



Applies to: Units, faculty, staff

Responsible Office

Office of the Chief Information Officer (OCIO)

POLICY

Issued: Target Effective Date: 11/01/2016

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 students can sit for licensure upon completion of their academic programs; and protecting academic programs, faculty, and students. All units engaging in trigger activities as defined below must follow the requirements outlined in this policy.

Purpose of the Policy

To educate units about regulations related to conducting university activities outside Ohio, develop a process to collect student placements outside Ohio, assist the State Authorization Team in prioritizing necessary authorization requests, and seek approvals for trigger activities.

Definitions

Table with 2 columns: Term, Definition. Rows include Trigger activities, Unit, Programs, NC-SARA member states, and Non-NC-SARA member states.

Policy Details

- I. Reporting and Renewal
A. The Ohio State University is an institutional participant in the National Council for State Authorization Reciprocity Agreements (NC-SARA), allowing the university to conduct trigger activities in other NC-SARA member states. Participation in NC-SARA requires annual reporting.
B. In non-NC-SARA member states, the university is required to obtain approval from each state prior to conducting trigger activities, pursuant to state law or regulation. The university is also required to submit



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annual renewal applications for those trigger activities the university has identified and determines should continue, including new trigger activities, in non-NC-SARA member states.

- C. Additionally, the university must annually report data on student experiential learning placements in all states to maintain the NC-SARA membership.
 - D. The State Authorization Team is charged with fulfilling these reporting and application requirements.
 - E. To fulfil these requirements, the State Authorization Team relies upon **units** to collect, analyze, and share with the State Authorization Team data and programmatic information about trigger activities.
- II. Professional Licensing Board Approval
- A. Regardless of NC-SARA membership, units may be required to receive approval from professional licensing boards in each U.S. territory or states other than Ohio for degree **programs** leading to licensure or certification.
 - B. Units are responsible for seeking any required professional licensing board approvals in NC-SARA member states and non-NC-SARA member states, supplying the approval letters to the State Authorization Team upon receipt.
- III. Roles
- A. The State Authorization Team
 - 1. Educates units in collaboration with the state authorization liaison regarding state authorization requirements for conducting trigger activities, providing transparent education, procedural, and status resources for units;
 - 2. Collects, analyzes, and reports aggregate data in collaboration with the Office of Institutional Research and Planning to fulfill annual reporting requirements;
 - 3. Seeks necessary approvals to operate in U.S. territories and states other than Ohio based on review and prioritization from the State Authorization Advisory Committee (SAAC);
 - 4. Consults with and supports units engaging in trigger activities;
 - 5. Maintains and publishes university state authorization approval status and required consumer disclosures on the state authorization website; and
 - 6. Reports to Student Financial Aid whenever there is a change in status to any distance education program or state approval, including additions, deletions, and/or changes in approval status.
 - B. The State Authorization Advisory Committee (SAAC)
 - 1. Is convened by the State Authorization Team and will include faculty and staff representatives from the four executive dean areas (Arts and Sciences, Health Sciences, professional colleges, regional campus), Student Financial Aid, and the University Registrar;
 - 2. Meets monthly or as needed to review and prioritize institutional applications for non-NC-SARA member states or territories based on risk assessments; and
 - 3. Informs state authorization liaisons, units, and university leadership of state actions against the university and the impact on current approvals.
 - C. State Authorization Liaisons
 - 1. Are appointed at the associate dean level and serve as the point of contact for their unit;
 - 2. Educate their units regarding state authorization requirements for trigger activities in coordination with the State Authorization Team;
 - 3. Collect, analyze, and report data to the State Authorization Team to fulfill reporting requirements; and
 - 4. Determine unit-specific action plans for trigger activities in conjunction with the SAAC.
 - D. Units
 - 1. Should be familiar with Trigger Activities by State and consult with their state authorization liaison prior to engaging in trigger activities;
 - 2. Submit all anticipated or emerging trigger activities for non-NC-SARA member states to the state authorization liaison monthly (see State Authorization Liaisons);
 - 3. Submit all non-NC-SARA member state application information to the state authorization liaison, as requested by the State Authorization Team;
 - 4. Disclose state authorization and professional licensing board status to students; and



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5. Must seek any required professional licensing board approvals in NC-SARA member states and non-NC-SARA member states, supplying the approval letters to the State Authorization Team upon receipt.
- E. Faculty and staff:
1. Must report anticipated or emerging trigger activities to their state authorization liaison, even if those trigger activities are conducted outside the scope of a unit-level program (e.g., individualized student internship placement, etc.).
 2. Who become aware that an individual or unit is engaging in trigger activities that have not been reported to/approved by the unit must share such information as detailed in Procedure I. 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.

PROCEDURE

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- I. Collection and reporting of data
 - A. Trigger activities
 1. Faculty and staff must inform their units of trigger activities they conduct or plan to conduct on an ongoing basis.
 2. Units must submit and/or update trigger activity data to the state authorization liaison on a monthly basis.
 3. State authorization liaison reviews unit trigger activity data, submitting data monthly via web portal.
 4. Trigger activities that faculty, staff, or units believe have not been reviewed should be disclosed within twenty business days of becoming aware of such activities by any of the following methods:
 - a. Inform their state authorization liaison (see State Authorization Liaisons);
 - b. Contact the State Authorization Team; or
 - c. Upload the information via web portal.
 - B. NC-SARA reporting data
 1. Units must collect and submit NC-SARA reporting data to the state authorization liaison on an annual basis. The unit must use the template provided by the State Authorization Team to collect NC-SARA reporting data from the prior academic year. Annual reporting requirements are available in the NC-SARA Data Reporting Guide.
 2. State authorization liaison reviews unit NC-SARA reporting data, submitting annually via web portal.
 - C. Non-NC-SARA application information
 1. Units must gather and submit non-NC-SARA member state application information to the state authorization liaison, as requested by the State Authorization Team.
 2. State authorization liaison reviews unit non-NC-SARA member state application information, submitting to the State Authorization Team as requested via web portal.
- II. Consultation on trigger activities
 - A. Units engaging or planning to engage in a trigger activity may consult with their state authorization liaison and the State Authorization Team by submitting a consultation request via web portal.
 - B. The State Authorization Team will review the information and schedule a consultation with the unit and the state authorization liaison. Additional information may be needed prior to the consultation.
 - C. The state authorization liaison and the unit jointly determine a plan of action to move forward, based off of the advisement of the State Authorization Team.
- III. Review of data
 - A. The State Authorization Advisory Committees (SAAC) meets monthly or as needed to review unit data and prioritizes institutional applications for non-NC-SARA member states or territories based on risk assessments.
 - B. The SAAC communicates recommendations back to units via state authorization liaisons.
 - C. The state authorization liaison develops a unit-specific action plan for trigger activities in collaboration with the SAAC.



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- D. The State Authorization Team will seek necessary approvals for trigger activities based off of the advisement from the SAAC and will inform the state authorization liaisons when approval is obtained to conduct trigger activities in non-NC-SARA member states.
- IV. Disclosing professional licensing board approval
 - A. Units must disclose professional licensing board approval status to students through the unit website, sharing the link annually with the state authorization liaison.
 - B. State authorization liaisons must submit the link to the State Authorization Team on an annual basis via web portal.
 - C. Units must submit and/or update documentation of professional licensing board approvals to their state authorization liaison upon receipt.
 - D. State authorization liaisons must submit professional licensing board approvals via web portal upon receipt.

Responsibilities

Position or Office	Responsibilities
State Authorization Team	<ol style="list-style-type: none"> 1. Educate units in collaboration with the state authorization liaison about state authorization requirements for conducting trigger activities. 2. Collect, analyze, and report aggregate data in collaboration with the Office of Institutional Research and planning. 3. Seek necessary approvals to operate in U.S. territories and states other than Ohio based on the review and prioritization from the SAAC. 4. Provide updates on authorization status for U.S. territories and states. 5. Consult with and support units engaging in trigger activities. 6. Maintain and publish university state authorization approval status and required consumer disclosures on the State Authorization website. 7. Report to Student Financial Aid any change in status to any distance education program or state approval. 8. Review consultation request information and schedule consultations with units and the state authorization liaison when requested.
State Authorization Advisory Committee (SAAC)	<ol style="list-style-type: none"> 1. Review and prioritize institutional applications for authorization or approval in non-NC-SARA member states or territories based on risk assessments. 2. Inform state authorization liaisons, units, and university leadership of state actions against the university and the impact on current approvals. 3. Meet monthly or as needed. 4. Address all trigger activities and provide regular decisions and status updates to state authorization liaisons as needed.
State authorization liaison	<ol style="list-style-type: none"> 1. Serve as the point of contact for their unit. 2. Educate their units on state authorization requirements for trigger activities. 3. Collect, analyze, and report data to the State Authorization Team. 4. In conjunction with the SAAC, determine unit-specific action plan for trigger activities. 5. Review and/or update and submit trigger activity data monthly via web portal. 6. In conjunction with the unit, use the template to collect and submit NC-SARA reporting data from the prior academic year and submit via web portal. 7. In conjunction with the unit, collect non-NC-SARA member state application information and submit to the State Authorization Team, as requested. 8. Work with the unit to disclose state authorization and professional licensing board status to students through the college website and email the link to the State Authorization Team on an annual basis.



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Position or Office	Responsibilities
	9. Submit and/or update documentation of professional licensing board approvals via web portal upon receipt.
Units	<ol style="list-style-type: none"> Should be familiar with Trigger Activities by State and consult with their state authorization liaison prior to engaging in trigger activities. Submit all anticipated or emerging trigger activities for non-NC-SARA member states to state authorization liaison monthly. Submit all requested non-NC-SARA member state application information to the state authorization liaison. Seek necessary approvals from professional licensing boards in collaboration with their state authorization liaison and submit documentation of approval letters via web portal upon receipt. Disclose state authorization and professional licensing board status to students through the college website. Report NC-SARA data to the state authorization liaison annually using the template provided to collect and submit student experiential learning placement data from prior academic year. Submit a consultation request via web portal to consult with their state authorization liaison or State Authorization Team. In conjunction with the state authorization liaison, determine unit-specific action plan based off of the advisement of the SAAC. Share information about trigger activities that have not been reported within 20 business days as detailed in the procedure. Know the unit's state authorization liaison.
Faculty/staff	<ol style="list-style-type: none"> Report anticipated or emerging trigger activities to state authorization liaison. Share information about trigger activities that have not been reported within twenty business days as detailed in the procedure.

Resources

Ohio State resources *(links will be added for all)*

- Authorization Status
- Frequently Asked Questions
- NC-SARA Manual
- NC-SARA Reporting Requirements
- State Authorization Liaisons
- State Authorization website
- State Authorization web portal
- Trigger Activities by State

National resources

- NC-SARA Data Reporting Guide, nc-sara.org/files/docs/NC-SARA-DataReportingGuide_final_040416.pdf
- U.S. Department of Education Questions and Answers, 2.ed.gov/policy/highered/reg/hearulemaking/2009/sa.html

Contacts

Subject	Office	Telephone	E-mail/URL
Policy questions (including trigger activities and State Authorization Advisory Committee)	State Authorization Team, Office of Distance Education and eLearning	614-292-0790	ODEE-stateauth@osu.edu stateauth.osu.edu



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Subject	Office	Telephone	E-mail/URL
Education abroad questions	Office of International Affairs	614-292-6101	oia-educationabroad@osu.edu

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