

SHEEO State Authorization Inventory

Rhode Island

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: **Rhode Island Board of Governors for Higher Education**

o Description:

The Rhode Island Board of Governors for Higher Education has approval authority for private/nonprofit degree-granting institutions not specifically exempted by statute or legislative action and approval authority for proprietary schools. For-profit degree-granting institutions are prohibited from operating in the state by statute. These regulations pertain to all programs of any level offered by degree-granting institutions outside of the Rhode Island system of public higher education and to institutions offering only certificate programs at the post-associate level or above. With one statutory exception, for-profit institutions may not offer degrees in Rhode Island. Degree granting schools seeking initial approval to operate in Rhode Island must provide evidence that they have initiated discussions with the New England Association of Schools and Colleges (NEASC). Within five years and before receiving full approval, these institutions must be accredited by NEASC at all levels for which they are seeking Rhode Island approval. Degree-granting schools seeking to offer certificate-only programs must be nationally accredited at all levels for which they are seeking Rhode Island approval.

o Contact Information:

Deanna Velletri
Rhode Island Office of Higher Education
Academic and Student Affairs
dvelletri@ribghe.org
401-456-6010
401-456-6028 (fax)

o Please state who institutions should contact if they have questions about your agency’s authority, policies, or application process?

Same as above.

- b. Links:
<http://www.ribghe.org/>
<http://www.ribghe.org/hiedinst.pdf>
<http://www.ribghe.org/regulations.htm>
- c. According to our records, the following agencies also have responsibility for authorization in the state. Please correct, add to, or clarify this list of authorizing authorities as necessary. These agencies will also be requested to complete this survey.
 None.
- d. If the division of responsibility among these agencies is not clear, please explain.
 Not applicable.

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.

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

Clarifying comments:

* unless exempted through legislative action

** degree-granting

- 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.
 Yes, if schools are required to get approval from Dept of Health, Secretary of State Business Regulation, ADA approval, building, fire, and health inspections as well, depending upon circumstance.

- c. Is accreditation required for an institution to be authorized in your state?
Yes, for degree granting institutions. No, for non-degree granting institutions.

- If yes, please explain:

Degree-granting institutions of higher education outside of the Rhode Island system of public higher education, including in-state and out-of-state independent institutions and out-of-state public institutions.

These institutions may apply to offer courses that award college-level credit, programs, degrees, or certificates (at any level). To receive initial approval, these institutions must provide evidence that they have initiated discussions with the New England Association of Schools and College (NEASC). Within five years and before receiving full approval, these institutions must be accredited by NEASC at all levels for which they are seeking Rhode Island approval. (Note: A for-profit institution may not grant degrees in Rhode Island unless authorized by Rhode Island statutes specific to the institution.)

Institutions that offer only certificate programs, at least one of which is at the post-associate level or above. These institutions may apply to offer courses that award college-level credit, programs, or certificates (at any level). Before receiving full approval, these institutions must be nationally accredited at all levels for which they are seeking Rhode Island approval. However, certificate-only granting institutions that wish to offer only pre-associate level certificates in Rhode Island must apply for approval under the RIBGHE's *Regulations Governing Proprietary Schools in Rhode Island*.

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

Regional (if degree granting)
 National
 Programmatic/specialized

Clarifying comments:

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

Both.

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

Education

Lisa Foehr

RI Department of Education

255 Westminster Street, Providence, RI 02903

401-222-8809

lisa.foehr@ride.ri.gov

Nursing

Pamela McCue, Director

Nurse Registration & Nursing Education

RI Department of Health

3 Capitol Hill Room 105, Providence, RI 02908

401-222-1741

Pamela.mccue@health.ri.gov

Allied Health Professions and related programs

Pamela McCue, Director

Nurse Registration & Nursing Education

RI Department of Health

3 Capitol Hill Room 105, Providence, RI 02908

401-222-1741

Pamela.mccue@health.ri.gov

3. Exemptions

- a. Are certain institutions or programs exempt by law or policy from your state authorization requirements?
- If yes, please describe which institutions or programs the exemption applies to and how it works? If available, please provide any pertinent web links.

PROPRIETARY SCHOOL EXEMPTIONS

<http://www.ribghe.org/propreg.htm>

The following types of schools, programs, and/or courses are exempt from these regulations. The following are eligible for consideration as exemptions:

- Schools approved under other regulations established by the Rhode Island Board of Governors for Higher Education or the Rhode Island Board of Regents for Elementary and Secondary Education.

- Schools recognized by the Rhode Island Department of Elementary and Secondary Education as exempt under the provisions of 16-40-14 of the General Laws, 1956, as amended.
- Schools, programs, or courses operated by a governmental agency.
- Driver training schools licensed by the Rhode Island Registry of Motor Vehicles.
- Flight schools holding an applicable current Federal Air Agency Certificate issued by the Federal Aviation Agency.
- Health-related programs or courses offered by non-profit hospitals in Rhode Island that are accredited by the appropriate professional medically related accrediting agency recognized by the U.S. Secretary of Education.
- Emergency medical technician (EMT) programs based on the U.S. Department of Transportation's curriculum guidelines and approved by the Rhode Island Department of Health.
- Programs and/or training leading to occupations regulated by the Rhode Island Department of Health's Office of Health Professions Regulation for which there is no specific course or curriculum requirement for licensing but which require the demonstration of certain techniques and skills via inspection (e.g., tattooing).
- Schools, programs, or courses offering instruction exclusively in avocational, recreational, or developmental subjects.
- Employment-related training for which no tuition is charged to the student.
- Programs or courses offered for the sole purpose of preparing a person to take a professional licensure examination, such as a bar exam preparation course for a recent law school graduate. Programs or courses that prepare students for specialized certification (such as Microsoft certification) are not exempt.
- Programs or courses offered primarily to meet continuing education standards required for professional licensure as defined by law or regulation in this state and for which no college-level credit is awarded.
- Short courses of study that are no more than 100 hours or 20 days in duration and for which students are charged no more than \$1,000. An exempted short course of study is further identified as one that: 1) results in its own certificate or credential and is not part of a sequence of classes for which the enrolling organization awards any program credential or certificate, 2) does not include an opportunity or a requirement that students register for or make a financial commitment to a longer program in addition to the individual class, and 3) is not advertised as leading to any professional credential or certification unless the entity that awards the credential or certification [e.g., Microsoft or Novell] indicates that the time needed to earn the credential or certification is 100 hours or less.

- Computer training offered at no additional charge with the purchase of hardware or software to the purchaser or to the purchaser's employee, as long as the seller is not primarily engaged in the business of providing instruction.
- Testing centers that provide examination scheduling, registration, administration, grading and results reporting only, as long as no additional instructional, student or administrative services are provided by the testing center within the borders of Rhode Island. Institutions located outside the borders of Rhode Island may use testing centers located in Rhode Island, as long as the institution does not seek to undertake any other form of operation in the state (refer to definition of *operate*).
- Individual instructors located within the borders of Rhode Island who provide instruction by distance learning under the auspices of an institution located outside of the state, as long as no additional on-ground instructional services or any (i.e., on-ground or at-a-distance) student or administrative services are provided within Rhode Island by the instructor. Institutions located outside the borders of Rhode Island may use individual instructors located in Rhode Island to provide instruction by distance learning, as long as the institution does not seek to undertake any other form of operation in the state (refer to definition of *operate*). Representatives of institutions that are regionally (e.g., New England Association of Schools and Colleges) or nationally (e.g., Accrediting Council for Independent Colleges and Schools, Accrediting Commission of the Distance Education and Training Council) accredited are allowed to disseminate information about their programs within Rhode Island as long as they collect no fees and enroll no students.

EXEMPTIONS OF INSTITUTIONS OF HIGHER EDUCATION OPERATING IN RI <http://www.ribghe.org/hiedreg.htm>

Certain types of institutions, programs, and/or courses may be fully or temporarily exempt from these regulations. The commissioner shall determine if an institution, program, and/or course qualifies for an exemption. The commissioner may request at any time additional information or documentation from an institution in order to verify the appropriateness of its continued designation as an institution that is exempted fully or temporarily from these regulations.

A. FULL EXEMPTIONS

The following are fully exempted from these regulations and do not need to apply for an exemption:

- Institutions approved under other regulations established by the Rhode Island Board of Governors for Higher Education or the Rhode Island Board of Regents for Elementary and Secondary Education.
- Certain independent higher education institutions now operating in Rhode Island. The exempted institutions are:

Institutions established in 1922 or earlier that are exempted by statute:

- Brown University
- Bryant College
- Providence College
- Rhode Island School of Design

Institutions that were established or exempted through legislative action

- Johnson and Wales University
- New England Institute of Technology
- Roger Williams University
- Salve Regina University

NOTE: Institutions established through legislative action are exempt only so far as the legislative action defined the degree levels at which they may operate. Any of these institutions that seek to offer degrees or certificates at levels beyond those defined in the legislation that applies to the institution must observe the procedures described in this document.

- Certain recruitment activities are exempted fully, such as the activities of representatives of regionally or nationally accredited institutions who come to Rhode Island to participate in college fairs, to meet with students in high schools or to meet with students and/or their parents in other group settings and who collect no fees during these activities are exempt from these regulations. Representatives of regionally or nationally accredited institutions who come to Rhode Island to recruit athletes under NCAA guidelines are also exempt from these regulations.

B. TEMPORARY EXEMPTIONS

In certain instances (e.g., an institution wishes to offer a course in Rhode Island only for a very limited time), the commissioner may grant a temporary exemption from all or part of these regulations. In order to obtain a temporary exemption, the institution must be accredited. Temporary exemptions will extend only for the period of time (not to exceed one year) specified by the commissioner.

An institution wishing to apply for a temporary exemption should send a letter to the commissioner describing the course(s) to be offered, the location where the course(s) will be held, intended students, and faculty. In particular, the letter should explain the reason(s) the institution believes a temporary exemption should be granted. Additional materials in support of the request may be requested.

The commissioner will respond to a request for a temporary exemption in writing and indicate the parameters of the temporary exemption, including the period of time for which the exemption is in effect.

C. ADDITIONAL EXEMPTIONS FOR POST-ASSOCIATE CERTIFICATE PROGRAMS AND DISTANCE PROVIDERS

The following exemptions apply only to providers of courses or certificate programs at the post-associate level and above. The exemptions do not apply to degree programs and are not automatic. The following may apply for consideration of exemptions:

- Flight schools holding an applicable current Federal Air Agency Certificate issued by the Federal Aviation Agency.
- Health-related programs or courses offered by non-profit hospitals in Rhode Island that are accredited by the appropriate professional medically related accrediting agency recognized by the U.S. Secretary of Education.
- Emergency medical technician (EMT) programs based on the U.S. Department of Transportation's curriculum guidelines and approved by the Rhode Island Department of Health.
- Programs and/or training leading to occupations regulated by the Rhode Island Department of Health's Office of Health Professions Regulation for which there is no specific course or curriculum requirement for licensing but which require the demonstration of certain techniques and skills via inspection (e.g., tattooing).
- Institutions, programs, or courses offering instruction exclusively in avocational, recreational, or developmental subjects.
- Employment-related training for which no tuition is charged to the student.

- Programs or courses offered for the sole purpose of preparing a person to take a licensure examination.
- Programs or courses offered primarily to meet continuing education standards required for professional licensure as defined by law or regulation in this state and for which no college-level credit is awarded.
- Short courses of study that are no more than 80 hours or 10 days in duration and for which students are charged no more than \$1,000. An exempted short course of study is further identified as one that: 1) results in its own certificate or credential and is not part of a sequence of classes for which the enrolling organization awards any program credential or certificate, 2) does not include an opportunity or a requirement that students register for or make a financial commitment to a longer program in addition to the individual class, and 3) is not advertised as leading to any professional credential or certification unless the entity that awards the credential or certification [e.g., Microsoft or Novell] indicates that the time needed to earn the credential or certification is 80 hours or less.
- Computer training offered at no additional charge with the purchase of hardware or software to the purchaser or to the purchaser's employee, as long as the seller is not primarily engaged in the business of providing instruction.
- Testing centers that provide examination scheduling, registration, administration, grading and results reporting only, as long as no additional instructional, student or administrative services are provided by the testing center within the borders of Rhode Island. Institutions located outside the borders of Rhode Island may use testing centers located in Rhode Island, as long as the institution does not seek to undertake any other form of operation in the state (refer to definition of *operate*).
- Individual instructors located within the borders of Rhode Island who provide instruction by distance learning under the auspices of an institution located outside of the state, as long as no additional on-ground instructional services or any (i.e., on-ground or at-a-distance) student or administrative services are provided within the state of Rhode Island by the instructor. Institutions located outside the borders of Rhode Island may use individual instructors located in Rhode Island to provide instruction by distance learning, as long as the institution does not seek to undertake any other form of operation in the state (refer to definition of *operate*).

- 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.?
 Providers are required to apply for either approved or exempt status. Based on the evidence provided, the commissioner will determine if an institution, certificate program, and/or course qualifies for an exemption. Explanations for adverse determinations will be provided in writing.
- 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.)?
 Secretary of State
 Business Services
 148 West River Street
 Providence, RI 02904-2615
 Phone: 401-222-3040
 Fax: 401-222-1309
 TTY: 711
 Email: corporations@sos.ri.gov
- c. Does your state constitution or do your state laws provide any exemptions for religious institutions?
 Only Board policy addresses partial exemptions from state authorization for religious institutions that are non-degree granting.
 - Are all religious institutions exempt (please describe)?
 No.
 - Are religious institutions that award only religious degrees or certificates exempt (please describe)?
 No.
 - Are certain religious institutions exempt that meet other criteria (please describe)?
 By Board policy established in 1985, non-degree granting religious institutions qualify for partial exemption from regulation at the discretion of the Commissioner.

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?
 No, only if physical presence.

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

Yes.

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.

<http://www.ribghe.org/distance%20learning.pdf>

A provider has a physical presence if:

1. it is physically located within the borders of Rhode Island; or
2. it maintains or sends within the borders of Rhode Island employees or paid representatives whose purpose is to conduct any activities, including, but not limited to the following: recruitment of students, advising of students, offering courses or programs, administration of examinations.

- 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?
See #2 above.
- Does this apply only to distance education students or more generally?
- Permitting a student to complete an internship, externship, field experience, or clinical practicum found by the student acting independently?
See #2 above.
- Does this apply only to distance education students or more generally?
See #2 above.
- Employing full-time faculty in the state to provide instruction via distance education programs to students in the state?
See #2 above.
- What about adjunct faculty?
See #2 above.

- Employing full-time faculty in the state to provide instruction via distance education programs solely to students outside of the state?
See #2 above.
 - What about adjunct faculty?
See #2 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)?
No.
- Advertising in local media sources that are largely viewed by residents of the state?
No.
- 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?
Yes.
- 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?

See #2 above.

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

See #2 above.

- Other [please explain]
- 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?

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.

If the institution seeking to offer distance education lacks a physical presence in Rhode Island, it is subject to the laws governing institutions within its jurisdiction.

If there is a physical presence in Rhode Island, there is an application process involving the Rhode Island Board of Governors for Higher Education and the Secretary of State. <http://www.ribghe.org/regulations.htm>

12 months prior to operating:

- A letter itemizing programs and degrees;
- Completed proposal;
- \$1,000 fee.

Operate or Operating: Operating an institution includes: 1) establishing or maintaining within the borders of the state of Rhode Island a facility or location where instruction, student services or educational program administration are provided or postsecondary educational credentials are granted to persons in the state or to persons outside of the state; 2) contracting with any person, group, or entity to operate such an institution; or 3) the activities of persons owning an interest in, employed by, or representing for remuneration a postsecondary educational institution in or outside the state who, by solicitation made in the state: a) give counsel to, enroll or seek to enroll students for education offered by the institution; b) offer to award educational credentials for remuneration, on behalf of the institution; or c) who hold themselves out to persons in the state as representing a postsecondary educational institution for any purpose.

- 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.
12 months.
- c. What is the authorization duration?
1 year.

d. What does an institution need to do to maintain authorization?

For-profit institutions must apply for full approval every five years and submit to the RIBGHE the following:

- a. a letter signed by the institution's chief executive officer requesting full approval and itemizing the programs and certificate/degree levels for which full approval is sought;
- b. an unbound original and four copies of the proposal developed according to the format described in Section III (*Criteria for Review and Content of Proposals*), with the institution demonstrating its compliance with the following criteria for review:
 - Section A: *Accreditation*. Documentation must be supplied from the accreditor demonstrating the institution's accreditation status. Degree-granting institutions must provide evidence of NEASC accreditation; no other accreditation will be accepted (A.2.1).
 - Section D: *Program*. Describe any changes made to curricula since the program(s) received initial or conditional approval and explain the rationale for the changes (D.4.1).
 - Section E: *Students*. Describe current costs to students of all approved programs and provide a copy of the current student enrollment agreement, if appropriate (E.0.1).
 - Section F: *Faculty*. Provide a list of all current faculty for all approved programs including the items specified in F.2.1.
 - Section I: *Fiscal Responsibilities*. Provide current audited financial statements for the institution (I.1.1). Describe how the program(s) performed compared to the original income and expenditure estimates made in the proposal for initial or conditional approval (I.1.2).
 - Section J: *Evaluation*. Describe internal and external evaluations of the approved program(s) and any adjustments made as a result of these evaluations (J.2.1).
 - Section K: *Public Disclosure and Institutional Integrity*. Provide copies of all major publications, including catalogs, bulletins and handbooks (K.1.1).
 - Other: Provide documentation of any other changes that have occurred relative to the criteria outlined in Section III (*Criteria for Review and Content of Proposals*) since RIBGHE approval was last granted to the institution or its programs.
- 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?
See above.

- f. Can an institution lose its authorized status? If so, how?
 The RIBGHE/commissioner may refuse to continue approval or seek revocation of an institution's approval if the institution:
- a. has committed a material or substantial violation of these regulations;
 - b. has a record of chronically or repeatedly violating any of these regulations;
 - c. has made a false statement about a material fact on any of the documents submitted to the RIBGHE;
 - d. is a for-profit institution and has failed to submit annual reports and related materials (as outlined in Section IV: Part B) in a timely manner;
 - e. has failed to maintain accreditation from a regional or national accrediting agency recognized by the U.S. Secretary of Education, as required by Criteria A.2 of these regulations; or
 - f. has acted or failed to act in a manner which gives cause for revocation pursuant to RIGL §16-40-5 (*Revocation of Approvals*).
- 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 applicable.
- h. Would multi-institution public systems be treated the same as multi-location for-profit institutions?
 Not applicable.
- 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)?
 Not applicable.
- j. Is your agency currently planning to amend its application process by the end of 2011?
 No.
- o If yes, please provide a brief description of the anticipated change.
 - o If yes, when does the agency expect the change to be fully implemented?

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.
 Yes. \$1,000. <http://www.ribghe.org/hiedinst.pdf>

- 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.)?
Depending on type of institution, they may be required to obtain a surety bond. There may also be fees to obtain approval from secretary of state and facility inspection fees.
- c. What are the costs, if any, to renew authorization?
\$100.
- d. What costs are associated with receiving a waiver or exemption to authorization?
None.

8. Interstate Reciprocity

- a. Do your state regulations explicitly allow or prohibit interstate reciprocal agreements about authorization? If so, please describe.
- b. What is the process, if any, to obtain a reciprocal agreement with your state?
- c. Are there any reciprocal agreements currently in place or under consideration? If so, please list those agreements.
- d. If interstate reciprocal agreements are not addressed in your regulations, would your agency consider establishing such agreements? Please elaborate.

9. Consumer Protection and Student Complaints

- a. Does your agency have a process for handling complaints about postsecondary institutions or programs?
RIBGHE is developing a formal complaint process for publics and independents.
 - If yes, please describe the process or provide a web link to the material that describes the complaint process.
 - 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)?
 - If available, please provide a web link to the complaint form.
 - Who is the contact person for receiving complaints? Please include name, title, address, phone, and email if available.

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

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?
A warning letter is sent. If the institution does not comply, then RIBGHE will take legal action to correct the situation.
- 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?
No.
 - If yes, please provide a brief description of the anticipated change.
 - If yes, when does the agency expect the change to be fully implemented?
- 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?
Not at the present time.
 - If yes, please provide a brief description of the anticipated change.
 - If yes, when does the agency expect the change to be fully implemented?
- c. Is your agency or state legislature making any other changes in your state regulations or statutes with regard to state authorization?
Not at the present time.
 - If yes, please provide a brief description of the anticipated change.
 - If yes, when does the agency expect the change to be fully implemented?

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