

SHEEO State Authorization Inventory

Oregon

Please note: For purposes of this survey, the terms “authorize” and “authorization” are used generically to include approve, certify, license, regulate, recognize, empower, or similar actions relative to the operation, provision, or availability of postsecondary education in your state.

1. Agency and Contact Information

a. Agency Name: **Office of Degree Authorization**

o Description:

The Office of Degree Authorization (ODA) oversight includes all of the following:

- ODA authorizes ALL private non-profit and for-profit degree-granting institutions of higher education whether operating in Oregon or offering degrees from outside the state.
- ODA authorizes ALL non-Oregon public degree-granters offering courses leading to a degree, practicum/clinical/internships, or full degree programs in Oregon or to Oregon students from outside the state.
- ODA approves requests for exemption from state regulation based a review of the exemption criteria, including: religious exemption, exemption based on accreditation + 5-year presence in Oregon, or exemption based on purely online delivery by a regionally-accredited provider from outside the state. (Oregon-based institutions with regional accreditation that operate successfully in Oregon for 5 years under ODA authorization will become exempt after that initial 5 year period of oversight. Online programs may be exempt based on certain criteria.

o Contact Information:

Jennifer Diallo
*Interim Administrator
Office of Degree Authorization
541-687-7478
jennifer.l.diallo@state.or.us

*Please note that a new administrator will be hired in the next few weeks and Jennifer Diallo will continue to work for ODA as Academic Program Evaluator.

- Please state who institutions should contact if they have questions about your agency’s authority, policies, or application process?
 Contact the ODA Administrator via email or click “Contact ODA” on our homepage at: <http://www.osac.state.or.us/ODA/>

b. Links:

Website: <http://www.osac.state.or.us/ODA/>

Rules: http://arcweb.sos.state.or.us/rules/OARS_500/OAR_583/583_030.html

- c. The following agency also has responsibility for authorization in the state and was requested to complete a survey.

Department of Education - Private Career Schools Office (Private Career Schools, NOT Private AND Career Schools)

- d. If the division of responsibility among these agencies is not clear, please explain.

The Private Career Schools Office is responsible for licensing of non-degree-granting private career, vocational, and training schools only.

ODA authorizes all degree programs and non-degree programs offered by all degree-granting private (both non-profit and for-profit) and out-of-state public colleges and universities.

2. Types of Educational Providers Authorized

- a. Please indicate the types of institutions that your agency authorizes, using the list below. Please answer “yes” or “no” to each item. Feel free to provide a short explanation of any ambiguity, including any necessary clarification of “in-state,” “out of state,” or other terminology.

- No Public, in-state degree granting institutions
- Yes Public, out-of-state degree granting institutions
- Yes Private, in-state, not-for-profit degree granting institutions
- Yes Private, out-of-state, not-for-profit degree granting institutions
- Yes Private, in-state, for-profit degree granting institutions
- Yes Private, out-of-state, for-profit degree granting institutions
- No Public, in-state, non-degree granting institutions
- No Public, out-of-state, non-degree granting institutions
- No Non degree, not-for profit institutions
- No Non degree, for-profit institutions
- Yes Religious institutions (if degree-granting)
- Yes* Tribally-controlled institutions

Clarifying comments:

*Though there is no reference to this in our rules or statutes, we suspect that a tribally-controlled institution would not be subject to ODA jurisdiction, but would most likely seek ODA authorization, at least initially, in order to establish legitimacy vis-à-vis external institutions and governments.

- b. Is an institution required to obtain approval from more than one agency to be authorized in your state (excluding purely programmatic approvals)? If so, please explain.

No, however for degrees intended to lead to professional licensure, schools are required to ensure that students are prepared for licensure and that their programs meet the standards of the designated licensing board.

- c. Is accreditation required for an institution to be authorized in your state?

It depends. It is not automatically required for authorization, however it is required for certain exemptions from authorization, such as for purely online programs, or for exemption of non-profit colleges located in Oregon after 5 years of ODA oversight. Accreditation would also be required for authorization of placement programs (usually associated with online degree programs) such as a clinical, student teaching or counseling practicum experience.

- If yes, please explain:

- Regional or programmatic accreditation is required for purely online degree programs requesting exemption from authorization, and for all out-of-state programs requesting authorization of practicum, clinical, or internship experiences, or those offering partial degree programs.
- We do not require regional accreditation as a pre-condition for full authorization of institutions located in Oregon because ODA has a thorough review and evaluation process in place.
- We have a number of small religious or narrowly-focused arts degree programs in the state that are unaccredited and ODA-approved.
- We have authorized a small number of unaccredited out-of-state programs, usually in adjoining states – these are mostly either small religious colleges or degree programs in specific areas of counseling or health-related fields that are not available in Oregon and frequently enroll Oregon students. In these cases, ODA approval is contingent on acceptance by the relevant Oregon licensing board of the unaccredited degree with ODA authorization.

- If yes, what type of accreditation is required? Please, check all that apply as appropriate.

- Regional
- National
- Programmatic/specialized

Clarifying comments:

Some of our rules specifically cite Regional Accreditation as the acceptable standard; however, we are currently re-assessing the references to accreditation in our rules for consistency, and changes may be proposed in the near future.

- Accreditation by a USDOE-recognized accreditor is acceptable in most cases.
- Programmatic accreditation may be required for authorization if the state licensing board requires graduation from a **degree** program with programmatic accreditation.

- d. Does your agency authorize specific academic programs offered by institutions or only institutions themselves?

Specific academic programs.

- e. Do programs in certain subject areas require the separate approval by another state entity; for example, a professional licensing agency?

In general, any program leading to professional licensure in Oregon must have approval of the appropriate licensing board or ensure that the program meets Board standards to adequately prepare students for licensure.

Education

Oregon Teacher Standards and Practices Commission
465 Commercial St. NE, Salem, OR 97301
contact.tspc@state.or.us
503-378-3586

Nursing

Oregon Board of Nursing
17938 SW Upper Boone's Ferry Rd., Portland, OR 97224-7012
oregon.bn.info@state.or.us
971-673-0685

Social Work

Oregon Board of Licensed Social Workers
3218 Pringle Road SE, Suite 240, Salem, OR 97302 – 6310
oregon.blsw@state.or.us
503-378-5735

Counseling Psychology

Oregon Board of Psychologist Examiners

3218 Pringle Rd. SE, Suite 130, Salem 97302-6309
oregon.bpe@state.or.us
503-378-4154

Allied Health Professions and related programs

Oregon Health Licensing Agency
700 Summer St. NE, Suite 320, Salem, OR 97301-1287
ohla.info@state.or.us
503-378-8667

Others:

Veterinary Medical Examining Board
ovmeb.info@state.or.us

Please note, Veterinary Medicine programs are approved by the VMEB under separate rules; ODA does not have jurisdiction over these programs. ODA does approve Veterinary Technician degree programs.

*other licensed professions can be found at <http://licenseinfo.oregon.gov/>

3. Exemptions

- a. Are certain institutions or programs exempt by law or policy from your state authorization requirements?

Yes, BUT exemption eligibility is determined by this office and is revocable if a status change invalidates the exemption eligibility.

- o If yes, please describe which institutions or programs the exemption applies to and how it works? If available, please provide any pertinent web links.
Categories of Exemption under Oregon rules include:

- Religious colleges offering only degrees in religion or theological subjects for use within a specific religious community.
- Regionally-accredited non-profit colleges and universities are exempt from authorization after 5 years of successful operation in Oregon under the same ownership.
- Purely online programs that do not have any “assistance” in Oregon as defined under OAR 583-030-0015 (23)
 - (23) "Person assisting a school" means any person or organization helping the school or its students or clients by acting as educator or intermediary or provider of communication technology or by acting in any other way that helps the school offer or effectuate its services in Oregon, regardless of whether the person assisting has a contract or compensation. "Person assisting a school: includes but is not limited to: advertiser, recruiter, admissions agent, course

registerer, advisor, teacher, mentor, tutor, supervisor of an internship or practicum, occasional speaker, seminar leader, informal discussion leader, student host for group activity, evaluator, member of a thesis or study committee, publisher of educational materials, operator of a radio station, internet service provider or a cable or broadcast television station.

- If yes, how does the institution or program claim an exemption? For example, is the exemption automatic as long as it meets specified criteria, does the institution or program notify the agency and the exemption is granted, is there an application process, etc.?

Exemption is established by review of an application and relevant supplementary materials to determine that the school or program meets the criteria for exemption. The application forms and instructions are available on the ODA website.

- b. If an institution or program is exempt from state authorization, are there any other state requirements that an institution would need to fulfill in order to operate in your state (e.g., providing contact information, list of programs, etc.)?

Yes. These supplementary requirements are described in the instructions available on our website and are different for the different types of exemptions. Most exemption categories require annual reporting and/or periodic renewal. The exemption must first be approved by ODA, and all exemptions are only valid as long as the institution continues to meet the eligibility criteria. An exemption can be denied or revoked when eligibility is invalidated by a change in status. Change of ownership is one example of a status change that may invalidate eligibility for exempt status.

- c. Does your state constitution or do your state laws provide any exemptions for religious institutions?

Yes, some religious institutions may qualify for exemption under Oregon Revised Statute 348.604.

- Are all religious institutions exempt (please describe)?

No.

- Are religious institutions that award only religious degrees or certificates exempt (please describe)?

If they meet the criteria for exemption under ORS 348.604.

- Are certain religious institutions exempt that meet other criteria (please describe)?

There are 18 criteria listed under ORS 348.604 to meet the exemption eligibility requirements.

4. Authorization of Distance Education

- a. Does your agency require purely (100%) distance education programs, including online or correspondence study programs that enroll residents of your state, to be authorized without regard to physical presence?

Yes and no. We require approval of online programs and authorization of those with placement programs.

Essentially, ALL degree programs offered in Oregon by institutions that are not part of the in-state public higher education systems are required *by statute* to obtain approval from ODA before offering a degree program to students in Oregon. Under *Oregon Revised Statute 348.606, Conferring or offering of degree before approval obtained prohibited; fees; rules*, which states:

“(1) A school may not confer or offer to confer any academic degree upon a person, or provide services purporting to lead to a degree in whole or in part, without first obtaining approval from the Oregon Student Assistance Commission through the Office of Degree Authorization.”

The Office of Degree Authorization has established *by rule* an exemption for purely online programs with no “assistance” in Oregon as defined under OAR 583-030-0015 (23). However, this exemption is not automatic, and is based on review of certain criteria. Exemption is suspended or revoked by ODA if there is a change in status that affects the institution’s eligibility for exemption.

- b. If not, does your agency determine whether an institution must be authorized based on a physical presence or “operating” standard?

Both.

5. Physical Presence Policy – Common “Triggers”

- a. If your agency uses a physical presence standard, how does your agency define physical presence? If available, please provide a link to that policy or a citation to the relevant regulation giving that standard.

“Assistance” in Oregon is defined by OAR 583-030-0015 (23) as:

"Person assisting a school" means any person or organization helping the school or its students or clients by acting as educator or intermediary or provider of communication technology or by acting in any other way that helps the school offer or effectuate its services in Oregon, regardless of whether the person assisting has a contract or compensation. "Person assisting a school: includes but is not limited to: advertiser, recruiter, admissions agent, course registerer, advisor, teacher, mentor, tutor, supervisor of an internship or practicum, occasional speaker, seminar leader, informal discussion leader, student host for group activity, evaluator, member of a thesis or study committee, publisher of educational materials, operator of a radio station, internet service provider or a cable or broadcast television station.

b. Please specify whether any of the following activities would constitute a physical presence or signify “operating” in your state, assuming that the named activity is the institution’s sole activity in your state. **Please answer “yes” or “no” to each question. In addition you may provide a short explanation of any ambiguity.**

- Permitting a student to complete an internship, externship, field experience, or clinical practicum organized by the institution?

Yes. All practicum, clinical, internship, and other experiential learning situations require authorization in Oregon, even when they are part of an otherwise “purely online” program.

Oregon Administrative Rules define “practicum” as *“that portion of a degree program that involves a supervised field placement in a professional or workplace environment.”* This definition would also extend to an internship, clinical placement, externship, student teaching or any other placement program that is part of a degree program.

- Does this apply only to distance education students or more generally?

Applies to all such situations.

- Permitting a student to complete an internship, externship, field experience, or clinical practicum found by the student acting independently?

Yes.

- Does this apply only to distance education students or more generally?

Applies to all such situations.

We discourage self-arrangement of clinical and externship experiences, in particular, for two reasons:

1. **Clinical Placements:** Recent intensive efforts by individual students contacting hospitals and clinics to seek placements has caused many sites to close their doors to placements, further restricting the already limited number of available placements in the metro areas.
2. **Externships:** We are concerned about the exposure of students to risk when students are required to self-arrange field experiences for which they are awarded credit but the school takes no responsibility for the organization or supervision of these experiences.

Also, please note:

The misuse of the term ‘practicum’ by online programs is of great concern to ODA. As defined in our rules, when a student enrolls in a practicum, there is an assumption of relevant pre-professional experience gained over time from an on-site learning experience in a workplace related to the field of study. This is clearly not the case for many “practicum” courses in online programs.

We have found many online degree programs offer “practicum” credit for experiences in which the student self-arranges a single contact, interview, or visit to a site, and subsequently reflects on personal gains from this experience. While these may be valuable as concrete assignments or learning experiences, they are not “practica” in the normal definition of that word as it is used in Oregon. Such experiences would be better described as a “Field Trip” experience or an “Action-Research” project; especially when there is no expectation of ongoing contact at a defined site, no established supervision, and no predetermined learning goals have been established by the institution.

These terms - practicum, internship, externship, and clinical – should not be used for situations that are self-arranged, unsupervised, and where credit awarded is *not* based on regular, verified participation at the site over a term or other prescribed period, and the assessment and award of credit is not based on this participation, nor on pre-established learning goals, but rather is solely based on a student’s reflection or other research and writing about the experience.

- Employing full-time faculty in the state to provide instruction via distance education programs to students in the state?
All faculty teaching students in Oregon must be approved to do so, whether teaching is online or on campus. The location that matters is that of the student, not the faculty member.
 - What about adjunct faculty?
ALL faculty teaching students in Oregon (same as above).
- Employing full-time faculty in the state to provide instruction via distance education programs solely to students outside of the state?
We do not regulate instruction to students in other states, except that these faculty may be approved as part of the normal review process for colleges with a campus in Oregon. This approval would only extend to their teaching in degree programs offered in Oregon. If a school outside the state employed a person in Oregon to teach only students outside the state, we would not exercise jurisdiction unless the program was also offered in Oregon.

- What about adjunct faculty?
Same as above.
- Having a contract/agreement between the institution and in-state institutions or in-state entities to provide services for students (i.e. library, gym, computer centers, etc.)?
Yes.
- Organized, consistent, on-the-ground recruiting of students in the state by employees or agents of the institution?
Yes.
 - What if the agent is only recruiting students in the state on an occasional basis (i.e. at job fairs)?
Yes.
- Advertising in local media sources that are largely viewed by residents of the state?
Yes.
- Advertising in national media sources that can be accessed by residents of the state?
No.
- Having computer servers or other equipment located in the state?
Technically, Yes, but if a server located in Oregon is the host for a school operating from and identified as being located in and approved by another state, we are not necessarily interested in the physical location of the server hosting their data or their online program's architecture. We would require approval if any address or location listing or other published information identifies the educational entity providing this service as being located in Oregon.
- Hosting short term, face-to-face, seminars or conferences in the state where students meet in person?
Yes.
- Employing mentors, tutors, or preceptors in the state to aid students, who are residents of the state, on an individual basis?
Yes.
- Requiring a student to take a proctored exam at a location or with an entity in the state prescribed by the institution?
Yes.

- Requiring a student to take a proctored exam with an entity in the state chosen by the student but approved by the institution?

Yes.

- Other [please explain]

“Assistance” in Oregon is defined by OAR 583-030-0015 (23) also includes but is not limited to:

- any person or organization helping the school or its students or clients by acting as educator or intermediary or
- provider of communication technology or
- acting in any other way that helps the school offer or effectuate its services in Oregon, regardless of whether the person assisting has a contract or compensation.
- advertiser,
- recruiter,
- admissions agent,
- course registrar,
- advisor ,
- teacher,
- mentor,
- tutor,
- supervisor of an internship or practicum,
- occasional speaker,
- seminar leader,
- informal discussion leader,
- student host for group activity,
- evaluator,
- member of a thesis or study committee,
- publisher of educational materials,
- operator of a radio station,
- internet service provider
- cable or broadcast television station.

- c. Of the activities or conditions listed above that alone would not constitute a physical presence, are there any that if combined would create a physical presence?

Not applicable, since the answer to all of the above was “yes”.

6. Application Process

- a. Please provide a short description of the application process to obtain state authorization. If available, please provide web links to the specific references to all applicable state laws, regulations, manuals, forms, or other pertinent documents. All of the forms and instructions are available on our webpage at www.osac.state.or.us/oda (please note this address is likely to be different in a few months).

Basically, there are three types of approvals and each has a related application form, available at: <http://www.osac.state.or.us/ODA/Application-Forms.html>

1. Authorization of a degree program – use General School and Specific Program application forms.
 2. Authorization of a practicum, clinical, or other partial program – use Initial Approval Request form and include requested supplementary materials.
 3. Determination of exempt status – use Initial Approval Request form.
- b. Generally, how long does it take to approve applications (assuming that the agency has received all required information from the institution)? Please provide a typical range if appropriate.
4 to 6 months depending on staffing.
- c. What is the authorization duration?
2 years.
- d. What does an institution need to do to maintain authorization?
Reapply every 2 years.
- e. What kinds of information or data must an institution report to your agency as a condition for continued authorization? How frequently is this reported or updated? Is this information published or shared publicly?
Changes in key administrative staff, new faculty hires, and program changes all must be submitted for approval and/or reported as they occur during an authorization period. On a yearly basis, all schools with authorized or exempt degree programs must submit an annual report. This information may be shared publicly. It includes statistics on students served, graduation rates, future plans, etc.
- f. Can an institution lose its authorized status? If so, how?
Yes. Authorization may be rescinded. For schools with a campus in Oregon, this is usually for cases of gross mismanagement or blatant non-compliance.

- g. Can a multi-institutional system or college corporation apply to your agency for authorization on behalf of all of its component institutions? If so, please describe the process.

Not at this time, though we will approve a 'system' if all of its component institutions use a single centralized distance learning division, or have a centralized oversight model with one office that has programmatic and administrative control of all distance learning for the entire system.

- h. Would multi-institution public systems be treated the same as multi-location for-profit institutions?

Not necessarily, not all of the institutions within either category would be "treated the same" either. How each institution is treated depends on the structure and how the online programs are administered within that structure. (i.e. centralized vs. decentralized, branch campuses vs. independently administered universities, individual online programs vs. centralized online learning division used by all branches, etc.)

- i. What distinctive features in your authorization process would be useful for applicants to know (e.g., certain times during the year that you process applications for authorization, sharing of applications or information about proposed programs with institutions or other stakeholders in your state for comment)?

We expect degree programs that are in fields that would require professional licensure to meet the specific standards set by the related state licensing board.

- j. Is your agency currently planning to amend its application process by the end of 2011?

Possibly.

- o If yes, please provide a brief description of the anticipated change.

We are currently developing a web portal application, tracking, and reporting system that will allow schools to apply for authorization or exemption online, maintain and update their own school information profile, submit new faculty qualification, teaching re-assignments, and program change requests for approval during an authorization period, and provide online information to the public users and other agencies about schools and degree programs approved for Oregon students.

- o If yes, when does the agency expect the change to be fully implemented?

We anticipate going live with the web portal by the end of the year.

7. Fees Associated with Authorization

- a. Is there an application fee to initiate the authorization process? If so, what is the fee or fee schedule? Please provide a web link if available.

Fees are assessed based on complexity of the review. There are maximum fees set in statute, however when there are extenuating circumstances that require additional review or ongoing evaluation in the case of unresolved deficits, additional fees may be charged as determined necessary by the ODA Administrator to cover the excessive costs.

- b. Are there any other costs associated with the state authorization process (e.g. site visits, hiring a reviewer, surety bond, tuition recovery fund, agent licensing, etc.)?
- c. What are the costs, if any, to renew authorization?
Same as the initial authorization review fees. Per program, based on fee schedule in effect.
- d. What costs are associated with receiving a waiver or exemption to authorization?
Standard fee for exemption review is \$250 per school. Additional fees may be assessed when necessary to cover cost overages as determined by the ODA Administrator.

8. Interstate Reciprocity

- a. Do your state regulations explicitly allow or prohibit interstate reciprocal agreements about authorization? If so, please describe.
There is no mention of this in our regulations, nor is there any prohibition.
- b. What is the process, if any, to obtain a reciprocal agreement with your state?
There is no established process for this under our rules.
- c. Are there any reciprocal agreements currently in place or under consideration? If so, please list those agreements.
No.
- d. If interstate reciprocal agreements are not addressed in your regulations, would your agency consider establishing such agreements? Please elaborate.
Yes. We are interested in the proposal presented in May by the President's Council, and are following its evolution. We are not interested in the other proposals we have seen from other parties.

9. Consumer Protection and Student Complaints

- a. Does your agency have a process for handling complaints about postsecondary institutions or programs?
Yes. All complaints about schools under our regulatory jurisdiction or an exempt status approved by this office are handled by ODA staff. Complaints about exempt schools are referred to the Attorney General's office.

- If yes, please describe the process or provide a web link to the material that describes the complaint process.

We accept written or email complaints. When a complaint is received, we first evaluate the information to substantiate its relevance to Oregon rules and statutes. If the complaint appears to have merit or indicate non-compliance on the part of the school, we contact the school to request information regarding the case. All correspondence is kept in the school's file. We continue to mediate between the student and the school until it we receive an indication that the complaint is unfounded or resolved.

- If yes, does this complaint process extend to institutions not authorized by the agency that may enroll residents of the state (such as explicitly distance education programs with no physical presence or exempt institutions)?

In some cases.

- If available, please provide a web link to the complaint form.

There is no form.

- Who is the contact person for receiving complaints? Please include name, title, address, phone, and email if available.

Jennifer Diallo

*Interim Administrator

Office of Degree Authorization

541-687-7478

jennifer.l.diallo@state.or.us

- b. If your agency has no formal process for handling complaints related to postsecondary institutions, what state agency would handle a complaint?

We have a formal process. We also refer students to the Attorney General's office in some cases.

10. Enforcement

- a. If your agency finds that an institution or program is operating in your state without authorization, what is the resulting warning or enforcement action?

If the school is known to have the legal authority to grant degrees elsewhere, but has not obtained ODA approval to offer academic programs in Oregon, the ODA Administrator would send a warning letter stating that we have received information that the school is offering courses, field experiences, or degree programs in Oregon without approval. The letter would include the relevant citations and information about obtaining approval.

In cases where there is no evidence of the school's legal authority to grant degrees, the Office would investigate further and follow up with enforcement action if necessary. Unresolved cases would be referred for follow-up to the Attorney General.

- b. Can an institution or program appeal a warning or enforcement action? If yes, please describe the process or provide web links to the regulations/policies.

11. Legislative or Regulatory Changes

- a. Is your agency or state legislature planning to amend its regulations or alter its physical presence policy by the end of 2011?

Possibly. It is more likely that this would happen in 2012, as there may be some restructuring of higher education oversight bodies in Oregon.

- o If yes, please provide a brief description of the anticipated change.
We are considering two options, either:
 - 1. Eliminating the exemption for online programs, as we have found that the majority of applicants do not meet the "without assistance in Oregon" (physical presence) standard.
 - 2. Eliminating the authorization process for practicums, and instead requiring a combination of appropriate programmatic accreditation and Oregon licensing board approval for external programs with field experiences in Oregon.
- o If yes, when does the agency expect the change to be fully implemented?
There is no timeline. We are in the exploratory stage.

- b. Is your agency or state legislature making changes in your state regulations or statutes so that institutions with locations in your state would be considered legally authorized in accordance with the federal institutional eligibility regulations?

We have already done so.

- o If yes, please provide a brief description of the anticipated change.
In the 2011 legislative session, a statutory change was passed under HB 2117, which required ODA to issue a license to a specific category of exempt schools: Oregon-based regionally-accredited non-profit institutions after 5 successful years of ODA authorization.
- o If yes, when does the agency expect the change to be fully implemented?
It has already been fully implemented. Licenses were issued in July 2011 to all eligible schools.

c. Is your agency or state legislature making any other changes in your state regulations or statutes with regard to state authorization?

o If yes, please provide a brief description of the anticipated change.

We are considering several possibilities; however, these are still in the exploratory stage and will be presented to schools and other stakeholders as appropriate according to the established rulemaking process. The most pressing change on the horizon involves a better way to authorize “hybrid” programs under standards that are more relevant to those programs. Our current process only allow for exemption of the online programs and authorization of campus-based programs. This is not working for students at campuses that combine the two and offer part of the program from various U.S. states.

There may also be statutory changes due to the planned implementation of a higher education governance and/or policy body in 2012.

o If yes, when does the agency expect the change to be fully implemented?

There is no implementation plan at this time.

12. Is there anything else about the authorization process in your state that we and others ought to know about?

We expect ALL schools located outside of Oregon to seek approval ODA and to do so BEFORE sending students to a placement site or offering degree programs to Oregon students. All the information and forms pertaining to approval are available on our website.

Any online program that includes a placement (clinical, practicum, internship, externship, etc.) at a site in Oregon cannot be exempt and must be individually authorized as a placement program. Authorization of a placement program includes approval of the associated online degree program.

The processes, depth, and criteria for review of online and campus-based programs are very different and the approval of one does not extend to include the other unless clearly stated in the approval letter. Therefore, any program that contains both (which we call ‘hybrid’) should be clearly presented as such.

At this time, we are not prepared to authorize “call centers”, “recruiting centers” and “outsourced” distance education program providers operating a “support center”. Schools who seek authorization or approval of exemption in Oregon must be clearly and solely responsible for the programs they intend to offer in this state, and willing to take responsibility for the Oregon students enrolled in their programs.

We are not interested in approving institutions who offer programs from one state and refer their Oregon students a corporate parent, “partner”, or other institution in a third state to resolve an issue encountered in their online program. Approval to offer online programs will be rescinded if there is evidence that the school’s operational structure does not

provide adequate support to students and take responsibility for the reasonable resolution of any potential issues, by the contact person and the location listed on the application for ODA approval. Students must be informed as to the process for dispute resolution and may not be prohibited from seeking recourse to this resolution through ODA and/or the Oregon Attorney General's office, especially where the state of origin does not accept responsibility for students of the online program located in that state.