External Hold-Ups
  - Application Submittal Chart
  - Purpose
  - Accessibility
  - Established Relationships
  - Working with Regulators, not Against
  - No fault of the regulators
  - Combating back-log
  - Creating a record

SUBMITTED INITIAL APPLICATIONS CHART

<table>
<thead>
<tr>
<th>State Agency</th>
<th>Agency Contact</th>
<th>Agency Email</th>
<th>Agency Phone</th>
<th>Link to Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alaska</td>
<td>Kierke A. Kussart</td>
<td><a href="mailto:Kierke.kussart@alaska.gov">Kierke.kussart@alaska.gov</a></td>
<td>907-465-6741</td>
<td><a href="http://acpe.alaska.gov/">http://acpe.alaska.gov/</a></td>
</tr>
<tr>
<td>Arizona</td>
<td>Terri Stanfill</td>
<td><a href="mailto:teri.stanfill@azpppse.gov">teri.stanfill@azpppse.gov</a></td>
<td>602-542-2399</td>
<td><a href="https://ppse.az.gov/">https://ppse.az.gov/</a></td>
</tr>
</tbody>
</table>

SUBMITTED INITIAL APPLICATIONS

- Handling External Hold-Ups
  - Application Submittal Chart
  - Purpose
  - Accessibility
  - Established Relationships
  - Working with Regulators, not Against
  - No fault of the regulators
  - Combating back-log
  - Creating a record
Case Study
- Applications that have been submitted and not approved longer than expected
- Importance of creating a record, following up and establishing relationships

Best Practices and Tips
- Keeping a Record
- Communication
- Organization
- Importance of Working Relationships

Managing Renewal Applications
- Post University’s approach to maintaining renewal applications
- Renewal Calendar
  - State
  - Renewal Date
  - Cost
  - Renewal Fee
  - Bond
  - Agent Fee
  - Application
  - Notes

Importance of Working Relationships

Renewal Applications
<table>
<thead>
<tr>
<th>States Type of Registration Renewal Date</th>
<th>Institutional Expenses</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama All Programs 2015 XXXX XXXX XXX XXX</td>
<td>Renewal will be based on AGI (if similar to 2013 around $XXXX)</td>
<td></td>
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<tr>
<td>Alaska XXXX XXXX</td>
<td></td>
<td></td>
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<tr>
<td>Arkansas All Programs 6/30/2014 XXXX XXXX XXX XXX</td>
<td>Arkansas requires authorization for each new program, so as we add programs we have to seek separate authorization</td>
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</tr>
<tr>
<td>Maryland Data Reporting Requirement</td>
<td>Maryland’s experience with this specific renewal requirement</td>
<td></td>
</tr>
<tr>
<td>Maryland Case Study</td>
<td>Using initial pull to set the tone for future reports</td>
<td></td>
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<tr>
<td>Maryland Case Study</td>
<td>Leaving ample time for data collection</td>
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<tr>
<td>Maryland Case Study</td>
<td>Don’t be afraid to question Regulators or the agency you are supplying student confidential data</td>
<td></td>
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</tbody>
</table>
### SAMPLE: MARYLAND DATA REPORTING REQUIREMENT

<table>
<thead>
<tr>
<th>Academic Year</th>
<th>College-Facility</th>
<th>State</th>
<th>OPEID Code</th>
<th>SSN</th>
<th>ID Number</th>
<th>Type</th>
<th>Gender</th>
<th>Financial Aid Application Status</th>
<th>Fall Attendance</th>
<th>Spring Attendance</th>
<th>Family Size</th>
<th>Dependency Status</th>
<th>Commuter Status</th>
<th>Expected Family Contribution</th>
<th>Cost of Attendance</th>
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</thead>
<tbody>
<tr>
<td>2013</td>
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<td></td>
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### MARYLAND CASE STUDY
- Maryland Data Reporting Requirement
  - Past University’s experience with this specific renewal requirement
  - Using initial pull to set the tone for future reports
  - Leaving ample time for data collection
- Don’t be afraid to question Regulators or the agency you are supplying student confidential data

### SUMMARY RENEWAL APPLICATIONS
- Best Practices and Tips
  - Organization
  - Deadlines
  - Outlook /other similar tools
  - Communicating to various internal stakeholders
  - Asking questions
Maintaining state specific requirements and holding your University accountable
• "DOING WHAT YOU SAY YOU WILL BE DOING”
• Ensuring compliance of the University
• How Post University handles State Specific Requirements
• Challenges of Implementation

Setting up procedures or even policy requirements

State Audit Compliance Chart
• Benefits of Chart/Checklist
  • Compliance Chart
    • How to decide what applies to your institution
  • Organization
  • State
  • State Specific Requirements
  • Audit Date
  • Stakeholders
  • Action Taken
  • Notes/Findings

STATE SPECIFIC REQUIREMENTS

APPENDIX C: SAMPLE STATE AUTHORIZATION COMPLIANCE CHECKLIST

STATE REQUIREMENT(S) COMPLETED TO BE COMPLETED ACTION TAKEN/STAKEHOLDER AUDIT DATE ACTION TAKEN

ALABAMA
(1) Annual Report Card: Each institution is required to report to the Alabama State Board of Education each year an annual student enrollment and performance report for the previous fiscal year. Annual Report Card information will be available to all institutions currently holding a private school license by July 15th of each year on the Alabama College System website. The Alabama Department of Postsecondary will publish a state-wide annual report card by January 1st of each year beginning 1/2009

By October 15th of each year
This information should be submitted to Finance Department via Susan Strano for completion September 1st of each year

(2) Agent applications: Admission Counselors should be bonded to specifically handle Alabama Residents

By October 1st of each year
This information should be requested from head of Admissions and submitted to Finance Department for reauthorization of bond. Submit information via Susan Strano Sept 1st of each year to see if Agent’s in Admission Office need to be Updated and every six months following

(3) Refund Policy for Alabama Students: If a cancellation occurs within 72 hours of enrollment date, all money paid by the prospective student shall be refunded. If the cancellation is after 72 hours of enrollment date, but before classes begin or correspondence materials are delivered, a refund shall be made of all money paid except the registration fee, if cancellation occurs after classes begin or after shipment of correspondence materials, a pro rata refund will be made of all unearned prepaid tuition, fees, and charges for books and supplies not issued to the student. Once books and supplies are issued and received by students, these become the property of students and refunds may be made only at the discretion of the private school. A full refund is due to students whose contracted educational services are denied by the school as a result of economic or academic fraud as defined by Alabama

Information submitted to the head of financial aid and Scott Allen for implementation. Documentation in State authorization web page on post.edu under Alabama information for students and prospective

Alaska
Renewal is due every two years, exemption form is on the S:/drive Admin/Marketing/Allison/States/AK

Every two years as of January 2015
Next Renewal is due January 2017; Application must be completed by Compliance Associate and submitted to Alaska Department. Start Application 30 days prior to due day in order to receive proper review by Chief Administrative Officer

Arizona
License renewal information will be sent via email (from email address noreply@azdoa.gov ~~ please add to your address book). The State Board will no longer send certified license renewal notification unless the licensing contact does not have a working email address. It is the licensee’s responsibility to know the license expiration date and renewal/reporting deadlines. There is a $100 a day late fee after the license renewal deadline. License Renewals are due approximately 60 days prior to the expiration date of the license.

Annually - January To be done by Compliance Associate January

STATE SPECIFIC REQUIREMENTS
- How a Chart can assist your Institution in staying organized
  - Internal Audit Dates
  - Putting renewal deadlines on the spreadsheet
  - Specific Requirements and key stakeholders
  - Involving multiple people in your organization

- Best Practices and Tips
  - Identification of key stakeholders
  - Holding people accountable for ownership
  - Proper audits
  - Keeping a record
  - Communication

- Questions?

Information:
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THANK YOU!