



Applies to: Units, faculty, and staff

Responsible Office

Office of Technology and Digital Innovation

POLICY

Issued: 12/01/2016
Revised: 05/03/2022

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 referred to as "state authorization." Through these efforts, Ohio State seeks to ensure that students pursuing licensure in states and U.S. territories other than Ohio are best positioned for success. All units engaging in distance education programs and/or physical presence activities as defined below must follow the requirements outlined in this policy.

Purpose

To set forth collection, maintenance, and reporting requirements for out-of-state educational activities.

Definitions

Table with 2 columns: Term and Definition. Rows include Direct disclosure, General disclosure, Licensing program, NC-SARA, NC-SARA member states, Non-NC-SARA member states, and Physical presence activities.



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Programs	A collection of for-credit instructional modules delivered for undergraduate, graduate, professional, certificate-seeking, non-degree, and continuing education students.
State authorization	Term used to describe the requirement that institutions must comply with federal, state, and professional licensing board regulations that impact online and on-ground education offered across state lines.
Unit	A regional campus, college, department, division, institute/center, or office.

Policy Details

I. Reporting and Renewal

- A. Ohio State is an institutional member of NC-SARA, which allows the university to conduct physical presence activities in other **NC-SARA member states** in accordance with the [NC-SARA Policy Manual](#). Additional authorization may be required in NC-SARA member states if the university conducts physical presence activities not covered by the NC-SARA manual. Membership 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 physical presence activities, in accordance with applicable state laws or regulations. The university also may be required to submit periodic renewal applications for those physical presence activities the university has identified and determines should continue, including new physical presence 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 its NC-SARA membership.
- D. The State Authorization Team in Distance Education and Career Pathways (DECP) is charged with fulfilling all reporting and application requirements.
- E. To fulfill reporting and application requirements, the State Authorization Team relies upon units to collect, analyze, and share with the State Authorization Team data and programmatic information about physical presence activities.

II. Professional Licensing Board Approval

- A. In non-NC-SARA member states and NC-SARA member states, the State Authorization team, in collaboration with the unit, must:
 - 1. Obtain approval or exemption, when applicable and in accordance with state professional licensing board administrative rules or policies, prior to participating in physical presence activities in connection with a **licensing program**.
 - 2. Seek required state professional licensing board approvals or exemptions in accordance with board administrative rules or policies when necessary for offering the licensing program(s) in a given state.
- B. 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. Seeks and maintains 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 in each unit regarding state authorization requirements for conducting physical presence activities in accordance with applicable law and provides state authorization resources to units;
- 3. 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);
- 4. Consults with and supports units engaging in physical presence activities;
- 5. Maintains and publishes university state authorization approval or exemption status and required consumer disclosures on the state authorization websites; and



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6. 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 includes faculty and staff representatives from the four executive dean areas (Arts and Sciences, Health Sciences, professional colleges, regional campuses), Student Financial Aid, and the University Registrar, as well as student representatives;
 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;
 2. Educate their units regarding state authorization requirements for physical presence 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 physical presence activities in conjunction with their unit and the SAAC.
- D. Units
 1. Must be familiar with and understand [Physical Presence Activities by State](#) and must consult with their state authorization liaison prior to initiating physical presence activities;
 2. Submit all anticipated or emerging physical presence 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, in collaboration with the State Authorization Team, 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 or emails to the State Authorization Team upon receipt.
- E. Faculty and staff
 1. Must report anticipated or emerging physical presence activities to their state authorization liaison, even if those physical presence activities are conducted outside the scope of a unit-level program (e.g., student internship placement, etc.).
 2. Must report physical presence activities in accordance with Procedure I when they become aware that an individual or unit is engaging in physical presence activities that have not been reported to/approved by the unit. The goal of this requirement is to ensure that the university 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. Physical presence activities

1. Faculty and staff must inform their units of physical presence activities they conduct or plan to conduct on an ongoing basis.
2. Units must submit and/or update physical presence activity data to their state authorization liaison when engaging in a new physical presence activity or when there is a change in the scope or location of an existing physical presence activity.



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3. State authorization liaisons must review unit physical presence activity data and submit data to the State Authorization Team via email or the [State Authorization Reporting Form](#) when units are engaging in a new physical presence activity or when there is a change in the scope or location of an existing physical presence activity.
 4. Physical presence activities that faculty, staff, or units believe have not been reviewed are to 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 the [State Authorization Reporting Form](#).
- B. NC-SARA reporting data
1. Under the direction of and in collaboration with 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 Handbook](#).
 2. State authorization liaisons must review unit NC-SARA reporting data and submit data annually to the State Authorization Team via email or [State Authorization Reporting Form](#).
- 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 [State Authorization Reporting Form](#).
- II. Consultation on Physical Presence Activities
- A. Units engaging or planning to engage in a physical presence activity must consult with their state authorization liaison and the State Authorization Team by submitting a consultation request via email or [State Authorization Reporting Form](#).
 - 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 will jointly determine a plan of action to move forward based on the advisement of the State Authorization Team.
- III. Review of Data
- A. The 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 or licensing changes and recommendations back to units via the state authorization liaisons. The state authorization liaisons must share these updates with their units as they are received.
 - C. The state authorization liaison and their unit must develop a unit-specific action plan for physical presence activities in collaboration with the State Authorization Team.
 - D. The State Authorization Team will seek necessary approvals or exemptions for physical presence activities based on the advisement of the SAAC and will inform the state authorization liaisons when approval or exemption is obtained to conduct physical presence activities in NC-SARA member states or non-NC-SARA member states.
- IV. Disclosing Professional Licensing Board Approval
- A. Units must provide a **general disclosure** of professional licensing board approval or exemption status to students through the unit website and post the link to the central disclosure webpage(s) maintained by the State Authorization Team.



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- 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 the [State Authorization Reporting Form](#) upon receipt.
- C. Units must provide a **direct disclosure** to a student under the following circumstances:
 - 1. Prospective students: If the program’s curriculum does not meet state educational requirements or no determination has been made where the prospective student is located, a notice to that effect must go to the student prior to the student making a financial commitment.
 - 2. Enrolled students: If the program’s curriculum does not meet the state educational requirements in the location where the enrolled student is located, the notice to that effect must be provided to the enrolled student within 14 calendar days of the institution making that determination.
- D. The State Authorization Team must provide a general disclosure on its website with the following information:
 - 1. The state licensing board contact information of each state for licensing programs.
 - 2. Whether a licensing program’s curriculum meets, does not meet, or the university has not made a determination whether it meets a state’s educational requirements for professional licensure or certification.

Responsibilities

Position or Office	Responsibilities
Faculty and staff	<ol style="list-style-type: none"> 1. Report anticipated or emerging physical presence activities to their state authorization liaison. 2. Report existing physical presence activities that have not yet been reported or reviewed as set forth in the policy. 3. Inform their units of physical presence activities they conduct or plan to conduct on an ongoing basis.
The State Authorization Advisory Committee (SAAC)	<ol style="list-style-type: none"> 1. Review and prioritize institutional applications for NC-SARA member states or non-NC-SARA member states or territories as set forth in the policy. 2. Inform state authorization liaisons, units, and university leadership of state actions against the university, regulatory changes, NC-SARA policy changes, and impact on current approvals or exemptions.
State authorization liaisons	<ol style="list-style-type: none"> 1. Educate units regarding state authorization requirements for physical presence activities in coordination with State Authorization Team. 2. Provide state authorization resources to units in collaboration with State Authorization Team as set forth in the policy. 3. Collect, analyze, and submit data to State Authorization Team as set forth in the policy. 4. Determine unit-specific action plans for physical presence activities in collaboration with their unit, SAAC, and State Authorization Team. 5. Review unit NC-SARA member state or non-NC-SARA member state application information and submit to State Authorization Team as set forth in the policy. 6. Communicate regulatory or licensing changes and recommendations to units as they are received from State Authorization Team. 7. Submit professional licensing board approvals or exemptions as set forth in the policy.
State Authorization Team	<ol style="list-style-type: none"> 1. Fulfill all reporting and application requirements and seek necessary approvals or exemptions as set forth in the policy. 2. Maintain institutional compliance with regulations related to offering of distance education outside state of Ohio. 3. Educate units regarding state authorization requirements for physical presence activities in coordination with state authorization liaisons. 4. Consult with and support units engaging in or planning to engage in physical presence activities. 5. Maintain and publish university state authorization approval or exemption status and required consumer disclosures on the state authorization websites. 6. Report status changes to Student Financial Aid as set forth in the policy. 7. Collaborate with units to review, collect, and submit NC-SARA reporting data as set forth in the policy. 8. Communicate regulatory or licensing changes and recommendations back to units via state authorization liaisons. 9. Collaborate with state authorization liaisons to develop unit-specific action plans for physical presence activities. 10. Inform state authorization liaisons when approvals or exemptions are obtained as set forth in the policy.



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Position or Office	Responsibilities
	11. Maintain central disclosure webpage(s) as set forth in the policy.
Units	<ol style="list-style-type: none"> 1. Collect, analyze, and share data and programmatic information about physical presence activities with State Authorization Team as set forth in the policy. 2. Supply any professional licensing board approval or exemption letters or emails to State Authorization Team upon receipt. 3. Provide NC-SARA member state and non-NC-SARA member state application information to their state authorization liaison, upon request by State Authorization Team. 4. Consult with their state authorization liaison and State Authorization Team prior to initiating physical presence activities. 5. Report anticipated or emerging physical presence activities to their state authorization liaison. 6. Report existing physical presence activities that have not yet been reported or reviewed as set forth in the policy. 7. Disclose state authorization and professional licensing board status to students. 8. Determine unit-specific action plans for physical presence activities in collaboration with their state authorization liaisons. 9. Provide general disclosure of professional licensing board approval or exemption status on unit website as set forth in the policy. 10. Provide direct disclosure to students as set forth in the policy.
University	<ol style="list-style-type: none"> 1. Obtain approval or exemption from non-NC-SARA member states prior to conducting physical presence activities as set forth in the policy. 2. Annually report data on the location of online students and student experiential learning placements in all states to maintain its NC-SARA membership.

Resources

OTDI State Authorization website, go.osu.edu/state_authorization, contains the following:

State Authorization Reporting Forms, go.osu.edu/stateauth-reportingform

Frequently Asked Questions, stateauth.osu.edu/departments/state-authorization#faq

Authorizations Map, stateauth.osu.edu/departments/state-authorization#authorization-map

Online program general disclosure webpage, go.osu.edu/stateauth-disclosures

On-campus program general disclosure webpage, go.osu.edu/stateauth-licensure

Physical Presence Activities by State, go.osu.edu/stateauth-bystate

National Resources

NC-SARA Data Handbook and Data Sharing Agreement: nc-sara.org/institutional-data-reporting

NC-SARA Policy Manual, nc-sara.org/sara-policy-manual

Contacts

Subject	Office	Telephone	E-mail/URL
Policy questions (including physical presence activities and State Authorization Advisory Committee)	State Authorization Team, Distance Education and Career Pathways	614-292-2582	stateauth@osu.edu stateauth.osu.edu
Education abroad questions	Office of International Affairs	614-292-6101	oia-educationabroad@osu.edu

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