

Reed, Katie

From: Weibush, Leslie A.
Sent: Thursday, June 30, 2016 10:47 AM
To: Reed, Katie
Subject: CAA
Attachments: State Authorization policy 2016 06 29.docx

Hi Katie –

I wanted to see if it would be possible to share this policy with the CAA group, including the following message:

The State Authorization Policy has been updated, incorporating feedback received during the initial feedback period. Key proposed changes in “Draft 2” include:

- *College and unit-level state authorization liaisons identified to serve as a point of contact for the state authorization team*
- *Removal of international language*
- *Addition of a State Authorization Advisory Committee (SAAC)*

If possible, please review the updated policy prior to the CAA meeting and submit feedback to: ODEE-stateauth@osu.edu

Tentatively, this policy will also be shared at the August 10 Council of Deans meeting.

We look forward to answering any questions you might have around this policy.

Let me know if you have any questions, Katie. Thanks for your help!

Leslie



Leslie Weibush

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Buckeyes consider the environment before printing.

Applies to: Units, faculty, staff

Responsible Office **Office of the Chief Information Officer (OCIO)**

POLICY

Issued: Target Effective Date: 09/01/2016

The Ohio State University is committed to fully complying with all requirements issued by states and U.S. territories regarding the operation of higher education institutions within their boundaries; ensuring that students can sit for licensure upon completion of their academic programs; and protecting academic programs and their faculty. All units that sponsor authorization trigger activities must follow the requirements outlined in this policy.

Purpose of the Policy

To educate colleges and units about regulations related to conducting university business outside Ohio, to develop a process ~~for-to~~ collecting placement information ~~for-on~~ students located outside Ohio; and to obtain approvals for trigger activities taking place outside Ohio.

Definitions

Term	Definition
Trigger activities	Online programs or courses, experiential learning opportunities, advertising, recruiting, proctoring, operating at a physical location outside Ohio, third party agreements or contracts, faculty or staff residing outside Ohio while explicitly undertaken for Ohio State. Activities are thematic in nature and does not imply individual placements or each piece of marketing, for instance. Typically, institutional activities do not apply to activities that occur for less than a week, such as conference travel, scholarly visits, personal travel, or post-graduate placements; however, a week time frame isn't universal as some states may care about regulate recruitment at one-day recruitment fairs. <u>For more information see Trigger Activities by State.</u>
Experiential learning opportunities	Includes, but is not limited to, the following credit-bearing experiences: clinicals, externships, field work, internships, practica, student teaching, or any face-to-face experience. Possible revision: Experiential Learning opportunities are educational experiences taken through Ohio State that involve engaging in direct or hands-on experience with the subject of study and may include, but are not limited to, clinicals, externships, field work, internships, practica, student teaching.
Advertising	
Recruiting	
Physical location	
Unit	A campus, college, department, division, institute/center or office sponsoring an institutional activity.
Programs	A collection of instructional modules delivered for undergraduate, graduate, professional, certificate-seeking, non-degree, and continuing education <u>students.</u>
State Authorization Team	Individuals within the Office of Distance Education and eLearning who partner with academic units, university support units, and OAA to seek approvals and provide general reports about the university's authorization status. The state authorization team regularly consults with CoDELIT, ODEE steering committee, APAC, and college secretaries.
SARA states	<u>States that are members of the National Council for State Authorization Reciprocity Agreements (NC-SARA) and that may therefore offer education or activities in other SARA states without approval in most cases. SARA requires annual reporting for its institutional members.</u>
Non-SARA states	<u>States that are not members of the National Council for State Authorization Reciprocity Agreements (NC-SARA) and in which Ohio State is required to obtain approval to offer education or activities.</u>



Applies to: Units, faculty, staff

Policy Details

~~I. State Authorization Team.~~

~~II.1. The State Authorization Team is responsible for to educating units regarding state authorization requirements; collect,ing and analyze, and reporting- data for to fulfil reporting requirements; seeking necessary approvals to operate in U.S. territories and states other than Ohio; and providing updates on authorization status for U.S. territories and states; and consult and support units engaging in trigger activities.~~

~~II. The Office of International Affairs is responsible for approving international activity outside the U.S.~~

III. Unit Role.s

A. Units must inform the college or VP unit when engaging in trigger ~~activities~~activities in any U.S. territory ~~or~~ a state other than Ohio, ~~or in a location outside the U.S.~~

~~B. Any unit engaging in authorization trigger activities in a U.S. territory or a state other than Ohio prior to the issuance of this policy must consult with the State Authorization Team.~~

~~C.B. Units should review Trigger Activities by State and consult with their college/VP unit prior to engaging in Units planning to engage in authorization trigger activities in a U.S. territory or a state other than Ohio, must consult with the State Authorization Team at the outset~~

~~D.C. Units must consult with the State Authorization Team prior to providing online courses or placing students for an experiential learning opportunity in a U.S. territory or a state other than Ohio, and must report all locations where students receive education each term~~Units must report all trigger activities to the college/VP unit state authorization liaison.

~~Units must consult with the Office of International Affairs prior to engaging in authorization trigger activities and experiential learning opportunities outside the U.S., including offering admission to a student in a foreign country into an online program.~~

~~Units must properly code their online courses and courses with experiential learning opportunities so the University can identify where students are receiving education. Coding assistance is available from the Office of the University Registrar.~~

IV. State Authorization Advisory Committee (SAAC).

A. The SAAC is responsible to review and make determinations regarding approvals, exceptions, and ~~recommendations on the submission of an institutional applications for non-SARA member states or territories; and to inform college/VP units of state actions against Ohio State and their impact on current approvals.~~

B. The SAAC is convened by the State Authorization Team and will include faculty from the four executive dean areas (Arts and Sciences, professional colleges, regional campus, Health Sciences), Student Financial Aid, University Registrar, and curricular deans.

C. The SAAC will use risk level to make determinations about and prioritize non-SARA member authorization efforts:

1. ~~Less Risk: Those trigger activities for which: only a few states show concern or desire to enforce; the vast majority of states show little interest in pursuingpursuing; impact on students is low given state/territorial law/regulation.~~

2. ~~More Risk: Those trigger activities for which there is high enforcement activity by states and state licensure boards; impact on students is high given state/territorial law/regulation.~~

~~VI.V. Professional Licensing Board Approval.~~

A. ~~Regardless of SARA status, (The University-university may be required to receive approval from professional licensing boards in each U.S. territory or, states other than Ohio, or locations outside the U.S., for degree programs leading to licensure or certification.~~

B. ~~Colleges and VP uUnits are responsible for seeking any required professional licensing board approvals, consulting with the State Authorization Team or the Office of International Affairs in seeking professional licensing board approvals, and providing approval documentation to the State Authorization Team for its reporting requirements in SARA and non-SARA member states.~~



Applies to: Units, faculty, staff

~~VII-VI.~~ Financial Aid.

Students may not receive federal financial aid if their educational activities are not approved in the state or territory where the student is physically present.

~~VIII-VII.~~ Reporting Requirements.

~~A.~~ The university is required to fulfill the following reporting requirements: submit annual renewal applications, including new program additions, in approved non-SARA member states.

~~B.~~ Colleges/VP units must:

~~1.~~ Report SARA requirements annually to the State Authorization Team.

~~2.~~ Submit anticipated reporting activity requirements for non-SARA member states as they emerge to the SAAC.

~~3.~~ Disclose state authorization and professional licensing board status to students. (unit)

~~B.~~ Report annually to the National Council for State Authorization Reciprocity Agreements (NC-SARA) on out-of-state student placements as required by the NC-SARA Data Reporting Guide. (SA team)

~~C.~~ Report annually to state regulatory agencies in states that are not members of SARA. (SA team)

~~C.~~ Faculty and staff who become aware that an individual or unit is engaging in out-of-state trigger activities that have not been reported/approved to the college/VP unit should share the information by emailing ODEEdee-stateauth@osu.edu and contacting their college/VP unit state authorization liaison. The goal of this requirement is to ensure the institution will seek and obtain approval to operate in the state if it has not already done so.

In an effort to ensure the University adheres to state requirements, faculty or staff members who become aware that a unit is engaging in out-of-state trigger activities without consulting with the State Authorization Team must disclose that information to the State Authorization Team within five business days.

PROCEDURE

Issued: Target Effective Date: 09/01/2016

~~I.~~ The State Authorization Advisory Committee (SAAC) will meet monthly or as needed to address issues submitted for their consideration and will provide regular updates to [college/VP unit liaisons](#) and units as needed.

~~II.~~ College/VP unit collection and reporting of state authorization data. (*web portal link to be added*)

~~A.~~ Units must enter trigger activity data ~~in~~ via the state authorization web portal ~~by~~ (web portal) on a monthly basis ~~the first of each month~~.

~~B.~~ The college/VP unit state authorization liaison must review and submit trigger activity data via the web portal on a monthly basis.

~~C.~~ The college/VP unit must report annually any SARA required data to the State Authorization Team through the web portal. Annual reporting requirements are available in Ohio State SARA Reporting Standards (*Link to be provided*).

~~D.~~ The college/VP unit must disclose professional licensing board approval status to students through the college website and provide the link to the State Authorization Team.

~~B-E.~~ The unit must report annually for the prior academic year where students are ~~were~~ placed in experiential learning opportunities via the web portal.

~~III.~~ The State Authorization Team must combine submit all required data annually to reporting entities on behalf of the university.

~~IV.~~ Disclosure and resolution of out-of-state trigger activities.

~~A.~~ Out-of-state trigger activities that individuals or units believe have not be approved should be shared within five business days to the college/VP unit state authorization liaison and via email to ODEEdee-stateauth@osu.edu.

~~C-B.~~ The SAAC will address all unapproved out-of-state trigger activities and provide updates to state authorization liaisons on a monthly basis.



Applies to: Units, faculty, staff

~~II.V.~~ Consultation and action planning on trigger activities with the State Authorization Team

- A. Units sponsoring, or planning to sponsor, a ~~trigger~~ institutional activity in a U.S. territory or a state other than Ohio ~~must~~ may consult with their college/VP unit and the State Authorization Team by submitting a consultation request via the State Authorization Consult Web Form portal to the State Authorization Team office to initiate a consultation.
- B. The State Authorization Team will review the ~~State Authorization Consult Web Form~~ information and schedule a consultation with the unit and the college/VP unit liaison college/VP unit state authorization liaison. Additional information may be ~~required~~ needed prior to the consultation.
- C. ~~The college/VP unit liaison college/VP unit state authorization liaison and the unit~~ he State Authorization Team and the unit will determine a plan of action to move forward following the consultation.
- D. The State Authorization Team will work with U.S. territories and/or states other than Ohio; to seek necessary approvals.
- E. ~~The units~~ must seek necessary approvals from professional licensing boards. To do so, they must work with their college/VP unit liaison college/VP unit state authorization liaison who will consult with the State Authorization Team and seek necessary approvals from professional licensing boards, if required.
- F. The State Authorization Team will inform the unit and college/VP unit liaison college/VP unit state authorization liaison and involved administrative offices when approval is obtained for trigger activities conducted in a U.S. territory or a state other than Ohio.

Reporting where students are placed in experiential learning opportunities

Units must consult with the State Authorization Team office prior to placing students in experiential learning opportunities outside Ohio.

Units must report to the State Authorization Team on student placements outside Ohio annually, using the Experiential Learning Opportunities Report Form.

Reports on student placements must be submitted by January 1.

~~VII.VI.~~ Providing documentation of Professional Licensing Board approvals.

Units must submit documentation of professional licensing board approvals to their college/VP unit liaison college/VP unit state authorization liaison State Authorization Team using the Professional Licensing Board Approval Form via the web portal.

~~The State Authorization Team will maintain and publish university~~ The State Authorization Team is available to consult as needed regarding seeking professional licensing board approvals.

~~IX.VII.~~ Disclosing state authorization approval status and status, professional licensing board status and required consumer information to students on the State Authorization website.

~~The State Authorization Team must publish Ohio State's state authorization status on the State Authorization Team website.~~

~~Units must disclose the professional licensing board status of any required board approval to students using a method determined by the University.~~

~~XII.VIII.~~ Reporting financial aid data.

A. The State Authorization Team must submit a report to Student Financial Aid whenever there is a change in status to any distance education program or state approval, including ~~This would include~~ additions, deletions, and/or changes in approval status.

B. Student Financial Aid is responsible for general Title IV reporting requirements related to federal student aid programs and university distance education degree programs.

~~XIII.IX.~~ Disclosing unapproved out-of-state trigger activities can occur in a number of ways:

A. Call the State Authorization Team lead.

B. Email ODEE-stateauth@osu.edu.

B.C. Inform the college/VP unit liaison college/VP unit state authorization liaison.

Commented [HEE1]: Earlier it says colleges are responsible for this. Which is it?

Applies to: Units, faculty, staff

Responsibilities

Position or Office	Responsibilities
State Authorization Team	<ol style="list-style-type: none"> 1. Educate units about state and territory requirements for conducting trigger activities or experiential learning opportunities that lasts more than a week in a state other than Ohio or a U.S. territory outside of Ohio. 2. 2. Collect, analyze, and report data. 3. Seek necessary approvals to operate in U.S. territories and states other than Ohio. 4. Provide updates on authorization status. 5. Consult with and support units with units regarding existing or planned out of state trigger activities, advise the unit of known risks, and determine a plan of action to seek approvals if necessary engaging in trigger activities. 6. Submit all required data annually to reporting entities. 7. Schedule consultations with units and college/VP unit liaisons college/VP unit state authorization liaison when a requested. 8. Work with U.S. territories and states to seek necessary approvals. 9. Inform units and college/VP units when approval is obtained for trigger activities. 10. Maintain and publish university state authorization approval status and required consumer information on the State Authorization web site. 2-11. 11. Report to Student Financial Aid any change in status to any distance education program or state approval.
Office of International Affairs	Approve international activity outside the U.S.
College/VP unit and state authorization liaison	<ol style="list-style-type: none"> 1. Seek required professional licensing board approvals in SARA and non-SARA member states. 2. Review and submit trigger activity data monthly. 3. Report SARA requirements annually to the State Authorization Team. 4. Work with units to receive state authorizations. 5. Submit anticipated reporting activity requirements as they emerge to SAAC for non-SARA member states. 6. Disclose state authorization and professional licensing board status to students through the college website and provide the link to the State Authorization Team.
Units	<ol style="list-style-type: none"> 1. Inform their college/VP unit when engaging in trigger activities in any U.S. territory or a state other than Ohio. 2. Review Trigger Activities by State and consult with their college/VP unit prior to engaging in trigger activities in any U.S. territory or a state other than Ohio. 3. Report all trigger activities to the college/VP unit state authorization liaison via the web portal. 4. Report annually for the prior academic academic year where students were placed in experiential learning opportunities via the web portal. 5. Consult with college/VP unit and the State Authorization Team when planning trigger activities. 6. Work with the college/VP unit liaison college/VP unit state authorization liaison on state authorization. 7. Seek necessary approvals from professional licensing boards in collaboration with the college/VP liaison. 8. 8. Submit documentation of professional licensing board approvals via the web portal.
State Authorization Advisory	<ol style="list-style-type: none"> 1. Review and make determinations regarding approvals, exceptions, and recommendations recommendations on the submission of an institutional application for non-SARA member states/territories.

Applies to: Units, faculty, staff

Position or Office	Responsibilities
<u>Committee (SAAC)</u>	<ol style="list-style-type: none"> 2. Address all unapproved out-of-state trigger activities and provide update to state authorization liaisons on a monthly basis. 3. Inform college/VP units of state actions against Ohio State and their impact on current approvals. 4. Use risk level to make determinations about/prioritize non-SARA member authorization efforts. 5. Meet monthly or as needed.
Student Financial Aid	Submit Title IV reports related to federal student aid and University offered distance education programs.
Faculty/ or staff member	Disclose/Share information about trigger activities that have not been reported via email to ODEE-stateauth@osu.edu and to the college/VP unit state authorization liaison to the State Authorization Team regarding units that are engaging in out-of-state trigger activities without consulting with the State Authorization Team.

Resources

Ohio State resources (links will be added for all)

~~Experiential Learning Opportunities Report Form (link will be added)~~

Authorization Status

Frequently Asked Questions

NC-SARA Manual

Ohio State SARA Reporting Requirements

State ~~Authorization~~ [Authorization](#) website

State Authorization ~~Professional Licensing Board Approval Form (link will be added)~~ Web Portal

Trigger Activities by State

National resources

~~State Authorization Consult Web Form (link will be added)~~

NC-SARA DATA Reporting Guide, nc-sara.org/files/docs/NC-SARA-DataReportingGuide_final_040416.pdf

U.S. Department of Education, 2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html

Contacts

Subject	Office	Telephone	E-mail/URL
Policy questions	State Authorization Team	614-292-0790	ODEE-stateauth@osu.edu stateauth.osu.edu
Course coding	Office of the University Registrar		xxx@osu.edu xxx.osu.edu/xxx
Financial aid	Student Financial Aid		esue-sfa-compliance@osu.edu
International authorization	Office of International Affairs		

History

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