Cheryl Dowd: Okay. Hello everybody. Today is the January open forum. We typically do not record open forum but we are today because we're very pleased to have two SANsational Award winners. You will recall in December that we had the award for compliance innovations that was won by a collaboration between James Madison University and University of Virginia. Excuse me.

Cheryl Dowd: Today we're very fortunate to have Kathryn Cross who is from the University of Louisville and she is going to be talking about her institution's award winning work on licensure programs. And then we will also have Tyson Heath from Western Governors University along with his colleague Trevor, oh and I'm going to forget Trevor's last name, Johnson, who will be assisting Tyson in sharing about their compliance innovations that they have developed. Without further ado, I'm going to turn it over to Kathryn.

Cheryl Dowd: But before I do, let me just mention one thing. We are going to hold questions until the end, and the reason for that is to make sure that we get in everybody's presentations. And so, I'd be very happy to have you all start putting your questions into the chat box if you like. We can do that and we will then address the questions once we have finished both of the presentations so we can have enough time for everyone. Without further ado now, I will turn it over to Kathryn. Kathryn, thank you so much for being with us today to share the work that you're doing at University of Louisville.

Kathryn Cross: Thank you for having me present. Cheryl, can you hear me?

Cheryl Dowd: Yes, you sound great.

Kathryn Cross: Okay, great. And you can see the screen.

Cheryl Dowd: Yes. Well done.

Kathryn Cross: All right, thank you. I'm very happy to be able to present here today, especially on the topic of licensing disclosures. I know it's a question that comes up a lot on the listserv and our process, I know it took a lot of time and a lot of thought and a lot of planning, so I'm hoping that someone in the membership will be able to hear some of our rationale and see some of our processes and maybe be able to use it at their institution as they start planning or revising what they are doing currently.

Kathryn Cross: To start, I thought I would give a little bit of context about the University of Louisville just so you can kind of see how it fits in here and how you can maybe apply what I talk about to your institution. So UofL is a large state-supported research institution in Louisville, Kentucky. We have around 22,500 total students in all of our programs and all of our schools. A little over 1500 of those students are enrolled in online programs for the fall 2019 semester. We have 40 online programs across multiple disciplines with more scheduled to launch over the next few years.

Cheryl Dowd: Excuse me, Kathryn. Before you go on, I just wondered if you might like to go ahead and share it in the slide show mode just so that you can share the different screens in a little broader viewing for our people to see.

Kathryn Cross: Yes. Just give me one second. Sorry. I might have to reshare.

Cheryl Dowd: Just go right over to the far left and see from beginning and you can start it from there.

Kathryn Cross: Yeah, I see that, but I have to reshare it on different screen. Just one second. Okay. Can you see it now?

Cheryl Dowd: Yes. It's interesting that it should have gone on a larger screen. Okay. We can see it, but it's not showing the way I think you want it to be showing. It's not just showing the one screen. You would have your 'About the University of Louisville' slide on one screen and that should be the screen you're sharing.

Kathryn Cross: It is the screen that it said it was sharing. I'm really sorry about this everyone.

Cheryl Dowd: We can go back to the way it was before. That was fine. We could see it. I just thought maybe you'd like to give it a shot.

Kathryn Cross: Okay. Can you see anything now?

Cheryl Dowd: Just the blue screen with the Windows. Okay. We're back to the working copy and that's fine. We can see it fine.

Kathryn Cross: Okay. I'm sorry. I don't know why it opened in another screen and I can't get it to open on the screen I'm trying to share.

Cheryl Dowd: No worries.

Kathryn Cross: Anyway, the bulk of my presentation will be on the details of our licensing disclosure processes, but I'll give a little bit of context about online learning at UofL. UofL is a decentralized institution, but the bulk of responsibility for distance education is with the Delphi Center where I work. Addison section, the Delphi Center for Teaching and Learning head much of the responsibility for growing online learning. At UofL, the Delphi Center assist programs with developing and launching new online programs, including guiding the program through approvals, marketing, recruiting and enrollment services. So, when the 2010 federal regulations were announced, the Delphi Center was tasked with state authorization and related compliance.

Kathryn Cross: Throughout the years, that responsibility evolved from obtaining approval to offer online programs to ensuring compliance with state and federal laws more generally. In that time we've collaborated and developed close partnerships with other departments such as our office of academic planning and accountability, which houses our IR, institutional research office, and university council and the academic units. Those partnerships helped us to evolve and improve the thoroughness and efficiency of our processes. I'll mention some of those in going through our license disclosure process in more detail.

Kathryn Cross: To start, I thought I would share our process for the researching and drafting of our licensing disclosures. In order to comply with SARA and the pending federal regulations, we have to review the licensing requirements for each state and then decide or to be able to advise students whether our programs will meet the licensing requirements. As such, I created a process to research and review licensure requirements and to draft the appropriate disclosures for each state. The process was reviewed by my supervisors and university council to ensure the thoroughness and accuracy of each disclosure.

Kathryn Cross: The current plan is to go through this process on an annual basis for each program. State by state changes may also be made as necessary throughout the year based upon new information. The first step, which you can see here where my mouse is, is to research laws regarding licensure requirements in each state and compare the state's requirements to our program information. With my legal background, it made the most sense for that responsibility to be on me.

Kathryn Cross: Then after I analyze these state, I make an initial determination on whether the program meets licensure requirements and then I send that analysis to the program for review and confirmation. We decided that having the program review and confirm the analysis was an important check to try and ensure that the academic requirements for licensure were or were not satisfied, and the program being responsible for the academic and curricular requirements made the most sense for them to be able to confirm that.

Kathryn Cross: As some of you have probably seen, some licensure fields have more detailed curriculum requirements than others, so that's why we wanted them to be able to look at that and kind of confirm the curriculum requirements. Once the program has reviewed those requirements and confirmed the analysis, I then email the analysis to each state licensing agency for confirmation.

Kathryn Cross: We decided this was important not only to try and confirm our understanding and provide the best information, but also to document each step of our process to show the work and the rationale that goes into drafting each disclosures. We also decided to email the licensing boards after doing an initial review as we thought that we would get the most helpful information if we had already done the work to try and understand the requirements, and we also thought the boards would be more open to assisting us if we came forward with a base of knowledge and specific questions.

Kathryn Cross: After receiving information from each state licensing board, I then draft disclosures based on what I received from each state board and then send those disclosures to university council for approval. At this step, I email the state board's response to the university council along with the draft that I'm created for review. This allows the university council to review my initial analysis, the requirements for licensure, the state board's response if there was any, and the proposed draft so he can determine whether any changes should be made.

Kathryn Cross: We also use this process to decide whether we have enough information where we can definitively state that the program does or does not meet licensure requirements or if we need to state that we cannot confirm that. This will be based in part on the depth of the state board's response, again, if there was one, and have complicated the particular licensure requirements are in that state.

Kathryn Cross: Once approved by university council, I then work with the online learning teams, IT department and with the program to ensure the disclosures are placed on the appropriate websites. My team's website developer has programmed our licensure site in such a way that updates can be processed through updating and uploading a spreadsheet. These updates usually take place on the same day. But as a check on the process, I also double check our site after each update to make sure that the update went through and that nothing else on the site was changed.

Cheryl Dowd: Excuse me, Kathryn. Can I just ask a quick question? I know that because we're in this mode for PowerPoint, are you able to advance slides on this sharing screen? Which slide should you be on right now?

Kathryn Cross: On the one I'm on, five-

Cheryl Dowd: Okay. Just making sure we were okay with the tech aspect. Sorry for interrupting. Thank you very much for helping.

Kathryn Cross: No problem. We believe with this multi-step review that these methods allow us to serve the best interest of our students by ensuring the accuracy of the information that we provide.

Kathryn Cross: On the next slide you can see an example of the type of analysis report that I create and send to the program. This is just a snippet from one state analysis for accounting. The document the program receives will contain an analysis for each state or territory. For this type of report, I instruct the programs to use the last column to make any notes or corrections. I give them the option to review it all at once or to send notes back piecemeal, however works for them. Some of the programs reports will be more detailed and require more time. So I usually ask for the review to be completed in two to four weeks and then follow up to check if that's realistic once they've had a chance to look it over initially.

Kathryn Cross: To ensure that these important disclosures are readily accessible, we take great care to link to them wherever possible. By linking to our page wherever possible, we want to ensure that students view the information prior to enrollment. We identify three main methods to make it so that prospective students, applicants and enroll students can find, be made aware of and review the information that's on our site. And I'll review examples of each in the next slide and on the OLL website.

Kathryn Cross: To start, I thought I would walk through where we maintain our disclosures, which is on the office of online learning website. I've included screenshots from the page on the next couple of slides, but I want to walk through the page as I think that'll be easiest to comprehend. Let's see. If you can see that, what you should see is we are now on the online learning website, Louisville.edu/online, and you can navigate to the disclosures from the about us page over here on the right and then looking for the licensing disclosures tab. It should take you down to this tab. The program pages also include links to the licensure's disclosure page, so students who are looking at a specific program page can link to here as well, but that's how you directly get to it from our main page.

Kathryn Cross: The licensing disclosures tab starts with an instructional section to guide prospective students on how to use the information on this site, which these are steps one through seven-

Dan: Hey Kathryn,

Kathryn Cross: ... on the page. Yes.

Dan: This is Dan. Do you want... Oh, nevermind. I'm sorry. I was wondering from Cheryl if we're doing present questions during or at the end, and she's just reminded me that we're doing the questions at the end. I'm sorry. Nevermind. Go on.

Kathryn Cross: Oh, it's okay. After the instructions we have a general notification section that we wanted to highlight as it contains what we consider to be basic information we want all students to know and it's not specific to any particular program. Below the general notification begins the license disclosures for each program. The programs are grouped by bachelor's, competency based, masters, certificates and teaching endorsements; and programs are listed in alphabetical order in each group.

Kathryn Cross: Although each program is listed and has the disclosure of some sort, we have three different categories of program disclosures. The first is for programs that are not intended to lead to licensure and to our knowledge do not lead any licensure in any state. We decided it was important to list all programs so that students would not be concerned as to why program was not listed. The program that we categorize this way have a very simple statement as a disclosure, which you can see. As an example, I opened up the Bachelor of Arts and Communication and it just reads, this program is not intended to meet any professional licensure requirements.

Kathryn Cross: The next category of disclosures are for programs that are not designed to lead to licensure for us but are within a traditionally licensed profession. As such, we drafted disclosures for these programs to inform students of this fact and to advise them to inquire what their licensing agency in their state if that's a path that they want to pursue. A couple of examples of this type of disclosure are our RN to BSN program and our Bachelor of Arts in Psychology programs. In these cases, the information is applicable to students regardless of location, so we just include the one statement instead of state-by-state disclosures.

Kathryn Cross: The last category of disclosures are our state-by-state disclosures. These are for programs that are in a licensed field and may or may not lead to licensure in a particular state. Examples of these are our accountancy and social work programs. To review the state specific disclosures, student navigate to the program of choice and then when they click on the tab associated with that program, a listing of states will appear for the student to choose. Once they click on their state, a pop up disclosure will appear to give them state specific information.

Kathryn Cross: This page is the central location for our disclosures to which all of the places will link. We made the decision to not include specific disclosure information in other locations as I'll show in the following slides so that we minimize the instances where students could view outdated information. Having one site that needs to be maintained and updated made the most sense from both an institutional efficiency standpoint and a consumer perspective.

Kathryn Cross: The next slide is how we link to that in our catalog. We were able to include a link to our disclosures in the catalogs through our partnership with the office of academic planning and accountability. This disclosure contains... is very general, it gives an overview of state authorization in licensure and it links back to the online learning website for more detailed information. I included links on the slide and a little bit of instructions on where to see it on the website.

Kathryn Cross: Due to the nature of the catalog updates taking place less frequently than other website updates, we decided that including a general disclosure would be best to ensure that it would not become outdated between updates. As mentioned earlier, the online learning website is updated as needed, and the linking to that site in the catalog seemed the best way to ensure that students would be directed to up-to-date and accurate information. We also thought the catalog would be a good source of information for not only prospective students but for current students.

Kathryn Cross: I mentioned that we send emails to students. This slide is an example of an email that we send to prospective students. As part of our enrollment management service for supporting online students, we send emails to prospective students who inquire into programs that may lead to licensure. These letters provide a link to the disclosure page on our website and are customized by program as necessary. I develop these letters with the assistance of our enrollment counselors.

Kathryn Cross: We decided that including the enrollment counselors was important as it provided the opportunity to inform the enrollment management team of the licensing disclosure issue and ensure that they are prepared to answer questions. The counselors also had the expertise of communicating with prospective students and were able to provide valuable insights on whether the language used would be clear to students or whether it could cause potential confusion.

Kathryn Cross: With the assistance of academic units and the admission's office on campus, we are also adding similar language to program admittance letters to ensure that all students are provided with this information prior to enrollment. This will ensure that if a student does not inquire through our office, the online learning office, at least we have a direct admit that those students will see this information as well.

Kathryn Cross: To ensure that these disclosures are readily accessible, we link them wherever possible. As I mentioned earlier, the online learning teams websites and materials contain numerous links to disclosure pages. Emails to prospective students, including other emails than the licensing disclosure emails specifically, they include link to our disclosures. Marketing materials direct students to check our website for program availability and disclosures.

Kathryn Cross: On our website landing pages, which is the page to which prospective students are taken if they clicked on an advertisement from another website, they contain a link to the disclosures. After they submit an inquiry, a thank you page instructs them to check the disclosure's page. As I mentioned earlier, mini sites, program-specific pages, they contain links to disclosures and we've also added a link to the disclosures page in the program e-packets, which are informational brochures sent to students upon inquiry, and you can see an example of an e-packet where the professional licensure is linked on this slide.

Kathryn Cross: External to the online learning team, our partner program is often linked to our website from their site. We're working to make sure that all of them do. We are also currently adding a link to the website to program admittance letters and we include the disclosure I showed in the catalog. By linking to our page wherever possible, as I mentioned, our goal is to ensure that students see this prior to enrollment.

Kathryn Cross: The goal of our license disclosures is to provide the best information possible to students so that they can make an informed decision regarding their educational pursuit. We also strive to present the information in such a way as to be easily readable and understandable. We have taken as many steps as possible to strike the right balance between providing sufficient information and minimizing potential confusion. Our first step to minimize confusion was to add an instruction section to the licensing disclosure website. We thought this section would make the page more readable and navigable.

Kathryn Cross: We also thought that organizing the disclosure page with dropdown tabs and pop up disclosures would help students navigate to the information that they need more seamlessly. As I described earlier, we drafted disclosure for each program because we were concerned that the absence of a disclosure may cause confusion or concern. We also believe that by having the disclosures reviewed by individuals in a variety of roles within the university, we can be relatively assured, short as we can, that the language and instructions are clear and do not cause concern or confusion.

Kathryn Cross: The disclosures and associated materials are directed and viewed by me and university council from the legal and compliance perspective. The program is involved in the analysis and they can view it as final disclosures and they'll provide an opportunity to ask questions. The online learning enrollment management and marketing teams is also view the disclosure materials and provide insights on how the language may be perceived by students. The enrollment management team and the counselors specifically have also been given an overview of the requirement and came up with their own internal process on how they will respond to questions about specific licensing requirements so that they can assure their questions can be addressed promptly.

Kathryn Cross: We also put a lot of thought into how to format our actual disclosure language. It's been well-stated by SAN and others that licensing disclosures are required by many different sources such as federal misrepresentation, federal State Authorization regulations, SARA and state laws. And considering these various requirements, we analyzed them all and decided upon approach that we believe would satisfy the strictest of the requirements.

Kathryn Cross: Our licensing disclosure process was initiated a while ago at the time of the 2016 federal State Authorization regulations. Those federal regulations would require institutions to state what the licensing requirements are and not just whether the program leads to lecture or not. We included the licensing requirements in our disclosures so that we will be prepared if those regulations went into effect. And we decided to continue that model of our disclosures going forward if we believe that this approach best ensures that they meet all the various licensing disclosure requirements. And we also believe that this structure makes our analysis and logic clear to students.

Kathryn Cross: To summarize, we came up with the strategies and approaches I just discussed with the goal of having a thorough approach to linking to this information throughout the entire university's website and to ensuring the accuracy of the information we provide. We believe that the methods we currently use and are improving upon serve the best interests of our students. If you have any questions about anything that I mentioned, I'll be around later to answer questions, but feel free to contact me at the email or phone number that I provide on this slide. Thanks everyone.

Cheryl Dowd: Kathryn, this was fantastic. Really very thorough. Thank you for this presentation. I should share with all of you that Kathryn's been doing very good work at University of Louisville with her team for many years now. When you think about the SANsational Awards, University of Louisville, this is the third year, out of I think five or six that we've been offering the award, that University of Louisville has done outstanding work for us to be able to acknowledge, so we really do appreciate the very good work that they do.

Cheryl Dowd: A number of people have asked questions in the chat box. I'm really glad that you have. We will address those after the next presentation. Just so that you know, Kathryn, central to many of the questions is your interaction with state agencies, so that you're aware of that when we come back to ask you some questions, that that is something that's really pressing on a number of people's minds. You might want to think about that. But thank you Kathryn and we'll get back with you in just a couple of minutes. But right now as you see Tyson has been able to get his presentation set up, and he has Trevor. I'll let him introduce Trevor and we look forward to Tyson's presentation in his compliance innovation with his team at WGU. Tyson?

Tyson Heath: Great. Thank you Cheryl and thank you everybody for joining today's open forum and for allowing us the opportunity to briefly talk about our semi-annual compliance reports. As Cheryl said, my name is Tyson Heath. I serve as the senior manager for academic engagement, overseeing university compliance at WGU and I'm joined by my colleague today, Trevor Johnson, who is our specialist overseeing university publications. He actually is the one who creates and maintains and owns these compliance reports and he will discuss those a little bit later on.

Tyson Heath: But over the next 20 minutes or so we plan to give a brief overview about WGU and then really spend time talking about the background of the creation of these compliance reports and that will take us from inception to implementation. Trevor will walk us through examples of the different compliance reports that we've created, the communication strategy to ensure ongoing relevance of these reports, as well as talking about some adaptability at your own institution and how these reports could be used and shared with your own leadership.

Tyson Heath: To begin, WGU was founded in 1997 through the Western Governors Association. We are completely online competency-based university. There is a caveat with online piece, and for our programs that lead to licensure do require field experience. For instance, in the teacher's college or nursing education, those programs do have on ground experiences attached to the licensure component. We are over 120,000 students currently enrolled in all 50 states and over 160,000 graduates. In 2020, we are projected to graduate over 40,000 students this calendar year alone.

Tyson Heath: We have our Northwest regional accreditation, five programmatic accreditations. We maintain a formal ongoing authorization in six states. We do participate in NC-SARA in 10 States. We have a specific teacher's college approval in seven states. We have board of nursing approvals and then we are able to license in teacher education as well as in county accounting in all 50 states. This is important because when we talk about the implementation and the reason why, when we have all of these different approvals, whether it's from the authorization side or from the college side, it was important to find one document where we could present this information to external stakeholders within the institution as well as outside of the institution.

Tyson Heath: Just to briefly talk about the academic engagement team. Formerly we were the compliance and accreditation team. As you can see, our team is broken into three different areas. We have college compliance. These individuals are responsible for teacher education, health professions, our licensure team as well as IT business. Each of these areas are led by a senior manager and they are responsible for getting the in state approvals needed through the professional licensing boards.

Tyson Heath: On the university compliance side, this is where Trevor and I sit, we have the regulatory individuals and then we have the compliance individuals. I sit right here where it says compliance and I have five functional individuals under me, one who specializes in authorization, one in accreditation, we have a database manager, Trevor is publications, and then we have a technical editor. And then we also have an academic outreach side. These individuals bridge the gap between the university internally and external stakeholders through doing government outreach as well as private outreach.

Tyson Heath: To give some backstory regarding these compliance reports. For those of us who have worked in compliance for a while, we know that those individuals are tasked with overseeing the university compliance and have to be knowledgeable about all aspects of the university. Here at WGU, the compliance team maintains all key information related to program approvals, accreditation, professional licensure as well as licensing. And as much as we have tried to continue to champion our cause and bring awareness to our work, we were lacking a principle document that outlined information on these key aspects that could easily be shared with and quickly digested by university stakeholders.

Tyson Heath: And so, based off of knowing some of those process gaps that we had, we work to find new and innovative ways to share knowledge, whether it was creating different Google sites, we're looking at different SharePoint sites, just a place where we can drive the 7,000 employees that work at WGU to a central repository where they can find key compliance and accreditation information. And unfortunately, you can create a database but it's hard to get people to traffic to that database. And so, we began to brainstorm a document that could house key information that then we could send out. And instead of bringing people into our area, we could push our area out into their area.

Tyson Heath: And so, that's where the idea of the compliance reports came about. The initial inception arose from the 2018, 2019 strategic planning process and it became a key initiative for the department to create a state and a program specific compliance report. The reason why getting this into the strategic plan mattered, if any of you participate in your organization or university strategic planning process, you know that the strategic plan just doesn't stop with your area. It moves up into the provost or the distance ed organization, wherever you sit, and then it folds up into the overall university strategic plan.

Tyson Heath: So, by securing this project within the strategic plan, we were guaranteed executive leadership oversight and further awareness to these reports. We knew that the reports needed to be not too short but also not too long. And so, we compromised on creating a two page document that would include the compliance snapshot: information related to authorization, professional licensure, board approvals as needed, licensure information, and then what accreditation was attached, either that program or college, and then also key data points that were relevant across the university.

Tyson Heath: Those included enrollment, graduates, student demographics and the university's key performance indicators. And then we determined that the reports would be produced semi-annually. We would have a calendar year report that is distributed in February and a fiscal year report that's distributed in August. So, every six months we are producing these reports and sharing them with stakeholders.

Tyson Heath: The first phase, like I mentioned within the strategic planning process, we had to define what the problem statement was. As we have here, in its simplest form the problem statement was a simple overview sheet of compliance information by college program in states that are currently not presently available. That's a very minimal problem statement, but within the scope it goes into more detail. What's you're looking at here on the right side, this is our department's project initiation canvas. This canvas is presented at a monthly meeting with the provost and key stakeholders so we can discuss how the project is advancing throughout that strategic planning year. As you can see, we originally finished this project last February.

Tyson Heath: Once getting it secured within the strategic plan, the second phase really included a deep dive within all of our programs; and looking at, what you're seeing here is teacher's college specific, but capturing the authorization information, the board approval for ed prep, and then as well as what the licensure pathway for that program in each individual state was. We had all of this information already, but if we think back to the org chart, key stakeholders are different parts of the department. So we had to create one central repository where all of this information could be stored.

Tyson Heath: We've created these college and program profiles. Like I said, they indicate the authorization, the professional licensure and pathways for each programming, each state; and then these became the basis for the compliance snapshot that are in the reports as well as in the maps. And so with that, I'm going to turn it over to Trevor and he's going to talk to us more about phase three of the implementation as well as walk us through the reports.

Trevor Johnson: Great. Thanks Tyson. As Tyson mentioned, we started planning, getting support for this. We utilize Smartsheet for project tracking and so that's what this image indicates here on this screen, that we used to project plan. Some of the key steps or milestones mentioned here was that state research compiling that was shown in phase two, testing and researching different software, different platforms that we could possibly use to show these reports. We ended up using Adobe InDesign.

Trevor Johnson: We already had licenses to Adobe programs and so that made the most sense for us. But we did work at several different options, creating the templates and identifying what headings, what information would be valuable to the different stakeholders. And then as part of that leadership review, getting feedback and then modifying as needed, collecting the data, identifying what was already available to us, which information was needed or we needed to go to our institutional research department to create different reports or have greater access to gather this information. Then eventually preparing the reports and distributing and making them available to all stakeholders.

Trevor Johnson: On the next couple of slides we'll see a few examples. We'll start with our program reports. Like Tyson mentioned, we've gone to updating these twice a year. The blue boxes indicate areas that are updated each time. The maps might not need to be updated as frequently, but the data that the boxes represent, whether that be just the enrollment number or a specific percentage, is updated with the iteration.

Trevor Johnson: So I'll just walk through a few of these sections. On the left, I guess we can call the front page or the first page and then on the right, the back or the second page. On the front page we do have the compliance snapshot at the top listing the state authorizations we maintain the ed prep approvals, the licensure pathways; and the map corresponds to those pathways. In this case that would be those eight states that we have approval in, nine where reciprocity is used, and then 34 direct states.

Trevor Johnson: Licensed recommendations, the total number in that year, the accreditation information. And then on a high level the number of new enrollments, number of graduates, number of teaching placements we had in that year for that specific program would be listed as well. Underserved percentage, we pay attention to that as we're... university is trying to expand access to those who might not fit in the traditional model. So we like to look at that underserved percentage, which those four boxes in the middle on that second page represent. That includes first generation college students, ethnic minorities, those from modest income or also rural areas. We pay attention to that as well. And then other student demographics like race, gender, age groups.

Trevor Johnson: Our average student is about 36 or 37, so for us it's worthwhile to look at that at a program or a state level just to get an idea of the population that is represented. The top states, as far as enrollment for that specific program and then the KPIs that Tyson mentioned, that as a university we focus on and look at each year. That's sort of a program work and then we can look at the college briefly. It's very similar to the program because it just is a compilation of those programs and all of that data. Nothing too different here. The map in this instance is showing the authorizations that we maintain for that respective college. And then SARA is utilized greatly as you see there with 44 States.

Trevor Johnson: We'll spend more time on the next slide here with the states because there are a few differences here that we wanted to point out. We show the authorization, again, top left. This state for instance, utilizing SARA, we don't maintain authorization. Also mentioning which programs are not offered has been very helpful for the state reports to get a quick look at which programs we are not able to enroll in. And then enrollment by college down at the bottom of that first page, just to give a quick overview of the students, how it's broken out for that particular state. Those are a few examples. Those are the three main areas we have the program, the college and the state reports. And I'll mention a little later the numbers that are associated with that. But for us it was a large number of reports.

Trevor Johnson: As far as communication, that was a key aspect to getting this going and keeping people updated on the progress of this project. Initially whether that's just getting initial resources, moving into reporting in the monthly strategy meetings and highlighting the project in a university town hall that gave greater awareness to all employees. And then towards the end updating stakeholders in department meetings.

Trevor Johnson: Currently, we house these on a SharePoint site that's accessible to all staff and we've presented in different department and college meetings to get the word out and remind people of these resources. And as Tyson mentioned at the beginning with the org chart, we do have different groups that interact with external bodies and these are a great resource for them. So we try to keep them updated with this information that they can use when they're discussing or meeting with these external individuals.

Trevor Johnson: To finish out, you might think, okay, 117 reports for WGU, that's obviously not applicable to everyone. We have a larger compliance team that can handle stuff like this. How could this apply to you? Some questions to maybe initially consider is, what do you often get asked about; is it authorization and SARA information, is it licensure, creditation, which states is the program not able to be offered in, things like that.

Trevor Johnson: Do you have access to a lot of data? Can you work with your institutional research department to get data? Which metrics would you want to choose to show as well? And then who would benefit from this information; might just be external stakeholders, high level leadership, maybe as we use it could be helpful for discussions with external organizations or individuals. How can I bring more awareness to the importance of my work? You might have spreadsheets tracking all sorts of different information as many of us do and just not a good way to present it. So, looking at ways to better present it or ways to improve that visibility into the great work that you do.

Trevor Johnson: And then which program? Like I mentioned, we used Adobe InDesign and then Adobe Illustrator for the maps that are easily inputted into InDesign. A simple word document could be used to start with. It doesn't have to be anything fancy. We're not designers on our end. And so we just looked for what could be somewhat easy to use and still be appealing and have a clean look to it. So those are just some questions to consider if you think this might be something you could implement in your organization.

Tyson Heath: Great. Thank you Trevor. One last piece that I want to mention about the communication strategy is, there are many institutions who have external stakeholders that attend different commission or board meetings or are participating with local government within their state or different boards. These reports have been extremely beneficial at sending to those stakeholders before they go to a meeting. They don't necessarily have to give the report to the individuals they're meeting with, but that key data points that are contained in the reports make for great statistics to briefly throw out there during any kind of communication.

Tyson Heath: As well as on the college side where it's been fascinating to see is, where can we license or not license students within a state and are there common trends across the states related to that program. So if you say, well, we can't offer this program in 20 states, when you have an actual physical viewable map where all those states are red, it brings more attention to executive leadership to do a deep dive as to why is that an issue for that program in so many states. And so then we're able to bring in our regulatory individuals to look at the state statutes to see if there'll come threads.

Tyson Heath: And the other thing is we also wanted to find a way to highlight all of the key stakeholders within the academic engagement team to be able to share our work. Each area was a little siloed, and so this project has allowed us to bring everybody together, have some of their key information on one report that then gets shared out. Cheryl, that completes our part of the presentation.

Cheryl Dowd: That was great. Thank you so much you and Trevor for sharing how you manage that at your institution. There are a couple of questions for you all that we will get to. First of all, actually I will ask you since you're right there because it comes from Kathryn, and she wants to know if all the stakeholders receive all the reports.

Tyson Heath: Kathryn, the communication strategy is a little bit different. If it's the deans of the colleges, the dean of the teacher's college, she will receive the teacher's college high-level report and then all of the programs that are under her portfolio, same for all the other deans. And then if there are trouble state reports, then we'll send those specific states if it relates to her program. But we always can send them to the SharePoint site where everybody has access to it. And then when the reports are updated every six months we continue to say, we kind of go on a marketing campaign of saying, "Hey, the new reports are out, please view them. Here's the link as well." We use different kinds of tactics depending on who we're speaking with at that time.

Cheryl Dowd: Great. Great. Okay. I'm going to shift back to some questions for Kathryn. Kathryn, folks want to know, if you have to get extra curriculum information about these programs, are you able to obtain them, are they publicly available or do you need assistance from the subject matter experts to obtain the curriculum information about the programs?

Kathryn Cross: A good question. It's a bit of a mix of both. To start, there is publicly available information on the courses and a brief description of them. It kind of depends on what the regulatory requirements say. For example, teaching, there'll be sometimes more specific where it won't say... it'll say something like, teachers need to have experience doing X, Y, or Z. And if it's not a clear course title and I'm not sure, at that point I would make a note to the program to say like, do the courses meet these specific objectives that they say teach... like these experience, these learning requirements that they need to know if I can't tell from the course title and description.

Cheryl Dowd: So do you have the attention of the subject matter experts for support information should you need it?

Kathryn Cross: Yes.

Cheryl Dowd: Great. Great. Great. Okay. A few folks want to know what the state board interaction is like. Are you able to... this is maybe a mixed bag as well, but are you able to get affirmative responses and how were those interactions going and how do you pursue that interaction?

Kathryn Cross: You're right, it is a bit of a mixed bag. I found that it's obviously a bit state-by-state specific and also a little bit disciplined area specific. For social work, for whatever reason, those boards were a lot more willing to, number one, respond and then affirmatively confirm or correct me on what my analysis was. I've found that in a lot of the other areas I either don't get as many responses. So like for accounting I'd sometimes don't get as many responses or they'll say we, I guess a state agency, we can't confirm that you need to seek legal counsel to know that.

Kathryn Cross: I'm not sure exactly what the difference is because that... and that's not even, that can happen in the same state sometimes. So like one state social work board answered it for me. And then the accountancy board did not answer it for me. So, I'm not sure what the difference is in approach, but it might just be their individual board council and how they deem to respond. But I'd say that-

Cheryl Dowd: Do you feel like these are email responses or are these phone inquiries?

Kathryn Cross: I email initially and if I don't get responses I will call. And then I always send, if I do end up having to talk to someone to get ahold and get an answer, I send my understanding back to them in an email so that it's documented and just ask them like, I'll say, "My understanding from what you said was this. If that is incorrect, please let me know." And then go from there so that everything is documented.

Cheryl Dowd: That's great. That sounds, this is such throwback, but it sounds like when we used to discuss about reviewing the state requirements for institutional approval first and then making our inquiry with the higher ed agency. So, it's a very similar process. That makes a lot of sense. Let's see. We have folks that are wondering if you will have to make many modifications to meet the 2019 regs. And there are folks that are wondering what people feel about these categories, if you will. They talk about the way the reg is written for fed regs in the general disclosures is three listings of states. What is your thought about that and how you all may pursue the 2019 regs for compliance?

Kathryn Cross: That's a good question. My initial thought is that we can keep how we do it the same because our disclosures do state it was in one of those categories. It might not be a list, but it does fit within one of the categories. However, I do think that once the university starts addressing these disclosures for non-online programs, if the non-online programs want to take a different approach, I could see maybe we might be pushed to format them differently. I think right now that's not what we're planning on, but it'll kind of depend, I think, on the outcome of those discussions as it relates to the non-online programs.

Cheryl Dowd: That makes sense. Let's see. We have a question here about what is included in your analysis to the academic programs. A questionary asks this because they're worried that they may overwhelm with too much information. So, how do you share what you're looking for? Are you bringing them up to speed with what regulations are, I guess, is the bottom line?

Kathryn Cross: Yes. I usually cite to the regulations so they can look at it. I doubt that they do, but they can refer to that as well. I focus my analysis on summarizing for them the best I can the academic licensure requirements. In my PowerPoint presentation, the table that I showed, it says that for this state for accounting, they have to have a bachelor's degree, they have to have a concentration in accounting. And then I define what that means, like 24 semester hours of accounting. And then I include what my understanding is of the curriculum. As the program requirements, I have that it's 33 credit hours. And then I list the courses.

Kathryn Cross: And then in my analysis I will say whether or not I think it meets the requirements and give a brief reasoning. In my example here, I said the certificate program does not meet the requirements as there are not nine hours of financial accounting. I try to point out where I see a gap or point out that I think that all the requirements are met. If anything seems questionable, like I'm not sure, then I will point out a specific course. So, if I didn't know if whether it meet intermediate accounting with the bachelor requirement, then I would ask about that specifically.

Kathryn Cross: Sometimes there's still a whole lot of specific curriculum requirements. Sometimes I also feel that I'm putting a lot in there, but I don't put in any of the requirements to the program about examination, that they had to take an examination or that they have to pass a background check or anything like that because to me they don't. As much need to know that or review that, we put that kind of information on our site that those requirements are there or might be there, but I don't want the program bogged down with that. So I try to focus their attention on the academic the best that I can.

Cheryl Dowd: Great. We have a question about the kind of time that's going into this process and also the shift that will have to take place to add all modalities for the July one deadline for the effective date. How many full-time employees do you have working on this at this point and do you anticipate additional FTE to manage the new regs in the implementation of that requirement?

Kathryn Cross: Right now for online programs, it is just me. Fortunately I've done a lot of the work in the previous year so I'm mostly caught up with that in turn. We're trying to add it to our process that programs need to tell us if it may lead to licensure very early in the program approval process so that I have more time to do that research before the program would even launch. Regarding the non-online programs, I do think that there would probably have to be more FTEs. I don't think that responsibility will fall on me, but I can't say that for sure.

Kathryn Cross: I also imagine more of the programs will probably take the 'I don't know' approach but I'm not sure if they'll do that. It's obviously not really an option for online programs. That's part of the reason we take the approach that I do. But hopefully I'm able to reuse a lot of the information I have too because we have two social work programs to accountancy program that helps get that. But it does take a lot of time and I usually try to book my schedule in a way that I have at least one solid week to try and get something done and get information started.

Cheryl Dowd: Mm-hmm (affirmative).

Kathryn Cross: But if people have to do.... if the non-online programs have to or decide to do research, I do think that they'll have to hire at least one person, probably two.

Cheryl Dowd: Let's see. We have another question whether... do you have an institution policy in place that's developed with the procedures that you all are doing, much like we have heard at some other institutions that they've developed this overarching policy about compliance. Do you have that at your institution?

Kathryn Cross: Oh, we do not. We are developing three policies on issues not related to licensing, so it's misrepresentation, regular insensitive, and identity verification. I would like to have one compliance generally, especially with licensing programs. I think that once the university is aware more fully that this will soon be an issue that everyone needs to address, I think that it would be wise and I can get some buy in to get a policy on that specifically. But right now we just have the kind of Delphi Center internal process that I follow to do licensing disclosures and compliance related work.

Cheryl Dowd: Great. And then one more question. Within the catalog, do you link the disclosures to the individual licensure program sections or just a general disclosure link?

Kathryn Cross: I link to the page. For example, what I link specifically down to like the accountancy program. Right now it's just generally to that page so that they can scroll and find it themselves. Sort of again with the non-online program, that's just on the institutional section in the catalog. I do think it might be worth revisiting whether that link should be added to specific program information in the catalog. Again, once they have to start doing that with non-online programs, it might make more sense to do that. Right now I don't know if they want to do it specifically just for online programs but...

Cheryl Dowd: Well, this has just been fabulous. I want to make sure that I'm careful about everyone's time today. We do have top of the hour again and I just am so thankful to Kathryn and for Tyson and Trevor for being on today and we will be able to share the slide decks that they offered today. They will be on the website probably by the end of the week. We'll get the recording, we'll have the transcript and the slides available on the SAN website for you to review. But I want to leave Kathryn and Tyson with the last word. If you have anything additional that you would like to share to close us out. Otherwise, if you're out of words, I understand that because you've shared so much today, but I just wanted to give you that opportunity.

Kathryn Cross: I guess my last word would be, well, however you decide to handle licensing disclosures or really any compliance issue, just document as much as you can your thought process and your rationale on how you came to that conclusion. I think it's helpful to see where you came from and then how you got to the decision you've got. Not just from a compliant perspective, all that's important, but I think also in just deciding how to move forward. As there'll be regulation changes, it's helpful to see what you've considered already and how to go forward from there.

Cheryl Dowd: Very good. Tyson, any final words?

Tyson Heath: I would kind of echo what Kathryn said, but just remember that you are the key expert in all things compliance and professional licensure for the most part at your institution. So, continue to find ways to elevate your work and be creative with it. That's what we did and it paid off with the provost commending these reports. And so, never stop inventing ways to showcase the wonderful work that all of you do.

Cheryl Dowd: Well, thank you both. You all both do wonderful work at your institutions and we're really grateful to you for sharing with the membership and congratulations on your SANsational Awards. Thanks everybody for being with us today. I'm going to end the recording here and I look forward to you all being with us next month at open forum, second Tuesday of the month, and we'll be talking to you soon. Have a great day.

Kathryn Cross: Thank you.