



Applies to: Units, faculty, staff

Responsible Office

Office of the Chief Information Officer (OCIO)

POLICY

Issued: 12/01/2016

Revised: 09/15/2018

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, a concept commonly referred to as “**state authorization**.” This ensures students can sit for licensure upon completion of their academic programs and protects our academic programs, faculty, and students. All units engaging in **trigger activities** as defined below must follow the requirements outlined in this policy.

Purpose

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

Definitions

Term	Definition
Trigger activities	Out-of-state educational activities, determined by state regulation or the National Council for State Authorization Reciprocity Agreements (NC-SARA), that trigger certain application and/or reporting requirements. Such activities may include but are not limited to: <ol style="list-style-type: none"> Credit-bearing educational activities (e.g., online programs or courses, experiential learning opportunities); and Related business activities (e.g., advertising, recruiting, proctoring, operating at a physical location outside Ohio, third party agreements or contracts, faculty or staff residing outside Ohio at the direction of the university) Trigger activities are thematic in nature and typically do not include activities that occur for less than a week such as conference travel, scholarly visits, personal travel, or post-graduate placements. A week time frame, however, isn't universal as some states may regulate recruitment at one-day recruitment fairs. For more information see Trigger Activities by State
Unit	A campus, college, department, division, institute/center, or office
Programs	A collection of for-credit instructional modules delivered for undergraduate, graduate, professional, certificate-seeking, non-degree, and continuing education students
NC-SARA member states	States or U.S. territories that are members of NC-SARA and may offer education or activities in other NC-SARA states without additional approval or exemption in most cases
Non-NC-SARA member states	States or U.S. territories that are not members of NC-SARA and in which the university is required to obtain approval or exemption prior to offering education or activities
State authorization	Term used to describe the requirement that institutions are authorized in the states and U.S. territories in which they offer trigger activities (both physical and non-physical presence)
State Authorization Team	Staff members within the Office of Distance Education and eLearning responsible for seeking and maintaining institutional compliance with state and federal regulations related to the offering of distance education outside the state of Ohio

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** in accordance with the NC-SARA manual. Additional authorization may be required in NC-



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SARA member states if the university conducts trigger activities not covered by the NC-SARA manual. Participation in NC-SARA requires annual reporting.

- B. In **non-NC-SARA member states**, the university is required to obtain approval or exemption from each state prior to conducting trigger activities, pursuant to state law or regulation. The university may also be required to submit periodic 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 the location of online students and 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 fulfill 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. In non-NC-SARA member states and NC-SARA member states, a unit is required to obtain approval or exemption, when applicable and in accordance with state professional licensing board administrative rules or policies, prior to engaging in trigger activities in connection with a degree or certificate **program** that a student could reasonably believe leads to licensure or certification.
 - B. Units are responsible for seeking required state professional licensing board approvals or exemptions in accordance with board administrative rules or policies in NC-SARA member states and non-NC-SARA member states.
 - C. Units must supply any professional licensing board approval or exemption letters or emails to the State Authorization Team upon receipt.
- III. Roles
- A. The State Authorization Team
 - 1. Is housed in the Office of Distance Education and eLearning and includes staff members responsible for seeking and maintaining institutional compliance with state and federal regulations related to the offering of distance education outside the state of Ohio;
 - 2. Educates units in collaboration with the state authorization liaison regarding state authorization requirements for conducting trigger activities in accordance with applicable law and provides state authorization resources to units
 - 3. Collects, analyzes, and reports aggregate data in collaboration with the Office of Institutional Research and Planning to fulfill annual reporting requirements;
 - 4. Seeks necessary approvals or exemptions to operate in U.S. territories and states other than Ohio based on review and prioritization from the State Authorization Advisory Committee (SAAC);
 - 5. Consults with and supports units engaging in trigger activities;
 - 6. Maintains and publishes university state authorization approval or exemption status and required consumer disclosures on the state authorization websites; and
 - 7. Reports to Student Financial Aid whenever there is a change in status to any distance education program or state approval or exemption, including additions, deletions, and/or changes in approval or exemption 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, the University Registrar, and students;
 - 2. Meets quarterly, or as needed, to review and prioritize institutional applications for NC-SARA member states or 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, state or federal regulatory changes, NC-SARA policy changes, and the impact on current approvals or exemptions.
 - C. State Authorization Liaisons
 - 1. Are appointed at the associate dean level and serve as the point of contact for their unit;



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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 their unit and 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 NC-SARA member states or non-NC-SARA member states to their state authorization liaison;
 3. Submit all NC-SARA member states or non-NC-SARA member state application information to their state authorization liaison, as requested by the State Authorization Team;
 4. Disclose state authorization and professional licensing board status to students; and
 5. Must seek any required professional licensing board approvals or exemptions in NC-SARA member states and non-NC-SARA member states and supply the approval or exemption 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. Must report trigger activities in accordance with Procedure I when they become aware that an individual or unit is engaging in trigger activities that have not been reported to/approved by the unit. The goal of this requirement is to ensure the institution will seek and obtain approval or exemption 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 their state authorization liaison when engaging in a new trigger activity or when there is a change in the scope or location of an existing trigger activity.
 3. State authorization liaisons must review unit trigger activity data and submit data to the State Authorization Team when units are engaging in a new trigger activity or when there is a change in the scope or location of an existing trigger activity via email or 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;
 - b. Contact the State Authorization Team; or
 - c. Upload the information via web portal.
 - B. NC-SARA reporting data
 1. Under the direction of the State Authorization Team, units must review, collect, and submit NC-SARA reporting data from the prior academic year to their state authorization liaison on an annual basis. The unit may 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 liaisons must review unit NC-SARA reporting data and submit data annually to the State Authorization Team via email or web portal.



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- C. NC-SARA and non-NC-SARA application information
 - 1. Units must gather and submit NC-SARA member state and non-NC-SARA member state application information to their state authorization liaison, as requested by the State Authorization Team.
 - 2. State authorization liaisons must review unit NC-SARA member state or non-NC-SARA member state application information and submit to the State Authorization Team as requested via email or 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 email or 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 on the advisement of the State Authorization Team.
- III. Review of Data
 - A. The State Authorization Advisory Committee (SAAC) meets quarterly or as needed to review unit data, state or federal regulatory changes, and/or NC-SARA policy changes and to prioritize institutional applications for NC-SARA member states or non-NC-SARA member states or territories based on risk assessments.
 - B. The State Authorization Team communicates regulatory changes and recommendations back to units via the state authorization liaisons.
 - C. The state authorization liaison and their unit develop a unit-specific action plan for trigger activities in collaboration with the State Authorization Team.
 - D. The State Authorization Team will seek necessary approvals or exemptions for trigger activities based on the advisement of the SAAC and will inform the state authorization liaisons when approval or exemption is obtained to conduct trigger activities in NC-SARA member states or non-NC-SARA member states.
- IV. Disclosing Professional Licensing Board Approval
 - A. Units must disclose professional licensing board approval or exemption status to students through the unit website and share the link annually with their state authorization liaison. State authorization liaisons must submit the link to the State Authorization Team on an annual basis via email or web portal.
 - B. Units must submit and/or update documentation of professional licensing board approvals to their state authorization liaison upon receipt. State authorization liaisons must submit professional licensing board approvals or exemptions via email or web portal upon receipt.

Responsibilities

Position or Office	Responsibilities
State Authorization Team	<ul 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 or exemptions to operate in U.S. territories and states other than Ohio based on the review and prioritization from the SAAC. 4. Consult with and support units engaging in trigger activities. 5. Maintain and publish university state authorization approval or exemption status and required consumer disclosures on the State Authorization website. 6. Report to Student Financial Aid any change in status to any distance education program or state approval or exemption. 7. Review consultation request information and schedule consultations with units and the state authorization liaison when requested.
State Authorization Advisory	<ul style="list-style-type: none"> 1. Meet quarterly or as needed. 2. Review and prioritize institutional applications for authorization, approval or exemption in NC-SARA member states or non-NC-SARA member states or territories based on risk assessments.



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Position or Office	Responsibilities
Committee (SAAC)	<ol style="list-style-type: none"> 3. Inform state authorization liaisons, units, and university leadership of state actions against the university, state or federal regulatory changes, NC-SARA policy changes, and the impact on current approvals or exemptions. 4. In conjunction with state authorization liaisons and their units, determine unit-specific action plan for trigger activities.
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. <ol style="list-style-type: none"> a. Review and/or update and submit trigger activity data as needed via email or web portal. b. In conjunction with the unit, collect NC-SARA reporting data from the prior academic year and submit via email or web portal. c. In conjunction with the unit, collect NC-SARA member state or non-NC-SARA member state application information and submit to the State Authorization Team, as requested. d. 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. 4. In conjunction with their unit and the SAAC, determine unit-specific action plan for trigger activities. 5. Submit and/or update documentation of professional licensing board approvals or exemptions via email or web portal upon receipt.
Units	<ol style="list-style-type: none"> 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 NC-SARA member states or non-NC-SARA member states to state authorization liaison as needed. 3. Submit all requested NC-SARA member state and non-NC-SARA member state application information to the state authorization liaison. 4. Report NC-SARA data to the state authorization liaison annually. 5. Share information about trigger activities that have not been reported within twenty business days as detailed in the procedure. 6. Disclose state authorization and professional licensing board status to students through the college website. 7. Seek necessary approvals or exemptions from professional licensing boards in collaboration with their state authorization liaison and submit documentation of approval or exemption letters via email or web portal upon receipt. 8. In conjunction with the state authorization liaison, determine unit-specific action plan based off of the advisement of the SAAC. 9. Submit a consultation request via email or web portal to consult with their state authorization liaison or State Authorization Team.
Faculty/staff	<ol style="list-style-type: none"> 1. Report anticipated or emerging trigger activities to state authorization liaison. 2. Share information about trigger activities that have not been reported within twenty business days as detailed in the procedure.

Resources

State Authorization website odee.osu.edu/state-authorization contains the following:

- State Authorization Resources
- State Authorization Reporting Forms (web portal)
- Frequently Asked Questions



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Authorizations Map

Trigger Activities by State: odee.osu.edu/system/files/trigger_activities_by_state.pdf

National Resources

NC-SARA Data Sharing Agreement, nc-sara.org

NC-SARA Data Reporting Guide, nc-sara.org

NC-SARA Manual, nc-sara.org

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	614-292-2582	ODEE-stateauth@osu.edu odee.osu.edu/state-authorization
Education abroad questions	Office of International Affairs	614-292-6101	oia-educationabroad@osu.edu

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