



State Authorization Research Funding Announcement & Request for Proposals

November 2019

The State Higher Education Executive Officers Association's primary mission is to promote an environment that values higher education and its role in ensuring the equitable education of all Americans, regardless of race, ethnicity, gender, or socioeconomic factors. Central to that mission is equipping states with the skills and information to act when and where necessary. One area that has recently required action is state authorization of postsecondary institutions.

Following the recent surge in institutional and campus closures, the growth in online education programs and providers, and increased concerns about educational quality, SHEEO published a [white paper](#) exploring the state role in the postsecondary education regulatory triad that includes the federal government and accreditors. In the white paper, we argue that through the state authorization process, states are the central actors in the higher education public accountability space. To this end, states should evaluate and strengthen their authorization processes to better protect students and improve quality in higher education. While the paper reviews conventional approaches to state authorization and offers recommendations for state agencies to consider, we were unable to find any empirical research on the effectiveness or outcomes of different strategies for state authorization, the process of state authorization, or the experience of individuals involved in state authorization. Without an empirical base of evidence to guide our recommendations, they are not as strong or as specific as they could be. With generous support from Arnold Ventures, SHEEO is issuing this Request for Proposals (RFP) to fund research projects that investigate state authorization processes, policies, outcomes, and procedures. The immediate goal of these research projects is to provide states with evidence-based recommendations to improve state authorization.

Background

As postsecondary credentials increasingly become a prerequisite for participation in the modern workforce, growing numbers of students, especially those from traditionally underrepresented populations, are enrolling in postsecondary institutions. However, many of these students have not been well served by the institutions they attend. *The Chronicle of Higher Education* recently reported that more than 1,200 college campuses have closed in the past five years, affecting nearly 500,000 students.¹ Approximately 158,000 students are waiting on the United States Education Department to process borrower-defense claims for

¹ <https://www.chronicle.com/interactives/20190404-ForProfit>

loan forgiveness after attending a postsecondary institution they believe deceived them.² At the same time as these campus closures, there has been a proliferation of distance education providers and programs offering new credentials. Some new providers are choosing to forego Title IV aid and thus operate outside of the federal regulatory framework. Even among traditional institutions, many public and nonprofit and for-profit private institutions are struggling financially as student demographics and preferences change.

This rapidly changing postsecondary environment has led to increased scrutiny of and interest in public accountability of education providers by the general public, state and federal policymakers, and other higher education stakeholders. While much of the attention has been focused on the role of accreditors and the federal government, states have the foundational role of approving each entity to establish itself as a postsecondary institution. Commonly known as state authorization, this approval process often serves as the foundation for which other quality assurance functions are built. Every postsecondary institution must be authorized or chartered by its respective state to offer legally recognized degrees and credentials. Processes within the states for authorization often vary by institutional sector (for-profit, nonprofit, public, non-degree granting, etc.) and by location and delivery mechanisms (including authorization of in- and out-of-state distance education providers, authorization of in-state brick and mortar institutions, authorization of distance education providers via reciprocity agreements, and the like). As part of these processes, states act to ensure that proposed postsecondary education providers have the capacity to accomplish their educational mission and goals and that students will be well served. They do this through the collection of data, information, and assurances. This must occur whether or not an institution is accredited or authorized by the U.S. Education Department to participate in Title IV financial aid programs.

The responsibilities of states do not end after initial approval. By requiring reauthorization or renewal of education providers, states also serve a continuous accountability and quality assurance role. The establishment—and continuous approval—process places tremendous responsibility on the state to assure that new and existing institutions are capable of meeting their educational missions and are operating in the best interests of their students and the state.

There are currently significant differences in state policies, procedures, and resources. In some states, authorization is viewed as a critical quality assurance and student protection function; however, in other states, it appears that authorization functions more as a registry of new and existing institutions. Until these disparities are addressed, bad actors may continue to operate to the detriment of our students, states, and workforce needs.³

² <https://www.insidehighered.com/quicktakes/2019/05/23/trump-official-says-no-timeline-review-borrower-defense-claims>

³ Those wishing to learn more about state authorization may want to review SHEEO's white paper on the topic: Tandberg, D.A., Bruecker, E.M., & Weeden, D.D. (2019). *Improving state authorization: The state role in ensuring quality and consumer protection in higher education*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2019/07/SHEEO_StateAuth.pdf

Unfortunately, there is currently no empirical research on the effectiveness or outcomes of different state authorization approaches, the process of state authorization generally, or the experience of individuals involved in state authorization. Without empirically-informed best practices to guide authorization policies and processes, states are left to guess about what components of authorization are effective and which may be unintentionally detrimental to student success and general quality assurance efforts.

Submission Process

SHEEO seeks to fund up to six research projects at \$13,500 each through this RFP. Researchers requiring additional funds for specific research costs, such as original data collection, significant travel, and data access fees, may submit an additional funds request, including a budget outlining these costs. Awardees will receive these dollars directly as an honorarium, and they may seek funding from other sources to supplement the funds. Each project will consist primarily of two elements: 1) an empirical research paper with an abstract and an executive summary; and 2) a corresponding blog post that translates the research for a more general policy audience. Proposals will be reviewed by a committee consisting of SHEEO staff, state higher education leaders, and external researchers. Successful proposals will propose research that promises to have immediate relevance to improving state authorization of postsecondary education providers and that meets traditional academic standards for quality and rigor.

Proposals

For full consideration, please submit a single-spaced proposal that does not exceed 2,000 words with 12-point font and 1-inch margins on all sides. The proposal should, at a minimum, include the following sections:

- *Objectives and purpose.* This should consist of a summary of your research project, its aims, and specific research questions that serve as an introduction to your proposal.
- *Related literature and relevant theory.* Though there is not much state higher education authorization academic literature to speak of, please identify and synthesize any relevant research, white papers, and reports that will inform your study. Be sure to ground your work in relevant theory, whether that theory comes from higher education, political science, economics, sociology, organizational theory, et cetera.
- *Research methods.* Please include a description of and rationale for the sampling framework. Identify the research design you intend to use, as well as the source(s) of the data you'll be collecting. If you require a partner to provide you with data access, please include that partner's letter of support at the end of your proposal.
- *Significance for policy and practice.* The immediate goal of these research projects is to provide states with evidence-backed recommendations to improve state authorization. Please describe how your research will inform policy and practice and lead to better processes and outcomes for students.
- *References.* This should be a works cited page formatted according to APA standards. Does not count against your word limit.
- *Staffing plan.* If you intend to employ assistance from people who are not named in this proposal, please list them here and delineate each individual's expected role in the project. Does not count against your word limit.

- *Résumé or curriculum vitae.* Please include a curriculum vitae or résumé for each member of your research team. Does not count against your word limit.

Please submit your proposal by uploading all relevant documents to the proposal website <http://bit.ly/stateauthrfp19> by **11:59 p.m. Mountain Time on January 15, 2020.**

Potential Approaches and Topics

We are open to all methodologies as long as the research designs and methods meet traditional academic standards and are rigorously applied. These include, but are not limited to survey research; descriptive, correlational, inferential, quasi-experimental, and experimental quantitative studies; analyses of original and secondary data; qualitative research; theoretical and philosophical examinations; legal analyses; and historical studies.

We are open to funding any project of policy relevance related to state authorization (including authorization of in- and out-of-state distance education providers, authorization of in-state brick and mortar institutions, authorization of distance education providers via reciprocity agreements, and the like). Given the nascent nature of this literature, we provide some potential project ideas. However, researchers should feel free to offer other project ideas.

Potential Project Ideas

- *Studies developing and testing a measure of authorization rigor or stringency.* With the development of a scale that measures the rigor or stringency of authorization practices, researchers could examine whether and to what extent authorization stringency impacts a number of outcomes such as the rate and likelihood of institution approvals, number of student complaints, student completions and graduation rates, likelihood of accreditation and loss of accreditation, and the likelihood and rate of institutional closures, among other outcomes.
- *Studies of specific components of state authorization.* We currently know very little about which components of authorization are effective and if the size of the treatment matters. For example, potential studies could explore the effectiveness of tuition-relief funds in practice, frequency of institutional renewal, utility of site visits, impact of student outcome measures (such as earnings data and default rates), impact of surety bonding and size of bonds, and many other components of authorization and their relationship with outcomes of importance.
- *Studies exploring the effect of resource differences.* In recent years, state authorizing agencies and offices have worked in an increasingly anti-regulatory environment and been required to function with fewer resources. What has been the effect of these resource changes on student outcomes and the stringency of authorization processes? Have agencies become more reliant on fees to fund operations; does the mix of revenue (e.g., fees or state appropriations) influence student outcomes or the likelihood institutions are authorized; to what extent are office financial resources and staffing associated with authorization practices and outcomes?

- *Studies of the authorization process from the perspective of authorizers and/or institutions.* We know, anecdotally, that authorization agencies often do not have adequate staff capacity or budgets to fulfill their missions. Studies, especially qualitative ones, could provide a deeper understanding of how these challenges and others—that we are likely not even aware of—impact agency operations and student outcomes. Likewise, we know very little about the elements of state authorization that institutions struggle with or find overly burdensome. A better understanding of the authorization process from the institutional perspective could lead to a more efficient and productive process that focuses on the components of authorization that truly benefit students. In-depth case studies could be very informative.
- *Studies investigating student complaint processes.* Since 2015, states have been required by federal law to institute a formal complaint process that covers all Title IV institutions. How have states managed this recent regulation? Which entities are responsible for handling complaints, and are distance education complaints handled differently? How have these different approaches led to better or worse outcomes for students, and how are these complaint processes communicated to constituents?
- *Studies on the authorization landscape and process.* Using surveys, interviews, and/or document analysis, these studies would provide the field with a better understanding of what is currently being done by states. SHEEO commissioned a state authorization inventory survey in 2012. Such studies could help identify what is currently being done, help develop classifications and models, and also identify effective authorization practices.
- *Studies of new and alternative educational activities.* Institutions are increasingly creating transient group activities, including extended field trips, micro campuses, and other temporary visits to other states accompanied by faculty members. Further, new credentials and instructional techniques and delivery mechanisms are becoming increasingly popular (hybrid education, badging, out-of-state educational activities of in-state providers, micro-credentials, boot camps, and the like). Little is known about how states oversee these activities. A survey of state-level practices, in-depth case studies, and/or empirical investigations regarding the impact of state oversight of these activities could illuminate how states vary in their approaches and how they might best strategize their engagement with such activities.
- *Studies evaluating the National Council for State Authorization Reciprocity Agreements (NC-SARA).* As of June 2019, 49 states (all but California), the District of Columbia, Puerto Rico, and the U.S. Virgin Islands are members of the State Authorization Reciprocity Agreement (SARA). Potential studies could empirically evaluate the impact of NC-SARA on such things as the number of distance education providers, distance education enrollments, student complaints, and other outcomes. Further, research evaluating the experiences and perceptions of participating institutions and member states as they relate to NC-SARA would be appreciated. Such research may lead to a greater understanding of NC-SARA and provide recommendations for improvement.

While we are interested in generating research related to the topics above, proposals and successful projects will not be limited to these areas if they relate to the broader topic of state authorization.

Conditions

Awardees planning to use quantitative methods will be required to meet the requirements and standards established in [Arnold Ventures Guidelines for Investments in Research](#) and pre-register their study on the [Open Science Framework](#) in accordance with those guidelines, [including pre-registration protocols](#), as well as make their data sets and related materials (e.g., survey instruments and statistical code) publicly available on the OSF site.⁴ Additionally, awardees will be expected to adhere to the following time line for the early stages of the project (more detailed deadlines to follow):

Date	Action Completed
January 15, 2020	Research proposals due to SHEEO
February 29, 2020	Send decision letters to submitters
April 30, 2020	Register quantitative studies with Open Science Framework
August 31, 2020	Interim reports due
Early 2021	Final papers due for peer review

The final research papers and the corresponding blog posts will be widely distributed. The papers will be posted to our website, emailed to our members, shared via our social media accounts and our monthly e-newsletter, and distributed at our conferences. Likewise, the blog posts will be emailed to our members and shared via our social media accounts and our monthly e-newsletter.

Finally, if your organization or institution requires IRB approval, you must submit said approval to SHEEO.

If you have any questions regarding the content of your proposal, please reach out to Dr. David Tandberg at dtandberg@sheeo.org. Any questions regarding the submission process or the submission website should be directed to Caitlin Dennis at cdennis@sheeo.org.

⁴ Data sets that are legally protected (e.g., student level data sets) may be exempt from the requirement to post their data set.