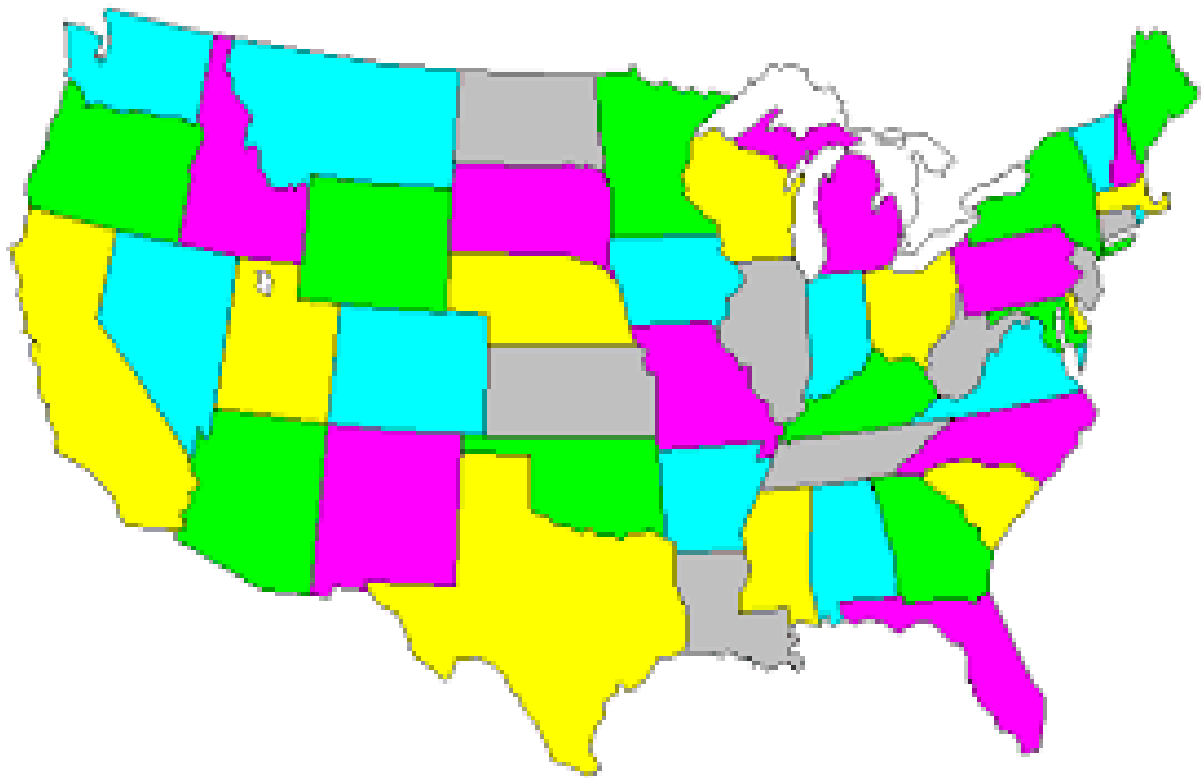


State Authorization 101



How did we get here?

- A brief history of state authorization . . .



Know your institution!

- State triage:
 - How many students are enrolled in each state?
 - Risk analysis based on enrollment patterns
- Which programs are active in each state?
 - Components of program (e.g., internships, clinical experiences, field placements, etc.)?
- Which other departments are active in other states?
 - What are they doing (e.g., marketing, recruiting, training)?
- Knowing your institution means knowing your triggers for state authorization

Then vs. now: How to research

- In 2010, very few resources for state authorization information and guidance existed.
- Today, there are many resources and groups dedicated to networking and information sharing with regard to best practices for state authorization compliance.
- Start with [SHEEO](#)
 - State Higher Education Executive Officers Association
 - Detailed surveys of state higher education regulators; information on regulations, statutes and rules

Then vs. Now: How to research

- Limitations of SHEEO surveys
 - Not 100% reliable
 - Not 100% complete
 - Not up to date, in some cases
- Always check the primary source(s): statutes, regulations and rules
 - Basic legal research
 - Definitions, exemptions, types of institutions regulated, requirements

Then vs. Now: How to research

- The importance of reaching out to states
 - Regulations vs. actual state processes and procedures
 - Do your homework first!
 - Build strong relationships with state regulators
 - Find the most knowledgeable/authoritative people to answer your questions and address your concerns

Then vs. Now: How we research

To confirm your institution's status in a state and to get your state authorization questions answered:

1. First, consult the SHEEO surveys.
2. Then, check the state regulations for confirmation.
3. If answer still isn't clear, reach out to the state agency.

The “Good Faith Effort”

- Origin of this phrase
- How to demonstrate a “good faith effort” towards compliance
- Requires ongoing research, documentation, and recordkeeping
- State regulations are constantly changing, and new states continue to join SARA
- Institutions of higher education are multi-faceted organizations, and any number of activities can trigger a change in authorization/exemption status

Develop Resources for Recordkeeping

What's worked at Franklin University:

- Keeping key information organized
 - “Mother” spreadsheet for quick view of authorization status in all states and territories
 - Triggers spreadsheets for specific University departments (e.g., Marketing, Community College Alliance)
 - New programs/state authorization spreadsheet
 - State level summary spreadsheets for complex states
 - Budgeting/planning/strategy spreadsheets
 - Electronic and physical files for all key documents
- University intranet (e.g., SharePoint or an internal wiki)
- Document Library (internal shared drive)

“Mother” Spreadsheet

- Summary view of all vital information for each state
- Quick reference guide
- Updated regularly
- Tells us:
 - Official status in each state (authorization, exempt by confirmation, exempt by regulations/interpretation)
 - Date status achieved; other key dates
 - Renewal requirements and dates
 - Reporting requirements (e.g., enrollment, tuition collected) and dates
 - Date of last full state review (for changes to regulations and/or statutes)

Trigger Monitoring

- Specific departments may need their activities in states monitored to make sure they don't trigger the need for authorization
- It's much easier to plan for implementation/launch of new programs or initiatives than to play catch-up
- Regular updates are provided to those staff from the AIE Department; meetings to discuss plans or strategy are held as needed

New Programs/State Spreadsheet

- Shows authorization status of each University program in every state and territory
- Updated as new programs are approved in each state
- Shared University-wide through internal wiki
- Serves as control guide for when marketing and recruiting efforts can begin in specific states for specific programs, and when students from specific states are permitted to enroll

Strategic Thinking about States

- Our story: initial state authorization strategy vs. current strategy
- What is important at your institution?
 - Specific degree programs?
 - Target geographic region?
 - New program/location rollouts?
 - Who makes these decisions and how?
 - Are there appropriate processes and procedures to manage and support the state authorization strategy?

Strategic Thinking about States

- Budgeting
 - Initial authorization phase
 - Maintenance phase
 - Curriculum changes
 - State fee changes
- Time/staff resources needed
 - Initial push for authorization vs. maintenance phase
- SARA: State Authorization Reciprocity Agreement
 - Joint strategy including SARA and authorization in some individual states?

Strategic Thinking about States

- Maintenance phase
 - Annual reauthorizations and regular reporting
 - Networking; staying informed and educated
 - Conferences, networks, workshops, webinars
 - WCET SAN, SAN-O, M-SARA, Inside Higher Ed and other higher education publications
 - State agency websites (regular review cycle)

It's all connected . . .

- Regional accreditation
- Specialized accreditation
- State licensing boards, such as nursing, social work, teacher education, etc. (possible review of curriculum and/or program authorization needed)
- State Worker's Compensation agencies
- State Veteran's Affairs agencies
- Other state agencies (e.g., Secretaries of State), that may require authorization for doing business in a state

The good news . . .

- It can be done!
- There are many helpful resources available now.
- State applications are all different, yet they ask for similar or identical information.
 - Once you've done a few, you get the hang of it!
- The maintenance phase is much more manageable than the initial authorization phase.
- A strategic and organized approach will net results!

Go forth and get authorized!

Questions?

