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September 2023 State Authorization Updates & Information [1]

September 13, 2023 by erika.swain@cu.edu [2]

Hello, everyone! Happy September!

The SARA policy proposal and approval process is progressing, and late last week, they released the proposals approved by the regional compacts to move forward. Out of over 50 new policy proposals or changes, only six are advancing to a Board vote:

1. Modification PMP-0356: SPE removal of provisional status
2. Modification PMP-0368: SARA Policy Manual
3. Modification PMP-0373: Provisional Notification - Add (i) to Section 3.2
4. Modification PMP-0383: Modification of Language: Arbitration Agreements
5. New Policy PMP-0330: Require NC-SARA to notify the public of institution status
6. New Policy PMP-0331: Institutional disclosure requirements

Personally, I'm wavering between concern, confusion, and ambivalence. None of these modifications or additions involve language that worries me or creates any new burdensome requirements. The only proposal that might impact our work is PMP-0331, Institutional Disclosure Requirement. If passed, this policy would require institutions to make a public disclosure about any adverse action taken against them by the state of Colorado or any other oversight entity, particularly regarding academic quality, financial stability, student consumer protection, or compliance with state or federal requirements. We would also be required to notify Colorado if there were a change in our institutional operations that would be inconsistent with SARA guidelines outlined in the SARA Manual. However, this notification requirement for adverse actions isn’t new—we’re already required to do this as part of our accreditation with HLC. This just formalizes that requirement for state-authorization purposes.

As for the other proposed changes? They seem like low-hanging fruit. It feels like NC-SARA is trying to keep things as neutral as possible while they work on hiring a new president and we wait to see what happens at the federal level. And I’m frustrated that 5.2 remains unchanged—meaning “all reasonable efforts” continues to be vague, leaving room for multiple interpretations and potential headaches.

In any case, these proposals will move forward to the NC-SARA Board later this fall for review and a vote.

In other news: I wanted to share a template email I use for discussions on state authorization.

At Boulder, I receive copies of changes in our Course Inventory Management (CIM) system

because there are questions relating to online delivery and state authorization and I need to stay informed about course updates. Faculty adding or changing courses are prompted with the following questions:

- Does this course require a teaching or experiential learning component that may be completed by a student outside of Colorado in any given semester?
- Could more than 10 students be enrolled at any given experiential learning site at the same time?

Faculty often answer "YES" to both questions without much thought, leading me to send an email that explains:

> *For the course [COURSE CODE & NAME], it's indicated that the course "requires a teaching or experiential learning component that may be taken by a student outside of Colorado in any given semester" and that it is "possible for more than 10 students to be enrolled at any given experiential learning site at the same time."*
> *"Experiential learning" refers to specific course types, such as internships, clinical placements, practica, or student teaching. This course does not appear to fall under those categories. Additionally, current state authorization regulations require us to track where our students complete these out-of-state learning experiences and notify them accordingly. We are also restricted from having more than 10 students at a single experiential learning site outside of Colorado at any one time.*

This happens so frequently that, yes, I have a standard response, and yes, I've been working with the registrar's office to revise the language and workflow on the CIM form. As a result, I've developed good relationships with faculty as we discuss what "experiential learning" really means, the history of reciprocity, and why having 11 students at a site in Manhattan is not allowed, while 11 in Denver is fine.

Boulder is also considering CIM changes related to program updates (e.g., adding modalities and addressing topics like regular & substantive interaction). This section will be updated again soon to help faculty better understand course types and their impact on state reciprocity.

How do you define and track experiential learning? How do you communicate this with the various departments and programs on your campus? And did you know that Colorado's workers' compensation laws are such that many institutions outside Colorado won't send students here for experiential learning? Some institutions (e.g., Ohio State) even "grey us out" on their maps. MORE FOR US, I say!

I hope you're all having a great week! The Department of Education remains suspiciously quiet, leaving room for speculation on what may or may not be released in the next six weeks. Here's hoping they stay occupied with the student loan crisis and forget about some of the proposals from May.

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