

## **August 2021 State Authorization Updates & Information** <sup>[1]</sup>

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Hi everyone & happy start of the Fall Semester!

As we begin the semester and take on our various roles in improving and optimizing learning for our students, I wanted to draw your attention to a somewhat overlooked aspect of state authorization and SARA participation: courses and programs offered on Coursera.

Regardless of the courses being credit bearing or the programs being financial aid (Title IV) eligible, if we are offering education to a student outside of CO and they are paying our university, the delivery of that education is covered by our participation in SARA. And yes, even the MOOCs.

But Erika, a MOOC isn't distance education—there's no regular and substantive interaction! I know, but NC-SARA defines distance education as:

*Instruction offered by any means where the student and faculty member are in separate physical locations. It includes, but is not limited to, online, interactive video, and correspondence courses or programs. ?*

So yes, even the MOOCs are included.

### **What does this mean for us?**

It means we still need to provide students with the required consumer information that is required with our SARA participation, including details on state authorization and instructions on how to file a complaint. Student complaints were a critical part of the formation of the reciprocity agreement, and ensuring that students have the ability to submit complaints is a must-do for all colleges and universities. Students must be informed of how they can file a complaint, regardless of program, enrollment, or modality.

Think about it this way: learning is learning, and students are students. We're still charging them money and issuing a certificate or credential (whether digital or physical) to indicate they have achieved something. Even if Boulder charges \$50 for a two-course MOOC program in knitting, Boulder is still responsible for ensuring that students understand we are complying with interstate regulations regarding the delivery of that education. By following SARA policies, we avoid potential issues like getting the Knitting Guild of Nevada upset because we're operating like a rogue knitting school. (I don't actually know how to knit, so I may have lost the metaphor, but I'm sure you understand why we comply with state authorization regulations!)

In addition to student complaint notifications, professional licensure regulations apply even when a student is enrolled in a program via Coursera. According to the NC-SARA manual,

section 5.2, while SARA participation does not impact state licensure requirements, it states:

In addition to student complaint notifications, professional licensure regulations don't stop just because a student is enrolled in a program via coursera. In the NC-SARA manual, section 5.2, while NC-SARA notes that they have no effect on state licensure requirements,

*Any institution approved to participate in SARA that offers courses or programs designed to lead to professional licensure or certification, or that are advertised as leading to licensure, must satisfy all federal requirements for disclosures regarding such professional licensure programs under 34 §C.F.R. 668.43.*

This means that, regardless of whether a course or program is for credit or financial aid is applicable, if your institution offers a course or program via Coursera that is intended to or could conceivably lead to professional licensure or certification, you are required by SARA to provide students (both prospective and enrolled) with the same general and direct notifications as those students taking professional licensure programs on-campus or through traditional distance education.

But Erika, our faculty handle that on their own or with assistance from the System! That may be true, but **your campus is still responsible**. The System doesn't participate in SARA; the campuses do. The System is not eligible to be a SARA participant, nor is it recognized as a provider of credentials. The individual campuses are.

Have a wonderful rest of the week, and if you have any questions, please don't hesitate to reach out!

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