



# December 2020

## IMPORTANT NOTE ABOUT THIS REPORT

Beginning with the Annual Data Report that was published in December 2020, NC-SARA changed the nomenclature used for reporting periods and thus the titles of its reports. All distance education enrollments that were reported to NC-SARA took place the fall term before the report-date year, and Out-of-State Learning Placements (OOSLP) took place in the previous calendar year.

The report that follows represents fall 2017 distance education enrollment data and calendar year 2017 Out-Of-State Learning Placements data. Additionally, the enrollment report and the Out-Of-State Learning Placements report (originally separate reports) have been merged into this single file.

The National Council for State Authorization Reciprocity Agreements (NC-SARA) is a voluntary, interstate reciprocal approach to state oversight of postsecondary distance education. The initiative is administered by the country's four regional higher education compacts (MHEC, NEBHE, SREB and WICHE) and coordinated by NC-SARA. States and institutions that choose to participate agree to operate under common standards and procedures, providing a more uniform and less costly regulatory environment for institutions, more focused oversight responsibilities for states, and better resolution of student complaints. <a href="https://www.nc-sara.org">www.nc-sara.org</a>

# NC-SARA 2018 ENROLLMENT REPORT

Prepared for NC-SARA by Terri Taylor Straut



## Preface

#### **NC-SARA** and Its Regional Partners

In 2013, the National Council for State Authorization Agreements (NC-SARA) became a nationwide coordinating entity, in partnership with the country's four regional education compacts (NEBHE, MHEC, SREB, and WICHE) to establish uniform standards and procedures for state oversight of postsecondary distance education delivered across state lines. States participating in SARA through any one compact are recognized as reciprocal partners with states participating in SARA through any other regional compact. And institutions are assured that their participation in one region's SARA initiative will carry full value in any other SARA state, from any other region.

#### SARA institutions' distance education data

Distance education enrollment data collected by NC-SARA provide a significant advance in the national collection and reporting of such information. NC-SARA's data provide greater transparency about which institutions are enrolling online students and where those students are located. Unlike the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS), in NC-SARA reporting, student enrollment data are disaggregated by state, delivering clarity as to where distance education activity takes place. The adoption of SARA by the states and the participation of institutions within them provides a new and more reliable source of information about distance education offerings in the U.S. than previously available.

#### Overall growth

Since the 2017 NC-SARA enrollment data collection in the spring of 2017, two states (Florida and Massachusetts) and Puerto Rico have joined SARA. SARA members now include 49 states (all but California), the District of Columbia, Puerto Rico and the U.S. Virgin Islands.

#### The path ahead

NC-SARA will convene, for the fourth year, a committee to assess and review NC-SARA's data reporting policies and procedures to maximize the knowledge that has been gained from the annual data collection cycle.

NC-SARA's commitment to transparency in distance education data collection continues to set a collaborative tone that may help establish a new norm for institutions. Continued improvement in the processes, systems and communication related to the annual NC-SARA data collection will improve the process and give all who use these data a renewed confidence in what they tell us about distance education.

Marshall A. Hill

Executive Director, NC-SARA

Marshore o. Hue

# Table of Contents

Preface	1
Executive Summary	4
Institutions Reporting	4
Reported Distance Education Enrollment	5
Highly Concentrated Distance Education Enrollment	6
Reporting Challenges	7
Continued Progress Towards Transparency	8
Introduction	9
Background	9
About NC-SARA	9
About SARA	9
Out-of-State Learning Placements	10
Methodology	10
NC-SARA and IPEDS Reporting	10
Unique Features of NC-SARA Enrollment Reporting	11
Reporting Institutions by Sector	12
Distance Education Enrollment	13
Total Reported Distance Education Enrollment	13
Reported Enrollment by Sector	14
2018 State Summary Data	16
In-State Enrollment	16
State-Level Enrollment Reporting	16
Top Ten Institutions by Size of Reported Enrollment	18
Data Trends: Spring 2016 through Spring 2018	24
Number of SARA Member States	24
Number of Institutions Reporting	25
SARA and Non-SARA Reported Enrollment	25
Changes in Enrollment by Sector	27
Reporting Challenges	29
Recommendations to Improve Reporting	31
Continued Progress Towards Transparency	32
Appendix A: Technical Notes	33

	Definitions	33
	Acknowledgment of Prior IPEDS Distance Education Analysis	33
	SARA Institutions Reporting In-State Enrollment	34
Α	ppendix B: Instructions and Survey	35
Α	ppendix C: About the Author	38
Α	ppendix D: Acknowledgments	38
Α	ppendix E: References	39

# **Executive Summary**

The 2018 NC-SARA Enrollment Report summarizes 2018 institutional reporting to the National Council as outlined in the State Authorization Reciprocity Agreement (SARA). Distance Education enrollment data are reported annually each fall by institutions in the Fall Enrollment (EF) component of their submissions to the federal Integrated Postsecondary Education Data System (IPEDS). IPEDS data collection is required by the federal government for all institutions that participate in federal student financial assistance programs. Distance education data for 2017 were reported to IPEDS in the fall of 2017; those same data, disaggregated by state, were submitted to NC-SARA in the spring of 2018. Similarly, distance education data for 2016 were reported to IPEDS in the fall of 2016 and to NC-SARA in the spring of 2017. NC-SARA now has three years of reported data.

This report summarizes the 2018 data reported and provides comparisons to the 2016 and 2017 data reported to NC-SARA. The process of states joining SARA and institutions within them applying to operate under SARA is ongoing. Therefore, the annual reporting provides a snapshot of the distance education data as of each year's fall IPEDS reporting.

#### Institutions Reporting

In May 2018 NC-SARA sent requests via email with a link to report fall 2017 distance education enrollments to the institutional contacts at 1,804 institutions then operating under SARA. NC-SARA received responses from 1,791 institutions during the annual reporting window in the spring of 2018. The response rate was 99.3% (non-reporting institutions have provided assurances that they will report in future years). The number of institutions operating under SARA increased 20.8% from 1,494 in 2017 to 1,804 in 2018. During this reporting period two states (Florida and Massachusetts) and Puerto Rico were approved to operate under SARA. However, of these new members only institutions in Florida had an opportunity to apply before the reporting period began on May 21, 2018. Sixty-six Florida institutions began operating under SARA this year. These Florida institutions combined reported 37,814 distance education enrollments, or 69.6% of the reported growth. Institutions in Massachusetts and Puerto Rico are currently in the process of applying to participate in SARA, but none of those distance education enrollments were counted in the current year.

Year	Number of Institutions Operating Under SARA	Number of Institutions Reporting to NC- SARA	Number of Institutions Reporting Distance Education Enrollments
2017	1,494	1,477	1,394
2018	1,804	1,791	1,778

Table 1. Institutions Reporting

### Reporting Institutions by Sector

Public institutions made up just over half (53.0%) of all institutions reporting enrollment to NC-SARA in 2018. Private non-profit institutions represent 41.0% and independent for-profit institutions account for 5.9% of reporting institutions operating under SARA and reporting in 2018. In addition, two Tribal institutions reported to NC-SARA in 2018, representing 0.1% of the total. The relative size of the sectors remained consistent between the 2017 and 2018 reporting.

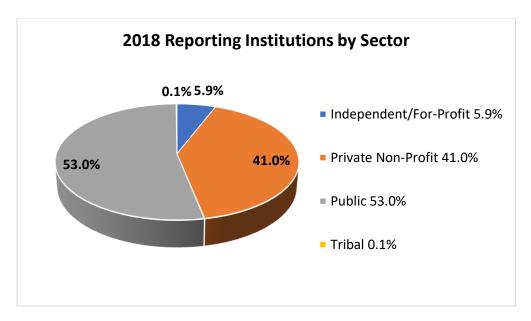


Figure 1. 2018 Reporting Institutions by Sector

Sector	Number of Institutions Reporting	% of Total Institutions Reporting
Independent/For-Profit	104	5.9%
Private Non-Profit	735	41.0%
Public	950	53.0%
Tribal	2	0.1%
Total	1,791	

Table 2. 2018 Reporting Institutions by Sector

#### Reported Distance Education Enrollment

For the 2018 reporting period the institutions operating under SARA in 48 states, the District of Columbia (DC) and the US Virgin Islands reported 1,225,022 distance education enrollments, 88.5% in states operating under SARA and 11.5% in non-SARA states. For the 2017 reporting period, the institutions operating under SARA in 47 states, DC and the U.S. Virgin Islands reported 1,170,725 distance education enrollments, 82.9% in SARA states and 17.1% in non-SARA states. This increase of 54,297 reported distance education enrollments represents 4.6% growth between the second and third year of reporting. Reported enrollment in states operating under SARA increased 11.7% between 2017 and 2018; reported enrollment in non-SARA states declined 29.6% in the same time period.

The slower growth in enrollment reported in 2018 may be attributable to the fact that only the state of Florida joined SARA early enough in the year to allow institutions within the state to apply to operate under SARA. In addition, there were no new large institutions of higher education that began operating under SARA during the period.

	SARA State Reported Enrollments	Non-SARA State Reported Enrollments	Total Reported Enrollments
2017	970,548	200,177	1,170,725
2018	1,084,008	141,014	1,225,022
Change in Reported Enrollment	113,460	-59,163	54,297
% Change	11.7%	-29.6%	4.6%

Table 3. 2018 Reported Enrollments by Sector

#### Highly Concentrated Distance Education Enrollment

As reported last year<sup>1</sup>, enrollment data reported to NC-SARA supports prior independent analyses of the distance education industry. This research affirms that distance education enrollments are highly concentrated. According to the *Grade Increase: Tracking Distance Education in the United States,* "Students enrolled in distance education remain highly concentrated in a relatively small number of institutions. Almost half of distance education students are accounted for in just 5% of institutions: the 235 institutions that represent only 5.0% of the higher education universe command 46.9% (2,985,347) of the student distance enrollments." These data are based on 2016 IPEDS reporting.

The 2018 NC-SARA reporting reveals that the three institutions reporting the largest distance education enrollments together represent 21.9% (267,767) of all distance education enrollments reported to NC-SARA. The ten institutions with the largest reported enrollment combined represent 46.0% (563,323) of distance education enrollments reported to NC-SARA.

#### In-State Distance Education Enrollment is Significant

NC-SARA focuses specifically on out-of-state distance education enrollments. While this focus aligns with the mission of SARA, it does not completely reflect the distance education enrollment patterns for U.S. institutions of higher education. For example, public institutions of higher education are primarily charged to serve students in their own state. Since in-state enrollment has historically not been reported to NC-SARA, the reported NC-SARA data reflects enrollment patterns across state lines, but not within a given state. The lack of in-state enrollment data reported provides a skewed picture of public institution distance education activity.

An analysis of 2016 IPEDS data submitted by 951 public institutions operating under SARA during the 2018 reporting period reveals that 83.9% (931,374) of their exclusively distance education enrollments were in-state, while 16.1% (179,088) were in another state. These data support the assertion that public institutions primarily serve in-state students, even when those students are studying exclusively through distance education.

http://ncsara.org/files/docs/2017%20Enrollment%20Data%20Report%20Publish%201.pdf

<sup>&</sup>lt;sup>1</sup> Straut, T. (2017) NC-SARA 2017 Enrollment Report, p. 8.

<sup>&</sup>lt;sup>2</sup> Allen, I.E., Seaman, J. and Seaman, J. (2018) Grade Increase: Tracking Distance Education in the United States, 2018, p. 22. <a href="https://onlinelearningsurvey.com/reports/gradeincrease.pdf">https://onlinelearningsurvey.com/reports/gradeincrease.pdf</a>

These proportions remained remarkably consistent to those reported in 2017. Last year, 83.7% (737,977) of public institutions' exclusively distance education enrollments were in-state, while 16.3% (144,241) were in another state.

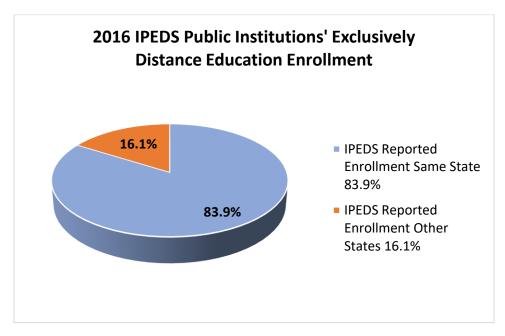


Figure 2. Reported 2016 IPEDS Enrollment In-state & Other States

	2016 Reported IPEDS Enrollments in Same State	2016 Reported IPEDS Enrollments in Other States	2016 Reported Total Enrollments
Reported Enrollments	931,374	179,088	1,110,462
Enrollment %	83.9%	16.1%	_,3, 102

Table 4. Reported 2016 IPEDS Enrollment In-state & Other States

Given the magnitude of in-state distance education enrollments, the NC-SARA Board has approved adding the reporting of these enrollments to NC-SARA beginning with the 2019 reporting period. Institutions already collect and report that data in their normal IPEDS reporting. All institutions operating under SARA have been alerted to this change in policy and procedures.

#### Reporting Challenges

As reported in 2017, in an attempt to standardize reporting requirements for institutions, SARA relies on IPEDS definitions, schedules, etc. Unfortunately, it is clear from the comments submitted again this year that confusion persists. Many institutions continued to struggle to understand how they should report to IPEDS; even though the 2018 Data Reporting Guide was edited in response to the questions and comments provided in 2017 and all institutions were given access to the guide in preparation for 2018 reporting. And, since NC-SARA's basic instructions are stated in *The NC-SARA Enrollment Data Reporting Guide*, "The required data reporting is based on the enrollment data your institution reports to IPEDS

each year; NC-SARA asks you to disaggregate some of that data",<sup>3</sup> those misunderstandings affect NC-SARA reporting. Over half (55.4.7%) of comments provided in the Comment field of 2018 survey specifically mentioned lack of clarity about what data to report, confusion about IPEDS definitions and concerns with how to report military students and those in U.S. territories. This finding is consistent with 2017, when 51.7% of comments also were related to these issues.

#### Continued Progress Towards Transparency

The reporting process and mechanisms to receive the data worked well for the third NC-SARA reporting period; no systemic issues were reported. Improvements to the survey and instructions for 2018 facilitated the participation of the growing number of institutions reporting to NC-SARA. Continued improvement in the processes, systems and communication related to the annual NC-SARA data collection will improve the process and give all who use these data a renewed confidence in what they communicate about distance education adoption and use across state lines in the U.S.

Starting in 2019, the data collected from institutions will include in-state distance education enrollments, providing a more comprehensive picture of distance education in the U.S. NC-SARA's commitment to transparency in distance education data collection and reporting is setting a collaborative tone that may help establish a new norm for institutions of higher education.

<sup>&</sup>lt;sup>3</sup> The NC-SARA Enrollment Data Reporting Guide, p. 2. <a href="http://www.nc-sara.org/files/docs/NC-sara\_spring\_2018\_DataReportingGuide\_FINAL.pdf">http://www.nc-sara.org/files/docs/NC-sara\_spring\_2018\_DataReportingGuide\_FINAL.pdf</a> (Retrieved September 17, 2018).

#### Introduction

The National Council for State Authorization Reciprocity Agreements (NC-SARA) has completed three years of distance education enrollment data collection. The purpose of this report is to provide a summary and analysis of the fall 2017 enrollment data collected by NC-SARA in the spring of 2018. Comparisons to the enrollment data collected in the spring of 2017 and 2016 are included on key points of interest to SARA stakeholders. In addition, data reporting challenges and recommendations to improve spring 2019 reporting are included.

# Background

#### About NC-SARA

NC-SARA is a nationwide coordinating entity established to ensure that the SARA initiative provides a national solution to the challenges of state authorization of distance education. NC-SARA works with the country's four regional compacts to establish and implement uniform standards and procedures for accepting and monitoring states participating in each of their respective regions: New England Board of Higher Education (NEBHE), Midwestern Higher Education Compact (MHEC), Southern Regional Education Board (SREB), and Western Interstate Commission for Higher Education (WICHE). States participating in SARA through any one compact are recognized as reciprocal partners with states participating in SARA through any other regional compact. And institutions are assured that their participation in one region's SARA initiative will carry full value in any other SARA state, from any other region.

#### About SARA

The State Authorization Reciprocity Agreement (SARA) is a voluntary agreement among its member states and U.S. districts and territories that establishes national standards for interstate offering of postsecondary distance education courses and programs. It is intended to make it easier for students to take online courses offered by postsecondary institutions based in another state and provide them certain assurances of quality and additional means to resolve problem that may occur. SARA is a voluntary process of state oversight of distance education that assures consistent consumer protection and relieves the burden of meeting individual state authorization requirements for participating institutions of higher education.<sup>4</sup>

As of May 2018, all U.S. states except California were SARA member states. Neither Guam, American Samoa, nor the Commonwealth of the Northern Mariana Islands (CNMI) are members of SARA. Since Massachusetts (MA) and Puerto Rico (PR) were accepted as SARA members after the start of the spring reporting period, enrollments reported in MA and PR are still counted as non-SARA for the 2018 report. The map below shows SARA states and territories in green.

<sup>&</sup>lt;sup>4</sup> NC-SARA, About SARA. (n.d) Retrieved from NC-SARA Website. <a href="http://www.nc-sara.org/about">http://www.nc-sara.org/about</a> (Retrieved July 18, 2018).

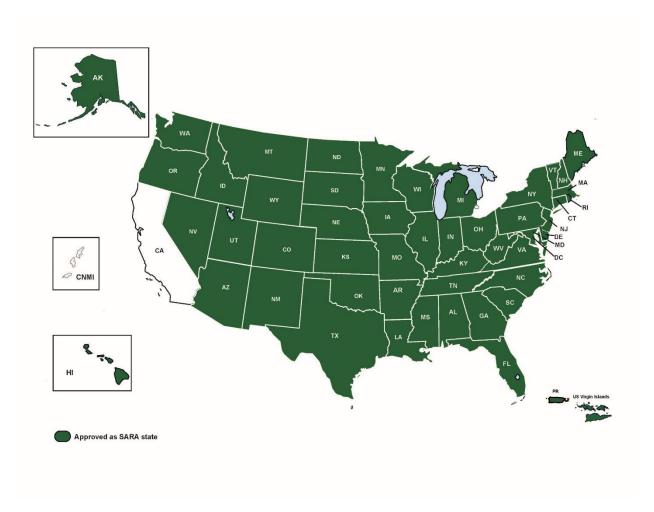


Figure 3. Map of SARA States, Districts and Territories

## Out-of-State Learning Placements

During the development of SARA, commitments were made to the state regulator community about assessing the number of learning placements occurring in their states. The goal of this reporting is to help institutions better attend to and meet professional licensure obligations in the states in which they enroll students, and for compliance with federal regulations affecting institutions' abilities to participate in federal Title IV student assistance programs. This spring, NC-SARA invited institutions operating under SARA to voluntarily report their learning placements in all states, territories and districts other than their own. The results of the 2018 pilot are shared in the 2018 NC-SARA Out-of-State Learning Placement Report on the NC-SARA website. The NC-SARA Board has made such reporting mandatory for spring 2019. A separate survey link will be provided for institutions to provide their learning placement data and the results will be reported in a separate publication annually.

# Methodology

#### NC-SARA and IPEDS Reporting

NC-SARA relies on the existing definitions and reporting schedules required by the federal government's <u>Integrated Postsecondary Education Data System</u> (IPEDS). IPEDS data collection is managed by the U.S.

Department of Education through the <u>National Center for Education Statistics</u> (NCES) and reporting is required of all institutions of higher education that offer federal financial aid in the U.S. states and territories. NCES has been requiring institutions to report distance education data since the IPEDS Fall Enrollment (EF) reporting in 2012. Additional information about prior IPEDS Distance Education analysis is available in Appendix A: Technical Notes.

#### NC-SARA Reporting Schedule

Distance education enrollment data are reported by institutions annually, each fall in the Fall Enrollment (EF) component of their submission to the federal IPEDS data collection. Distance education data for 2017 were reported to IPEDS in the fall of 2017 and to NC-SARA in the spring of 2018. Similarly, distance education data for previous years were reported to IPEDS in the fall and to NC-SARA in the spring of the following year. NC-SARA now has three years of data reported. The figure below illustrates when institutions report distance education enrollments to IPEDS and to NC-SARA.

#### **Timeline of Reporting Students Enrolled in Distance Education Activity**

Fall 2015	Student Enrollment	Report to IPEDS	
Spring 2016			Report to NC-SARA
Fall 2016	Student Enrollment	Report to IPEDS	
Spring 2017			Report to NC-SARA
Fall 2017	Student Enrollment	Report to IPEDS	
Spring 2018			Report to NC-SARA

Figure 4. Timeline of Reporting Students Enrolled in Distance Education Activity

IPEDS defines a Distance Education Course as "a course in which the instructional content is delivered exclusively via distance education. Requirements for coming to campus for orientation, testing, or academic support services do not exclude a course from being classified as distance education." 5

Institutions participating in SARA annually report the number of students enrolled in the institution via distance education delivered *outside* the home state of the institution. The data are disaggregated by the state, territory, or district where the learning takes place. SARA enrollment data are reported in May-June of each year. The data are reported to NC-SARA annually in the spring following the due date for institutions to make their fall enrollment reports to IPEDS.

#### Unique Features of NC-SARA Enrollment Reporting

While NC-SARA reporting relies on the existing IPEDS reporting schedules and definitions, there are some unique features of NC-SARA reporting. These include:

 Historically, institutions do not report distance education enrollments in their own state to NC-SARA. If an institution does report their in-state enrollments, NC-SARA removes that data from the totals reported. In future years, this in-state data will be reported to more accurately reflect total distance education enrollments.

<sup>&</sup>lt;sup>5</sup> U.S. Department of Education, NCES National Center for Education Statistics, *IPEDS Glossary for 2018-2019 Data Collection System* <a href="https://surveys.nces.ed.gov/ipeds/Downloads/Forms/IPEDSGlossary.pdf">https://surveys.nces.ed.gov/ipeds/Downloads/Forms/IPEDSGlossary.pdf</a>

- Non-SARA state and territory enrollments are not published individually. Each institution's non-SARA state enrollments are combined by NC-SARA and reported in one field as non-SARA enrollments.
- For the first reporting year, 2016, institutions were instructed *not* to report enrollment in a state if there were fewer than 10 students because of concerns about student privacy. For subsequent reporting periods (2017 and 2018) that restriction was removed; however, some institutions still did *not* report enrollment under 10 for a state. The result is an enrollment undercount, though the extent of the undercount is not known.
- The process of states joining SARA and institutions within them applying to operate under SARA
  is ongoing; year to year comparisons of enrollment are affected by that fact. Therefore, the
  annual reporting provides a snapshot of the distance education data as of each year's fall IPEDS
  reporting.
- The NC-SARA website (<u>www.nc-sara.org</u>) publishes <u>detailed reporting</u> of these data by institution name.
- The spring 2018 data discussed in this report are available for download from the <u>NC-SARA</u> website.

Screenshots of the 2018 instructions and survey are in Appendix B.

#### Reporting Institutions by Sector

Public institutions made up just over half (53.0%) of all institutions reporting enrollment to NC-SARA in 2018. Private non-profit institutions represent 41.0% and independent for-profit institutions account for 5.9% of reporting institutions operating under SARA and reporting in 2018. In addition, two Tribal institutions reported to NC-SARA in 2018, representing 0.1% of the total. The relative size of the sectors remained consistent between the 2017 and 2018 reporting.

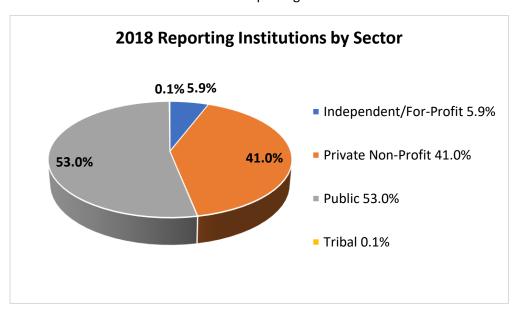


Figure 5. 2018 Reporting Institutions by Sector

Sector	Number of Institutions Reporting	% of Total Institutions Reporting
Independent/For-		
Profit	104	5.9%
Private		
Non-Profit	735	41.0%
Public	950	53.0%
Tribal	2	0.1%
Total	1,791	100.0%

Table 5. 2018 Reporting Institutions by Sector

# Distance Education Enrollment

In May 2018 NC-SARA sent requests via email with a link to report fall 2017 enrollment to the institutional contacts at 1,804 institutions operating under SARA. NC-SARA received responses from 1,791 institutions during the annual reporting window in the spring of 2018. The response rate was 99.3%, up from 98.9% in 2017. Annual reporting to NC-SARA is a mandatory part of participation. This fact contributes to the consistently high response rate. The 13 non-reporting institutions have provided assurances that they will report next year.

#### Total Reported Distance Education Enrollment

Of the 1,791 responses received, 165 or 9.2% reported no distance education enrollment. While some institutions may participate in SARA in anticipation of future distance education offerings, others have existing distance education offerings but remain challenged regarding identifying their students' locations, and still others join for the ability to offer out-of-state learning placements to their students. Institutions operating under SARA reported 1,225,022 distance education enrollments, 88.5% in SARA states and 11.5% in non-SARA states. The graphic and table below present the enrollment data for 2018.

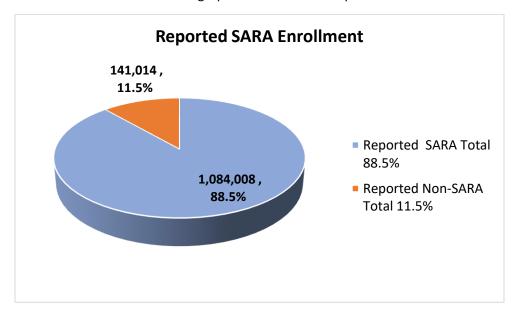


Figure 6. Reported SARA vs. Non-SARA Enrollment

	Reported Enrollment in SARA States	Reported Enrollment in Non-SARA States	Total Reported Enrollment
2018			
Reported Enrollment	1,084,008	141,014	1,225,022
Enrollment %	88.5%	11.5%	100.0%

Table 6. Reported SARA vs. Non-SARA Enrollment

Florida, Massachusetts and Puerto Rico became members of SARA during the period between 2017 and 2018 data reporting. However, Massachusetts and Puerto Rico were approved to participate in SARA after the beginning of the data collection period in May 2018, so those enrollments are categorized as non-SARA in 2018. As of September 2018, California is the only state that is not a member of SARA.

The U.S. Virgin Islands, through affiliation with SREB, has joined SARA. Guam, American Samoa and the Commonwealth of the Northern Mariana Islands (CMNI) are members of WICHE, but they are not at present members of SARA.

## Reported Enrollment by Sector

Private non-profit institutions represent 41.4% of reported enrollment in 2018. Independent for-profit institutions represent the second largest sector by enrollment with 36.1% of reported enrollment. Public institutions reported 22.5% of all distance education enrollment reported to NC-SARA in 2018. Additionally, two Tribal institutions reported to NC-SARA in 2018, but their combined reported enrollment made little impact on the totals.

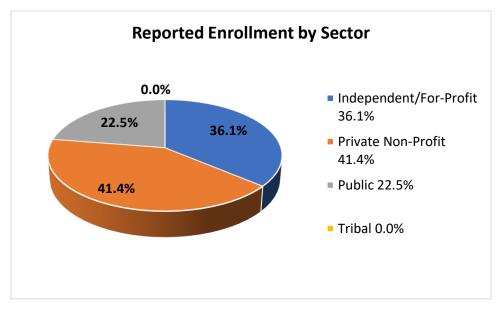


Figure 7. Reported Enrollment by Sector

Sector	Reported SARA State Enrollment	Reported Non- SARA State Enrollment	Total Reported Enrollment	% of Total Reported Enrollment
Independent/For-	201 902	FO 207	442 100	26.19/
Profit Private	391,802	50,387	442,189	36.1%
Non-Profit	456,102	51,297	507,309	41.4%
Public	236,188	39,330	275,518	22.5%
Tribal	6	-	6	0.0%
Total	1,084,008	141,014	1,225,022	100.0%

Table 7. Reported Enrollment by Sector

# 2018 State Summary Data

Institutions operating under SARA report their distance education enrollments by state. The enrollment data are available on the NC-SARA website. Historically, NC-SARA has asked institutions not to report instate enrollment since SARA addresses enrollment across state lines. When institutions report in-state enrollment, NC-SARA removes that data from the totals. The data tables presented in this report have been adjusted to remove reported in-state enrollment.

#### In-State Enrollment

In-state enrollment represents a large proportion of the data reported to IPEDS for most institutions operating under SARA since the mission of many institutions is to serve their local community, even with courses that are delivered exclusively by distance education. For this reason, the NC-SARA Data Committee recommended that NC-SARA collect and report in-state enrollment beginning with the 2019 data collection. These data will provide a more comprehensive view of distance education enrollment among institutions operating under SARA.

#### State-Level Enrollment Reporting

The following table compiles SARA and non-SARA state enrollment for institutions in each SARA state and territory reporting in 2018. For example, Alaska's institutions participating in SARA reported enrolling 430 students in other SARA states and 78 students in non-SARA states, for a total of 508 out-of-state students reported. This answers the question, "Where are my state's institutions enrolling students?" In addition, 5,918 student enrollments were reported in Alaska by SARA institutions located in other SARA states or territories. This answers the question, "Who's enrolling students in my state?" Essentially, these are two different ways of looking at the reported data.

State/ District	Total Reported Enrollment in SARA States	Total Reported Enrollment in Non-SARA States	Total Enrollment Reported	Enrollment in State Reported by SARA Institutions from Other SARA States
AK	430	78	508	5,918
AL	42,397	3,506	45,903	19,883
AR	3,627	140	3,767	10,754
AZ	181,768	51,062	232,830	19,011
CO	51,903	6,158	58,061	22,606
СТ	7,543	972	8,515	12,781
DC	44,694	1,407	46,101	3,700
DE	3,559	70	3,629	4,184
FL	33,836	3,978	37,814	73,287
GA	45,816	4,823	50,639	65,365
HI	300	374	674	8,677
IA	8,519	522	9,041	9,090
ID	20,659	3,986	24,645	8,326
IL	19,915	1,842	21,757	42,113

	Total	Total		Enrollment in
State/	Reported Enrollment	Reported Enrollment	Total	State Reported by SARA
District	in SARA	in Non-SARA	Enrollment	Institutions
	States	States	Reported	from Other
				SARA States
IN	50,365	3,477	53,842	20,921
KS	19,033	1,266	20,299	9,795
KY	12,176	1,010	13,186	15,319
LA	4,834	400	5,234	19,410
MD	12,979	1,743	14,722	32,061
ME	3,983	904	4,887	4,523
MI	6,747	706	7,453	27,430
MN	44,539	3,638	48,177	14,847
MO	21,724	2,267	23,991	21,877
MS	3,746	204	3,950	14,210
MT	926	179	1,105	5,104
NC	4,465	423	4,888	57,508
ND	4,245	416	4,661	4,036
NE	8,301	760	9,061	5,065
NH	64,875	13,152	78,027	3,468
NJ	8,005	1,196	9,201	31,643
NM	3,915	609	4,524	9,483
NV	579	631	1,210	16,339
NY	34,596	3,389	37,985	43,229
OH	21,522	2,386	23,908	39,855
OK	3,302	296	3,598	13,259
OR	9,049	2,313	11,362	13,018
PA	26,162	3,278	29,440	42,841
RI	1,201	370	1,571	3,493
SC	2,301	526	2,827	30,564
SD	3,587	254	3,841	3,303
TN	4,607	216	4,823	31,746
TX	14,518	2,857	17,375	103,319
UT	92,770	11,623	104,393	14,310
VA	59,297	3,979	63,276	53,166
VI	1	2	3	639
VT	3,622	657	4,279	2,276
WA	3,496	1,303	4,799	42,085
WI	6,570	475	7,045	17,131
WV	43,351	4,007	47,358	6,578
WY	533	41	574	4,462
Totals	1,084,008	141,014	1,225,022	1,084,008

Table 8. State Level Enrollment Reported

States with institutions that have large distance education operations report much higher out-of-state enrollment than states that do not have such institutions. The three states with the largest reported out-of-state enrollment are Arizona, Utah and New Hampshire, each of which has at least one major distance education provider.

#### Highly Concentrated Distance Education Enrollment

The NC-SARA enrollment reporting supports prior independent analysis of the distance education industry, affirming that distance education enrollments are highly concentrated. According to the *Grade Increase: Tracking Distance Education in the United States,* "Students enrolled in distance education remain highly concentrated in a relatively small number of institutions. Almost half of distance education students are accounted for in just 5% of institutions: the 235 institutions that represent only 5.0% of the higher education universe command 46.9% (2,985,347) of the student distance enrollments." These data are based on 2016 IPEDS reporting.

#### Top Ten Institutions by Size of Reported Enrollment

The institutions that reported the largest enrollment are University of Phoenix, located in Arizona; Western Governors University, located in Utah, and Southern New Hampshire University, located in New Hampshire. These three institutions together represent 21.9% (267,767) of all distance education enrollments reported to NC-SARA in 2018. The ten institutions with the largest reported enrollment combined represent 46.0% (563,323) of all distance education enrollments reported to NC-SARA. These ten institutions are reported in the table below. None is a public institution.

<sup>&</sup>lt;sup>6</sup> Allen, I.E., Seaman, J. and Seaman, J. (2018) Grade Increase: Tracking Distance Education in the United States, 2018, p. 22. <a href="https://onlinelearningsurvey.com/reports/gradeincrease.pdf">https://onlinelearningsurvey.com/reports/gradeincrease.pdf</a>

Institution Name	State	Sector	Reported SARA State Enrollment	Reported Non-SARA State Enrollment	Total Reported Enrollment
University of Phoenix	AZ	Independent/for- profit	84,547	15,899	100,446
Western Governors University	UT	Private/non-profit	81,455	10,098	91,553
Southern New Hampshire University	NH	Private/non-profit	63,229	12,539	75,768
Liberty University	VA	Private/non-profit	49,668	3,011	52,679
Grand Canyon University	AZ	Private/non-profit	43,226	8,673	51,899
American Public University System	WV	Independent/for-profit	39,492	3,567	43,059
Ashworth College	GA	Independent/for- profit	38,551	3,753	42,304
Strayer University	DC	Independent/for- profit	36,848	529	37,377
Capella University	MN	Independent/for- profit	31,813	2,856	34,669
Penn Foster College	AZ	Independent/for- profit	30,286	3,283	33,569

Table 9. Top Ten Institutions by Size of Reported Enrollment

#### Top Ten Private For-Profit Institutions

Private for-profit institutions represent six of the top ten institutions that reported out-of-state enrollment to NC-SARA in 2018. The table below provides details for the ten private for-profit institutions that reported the largest distance education enrollment in 2018.

Institution Name	State	Reported SARA State Enrollment	Reported Non-SARA State Enrollment	Total Reported Enrollment
University of Phoenix	AZ	84,547	15,899	100,446
American Public				
University System	WV	39,492	3,567	43,059
Ashworth College	GA	38,551	3,753	42,304
Strayer University	DC	36,848	529	37,377
Capella University	MN	31,813	2,856	34,669

Institution Name	State	Reported SARA State Enrollment	Reported Non-SARA State Enrollment	Total Reported Enrollment
Penn Foster College	AZ	30,286	3,283	33,569
Columbia Southern				
University	AL	29,931	2,932	32,863
Colorado Technical				
University	CO	21,169	954	22,123
Full Sail University	FL	9,797	989	10,786
College for Financial				
Planning	CO	8,753	1,394	10,147

Table 10. Top Ten Private For-Profit Institutions

#### Top Ten Private Non-Profit Institutions

Private non-profit institutions represent four of the top ten institutions that reported out-of-state distance education enrollments to NC-SARA in 2018. The table below provides details for the ten private non-profit institutions that reported the largest enrollment in 2018. The top three institutions maintained the same ranking, based on enrollment reported in 2017 and 2018. Grand Canyon University was an independent for-profit institution during the 2017 reporting period.

Institution Name	State	Reported SARA State Enrollment	Reported Non-SARA State Enrollment	Total Reported Enrollment
Western Governors				
University	UT	81,455	10,098	91,553
Southern New				
Hampshire University	NH	63,229	12,539	75,768
Liberty University	VA	49,668	3,011	52,679
Grand Canyon				
University	AZ	43,226	8,673	51,899
Excelsior College	NY	25,641	2,017	27,658
Brigham Young University - Idaho	ID	18,050	3,486	21,536
Embry-Riddle	10	10,030	3,400	21,550
Aeronautical University				
- Daytona Beach	FL	8,635	1,405	10,040
American College	PA	7,467	874	8,341
Park University	MO	4,741	519	5,260
Johns Hopkins				
University	MD	4,488	908	5,396

Table 11. Top Ten Private Non-Profit Institutions

#### Top Ten Public Institutions

There are many public institutions that reported significant out-of-state distance education enrollments to NC-SARA in 2018. The public institutions ranked by the highest reported enrollment are found in the table that follows. It is important to note the Purdue University, Global, Inc. is a new public institution created when Purdue acquired Kaplan University<sup>7</sup>. Kaplan was a for-profit institution during the 2017 reporting period, reporting 35,889 total distance education enrollments to NC-SARA last year.

Institution Name	State	Reported SARA State Enrollment	Reported Non-SARA State Enrollment	Total Reported Enrollment
Arizona State				
University	ΑZ	27,405	12,233	39,638
Purdue University				
Global, Inc.	IN	29,896	1,935	31,831
Pennsylvania State				
University	PA	6,750	1,257	8,007
University of Maryland				
- University College	MD	6,736	710	7,446
Colorado State University-Global				
Campus	CO	5,796	1,531	7,327
Thomas Edison State University	NJ	5,591	1,003	6,594
Eastern Gateway				
Community College	ОН	4,118	465	4,583
Oregon State University	OR	2,858	883	3,741
Georgia Institute of Technology - Main				
Campus	GA	2,876	794	3,670
The University of Texas at Arlington	TX	2,325	1,158	3,483

Table 12. Top Ten Public Institutions

#### Public Institutions Largely Serve In-State Students

Public institutions of higher education are primarily charged to serve students in their own state. The data support this fact. An analysis of 2016 IPEDS data submitted by the 951 public institutions that were operating under SARA during the 2018 reporting period reveals that 83.9% (931,374) of their reported exclusively distance education enrollments were in-state, while 16.1% (179,088) were in another state.

<sup>&</sup>lt;sup>7</sup> Purdue Officially Launches Purdue University Global, WLFI.com, <a href="http://www.wlfi.com/content/news/Purdue-officially-launches-Purdue-Global-478542633.html">http://www.wlfi.com/content/news/Purdue-officially-launches-Purdue-Global-478542633.html</a>

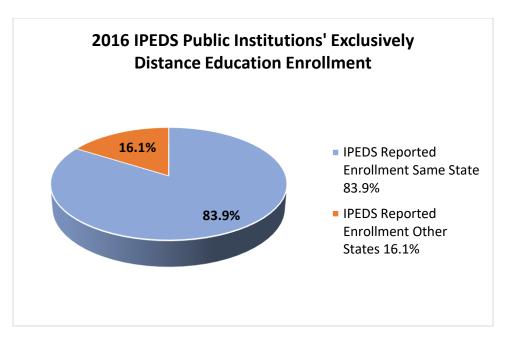


Figure 8. 2016 IPEDS Public Institutions' Exclusively Distance Education Enrollment

	Reported IPEDS Enrollment in Same State	Reported IPEDS Enrollment in Other States	Total Reported Enrollment
Reported Enrollments	931,374	179,088	1,110,462
Enrollment %	83.9%	16.1%	

Table 13. 2016 IPEDS Public Institutions' Exclusively Distance Education Enrollment

These proportions remained remarkably consistent to those reported in 2017. Last year, 83.7% (737,977) of public institutions exclusively distance education enrollments were in-state, while 16.3% (144,241) were in another state.

National IPEDS distance education data also confirm that public institutions continue to primarily serve in-state students, even with their distance education courses. According to a recent Babson Research Group study, "Enrollment patterns reveal that public institutions are much more likely to design their programs and recruiting efforts to serve local students. The vast majority (84.2%) of students taking exclusively distance courses enrolled at public institutions are located in the same state as the institution. This compares to slightly more than a third (35.5%) for private not-for-profit institutions, and only 16.5% for private for-profit institutions." Historically, NC-SARA has not collected or reported instate enrollment data. This results in distance education enrollments reported for public institutions far below their actual enrollment total.

<sup>&</sup>lt;sup>8</sup> Allen, I.E., Seaman, J. and Seaman, J. (2018) *Grade Increase: Tracking Distance Education in the United States*, 2018, p. 17. <a href="https://onlinelearningsurvey.com/reports/gradeincrease.pdf">https://onlinelearningsurvey.com/reports/gradeincrease.pdf</a>

To provide a more accurate picture of institutions' distance education activity, beginning in 2019 NC-SARA will collect in-state distance enrollments in addition to out-of-state distance education enrollments from SARA institutions. This information will facilitate more accurate institution comparisons by sector. This reporting will take the place of the current process that pulls IPEDS data for institutions operating under SARA from the previous year's reports. In-state enrollment reporting will be required of all institutions operating under SARA.

# Data Trends: Spring 2016 through Spring 2018

NC-SARA has been collecting and reporting enrollment data since 2016. This section reports enrollment trends over the three years of data collection. The data reflect annual growth in states/territories joining SARA as well as enrollment growth as institutions apply to participate under SARA. These trends reflect the fact that states and territories must first take action to join SARA through an application to a regional compact. Once the state (territory or district) is approved to operate under SARA, institutions in that state may apply to participate in SARA.

#### Number of SARA Member States

At the time of the 2016 reporting, there were 36 SARA states; by 2017 that number had increased by 30.6% to 47. In 2018, two states (Florida and Massachusetts) and the territory of Puerto Rico became members. However, since Massachusetts and Puerto Rico were approved after the beginning of the 2018 reporting cycle, reported distance education enrollments are still counted as non-SARA this year.

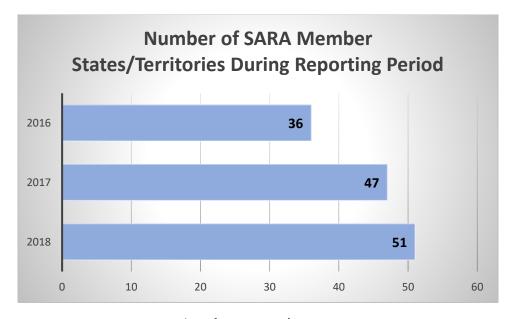


Figure 9. Number of SARA States/Territories 2016-2018

	Number of Member States/Territories	% Increase from Prior Year
2016	36	
2017	47	30.6%
2018	51	8.5%

Table 14. Number of SARA States/Territories 2016-2018

### Number of Institutions Reporting

As expected, growth in the number of institutions operating under SARA slowed between 2017 and 2018 reporting periods. Between May 2016 and May 2017, eleven states joined SARA, allowing the institutions in those states to begin the process of applying for participation.

For the 2018 reporting year, Florida was approved as a SARA state in October of 2017 and 66 Florida institutions applied and were approved to operate under SARA by the start of the reporting period on May 21, 2018. The new SARA institutions in Florida reported 37,814 distance education enrollments, or 69.6% of the growth in reported enrollment between 2017 and 2018. There are no institutions in Massachusetts or Puerto Rico reporting enrollment data in the 2018 period because these entities were approved after the start of the 2018 enrollment reporting period.

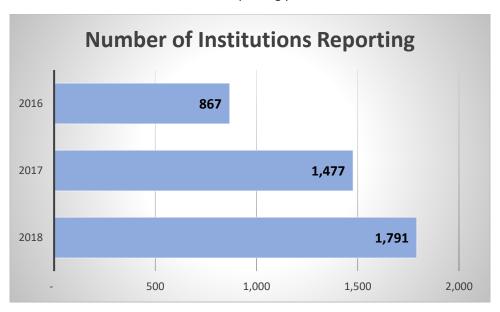


Figure 10. Number of Institutions Reporting 2016-2018

	Number of Institutions Reporting	% Increase from Prior Year
2016	867	
2017	1,477	70.4%
2018	1,791	21.3%

Table 15. Number of Institutions Reporting 2016-2018

### SARA and Non-SARA Reported Enrollment

Over the three years of reported data, the number of SARA states has steadily increased. The bar graph and data table below reveal the proportion of SARA state/territory enrollment continuing to increase as a proportion of the total each year. This is true, even as the total enrollment has also increased significantly each year.

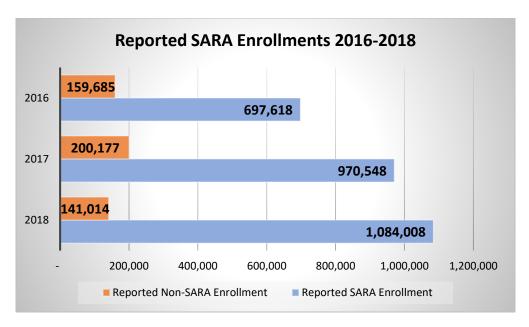


Figure 11. Reported SARA Enrollments 2016-2018

	Reported SARA Enrollment	Reported Non- SARA Enrollment	Reported Total Enrollment	% Change from Prior Year Total Enrollment
2016	697,618	159,685	857,303	
2017	970,548	200,177	1,170,725	36.6%
2018	1,084,008	141,014	1,225,022	4.6%

Table 16. Reported SARA Enrollments 2016-2018

As the number of states/territories and institutions operating under SARA increases each year, so does the proportion of reported distance education enrollments that are in SARA states/territories. Those proportions are reported below.

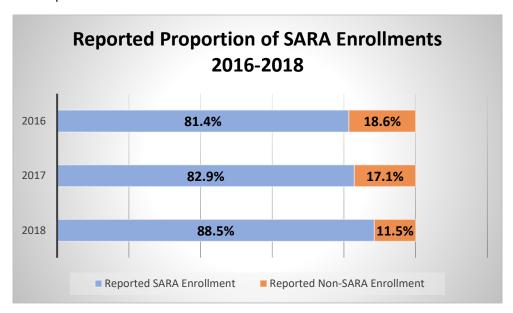


Figure 12. Reported Proportion of SARA Enrollments 2016-2018

	Reported SARA Enrollment	% Reported SARA Enrollment	Reported Non-SARA Enrollment	% Reported Non-SARA Enrollment	Reported Total Enrollment
2016	697,618	81.4%	159,685	18.6%	857,303
2017	970,548	82.9%	200,177	17.1%	1,170,725

Table 17. Reported Proportion of SARA Enrollment 2016-2018

#### Changes in Enrollment by Sector

Between 2017 and 2018 total reported enrollment grew by 4.6%. Reported public sector distance education enrollments increased by 35.9%; private non-profit sector enrollments increased by 31.4%, while reported independent for-profit enrollments declined by 24.0%. Tribal institutions represent a new reporting sector of NC-SARA in 2018 and represented less than 0.1% of reported distance education enrollments.

As noted previously, a single institution with large enrollment can significantly impact these data. For example, Kaplan University reported a total of 35,971 distance education enrollments to NC-SARA in 2017. Kaplan represented 6.2% of the for-profit enrollment reported last year. When Kaplan was acquired and became a public institution, Purdue University Global, Inc., that large enrollment (31,831 in 2018) became categorized as public rather than for-profit. The result was that Purdue University Global, Inc. became the public institution reporting the second largest distance education enrollments (and the largest reported enrollment in SARA states) to NC-SARA in 2018.

NC-SARA staff postulate that institutions are getting better at tracking student location. Improved processes for tracking and reporting student location should result in more accurate data with each year of reporting.

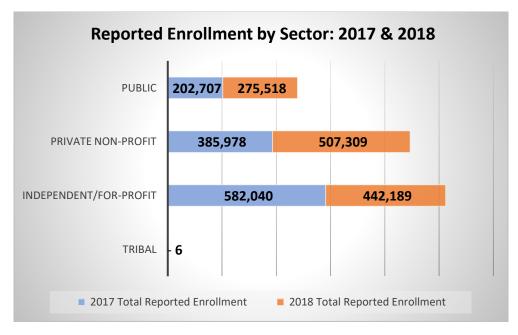


Figure 13. Reported Enrollment by Sector: 2017 & 2018

Sector	2017 Total Reported Enrollment	2018 Total Reported Enrollment	Change in Enrollment	% Change in Enrollment
Public	202,707	275,518	72,811	35.9%
Private Non-Profit	385,978	507,309	121,331	31.4%
Independent/For-				
Profit	582,040	442,189	(139,851)	-24.0%
Tribal	0	6	6	
Totals	1,170,725	1,225,022	54,297	4.6%

Table 18. Reported Enrollment by Sector: 2017 & 2018

During the 2017 reporting cycle, some institutions reported that they applied to operate under SARA in preparation for distance education programs that are in the planning stages; many mentioned similar plans in the Comments field of the 2018 survey as well. This dynamic could partially account for the fact that the composition of reported enrollment by sector shifted significantly in this past year. As previously noted, the data reported to NC-SARA are merely a snapshot at a point in time. Programs planned in 2016 were launched in 2017 and reported to NC-SARA in spring of 2018.

It may also be true that it takes public institutions longer to gain the internal approvals and set up the necessary systems to seek approval to operate under SARA. If that is the case, growth in public sector enrollment for the next few years may increase as institutions in newer SARA states continue the work toward the goal of participating in SARA. For a variety of reasons, total enrollments (whether on-campus or distance education) in the for-profit sector have been dropping for the past several years. This trend is evident in the reported NC-SARA data as well.

There were several comments in the 2018 survey that suggest that institutions continue to apply to participate in SARA in preparation for new programs and offerings. This information is anecdotal, therefore, not quantifiable.

NC-SARA 2018 Enrollment Report

<sup>&</sup>lt;sup>9</sup> Lederman, D. (2016) *For-Profit College Sector Continues to Shrink*, Inside Higher Education, <a href="https://www.insidehighered.com/quicktakes/2016/07/15/profit-college-sector-continues-shrink">https://www.insidehighered.com/quicktakes/2016/07/15/profit-college-sector-continues-shrink</a>

# Reporting Challenges

It is clear from the comments submitted again this year that even with the additional instructional information provided by NC-SARA, many institutions struggle with reporting because of their confusion about how they should report to IPEDS. Over half (55.4.7%) of comments provided in the Comment field of 2018 survey specifically mentioned lack of clarity about what data to report, confusion about IPEDS definitions and concerns with how to report military students and those in U.S. territories. This finding is consistent with 2017, when 51.7% of comments also were related to these issues. It is important to note that some of the comments and questions NC-SARA received regarding reporting issues were, in fact, answered in the 2018 NC-SARA Data Reporting Guide (e.g., how to report military students).

SARA member institutions continue to describe enrollment reporting issues related to IPEDS protocols. These include:

- Conflict between IPEDS and institutional definitions of distance education course. IPEDS'
  definition of a "Distance Education Course" as one delivered exclusively via distance education is
  a source of confusion as reported by many providing the enrollment data for their institutions.
  Some institutions have their own definitions, usually less narrow, that they use to generate
  distance education reports. It is a burden to the institutions to have to maintain data using
  different definitions.
- Confusion about instructions to report in-state (home state) enrollments. In-state enrollment
  was not reported by NC-SARA in 2018. Reporting of in-state enrollment will be mandatory in
  2019 and it will be included in the 2019 Enrollment Report. These data will provide a more
  complete picture of distance education enrollment in institutions operating under SARA.
- Confusion about how to report military students (APO, etc.). Many survey respondents provided details about their military students in the Comments field.
- Confusion about how to report enrollment in the U.S. territories. Comments reveal uncertainty about which territories to report and where to report that enrollment in the survey. Neither Guam, American Samoa, nor the Commonwealth of the Northern Mariana Islands (CNMI) are members of SARA. But CMNI has a data entry field in the form, while the other non-member territories do not. There is a field for Other Territories, but the instructions were not clear about which territories to report there. Adding to the confusion is the fact that no territories are included in the IPEDS Distance Education reporting.
- Inconsistent use of the "Other Location" field in the current NC-SARA survey. This field was used by many respondents to report enrollment in the categories that they couldn't find an appropriate field to capture. Some also used this field to report international students.

In addition to reporting challenges related to IPEDs protocols, other reporting concerns related to SARA requirements and unique institutional challenges were also reported.

#### These include:

Difficulty completing the NC-SARA survey accurately due to inconsistency in how data is
displayed. The NC-SARA survey alphabetizes states and territories by their complete name
rather than by the state abbreviation. Many institutions' reports alphabetize by state/territory
abbreviation. This means that the data are out of order during data input into the NC-SARA
survey, increasing the possibility of reporting enrollment incorrectly.

- Variation in institutions' enrollment patterns. A small number of institutions reported that they
  have continuous enrollment throughout the year, so the IPEDS "Fall Enrollment" date has little
  meaning for them. Some institutions report the full year of enrollment, others use the IPEDS
  date as a cut off, knowing the result is under-reporting enrollment.
- Inability to capture summer enrollments. A small number of institutions reported that the only time they offer online courses is in the summer, therefore, their only online enrollments are not counted since the Fall Enrollment report is the basis for reporting. This also results in an underreporting of enrollment.
- Some institutions deviate from the requested reporting strategy. A small number of institutions indicated that they did not report state enrollment totals less than ten because of continuing concerns about student privacy. Most mentioned that they are not reporting small enrollment on advice of legal counsel. NC-SARA has obtained a legal opinion on the issue regarding cell size limit.<sup>10</sup>

In addition, institutional changes that either merge previous IPEDS Unit IDs or separate units that previously reported together into individual campus IDs remain a problem for the institutions affected and those comparing institutional data over time. The IPEDS Unit ID is a unique numeric identification number assigned to an institution by IPEDS. To assist with these comparisons, NC-SARA added a field in the 2018 survey that requires each reporting institution to provide their IPEDS number.

<sup>&</sup>lt;sup>10</sup> Steven Y. Winnick to Marshall A. Hill, March 16, 2017, Reporting Small Cell Size Data to NC-SARA. http://www.nc-sara.org/files/docs/NC-SARA-Memo-EdCouncil\_2017.pdf

# Recommendations to Improve Reporting

Based on a review of the comments provided by those reporting distance education data to NC-SARA in the spring of 2018 and interviews with NC-SARA staff, the following recommendations should be considered as NC-SARA continues to refine the data reporting process:

- Ensure there are fields for all five U.S. territories in the enrollment survey. These include: U.S. Virgin Islands, Puerto Rico, CNMI, American Samoa, and Guam. This would require adding American Samoa and Guam, or if they will not participate in SARA, provide clear instructions for where those territory enrollments should be reported.
- Consider deleting the "Other Location" field in the survey. Or clarify what that field should be used to document in the instructions and the Reporting Guide.
- Ensure that all instructions consistently include the requirement that in-state enrollment is required beginning with the 2019 reporting period. Clarity about this requirement is necessary so that in-state data are accurate and can be reported next year.
- Incorporate a review of communications and instructions related to the 2019 reporting period by non-NC-SARA staff. An independent review would be an addition to the quality assurance process.
- Add contact fields. These might include: Name, Title, Email, and Phone Number of the person completing the report.
- Add instructions that explain that the data reported to IPEDS and NC-SARA will not necessarily match. SARA requires institutions to report enrollment in member territories, IPEDS does not. IPEDS has fields that are not relevant to SARA data collection, those include: "Student in U.S., Location Unknown", "Student Located Outside the U.S." and "Student Location Unknown".
- Keep the Comments field. Those reporting in 2018 continued to use this field to explain
  discrepancies from IPEDS data, inform NC-SARA of changes in IPEDS Unit number, provide their
  contact information, and report issues that were confusing to them. It is a useful addition to the
  data survey since it allows NC-SARA to identify trends and areas for improvement.
- Consider adding state abbreviations next to state name in the survey. Institutions' system queries often return reports by two letter state abbreviations. Alphabetic listings of state names and state abbreviations return the states in different order. Including the abbreviation in the label of the survey for each state should improve the reliability of the data reported. Survey responders mentioned this discrepancy in the Comments field.
- Standardize the display of data by state to be consistent between tables, both in the surveys and
  in data tables on the NC-SARA website. Alphabetize either by state name or abbreviation
  consistently.
- Consider adding a Total field that automatically totals submissions, if not technically burdensome. This request continues to be recommended by survey responders in the Comments field. It would assist those filling out the survey to ensure that their reporting matches their IPEDS reporting, as appropriate.
- There were also comments about not being able to save the data and come back in to complete
  the survey. NC-SARA staff confirm that this capability exists, so better communication about the
  functionality and how to use it should be added to the instructions.

 Communicate with NCES regarding the confusion about IPEDS terms and processes. Confusion about IPEDS terms and processes continue to be communicated to NC-SARA by survey respondents.

# Continued Progress Towards Transparency

The reporting process and mechanisms to receive the data worked well for the third NC-SARA reporting period, no systemic issues were reported. Improvements to the survey and instructions for 2018 facilitated the participation of the growing number of institutions reporting to NC-SARA. Continued improvement in the processes, systems and communication related to the annual NC-SARA data collection will improve the process and give all who use these data a renewed confidence in what they tell us about distance education adoption and use across state lines in the U.S.

Starting in 2019, the data will include in-state enrollment, providing a more comprehensive picture of distance education in the U.S. NC-SARA's commitment to transparency in distance education data collection and reporting is setting a collaborative tone that may help establish a new norm for institutions of higher education.

# Appendix A: Technical Notes

#### **Definitions**

The following definitions are provided by The Department of Education National Center for Educational Statistics (NCES)<sup>11</sup>.

**Distance Education** - Education that uses one or more technologies to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor synchronously or asynchronously. Technologies used for instruction may include the following: Internet; one-way and two-way transmissions through open broadcasts, closed circuit, cable, microwave, broadband lines, fiber optics, satellite or wireless communication devices; audio conferencing; and video cassette, DVDs, and CD-ROMs, if the cassette, DVDs, and CD-ROMs are used in a course in conjunction with the technologies listed above.

**Distance Education Course** - a course in which the instructional content is delivered exclusively via distance education. Requirements for coming to campus for orientation, testing, or academic support services do not exclude a course from being classified as distance education.

**Distance Education Program** – A program for which all the required coursework for program completion is able to be completed via distance education courses.

The historic use of definitions:

The IPEDS Fall Enrollment report asks institutions to separate students into three categories:

- Enrolled Exclusively in Distance Education Courses
- Enrolled in Some (But Not All) Distance Education Course
- Not Enrolled in Any Distance Education Courses

To approximate the historic distance education surveys conducted by the Babson Survey Research Group (BSRG) that used a definition of approximately 80% of the course online, the WICHE Cooperative for Educational Technologies (WCET) and others have combined the IPEDS reporting for Exclusively in Distance Education courses and Some But Not All Distance Education course. This combination of reporting has been referred to as "Enrolled in At Least One" Distance Education Course. Reporting of IPEDS distance education data often utilizes this category.

Additional SARA-specific definitions are available in the current version of the *State Authorization Reciprocity Agreements Manual*.<sup>12</sup>

Acknowledgment of Prior IPEDS Distance Education Analysis. Prior to the 2012 IPEDS reporting, the Babson Survey Research Group (BSRG) collected data on online enrollments annually, beginning in the

<sup>&</sup>lt;sup>11</sup> U.S. Department of Education, NCES National Center for Education Statistics, *IPEDS Glossary for 2018-2019 Data Collection System* <a href="https://surveys.nces.ed.gov/ipeds/Downloads/Forms/IPEDSGlossary.pdf">https://surveys.nces.ed.gov/ipeds/Downloads/Forms/IPEDSGlossary.pdf</a>

<sup>&</sup>lt;sup>12</sup> NC-SARA, State Authorization Reciprocity Agreements Manual (2018). Version 18.2, May 11, 2018, http://www.nc-sara.org/files/docs/NC-SARA Manual.pdf

# Appendix A: Technical Notes-Continued

fall 2002 period.<sup>13</sup> BSRG used the distance education definition of 80% of the content delivered online. The BSRG survey is a sampling, not a reporting of the entire population of institutions of higher education. Analysis by the <u>WICHE Cooperative for Educational Technology</u> (WCET) provides greater detail about methodology of historic distance education reports and the differences in the data and definitions used.<sup>14</sup> NC-SARA thanks the professionals who developed and shared the methodology used to create the IPEDS comparisons in this report.

#### SARA Institutions Reporting In-State Enrollment

The *NC-SARA Manual* outlines data submission requirements for participating institutions. The instructions say, "Institutions participating in the State Authorization Reciprocity Agreements (SARA) shall annually report to the National Council for State Authorization Reciprocity Agreements the number of students enrolled in the institution via distance education delivered outside the home state of the institution, disaggregated by state, territory, or district in which the students reside." <sup>15</sup>

In addition, the 2018 email instruction indicate, "Enter 0 for your home state."

For the first three reporting years, 2016-2018, NC-SARA returns in-state enrollment reported by institutions to zero to ensure accurate reporting at the state in and institutional level, in alignment with the historic SARA guidelines.

Beginning with the 2019 reporting, institutions will be required to report their in-state enrollment and all Guides and instructions will be edited to reflect this change in policy approved by the Board in May 2018.

<sup>&</sup>lt;sup>13</sup> Allen, I.E. and Seaman J., (2003). *Sizing the Opportunity: The Quality and Extent of Online Education in the United States*, Babson Survey Research Group.

<sup>&</sup>lt;sup>14</sup> Poulin, R. and Straut, T. (2016). *WCET Distance Education Enrollment Report 2016*. http://wcet.wiche.edu/initiatives/research/WCET-Distance-Education-Enrollment-Report-2016

<sup>&</sup>lt;sup>15</sup> NC-SARA, *State Authorization Reciprocity Agreements Manual* (2018). Version 18.2, May 11, 2018, http://www.nc-sara.org/files/docs/NC-SARA\_Manual.pdf

#### Appendix B: Instructions and Survey

Below are screenshots of the instructions and the survey screens that institutions completed for the 2018 NC-SARA enrollment data collection.

Page: 1 2



All SARA institutions are to report annually the number of students they enroll via distance education delivered **outside** the institution's home state.

This required data submission is based on the enrollment data your institution last fall reported to the Integrated Postsecondary Education Data System (IPEDS); for SARA, that data is to be disaggregated by the state\*, territory, or district in which the students reside. Institutions are to determine the locations to report for their students by whatever means they currently employ.

What's different for spring 2017 reporting?

- For spring 2017, report between May 22-June 14, 2017.
- There is no longer a cell size limit on reporting enrollments; report actual enrollments in each state. (In 2016 we instructed institutions to report "zero" for each state in which their enrollments were fewer than ten students. For 2017, there is no such directive. Report actual enrollment numbers for each state, regardless of number.)
- For spring 2017, **DO NOT include experiential learning placements** in the enrollment data you report.
- Enter "0" for your home state
- Within the online form on which you will report your enrollments, we've added
  a space to briefly comment on any apparent anomalies in your data. Please do
  not ask questions here as this box will not be actively monitored in that respect.
   Please email data@nc-sara.org directly for any questions not resolved by your
  state's SARA entity.

\*A value must be entered for each state. Once you have entered enrollments for SARA states and territories, you then fill in your enrollment numbers for non-SARA states. You can reference the <a href="NC-SARA Data Reporting Guide">NC-SARA Data Reporting Guide</a> for additional guidance, if needed.

Please note that Institutional enrollment data will be reported on the NC-SARA website as portrayed in the Reporting Guide.

Please note the important data sharing disclaimer, which is incorporated by reference.

Confirmation of the submission of the report will be sent from NC-SARA's system to all active institution contacts on file.

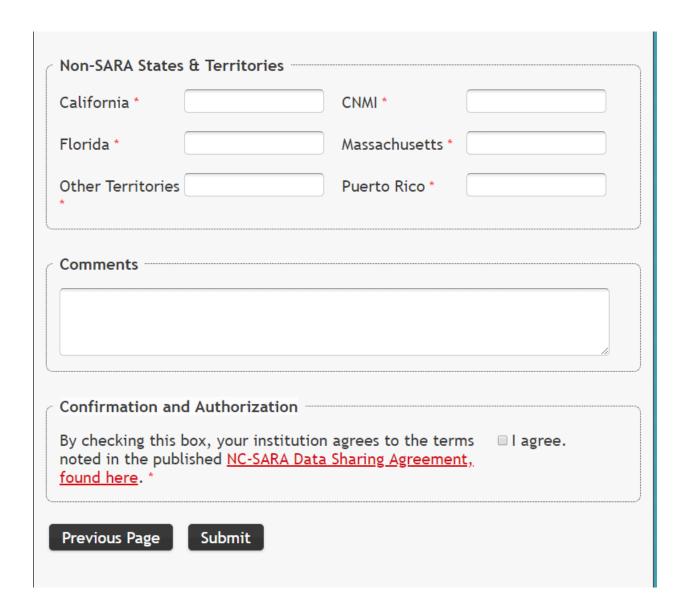
We thank you for your participation.

Please note: CNMI refers to the Commonwealth Northern of the Mariana Islands

# Appendix B: Instructions and Survey-Continued

SARA States & 1	Territories		
Alabama *		Alaska *	
Arizona *		Arkansas *	
Colorado *		Connecticut *	
Delaware *		Georgia *	
Hawaii *		Idaho *	
Illinois *		Indiana *	
lowa *		Kansas *	
Kentucky *		Louisiana *	
Maine *		Maryland *	
Michigan *		Minnesota *	
Mississippi *		Missouri *	
Montana *		Nebraska *	
Nevada *		New Hampshire	
New Jersey *		New Mexico *	
New York *		North Carolina *	
North Dakota *		Ohio *	

#### Appendix B: Instructions and Survey-Continued



#### Appendix C: About the Author

Terri Taylor Straut, CEO and Solution Architect at Ascension Consulting Group is an independent consultant and an experienced researcher, project manager, and higher education administrator. As the founding director of CU Online (for the University of Colorado) and a member of the founding management team of the Western Governors University (WGU), Terri has been part of the distance learning industry since its infancy in the mid-1990s. Terri has significant experience implementing distance education projects in corporations as well as non-profit organizations. She is very familiar with IPEDS distance education reporting through her work on the annual distance education IPEDS reporting for the WICHE Cooperative for Education Technologies' (WCET) Policy and Analysis unit. Terri earned her Master of Business Administration from Northeastern University and her Bachelor of Arts from the University of Delaware. (Terri\_Straut@msn.com)

#### Appendix D: Acknowledgments

The author appreciates and wishes to thank NC-SARA staff for their assistance in providing the data set, serving as a sounding board for the topics to explore, and in the final editing and distribution of this report. The NC-SARA staff assisting in this project include:

- Kris Biesigner, Ph.D., retired Associate Vice Chancellor for Instructional Technology Services for the University System of Georgia and Senior Advisor to SREB for SARA, provided editorial comments and recommendations on final drafts of the report.
- Marianne Boeke, Ph.D., Associate Director for Policy Research and State Support, collaborated
  on the topics to explore, facilitated internal operations and communication, and edited multiple
  drafts of the report.
- Victoria Brieske, Executive Assistant, provided support in report creation, production and distribution.
- Marshall A. Hill, Ph.D., Executive Director, provided a guiding vision and edited drafts of the report.
- Jennifer Shanika, Assistant Director for Technical Operations, provided numerous data reports and insights to assist with data validation and presentation.

#### Appendix E: References

Allen, I.E. and Seaman, J., (2017). *Digital Learning Compass: Distance Education Enrollment Report*, http://digitallearningcompass.org/

Allen, I.E. and Seaman J., (2003). Sizing the Opportunity: The Quality and Extent of Online Education in the United States, Babson Survey Research Group.

Allen, I.E., Seaman, J. and Seaman, J. (2018) *Grade Increase: Tracking Distance Education in the United States*, 2018, p. 17. <a href="https://onlinelearningsurvey.com/reports/gradeincrease.pdf">https://onlinelearningsurvey.com/reports/gradeincrease.pdf</a>

Lederman, D. (2016) For-Profit College Sector Continues to Shrink, Inside Higher Education, <a href="https://www.insidehighered.com/quicktakes/2016/07/15/profit-college-sector-continues-shrink">https://www.insidehighered.com/quicktakes/2016/07/15/profit-college-sector-continues-shrink</a>

Lederman, Doug (2018) *Price Matters but Doesn't Rule*, Inside Higher Ed, June 13, 2018, <a href="https://www.insidehighered.com/digital-learning/article/2018/06/13/online-students-price-matters-doesnt-dictate-choice">https://www.insidehighered.com/digital-learning/article/2018/06/13/online-students-price-matters-doesnt-dictate-choice</a>

NC-SARA, *About SARA* (n.d.) Retrieved from NC-SARA Website. <a href="http://www.nc-sara.org/about">http://www.nc-sara.org/about</a> (Retrieved July 30, 2018).

NC-SARA, *State Authorization Reciprocity Agreements Manual* (2018). Version 18.2, May 11, 2018, <a href="http://www.nc-sara.org/files/docs/NC-SARA">http://www.nc-sara.org/files/docs/NC-SARA</a> Manual.pdf

Poulin R. and Straut, T. *IPEDS Fall 2013: Higher Ed Sectors Vary Greatly in Distance Ed Enrollments*. WCET Frontiers. March 2015. <a href="http://wcet.wiche.edu/initiatives/research/WCET-Distance-Education-Enrollment-Report-2016">http://wcet.wiche.edu/initiatives/research/WCET-Distance-Education-Enrollment-Report-2016</a>

Poulin, R. and Straut, T. (2016). WCET Distance Education Enrollment Report 2016. http://wcet.wiche.edu/initiatives/research/WCET-Distance-Education-Enrollment-Report-2016

Purdue Officially Launches Purdue University Global, WLFI.com, <a href="http://www.wlfi.com/content/news/Purdue-officially-launches-Purdue-Global-478542633.html">http://www.wlfi.com/content/news/Purdue-officially-launches-Purdue-Global-478542633.html</a>

Straut, T. (2017) NC-SARA 2017 Enrollment Report, p. 8. <a href="http://nc-sara.org/files/docs/2017%20Enrollment%20Data%20Report%20Publish%201.pdf">http://nc-sara.org/files/docs/2017%20Enrollment%20Data%20Report%20Publish%201.pdf</a>

U.S. Department of Education, NCES National Center for Education Statistics, *IPEDS Glossary for 2018-2019 Data Collection System* https://surveys.nces.ed.gov/ipeds/Downloads/Forms/IPEDSGlossary.pdf

Winnick, Steven Y. Steven Y. Winnick to Marshall A. Hill, March 16, 2017, Reporting Small Cell Size Data to NC-SARA. <a href="http://www.nc-sara.org/files/docs/NC-SARA-Memo-EdCouncil">http://www.nc-sara.org/files/docs/NC-SARA-Memo-EdCouncil</a> 2017.pdf

# NC-SARA 2018 Out-of-State Learning Placements Report

#### AN OVERVIEW AND FINDINGS OF THE PILOT YEAR DATA

PREPARED FOR NC-SARA BY TERRI TAYLOR STRAUT
OCTOBER 15, 2018





### National Council for State Authorization Reciprocity Agreements

A voluntary, regional approach to state oversight of distance education

Marshall A. Hill Executive Director

\*Paul Lingenfelter Chair, NC-SARA Board

Barbara Ballard Kansas Legislature

\*Chris Bustamante Rio Salado College

**Kathryn G. Dodge** Dodge Advisory Group, LLC

**Dianne Harrison**California State University, Northridge

Larry Isaak Midwestern Higher Education Compact

**David Longanecker** Western Interstate Commission for Higher Education

\*Teresa Lubbers (Vice Chair)
Indiana Commission for Higher
Education

**Leah Matthews**Distance Education Accrediting Commission

M. Peter McPherson Association of Public and Land-grant Universities

\*Patricia O'Brien
New England Association of
Schools and Colleges

**Stephen Pruitt** Southern Regional Education Board

Pam Quinn
Dallas County Community College
District

**George E. Ross** Central Michigan University

**Kathleen Curry Santora** National Association of College and University Attorneys

**Paul Shiffman** The Presidents' Forum

**Peter Smith** University of Maryland University College

\*Michael Thomas
New England Board of Higher
Education

\*Larry Tremblay Louisiana Board of Regents

\*Leroy Wade (Treasurer)
Missouri Department of Higher
Education

Belle Wheelan Commission on Colleges, Southern

Association of Colleges and Schools **Michael Zola** 

American Association of State Colleges and Universities

\*Member of NC-SARA Executive Committee

3005 Center Green Drive, Suite 130 Boulder, Colorado 80301 303.541.0283 • nc-sara.org

#### **Foreword**

This initial report on SARA institutions' out-of-state learning placements focuses on NC-SARA's first collection of institutional data about those placements. This 2018 reporting was voluntary for SARA institutions in spring 2018 but will be mandatory for spring 2019 and following years. The overall results of the pilot indicate, first of all, that institutions of all types and sizes can indeed collect and report such data. Institutions reported 32,931 placements, categorized by CIP code and state.

#### Foremost, our thanks

NC-SARA greatly appreciates the special efforts of many individuals at the 297 SARA institutions that voluntarily provided data for this initial reporting. (A list of those institutions, by state, is available in Appendix C of this document.) We understand the time, thought, care and substantial work necessary to gather and report the data. For many institutions, such data had never been collected at the institutional level. Gathering and reporting it required effort, collaboration, commitment, persuasion and tact.

#### Reporting on the first year's data

From discussions with many institutional staff, we understand the first-year challenges that have undoubtedly affected the accuracy of this year's voluntarily reported data. Consequently, rather than report each of the 297 reporting institutions' raw data, we have for this initial pilot year aggregated and summarized their data in hopefully useful ways. By listing the institutions that participated in this year's pilot collection, we hope that institutions of all types can identify institutions that participated in this year's collection and contact them for advice on collecting and reporting their own data for 2019 and future years. We plan a more comprehensive reporting on learning placements – similar to the current enrollment reporting – in future years.

#### **Next steps**

In fall, 2018 NC-SARA will assemble a group of individuals to review the 2018 data and the reporting process and recommend any needed modifications to future reporting. Any changes will be communicated to SARA institutions as soon thereafter as possible. Cordially,

Marshall A. Hill



Marshare o. there







#### Contents

Letter from the Executive Director	1
Introduction	3
Purpose	3
Background	
Learning Placements	4
Classification of Instructional Programs	5
Pilot Learning Placement Data Collection	6
Methodology	6
Learning Placement Findings	
Reporting Institutions by Sector	7
Reported CIP Code Program Areas	8
Pilot Year Participation	9
Recommendations to Improve Reporting	9
Summary	10
Appendix A: Classification of Instructional Programs (CIP)	
Appendix B: Survey Instructions and Screen Shots of Online Survey	
Appendix C: Institutions Reporting Out-of-State Learning Placements	

#### Introduction

#### Purpose

The National Council for State Authorization Reciprocity Agreements (NC-SARA) has completed the first collection of annual out-of-state learning placements data from the institutions that voluntarily provided data during the pilot year. Participating institutions reported enrollments in on-the-ground, out-of-state learning placements. The purpose of this report is to provide a summary of findings regarding the learning placements reported to NC-SARA in the spring of 2018.

#### Background

In 2013, NC-SARA was formed as a nationwide coordinating entity, in partnership with the country's four regional education compacts: New England Board of Higher Education (NEBHE), Midwestern Higher Education Compact (MHEC), Southern Regional Education Board (SREB), and Western Interstate Commission for Higher Education (WICHE). NC-SARA was created to establish uniform standards, policies and procedures for accepting and monitoring member states in each of their respective regions as their institutions deliver education to students residing in other states. States joining SARA through any one compact are recognized as reciprocal partners with states participating in SARA through any other regional compact. And institutions are assured that their participation in SARA through one region will carry full value in any other SARA state, from any other region.

In spring 2016, institutions operating under SARA first reported their out-of-state distance education enrollments to the NC-SARA, disaggregated by state. Similar reporting was done in spring 2017 and a report was written with the findings for both years. The NC-SARA 2017 Enrollment Report is available on the NC-SARA website<sup>1</sup>. For both reporting cycles, NC-SARA used the definitions and protocols of the U. S. Department of Education (ED), promulgated through the Integrated Postsecondary Education Data System (IPEDS) operated by the National Center for Education Statistics (NCES). Details of these definitions and protocols are available in Appendix A of the NC-SARA 2017 Enrollment Report. An analysis of enrollment data reported in spring 2018 is available on the NC-SARA website.

Enrollment previously captured and reported under the SARA distance education reporting provisions did not include on-the-ground, out-of-state learning placements (e.g., clinical rotations, student teaching, internships, etc.). Learning placement activities are an important part of many academic programs and the number and extent of such placements are of great interest and concern to educators, practitioners, licensing bodies and state regulators. Therefore, it was agreed during the formation of SARA that after successfully creating the process for reporting distance education enrollment, NC-SARA would create a similar process for collecting and reporting out-of-state learning placements.

Reporting out-of-state learning placements is beneficial in several ways. It meets the commitments made to the state regulator community during the development of SARA, it helps institutions better attend to and meet professional licensure obligations in the states where they enroll students, and it helps institutional staff comply with federal regulations affecting each the institution's ability to participate in federal Title IV student assistance programs. This is the first year of reporting learning

<sup>&</sup>lt;sup>1</sup> Straut, T. (2017), NC-SARA 2017 Enrollment Report, <a href="http://www.nc-sara.org/files/docs/NC-sara">http://www.nc-sara.org/files/docs/NC-sara</a> 2017 Enrollment Data Report.pdf

placements, and the 2018 reporting was optional for institutions. Such reporting will be mandatory for spring 2019 and following years.

#### Learning Placements

As described in the 2018 Placement Reporting Guide<sup>2</sup>, learning placements (e.g., clinical rotations, student teaching, internships, etc.) are important parts of many instructional programs. Though learning placements occur in a variety of disciplines, they are particularly common in certain fields, such as health-related disciplines and education. In addition, learning placements are often a required part of obtaining a degree and/or license to practice a profession.

While the majority of such placements, for most institutions, are made through their academic programs and are likely located in the same state as the institution, placements do occur across state lines. In making such placements, institutions are obliged to comply with the relevant laws, rules and regulations of the state in which such placements are made. Rules and regulations on such matters may be those of a state education agency or may come from a professional licensure board located in the state where the placement is made. As recent studies indicate, there is enormous variety among how states oversee the estimated 1,300 or so professions that one state or another may license.<sup>3</sup>

SARA institutions, under specified conditions, may place a limited number of students in such learning placements in other SARA states without securing prior authorization for those placements. Importantly, though, if such placements are part of a degree program intended to prepare students for professional licensure in another state, prior approval by the other state's professional licensure board that oversees practice of the discipline may be required. SARA participation does not include such professional licensure approval. In some states, an even broader range of activities fall under the jurisdiction of licensing boards. SARA policies require institutions to inform students whether completion of the institution's program will enable a student to take licensure exams in the state in which the student is located. New rules from ED, originally set to take effect July 1, 2018, now postponed until July 1, 2020, are far more prescriptive about such disclosures and notifications<sup>4</sup>.

As stated in the 2018 Placement Reporting Guide<sup>5</sup>, NC-SARA strongly believes that regulatory attention to matters such as clinical placements, adherence to the rules of states' professional licensing boards, and the intersection between postsecondary education and professional licensure will most certainly increase in the coming years. If an institution cannot document where its students are, and whether completion of these out-of-state learning placements will help enable students to sit for licensure exams in their desired location, the institution is vulnerable on several fronts. Not being compliant with these requirements may include possible violations of state or U.S. Department of Education regulations or exposure to costly lawsuits. Assembling this information is a necessary component of reducing such risks for institutions offering interstate learning placements and distance education.

http://www.nc-sara.org/files/docs/2018 PlacementReporting Final.pdf

http://www.nc-sara.org/files/docs/2018 PlacementReporting Final.pdf

<sup>&</sup>lt;sup>2</sup> NC-SARA, 2018 Placement Reporting Guide,

<sup>&</sup>lt;sup>3</sup> The Council of State Governments, http://knowledgecenter.csg.org/kc/content/us-licensing-system (9/12/2017).

<sup>&</sup>lt;sup>4</sup> Federal Register, May 25, 2018, https://www.gpo.gov/fdsys/pkg/FR-2018-05-25/pdf/2018-11262.pdf.

<sup>&</sup>lt;sup>5</sup> NC-SARA, 2018 Placement Reporting Guide,

#### Classification of Instructional Programs

According to National Center for Education Statistics (NCES), the purpose of the Classification of Instructional Programs (CIP) is to provide a taxonomic scheme that supports the accurate tracking, assessment, and reporting of fields of study and program completion activity<sup>6</sup>. Developed by NCES in 1980, the CIP has been revised three times, most recently in 2000.

The highest order of the taxonomy has 47 two-digit CIP codes that represent program areas. Each program area code is further subdivided, using either two digits (xx), four digits (xx.xx), or six digits (xx.xxxx). Below is a screen shot that illustrates the initial portion of the CIP code for program area Education<sup>7</sup>. Appendix A provides additional detail about CIP codes and links to all 47 two-digit CIP codes that represent the program areas.

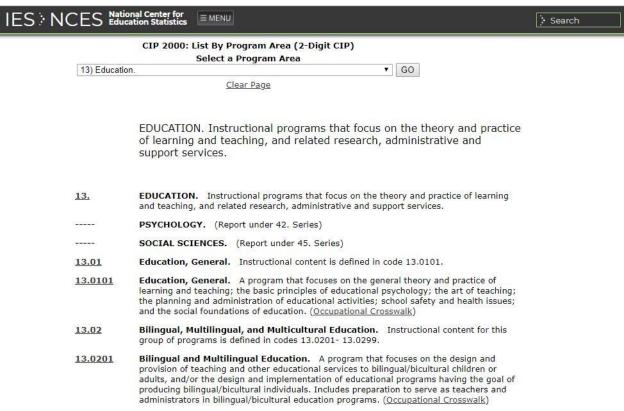


Table 1: CIP Code Example for Education (CIP #13)

Virtually every campus, state and accrediting body in the nation uses CIP codes in some fashion. One fundamental characteristic of SARA is its reliance on certain previously existing, workable mechanisms (such as accreditation, federal financial responsibility composite scores, etc.), rather than inventing similar mechanisms anew. Because it is used by almost all U.S. institutions of higher education, NC-SARA is using the CIP system to categorize and report out-of-state learning placements. Most institutions have

<sup>&</sup>lt;sup>6</sup> Classification of Instructional Programs (CIP 2000). (n.d.) Retrieved from NCES Website. <a href="https://nces.ed.gov/pubs2002/cip2000/">https://nces.ed.gov/pubs2002/cip2000/</a> (Retrieved July 31, 2018).

<sup>&</sup>lt;sup>7</sup> Classification of Instructional Programs (CIP 2000). (n.d.) Retrieved from NCES Website. https://nces.ed.gov/pubs2002/cip2000/ciplist.asp?CIP2=13 (Retrieved July 31, 2018).

already assigned CIP codes to their academic programs, and NC-SARA doesn't expect or desire institutions to revisit those decisions for the purpose of reporting to SARA.

#### Pilot Learning Placement Data Collection

In the spring of 2018 NC-SARA invited all institutions participating in SARA to report their learning placements in all states, territories and districts other than their own. This 2018 reporting to NC-SARA was voluntary. The NC-SARA Board has made such reporting mandatory for spring 2019 and following years. While the data reported for 2018 are not a representative sampling of SARA institutions, they do provide some preliminary information that may inform the data collection and reporting process for 2019 and future years. The institutions that voluntarily reported out-of-state learning placements to NC-SARA this year are listed in Appendix C.

#### Methodology

On or before May 21, 2018, the first day of the reporting period, the primary contact for each institution operating under SARA received an email with instructions and a link to enter the learning placement data in an online form. The instructions and screen shots of the survey are available in Appendix B. Of the 1,804 institutions contacted by NC-SARA to report learning placements, 297 institutions voluntarily reported data for this pilot year, a 16.5% response rate.

NC-SARA asked for reporting by two-digit CIP code only. For example, a SARA institution would report, for each state other than its own, the number of students placed during calendar year 2017, disaggregated by two-digit CIP code and the state in which the placement was made. These two-digit CIP codes are referred to as program areas.

There is infinite variety in the characteristics of learning placements, including what they are called (internships, rotations, student teaching, etc.), how long they last, whether they are required or not, whether they are arranged by the student or the institution, whether they are supervised or unsupervised, etc. For this reason and to increase consistency across institution data, NC-SARA defined a specific list of characteristics that were to be met for this collection process. Short courses, field trips, etc. are not included in the placement numbers.

According to the 2018 Placement Reporting Guide<sup>8</sup>, institutions were asked to report out-of-state placements that meet *all* of the following criteria:

- The placement is outside the "home state" of the SARA institution;
- The placement involves the physical presence of the student at the out-of-state location(s);
- The placement is an activity required for degree completion (a requirement of the student's major, rather than a general institutional requirement) or professional licensure;
- The placement is carried out under the provisions of a formal agreement between the institution and the placement location; and
- The placement started between January 1, 2017 and December 31, 2017.

<sup>&</sup>lt;sup>8</sup> NC-SARA, *2018 Placement Reporting Guide*, <a href="http://www.nc-sara.org/files/docs/2018">http://www.nc-sara.org/files/docs/2018</a> PlacementReporting Final.pdf

Placements that meet the above criteria were to be reported as follows:

- Report unduplicated headcounts;
- Disaggregated by two-digit CIP code; and
- Disaggregated by the state in which the placement was made.

Email instructions and copies of the data entry screens used to report out-of-state learning placements are in Appendix B.

#### Learning Placement Findings

#### Reporting Institutions by Sector

Of the 297 reporting institutions 148 are public, representing 49.8% of the total. Private non-profit institutions represent 43.8% and for-profits account for 6.4%. No Tribal institutions reported out-of-state learning placements. The relative size of the sectors reporting out-of-state learning placements closely mirrors the results in the 2018 Enrollment Data Report. This is the case even though all the institutions reporting learning placements did so voluntarily. All 1,804 institutions participating in SARA were invited to report their learning placements.

In the 2018 Enrollment Report, public institutions made up just over half (53.0%) of all institutions reporting enrollment to NC-SARA in 2018. Private non-profit institutions represent 41.0% and independent for-profit institutions account for 5.9% of reporting institutions operating under SARA and reporting in 2018. In addition, two Tribal institutions reported enrollment to NC-SARA in 2018, representing .1% of the total.

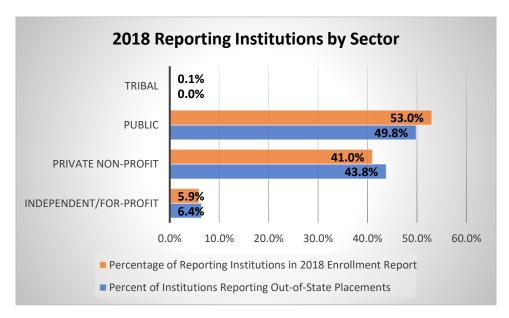


Chart 1: 2018 Reporting Institutions by Sector

Sector	Number of Institutions Reporting Out- of-State Learning	Percent of Total Institutions Reporting Out- of-State Learning	Number of Institutions Reporting	Percent of Total Institutions Reporting
	Placements	Placements	Enrollment	Enrollment
Tribal	0	0.0%	2	.1%
Public	148	49.8%	950	53.0%
Private				
Non-Profit	130	43.8%	735	41.0%
Independent/For-				
Profit	19	6.4%	104	5.9%
Total	297	100.0%	1,791	100.0%

Table 2: Reporting Institutions by Sector

#### Reported CIP Code Program Areas

Using the 47 two-digit CIP codes representing program areas, 297 institutions reported a total of 32,931 out-of-state learning placements to NC-SARA. As anticipated, the program area with the largest number of such placements by far was in Health Professions and Related Programs (CIP #51), with 20,578 placements, representing 62.5% of all placements reported. Education (CIP #13) had the second highest number of placements with 4,432 (13.5%) and Liberal Arts accounted for 6.3% of reported placements (2,079). All other program area CIP codes combined accounted for 17.7% of reported learning placements. The table below provides enrollment for the top ten program area CIP Codes reported. Appendix C provides details about the 297 institutions that reported learning placements to NC-SARA in 2018.

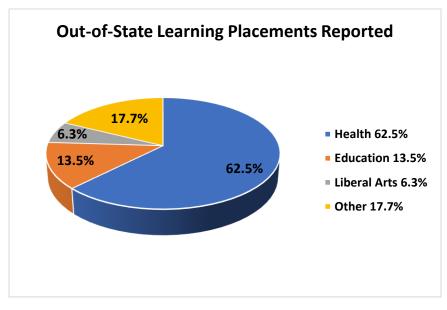


Chart 2: Out-of-State Learning Placements Reported

Program Area (Two-Digit CIP Code)	Total Reported Learning Placements	% Total of Reported Learning Placements
Health Professions and Related Programs (#51)	20,578	62.5%
Education (#13)	4,432	13.5%
Liberal Arts and Sciences, General Studies and Humanities (#24)	2,079	6.3%
Business, Management, Marketing, and Related Support Services (#52)	1,380	4.2%
Public Administration and Social Service Professions (#44)	643	2.0%
Parks, Recreation, Leisure, and Fitness Studies (#31)	472	1.4%
Psychology (#42)	410	1.2%
Residency Programs (#60)	313	1.0%
Health-related Knowledge and Skills (#34)	281	0.9%
Homeland Security, law Enforcement, Firefighting and Related Protective Services (#43)	214	0.6%
All Other Enrollments reported by CIP Codes	2,129	6.5%
Total Placements Reported	32,931	100.0%

Table 3: Out-of-State Learning Placements Reported

As previously mentioned, the pilot data reported in 2018 for learning placements does not represent all institutions operating under SARA. The number of learning placements reported in program areas by state ranged from 0 to 3,566. The fact that Health Professions was the program area with the largest reported enrollment is not surprising since most health professions require learning placements. In fact, in the pilot every state that had learning placement data reported had at least one Health Professions placement. All health professions are categorized within this single two-digit CIP code. In future years, NC-SARA may disaggregate all such reporting by state and CIP program area code.

#### Pilot Year Participation

The 297 institutions reporting learning placements represent 47 states and territories out of the 51 that were members of SARA at the time of data collection. Massachusetts and Puerto Rico were approved to participate in SARA after the beginning of the data collection period in May 2018, so learning placement data was not reported in those states. As of September 2018, California is the only state that is not a member of SARA.

#### Recommendations to Improve Reporting

The 2018 data collection was a pilot approved by the NC-SARA Board to keep the commitment made during the formation of SARA to create a process for collecting and reporting out-of-state learning placements. As was true with the first year of reporting distance learning enrollments, there is a learning curve associated with reporting out-of-state learning placements, both for the NC-SARA staff and for participating institutions. Therefore, NC-SARA made the reporting voluntary.

There were no major, systemic issues related to the process of reporting learning placements by the institutions that provided data for the pilot year, but they did provide good feedback to improve the data collection process in the future. Based on a review of the comments provided by reporting institutions and interviews with NC-SARA staff, the following recommendations should be considered as NC-SARA continues to refine the learning placement data reporting process:

- Evaluate the format and usability of the online survey form. Some respondents reported that the form was difficult to use. Specifically, the fact that the user must click through each state for each CIP program area is time-consuming. A format with columns that would allow respondents to enter data for all the CIP program areas per state in columns (like the enrollment reporting) should be considered.
- Change the language of the form to match the NCES language used. For example, 'CIP Type' on the form should be changed to 'CIP Program Area' for consistency.
- Communicate how to 'save' more prominently in the instructions and/or on the form itself.
- Consider adding a Contact field. This would capture who completed the form and how to reach them with additional questions.
- Keep the Comments field. Respondents used this field to explain where they had placements in non-SARA states/territories, explain unique characteristics of their placements, and to convey feedback on the online form and process.
- Review the communications provided to participating institutions for consistency, clarity and usability. Materials that should be reviewed include: email instructions, *Placement Reporting Guide* and the instructions on the online survey forms.
- Incorporate a review of all communications by non-NC-SARA staff. A reviewer less familiar with the process and language used would provide additional quality control.

In addition to considerations for process improvement in reporting, NC-SARA acknowledges that oncampus collection of such data was clearly a new exercise on many campuses, causing numerous questions. NC-SARA intends to continue to provide support to SARA institutions that will help them gather the learning placement data across their campuses and assist them in educating their colleagues about the importance of this reporting.

#### Summary

NC-SARA thanks those institutions that participated in data collection for the pilot year and recognizes that this reporting may require significant, new efforts across campuses to compile accurate out-of-state learning placement data. NC-SARA will use the experiences reported by the institutions that participated in the 2018 pilot to improve future instructions and surveys. The fact that learning placement data reporting will be mandatory in 2019 serves as impetus to institutions to coordinate across their campuses to collect and report this data in a timely fashion next year. Finally, NC-SARA would like to reiterate its profound appreciation to institutions that participated in data collection for the pilot year and provided feedback to improve the reporting process. Without their efforts, this report and the resulting improvements to the required out-of-state learning placement reporting process would not be possible.

Transparency in reporting out-of-state learning placements has long been a goal for NC-SARA and its stakeholders. The pilot data collection conducted in spring 2018 is an important step towards that goal.

As with any new reporting process, refinements in expectations and communications are to be expected. NC-SARA looks forward to the full implementation of institutions operating under SARA reporting learning placements beginning next year.

# Appendix A: Classification of Instructional Programs (CIP) —Information provided to SARA institutions by NC-SARA

Classification of Instructional Programs (CIP) codes were developed by the U.S. Department of Education's National Center for Education Statistics (NCES) in 1980, with revisions in 1985, 1990, and 2000. Virtually every campus, state and accrediting body in the nation uses them in some fashion. They are used to maintain and categorize academic program inventories, report completions, and, in some states, they affect funding for public institutions. In health-related fields, they can affect the pricing of delivered services, insurance reimbursement to providers, and limits of coverage and practice.

The codes provide a taxonomy (a hierarchical organizational scheme) of fields of study, with greater or lesser subdivision within broad subject areas. For example, CIP Code 51 (Health Professions and Related Programs, with more than 200 sub-categories – 26 within nursing, alone) contains far more narrowly specified programs than does CIP Code 54 (History, with nine specified sub areas).

The highest order of the taxonomy has 47 two-digit CIP codes and subdivides each of them according to the scheme, using either two digits (xx), four digits (xx.xx), or six digits (xx.xxxx). In the Appendix, if reading online, you can click on a two-digit field, be taken to an online definition of that code, and then further click on any of the indicated sub-fields. Definitions are provided for each sub-field. The table is directly available at: <a href="https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55">https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55</a>.

Institutions have already assigned CIP codes to their academic programs, and *NC-SARA doesn't expect or desire institutions to revisit those decisions for the purpose of SARA reporting*. Rather, SARA institutions are to report learning placements categorized by the codes already assigned to the related programs.

#### **National Center for Education Statistics**

The Integrated Postsecondary Education Data System Help Documentation Version 1.1, July 2009 CIP Website, CIP Wizard, and CIP Selector CIP 2010 (https://nces.ed.gov/ipeds/cipcode/Help/CIP2010Help.pdf)

CIP 2010 Resources -- https://nces.ed.gov/ipeds/cipcode/resources.aspx?y=55

- 1. What is the CIP? The Classification of Instructional Programs (CIP) provides a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity.
- Who creates the CIP? CIP was originally developed by the U.S. Department of Education's National Center for Education Statistics (NCES) in 1980, with revisions occurring in 1985, 1990, and 2000.

Two-digit CIP Codes, CIP 2010 -- https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55 (Accessed 12/18/2017)<sup>9</sup>

• (01)AGRICULTURE, AGRICULTURE OPERATIONS, AND RELATED SCIENCES.

<sup>&</sup>lt;sup>9</sup> Placement Reporting Guide: How to Report Out-of-State Learning Placements to NC-SARA, Spring 2018 http://www.nc-sara.org/files/docs/2018 PlacementReporting Final.pdf

- 03) NATURAL RESOURCES AND CONSERVATION.
- 04) ARCHITECTURE AND RELATED SERVICES.
- 05) AREA, ETHNIC, CULTURAL, GENDER, AND GROUP STUDIES.
- 09) COMMUNICATION, JOURNALISM, AND RELATED PROGRAMS.
- 10) COMMUNICATIONS TECHNOLOGIES/TECHNICIANS AND SUPPORT SERVICES.
- 11) COMPUTER AND INFORMATION SCIENCES AND SUPPORT SERVICES.
- 12) PERSONAL AND CULINARY SERVICES.
- 13) EDUCATION.
- 14) ENGINEERING.
- 15) ENGINEERING TECHNOLOGIES AND ENGINEERING-RELATED FIELDS.
- 16) FOREIGN LANGUAGES, LITERATURES, AND LINGUISTICS.
- 19) FAMILY AND CONSUMER SCIENCES/HUMAN SCIENCES.
- 22) LEGAL PROFESSIONS AND STUDIES.
- 23) ENGLISH LANGUAGE AND LITERATURE/LETTERS.
- 24) LIBERAL ARTS AND SCIENCES, GENERAL STUDIES AND HUMANITIES.
- 25) LIBRARY SCIENCE.
- 26) BIOLOGICAL AND BIOMEDICAL SCIENCES.
- 27) MATHEMATICS AND STATISTICS.
- 28) MILITARY SCIENCE, LEADERSHIP AND OPERATIONAL ART.
- 29) MILITARY TECHNOLOGIES AND APPLIED SCIENCES.
- 30) MULTI/INTERDISCIPLINARY STUDIES.
- 31) PARKS, RECREATION, LEISURE, AND FITNESS STUDIES.
- 32) BASIC SKILLS AND DEVELOPMENTAL/REMEDIAL EDUCATION.
- 33) CITIZENSHIP ACTIVITIES.
- 34) HEALTH-RELATED KNOWLEDGE AND SKILLS.
- 35) INTERPERSONAL AND SOCIAL SKILLS.
- 36) LEISURE AND RECREATIONAL ACTIVITIES.
- 37) PERSONAL AWARENESS AND SELF-IMPROVEMENT.
- 38) PHILOSOPHY AND RELIGIOUS STUDIES.
- 39) THEOLOGY AND RELIGIOUS VOCATIONS.
- 40) PHYSICAL SCIENCES.
- 41) SCIENCE TECHNOLOGIES/TECHNICIANS.
- 42) PSYCHOLOGY.
- 43) HOMELAND SECURITY, LAW ENFORCEMENT, FIREFIGHTING AND RELATED PROTECTIVE SERVICES.
- 44) PUBLIC ADMINISTRATION AND SOCIAL SERVICE PROFESSIONS.
- 45) <u>SOCIAL SCIENCES.</u>
- 46) CONSTRUCTION TRADES.
- 47) MECHANIC AND REPAIR TECHNOLOGIES/TECHNICIANS.
- 48) PRECISION PRODUCTION.
- 49) TRANSPORTATION AND MATERIALS MOVING.
- 50) VISUAL AND PERFORMING ARTS.
- 51) HEALTH PROFESSIONS AND RELATED PROGRAMS.
- 52) BUSINESS, MANAGEMENT, MARKETING, AND RELATED SUPPORT SERVICES.
- 53) HIGH SCHOOL/SECONDARY DIPLOMAS AND CERTIFICATES.
- 54) HISTORY.
- 60) RESIDENCY PROGRAMS.

# Appendix B: Survey Instructions and Screen Shots of Online Survey — Information provided to SARA institutions by NC-SARA

For 2018, NC-SARA is asking institutions to report their Out-of-State Learning Placements. This

reporting is voluntarily in 2018, but will be required in 2019. For this report, a SARA institution would report, for each state other than its own, the number of students placed during calendar year 2017, disaggregated by two-digit Classification of Institutional Programs (CIP) code and the state in which the placements were made. Please see <a href="http://nc-sara.org/content/Data\_Info">http://nc-sara.org/content/Data\_Info</a> for explanatory guides and documents.

There is infinite variety in these "placements," including what they are called (internships, rotations, student teaching, etc.); how long they last; whether they are required or not; whether they are arranged by the student or the institution; whether they are "supervised or unsupervised"; and so forth. NC-SARA does not intend to have institutions identify and capture all such possible activities. (Nor is this reporting designed to capture short courses, field trips, etc.)

Institutions should report out-of-state placements that meet <u>all</u> of the following criteria:

- · The placement is outside the "home state" of the SARA institution;
- The placement involved the physical presence of the student at the outof-state location(s);
- The placement is an activity required for degree completion (a requirement of the student's major, rather than a general institutional requirement) or professional licensure;
- The placement is carried out under the provisions of a formal agreement between the institution and the placement location; and
- · The placement started between January 1, 2017 and December 31, 2017.

#### Placements that meet the above criteria should be reported as follows:

- · Report unduplicated headcounts per state;
- · Disaggregated by two-digit CIP code; and
- · Disaggregated by the state in which the placement was made.

Example: Three University of Texas at El Paso nursing students each do a single clinical rotation at each of two hospitals in Las Cruces, New Mexico and one rotation at a hospital in Phoenix, Arizona. UTEP would report three placements in New Mexico and three placements in Arizona, all under CIP 51. Institutional enrollment data will be reported on the NC-SARA website as portrayed in the 2018 Placement Reporting Guide.

On the dedicated form, please select the 2-digit CIP code from the dropdown box, along with the appropriate state and the enrollment number. Select "Add another CIP/State Enrollment" for each entry as needed.

Please note the important Data Sharing Agreement, which is incorporated by <u>reference</u>.

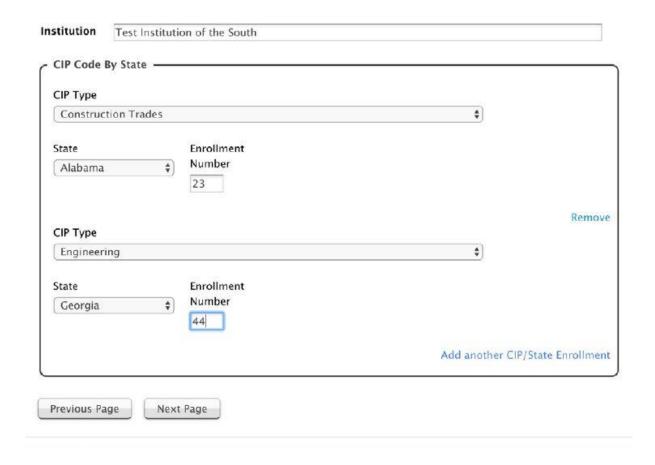
Confirmation of the submission of the report will be sent from NC-SARA's system to all active institution contacts on file.

We thank you for your participation.

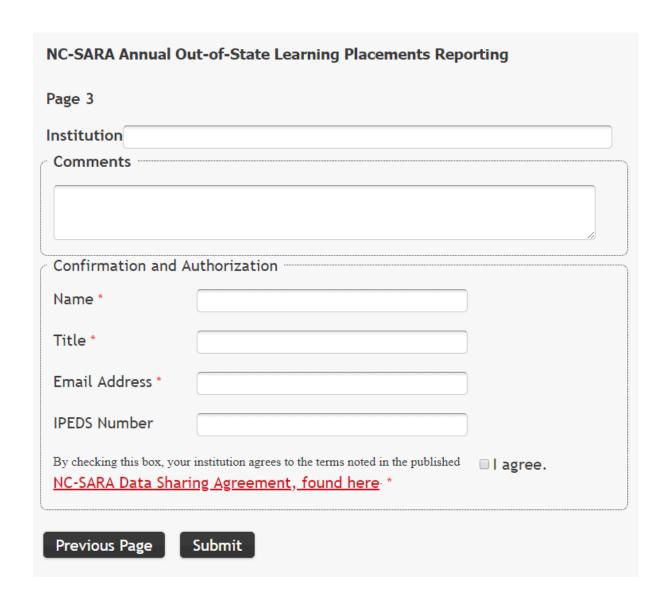
# Appendix B: Survey Instructions and Screen Shots of Online Survey—Information provided to SARA institutions by NC-SARA

Page 2	al Out-of-State Learning Placements Reporting  Rectangular Snip
nstitution	
Reporting Guide	iteria on the previous page and located in the 2018 Placement on nc-sara.org, 1) please select the CIP code from the 2) along with the appropriate state and 3) the enrollment
number. Select "	'Add another CIP/State Enrollment" for each entry as needed; lease select "remove" button before proceeding to next page.

### Appendix B: Survey Instructions and Screen Shots of Online Survey--Information provided to SARA institutions by NC-SARA



### Appendix B: Survey Instructions and Screen Shots of Online Survey--Information provided to SARA institutions by NC-SARA



# Appendix C: Institutions Reporting Out-of-State Learning Placements

States/Territory	Institutions Reporting Out-of-State Learning Placement
Alabama	Alabama State University
	The University of Alabama
	Auburn University-Montgomery
	George C Wallace Community College - Dothan
	Wallace State Community College - Hanceville
	Heritage Christian University
	Jefferson State Community College
	Bevill State Community College
Arizona	Harrison Middleton University
	Northern Arizona University
	Prescott College
	Southwest Institute of Healing Arts
	Arizona Christian University
Arkansas	University of Arkansas, Fayetteville
	University of Central Arkansas
	East Arkansas Community College
	National Park College
	University of Arkansas Community College-Batesville
	Harding University
	South Arkansas Community College
Colorado	Rocky Vista University
	Colorado Christian University
	Iliff School of Theology
	Pueblo Community College
	Red Rocks Community College
	Colorado State University - Pueblo
Connecticut	Albertus Magnus College
	Charter Oak State College
	University of New Haven
	Post University
	University of Saint Joseph
	Western Connecticut State University
Delaware	University of Delaware
District of Columbia	Gallaudet University
Florida	The University of West Florida
	Academy for Nursing and Health Occupations
	Ave Maria University
	Barry University
	Daytona State College
	Embry-Riddle Aeronautical University - Daytona Beach
	Florida Institute of Technology-Melbourne

	Florida Southern College
	Florida State University
	Miami Dade College
	Northwest Florida State College
	Pasco-Hernando State College
Coorgia	
Georgia	Columbia Theological Seminary
	Columbus State University
	East Georgia State College
	Gordon State College
	Mercer University
	Middle Georgia State University
	Morehouse School of Medicine
	Thomas University
	Toccoa Falls College
	Truett McConnell University
	Coastal Pines Technical College
	John Marshall Law School - Atlanta
Hawaii	Hawaii Pacific University
Idaho	North Idaho College
Illinois	Bradley University
	Midwestern University
	Chicago State University
	Concordia University Chicago
	Danville Area Community College
	Elmhurst College
	Midstate College
	National University of Health Sciences
	St John's College
	Sauk Valley Community College
	Harper College
Indiana	American College of Education
	University of Evansville
	University of Indianapolis
	Indiana State University
	Oakland City University
	Purdue University Northwest.
	Trine University
Iowa	Allen College
	Cornell College
	Drake University
	Morningside College
	Northwestern College
	Simpson College
Kansas	Baker University
Ransus	Fort Hays State University
	Independence Community College
	macpenaence community conege

	Vancas City Vancas Community Callaga
	Kansas City Kansas Community College
17	University of Saint Mary
Kentucky	Asbury Theological Seminary
	Brescia University
	Lexington Theological Seminary
	University of Louisville
	Southeast Kentucky Community and Technical College
	Western Kentucky University
Louisiana	Louisiana Tech University
	Loyola University New Orleans
	McNeese State University
	University of New Orleans
	Franciscan Missionaries of Our Lady University
	Southeastern Louisiana University
	Southern University at Shreveport
	Nations University
	Louisiana State University Health Sciences Center at Shreveport
	Delgado Community College
Maine	Saint Joseph's College of Maine
	University of Southern Maine
Maryland	Salisbury University
	Cecil College
	Stevenson University
	SANS Technology Institute
Michigan	Central Michigan University
	Cleary University
	Davenport University
	Michigan State University College of Law
	Grand Valley State University
	Jackson College
	Kellogg Community College
	Madonna University
	Northern Michigan University
	Olivet College
	Saginaw Valley State University
Minnesota	Northwestern Health Sciences University
	St. Catherine University
	Hazelden Betty Ford Graduate School of Addiction Studies
Mississippi	Blue Mountain College
- Постори	Copiah-Lincoln Community College
	University of Mississippi Main Campus
	Mississippi Valley State University
Missouri	University of Missouri - Kansas City
	Central Christian College of the Bible
	University of Missouri - St Louis
	Truman State University
	Training State Office Stry

	Name to the Adiana and Chata Harina and the
	Northwest Missouri State University
	Southwest Baptist University
	Three Rivers College
	Washington University in St Louis
	William Woods University
	Concordia Seminary
Montana	Montana Tech of the University of Montana
Nebraska	Creighton University
New Hampshire	Franklin Pierce University
	University of New Hampshire
New Jersey	Brookdale Community College
	Rowan College at Burlington County
	The College of New Jersey
New Mexico	Clovis Community College
	San Juan College
	Southwestern College
	National College of Midwifery
	Burrell College of Osteopathic Medicine
New York	Cayuga County Community College
	Clarkson University
	Columbia University in the City of New York
	Daemen College
	Ithaca College
	Mercy College - Dobbs Ferry
	The Sage Colleges
	SUNY College of Technology at Canton
	SUNY College at Buffalo
	SUNY College at New Paltz
	SUNY College at Oswego
	SUNY College at Plattsburgh
	School of Visual Arts
North Carolina	Chowan University
North Caronna	Cleveland Community College
	Coastal Carolina Community College
	Davidson County Community College
	East Carolina University
	Elon University
	Fayetteville Technical Community College
	•
	North Carolina Wesleyan College
	Richmond Community College
	Vance-Granville Community College
	Wake Forest University
	Wingate University
	Lenoir Community College
North Dakota	Bismarck State College
	Minot State University

Ohio Ashland University Cincinnati State Technical and Community College	
Cincinnati State Technical and Community College	
•	
The University of Findlay	
Franklin University	
Lake Erie College	
Rhodes State College	
Northwest State Community College	
Ohio Dominican University	
Ohio State University	
University of Rio Grande	
Shawnee State University	
University of Toledo	
Union Institute & University	
Christ College of Nursing and Health Sciences	
Oklahoma Southern Nazarene University	
Connors State College	
Redlands Community College	
Southeastern Oklahoma State University	
Tulsa Community College	
Oregon Blue Mountain Community College	
Chemeketa Community College	
Eastern Oregon University	
Pacific University	
Columbia Gorge Community College	
Pennsylvania Central Penn College	
Clarion University of Pennsylvania	
Delaware County Community College	
Elizabethtown College	
Millersville University of Pennsylvania	
Moravian College	
Pennsylvania State University	
Philadelphia College of Osteopathic Medicine	
University of the Sciences	
Saint Francis University	
Temple University	
Wilkes University	
Rhode Island New England Institute of Technology	
C C	
South Carolina Anderson University	
Claffin University	
Coker College	
Columbia College	
Francic Marion University	
Francis Marion University	
Presbyterian College	

South Dakota	Augustana University
Journ Barrota	Black Hills State University
	Dakota State University
	Mitchell Technical Institute
	Northern State University
	South Dakota School of Mines and Technology
	University of Sioux Falls
Tennessee	Belmont University
Termessee	Bethel University, Tennessee
	Christian Brothers University
	Pentecostal Theological Seminary
	Cleveland State Community College
	Freed-Hardeman University
	The University of Tennessee - Martin
	Trevecca Nazarene University
Texas	The University of Texas MD Anderson Cancer Center
TEXAS	B.H. Carroll Theological Institute
	Alvin Community College
	Baylor College of Medicine
	Dallas Institute of Funeral Service
	University of Houston-Downtown
	Texas A & M International University
	LeTourneau University
	Texas A&M University-Central Texas  North Lake College
	St. Edward's University
	The University of Texas at Arlington
	The University of Texas at El Paso
	The University of Texas at E11 aso  The University of Texas at San Antonio
	Texas Woman's University
	Trinity University
	Wayland Baptist University
	West Texas A & M University
	The King's University
Utah	Rocky Mountain University of Health Professions
Otali	Broadview University - West Jordan
	Utah State University
	Utah Valley University
	Salt Lake Community College
	Western Governors University
	Nightingale College
Virginia	George Mason University
viigiiiia	J Sargeant Reynolds Community College
	James Madison University
	Longwood University
	·
	Marymount University

	Shenandoah University
	Wytheville Community College
	Stratford University
	University of Management and Technology
	Saint Michael College of Allied Health
Washington	Heritage University
	Pacific Lutheran University
	Spokane Falls Community College
	The Seattle School of Theology and Psychology
	DigiPen Institute of Technology
	Pacific Northwest University of Health Sciences
	Charter College
	Walla Walla Community College
	Seattle Film Institute
West Virginia	University of Charleston
	Huntington Junior College
	Southern West Virginia Community and Technical College
	West Virginia School of Osteopathic Medicine
Wisconsin	Madison Area Technical College
	Bellin College
	Concordia University Wisconsin
	Edgewood College
	Blackhawk Technical College
	Madison Media Institute
Wyoming	Casper College
	Northern Wyoming Community College District - Sheridan College