

Policy Name: Out of State Educational Activities State Authorization	Date Approved:
Policy Category: Operational Policy	Date Effective: July 1, 2020
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Approval Authority: Provost and Vice President for Academic Affairs	Review Cycle:
Responsible Department: Extended Studies	

Purpose: The purpose of this policy is to align current university practices with the Department of Education and individual state authorization compliance requirements for the delivery of distance education programs to students located outside the state of Missouri.

As a regionally accredited public institution that participates in federal financial aid programs and meets U.S. Department of Education 2019 updated rules, UCM must act in compliance with various regulations that govern its out-of-state educational activities, commonly referred to as “state authorization.”

The regulations require UCM to obtain approval from states in which it provides postsecondary education programs. The regulations allow authorization to come directly from a state or through a "state authorization reciprocity agreement" (SARA). UCM is currently authorized to offer distance education programs to students located in 49 states and U.S. territories under SARA. The State of CA does not require approval for offering distance education programs. California may have requirements for other physical and nonphysical presence that require state approval.

Not covered under SARA, but required by the Department of Education, UCM must notify students whether programs (regardless of modality) meet standards of practice set by state licensing boards. SARA membership requires email notification be given

to students at the time of registration and enrollment whether educational programs meet the professional licensure requirements in states where the student is located.

The University is also required to track and report to SARA out-of-state field experiences such as practicums, clinicals and internships.

Requiring authorization of distance education programs protects students as consumers.

Scope

This policy applies to all university personnel that deliver or engage in out-of-state educational activities as defined below and programs that lead to professional licensure.

Definitions

State Authorization: Term used to describe the requirement that institutions are authorized in the states and U.S. territories in which they offer educational activities (both physical and non-physical presence).

SARA : State Authorization Reciprocity Agreement is an agreement among states, districts and territories that establishes comparable national standards for interstate offering of post-secondary distance education.

NC-SARA: National Council for State Authorization Reciprocity Agreement is the governing body of the reciprocity agreement.

Member States: 49 states and U.S. territories are members of NC-SARA and agree to follow uniform processes for approving their eligible institutions' participation. They also agree to deal with other states' SARA institutions in a common way when those institutions carry out activities in SARA states other than their own.

Non-Member States: California does not participate in SARA. The California Bureau of Private Postsecondary Education does not regulate out-of-state public institutions.

Educational Programs: For credit undergraduate and graduate degrees, and certificates.

Location: Where the student is taking a course. Student location will be determined by their "current mailing address" provided by the student.

Professional licensure: Educational programs such as nursing, teacher education, etc. for which states and other government entities have established standards of practice for the occupations or professions they have chosen to regulate and they provide legal permission to practice those professions only to individuals who meet those standards.

Out-of-state educational activities:

Activities may include but are not limited to:

1. Credit-bearing educational activities (e.g., online programs or courses, experiential learning opportunities); and
2. Related business activities (e.g., advertising, recruiting, proctoring, operating at a physical location outside Missouri, third party agreements or contracts, faculty or staff residing outside of Missouri at the direction of the university)
3. [The State Authorization Guide](#) (external link) provides specific triggers by state as well as other relevant information.

Procedures

To comply with state authorization regulations UCM will:

1. Obtain annual membership in NC-SARA
2. Maintain compliance with non-member SARA states
3. Publish a student complaint process
 - a. Publish a student complaint process for out-of-state students on the UCM web page and disclose at least one point of contact for each state.
4. Monitor Out-of-State Activities:
University personnel (administrators, faculty, and staff) should be familiar with activities that may trigger state authorization. The goal of this requirement is to ensure the institution will seek and obtain approval or exemption to operate in a state, when required.

5. Determine Student Location:

UCM is required to consistently determine the state in which a student is located. The determination of location must be made at the time of initial enrollment and upon formal receipt from the

student about a change in location. This information is important for distance education program reporting and programs that lead to professional licensure.

a. UCM will use the “current mailing address” provided by the student to identify the student location.

b. The Office of the Registrar will inform students of the requirement to submit a change in location notice when their location changes. Students are provided the opportunity to change their information before each semester.

c. Extended Studies will use reporting data collected before Fall and Spring semesters to determine locations of out-of-state students and programmatic information with respect to professional licensure.

d. Extended Studies, in coordination with the University Analytics and Institutional Research (UAIR), will report required locational data to NC-SARA on all students in distance learning programs to include students within the state of Missouri.

6. Identify Professional Licensure and provide direct disclosures to students:

UCM is required to provide general disclosure information for all programs leading to professional licensure or certification regardless of modality.

This disclosure must state whether a UCM program meets, does not meet, or has not determined if a program will meet the state requirements in the state where the student is located.

a. Extended Studies will request UCM academic colleges/schools provide a list of programs that lead to professional licensure and/or certification to Extended Studies by July 1 of each academic year.

b. New or proposed program changes are required to identify whether the program is intended to lead to a professional licensure or credential. This information will be obtained as part of the University’s curriculum review process.

c. Extended Studies will work in coordination with UCM academic colleges/schools to determine if a program meets requirements in the state the student is located.

1) Upon determination, Extended Studies will update the website and contact students directly, within 14 days, if the program does not meet state requirements.

2) Extended Studies will notify all prospective and newly admitted students the status of our licensure programs with respect to the state the student is located in.

a) messaging for admitted undergraduate and graduate admits will be updated as new programs are created or deleted.

b) messaging for prospective undergraduate and graduate students will be updated as program changes are incurred.

d. Extended Studies will routinely update the University's State Authorization web page to include professional licensure compliance information

7. Track and Report Out-of-State Field Experiences

As a member of NC-SARA, UCM is required to account for all in- and out-of-state placements (i.e., internships, externships, clinicals, field experiences, practicums, etc.) that are required or optional for a program.

a. Extended Studies will request UCM academic colleges/schools provide a listing of programs that require internships to Extended studies by March of each academic year.

b. New or proposed programs are required to identify whether the program includes an internship (whether required or optional). This information will be obtained as part of the University's curriculum review process.

c. Extended Studies will work with UCM academic colleges/schools to identify the location and number of students by program who participated in an out-of-state placement.

d. Extended Studies will provide out-of-state placement data to NC-SARA by the required date each academic year.