



HOW STATES RESPOND TO FEDERAL POLICY ON STATE
AUTHORIZATION FOR HIGHER EDUCATION: FINDINGS FROM
A MULTI-CASE STUDY

A Report to the State Higher Education Executive Officers Association

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This paper is one in a series of reports coordinated by the State Higher Education Executive Officers Association (SHEEO) and generously supported by Arnold Ventures. Given increased public concerns about educational quality, the series is designed to generate innovative empirical research regarding state authorization processes and policies that can serve as a foundation for future research and policy in this understudied area. The views expressed in this paper – and all papers in this series – are those of its author(s) and do not necessarily reflect the views of SHEEO or Arnold Ventures.

ABSTRACT

State authorization for higher education refers to the required approval from the state government that a college or university obtains to operate as a postsecondary institution in the state. Higher education institutions are not eligible to receive funds through federal student financial aid programs without state authorization. Although the federal government initiated a series of significant reforms on state authorization policy in recent years, little is known about how states respond to federal policy on postsecondary state authorization. This multi-case study analyzed the experiences of five states—California, Illinois, Massachusetts, North Carolina, and Pennsylvania—responding to federal policy on state authorization. Through interviews with 25 individuals and analysis of relevant policy documents, this study found that states learned about federal policy regarding state authorization from a variety of sources, some of which were more closely related to interactive communications with the U.S. Department of Education (ED) than others. States responded to federal policy change by reviewing and updating their state’s authorization processes, by informing institutions about federal policy, and in all states except California, by joining the State Authorization Reciprocity Agreement (SARA). Challenges states have faced when responding to these federal policies include insufficient staff capacity to effectively respond to federal policy, limited communications with ED, complexity of federal regulations, and high costs of compliance. Nongovernmental intermediary organizations have played an important role in many aspects of states’ responses to and implementation of federal policy on postsecondary state authorization.

State authorization for higher education refers to the required approval from the state government that a college or university must obtain to operate as a postsecondary institution in the state. The process for obtaining such approval varies by state, with some states having extensive approval and renewal processes and others requiring little more than a formality of initial approval (Bruckner, 2020; Harnisch et al., 2016; Tandberg et al., 2019).

Title IV of the Higher Education Act (HEA) makes state authorization a requirement for institutions to receive funds through federal student financial aid programs. This requirement endows states with an important role as one third of the Program Integrity Triad, through which states—together with accreditors and the U.S. Department of Education (ED)—are charged with maintaining educational quality for institutions receiving funds under Title IV. Institutions are not eligible to receive funds through the HEA's student financial aid programs without state authorization. Through this provision, the federal government envisions states as a key partner in ensuring accountability for institutions receiving federal student aid (Bruckner, 2020; Contreras, 2017; Harnisch et al., 2016; Hegji, 2014; Kelchen, 2018; Madzelan, 2015; McCann & Laitinen, 2019; Shireman, 2019; Tandberg & Martin, 2019; Tandberg et al., 2019).

However, criticism of state oversight of institutions, particularly in the for-profit higher education sector, and the proliferation of distance learning programs have led the federal government during President Obama's terms to initiate a series of regulatory reforms on state authorization. Key provisions of the Obama

administration's final state authorization rule, issued in 2016, required institutions that enroll students in other states (such as fully online programs) to obtain authorization to operate in all states where they enroll students, either individually or via a reciprocity agreement between those states and the institution's home state. The regulations also required institutions to be authorized in states that have "a process to review and appropriately act on complaints concerning the institution" (State Authorization, 2019, § 600.9[a][1]; see also McCann & Laitinen, 2019).

A change in the presidential administration following the 2016 election before new state authorization rules took effect caused delays, confusion, and policy change. First, Trump's Department of Education delayed implementation of the rule and initiated a new rulemaking to revise the regulations. A court later ruled the delay to be improper, and the Obama administration's rules took effect in May 2019 (Fain, 2019; McCann & Laitinen, 2019). A few months later, California students who had been enrolled in out-of-state non-profit and public postsecondary programs were briefly threatened with the loss of federal financial aid following ED's determination that California's process for handling student complaints for those institutions was insufficient under the Obama-era state authorization rule.¹ Following this incident, California revised its student complaint system for out-of-state institutions, and ED authorized early implementation of the Trump-era state authorization rule that had less stringent complaint-system requirements, which settled the matter for California

¹ Because California had a sufficient complaint process in place for students enrolled in out-of-state for-profit programs, students enrolled at those institutions were not at risk of losing financial aid (Stratford, 2019).

students (Lederman, 2019; McCann & Laitinen, 2019; Stratford, 2019). But this situation demonstrates the great influence the federal government has on state-level policies and practices regarding institutional authorization, with serious implications for institutions and students.

Authorizing institutions provides states with an opportunity to play an important role in higher education accountability (Tandberg et al., 2019). Moreover, as what happened with the student-complaint process in California illustrates, federal regulations on postsecondary state authorization can have a tremendous influence on institutions and students. Yet little is known about how states respond to federal policy regarding postsecondary state authorization. The purpose of this multi-case study was to analyze the experiences of five states responding to these federal policies and to examine how state-level actors learn about and respond to changes in federal policy on state authorization. This study also investigated the challenges states have faced when implementing federal policy on state authorization and how state officials have responded to those challenges. This research addresses a gap in the literature regarding states' role in implementing federal higher education policy, particularly with regard to the under-analyzed area of state authorization policies.

FEDERAL POLICY ON STATE AUTHORIZATION

The HEA's state authorization requirement dates to the statute's origin in 1965 (Harnisch et al., 2016; Shireman, 2019; Tandberg et al., 2019). Since then, major changes to federal policy affecting state authorization have happened infrequently, typically following claims of inadequate state monitoring of institutions (Gore, 1993;

Harnisch et al., 2016; McCann & Laitinen, 2019). In the 1990s, following criticism from watchdog agencies and policymakers, Congress acted to strengthen states' role in overseeing institutions that receive Title IV funds (El-Khawas, 2005; Hegji, 2014). Then beginning in 2010, the federal government again sought to strengthen states' role, this time via ED's rulemaking process. These changes followed reports of inadequate standards some states had been using to grant institutional authorization, and particularly out of concern regarding some states' low standards for authorizing for-profit institutions (McCann & Laitinen, 2019; Stratford, 2019).

A regulation issued by ED in 2016 required institutions with distance learning programs to obtain authorization from all states in which they enroll students. Because of the burden that would be involved for institutions offering a large number of online courses to obtain authorization from many different states, ED provided that the state authorization rule's obligations could be met through reciprocity contracts between states. One such contract, known as the State Authorization Reciprocity Agreement (SARA), is coordinated by the National Council for State Authorization Reciprocity Agreements (NC-SARA) (McCann & Laitinen, 2019; Tandberg et al., 2019). States agree to become parties to SARA by applying through one of the regional interstate compacts, which are voluntary interstate collaborations that aim to improve access to, and enhance the quality of, higher education within their region (Longanecker & Hill, 2014). Then, institutions within SARA member-states may join SARA so they can offer educational programming to students located in other member-states without needing to apply to those states for authorization (NC-

SARA, n.d.-b). Forty-nine states, Puerto Rico, the Virgin Islands, and the District of Columbia are currently members of SARA; California has not yet joined (Tandberg et al., 2019).

Title IV of the HEA differs from ED's regulations in the manner in which the policies involve states. The wording of Part H of HEA Title IV provides that states "shall" do the following to carry out their role in the Program Integrity Triad: (1) inform ED about their state authorization processes; (2) inform ED when there is evidence that an institution violated the law with regard to federal financial aid programs; and (3) provide notice to ED of rescissions of state authorization (Higher Education Act, 2018, § 1099a; see also Bruckner, 2020; Hegji, 2014). ED's regulatory influence on states and state policy, however, is more indirect (Poulin & Dowd, 2017). For example, the Obama-era regulations required institutions to be authorized by states that have a consumer complaint process to which the institution would be subject (Brozovic, 2019; State Authorization, 2019). Thus, whereas the HEA directly seeks state action, ED's state authorization rule imposes obligations and penalties on institutions, not states (Program Integrity & Improvement, 2016). Although indirect, ED's state authorization regulations have influenced state-level policy and practices. This was demonstrated in the California example described above, in which ED's regulations of institutions nearly rendered California students enrolled in out-of-state programs ineligible for federal student aid, leading California to change its consumer complaint process (Lederman, 2019).

CONCEPTUAL PERSPECTIVES

Perspectives on federalism, policy implementation, and intergovernmental relations can shed light on how state agencies are tasked with implementing or otherwise responding to federal policy. Government in the United States is prominently characterized by federalism, which is the separation of government authority across national and subnational governments (Erbsen, 2008; Grissom & Herrington, 2012; Thompson, 2013). Federal-state relations have been dubbed vertical federalism, whereas horizontal federalism describes relations among states (Burk, 1996; Erbsen, 2008). The nature of federal-state relations has varied by time period, policy subsystem, and substantive policy area. Depending on the context, federal-state relations have at times resembled the following: dual federalism, in which state and federal governments act independently of one another; cooperative federalism, in which federal and state governments coordinate their functions; and new federalism, in which the federal government largely defers to states (Fischman, 2005; Herian, 2012).

With regard to education policy, federal-state relations often resemble coercive federalism, in which the federal government issues mandates or powerful incentives to prompt states to take certain actions (Herian, 2012; Posner, 2007). Examples of coercive policy tools used by the federal government include direct mandates, tying conditions to the receipt of funding upon which states and other organizations rely, and preempting subnational laws via the Constitution's Supremacy

Clause (Posner, 2007). Another form of federalism, what Gluck (2011) has called “intrastatutory federalism,” involves “legislation-focused” federalism that is “expressed from the inside of federal statutes rather than through the separation of state and federal law” (p. 542). Intrastatutory federalism refers to the fact that states are implicated in some way within a statute, which could be either coercive or cooperative depending on what actions the statute expects states to take (Gluck, 2011). This form of federalism is evident when states are called upon to implement federal policy, such as with the Affordable Care Act and the Children’s Health Insurance Program, both of which involved individual states’ implementation of federal health care programs (Gluck, 2011; Stevens & Sa, 2018). The HEA’s Program Integrity Triad, which includes a prominent role for states, is another example of intrastatutory federalism.

Literature on policy implementation indicates that responding to federal policy at the state level is not an easy task (Conlan & Posner, 2016). Effective state-level implementation of federal policy may be hindered by excessive administrative burdens, resource constraints, the need for negotiation across levels of government, policy or ideological disagreements, and other challenges (Conlan & Posner, 2016; Creek & Karnes, 2009; Dahill-Brown & Lavery, 2012; Derthick, 2007; Huque & Watton, 2010; Stevens & Sa, 2018; Thompson, 2013). Even poor “working relationships” between officials at different levels of government can hinder state-level implementation of federal policies (Scheberle, 1997). Challenges such as these have led to implemented programs not reflecting policymakers’ intent (problems at

the vertical level) and disparities in how policies are implemented across states (problems at the horizontal level) (Creek & Karnes, 2009; Dahill-Brown & Lavery, 2012).

Additionally, the resources needed to implement policy often exceed the capacity of government agencies, leading nongovernmental organizations to play a significant role in policy implementation (Abrams et al., 2018). Such organizations, which have been called intermediary organizations due to their presence between policymakers and policy implementers, have been instrumental in providing information, networking, and programming to help governments implement education policy (Abrams et al., 2018; Honig, 2004; Wohlstetter et al., 2015). In addition to states and intermediary organizations, higher education institutions have an important role to play in implementing federal policy as well. Individuals who work in higher education institutions are often tasked with policy implementation and compliance within their own organizations, and as such, they can affect how policies are implemented on the ground and the extent to which implemented policy resembles policymakers' intentions (Brower et al., 2017).

Previous research has not examined how states respond to federal policies regarding higher education state authorization. However, states' responses are important to understand. Federal policy change combined with the nature of U.S. federalism can prompt states to take action when they otherwise might not. The federal government's actions may also pose serious challenges for states, students, and institutions, as was the case in California in 2019. Analyzing the challenges faced

by states when implementing federal policy on state authorization yields useful information for policymakers and state-level officials about how to respond to federal policy effectively and to anticipate and address policy implementation problems.

RESEARCH METHODS

This study sought to understand: How do state authorizers implement their responsibilities under Title IV of the Higher Education Act and related federal regulations? This research question, in turn, was addressed via the following subquestions:

- How have states learned about and responded to federal policy regarding state authorization for higher education?
- What challenges have states encountered when responding to federal policy regarding state authorization for higher education?
- How have state officials addressed the challenges presented by implementing federal policy regarding state authorization for higher education?

Approach and Case Selection

This research involved a multi-case study (Yin, 2014) of five purposefully sampled states: California, Illinois, Massachusetts, North Carolina, and Pennsylvania. These states were selected using a most different systems sampling strategy, in which cases were chosen for analysis because their structures and contexts differed in key ways, although they shared a common “variable of interest” (Seawright & Gerring, 2008, p. 306; see also Borges, 2008; Creek & Karnes, 2009; Ness et al.,

2015). The “variable of interest” (Seawright & Gerring, 2008, p. 306) that these states shared is the experience of responding to federal policies regarding postsecondary state authorization. The five case-study states differed along the following key variables:

- State authorizing agency type: Different types of government agencies handle authorization of postsecondary institutions to operate within a given state. In some states, authorization is granted by higher education governing or coordinating boards. Other states have a department of education that grants state authorization. Still others have tasked consumer-protection agencies, such as the Department of Consumer Affairs in California (Lederman, 2019), with granting authorization to out-of-state and/or private institutions. Some states have a combination of agency types handling state authorization issues. For example, states may delegate authorization responsibility to a state-level education department for public and/or nonprofit institutions and to a consumer-protection agency for for-profit institutions (NC-SARA, n.d.-d).
- Out-of-state students: Because recent regulations of state authorization have addressed issues of students enrolling in higher education institutions across state lines, the number of out-of-state students enrolled within a state, as well as the number of state residents who enroll in out-of-state institutions, is relevant to this analysis.
- Geographic location: A state’s geographic location influences state authorization in multiple ways. For example, a state’s residents may be enrolled in higher

education institutions located in contiguous or other nearby states (Heyboer, 2019). Also, a state's political culture, which influences public policy, is often shaped by geographic region (Lieske, 2010). Geography also influences the extent to which state officials will be located near one of ED's offices, whether its headquarters in Washington, DC or one of the agency's regional offices. A state's geographic location also affects the higher education regional compact a state may join, which is relevant to state authorization because states must apply to join SARA through a regional compact (Longanecker & Hill, 2014).

- Higher education governance: The governance structure within each state is relevant to issues of authorization, coordination, and management of higher education.
- Number and type of postsecondary institutions in the state: The number of higher education institutions within a state, which influences the scope and workload of state education agencies, varies considerably by state. States also vary in the numbers and ratios of different institutional types within the state. For example, among the case-study states, Massachusetts had by far the largest percentage of private, nonprofits and the smallest percentage of for-profits within the state, while California, which had a higher percentage of for-profits than any other case-study state, had less variation by institutional type than other states in the sample.

Table 1 describes how the case-study states varied along each of these variables. By employing the "most different systems" case selection strategy (Borges, 2008; Creek

& Karnes, 2009; Ness et al., 2015; Seawright & Gerring, 2008), the research team was able to identify commonalities and differences across states with different higher education system characteristics.

Table 1

The Case Study States and “Most Different” Variables

State	State Authorization Agency Type ¹	Out-of-State Students ²	Geographic Region in U.S.	Higher Education Governance ³	Number of Institutions ⁴
California	Consumer-Protection Agency	Data not available	West	No statewide governing/ coordinating board; 2 governing boards for public 4-years and 1 governing board for public 2-years; council of system leaders and other stakeholders advises the governor on higher education matters	420 (151 public, 148 nonprofit private, 121 for-profit)
Illinois	Coordinating Board	From IL: 26,436 To IL: 9,367	Midwest	Statewide coordinating board; another coordinating board for public 2-years; institutions and 2 public university systems have individual governing boards	157 (60 public, 80 nonprofit private, 17 for-profit)
Massachusetts	Combination of Coordinating Board and Consumer-Protection Agency	From MA: 7,758 To MA: 4,539	New England	Statewide coordinating board with some governing responsibilities; institutions and the public university system have individual governing boards	111 (30 public, 77 nonprofit private, 4 for-profit)
North Carolina	Governing Boards	From NC: 3,160 To NC: 7,811	Southeast	No statewide governing/ coordinating board; 1 governing board for public 4-years and 1 governing board for public 2-years; individual 2-years also have local governing boards	136 (75 public, 49 nonprofit private, 12 for-profit)
Pennsylvania	State Education Department	From PA: 14,355 To PA: 6,765	Mid-Atlantic	No statewide governing/ coordinating board; 14 universities have a systemwide governing board and individual governing boards; 1 multicampus university, other 4-years, and 2-years have individual governing boards	220 (63 public, 116 nonprofit private, 41 for-profit)

¹ Sources: Education Commission of the States (n.d.); NC-SARA (n.d.-d).

² As of 2019; source: Straut & Boeke (2020).

³ Source: Education Commission of the States (2020).

⁴ As of 2018-2019; source: U.S. Department of Education (2019).

Data Collection

Data collection involved interviews and policy-relevant documents from all five states. Such use of multiple data sources, common in case study designs, serves to enhance the trustworthiness of findings (Merriam & Tisdell, 2016).

Interview Data

We conducted in-depth, semi-structured interviews with 25 individuals across the case-study states: six in California, five in Illinois, six in Massachusetts, five in North Carolina, and three in Pennsylvania. These individuals worked at state-level agencies or a public higher education system or institution. Table 2 indicates the state government roles of interviewees. We identified potential respondents by reviewing state-agency websites and asking for referrals from interviewees and other individuals who worked on higher education state authorization issues. Interviewees represented a broad range of state-level policy actors, having worked at state-level entities that either provided or sought authorization for four-year or two-year institutions in both the public and private sectors (and, within the private sector, both for-profit and nonprofit higher education). As data collection occurred amid the COVID-19 pandemic (interviews were conducted from May to October 2020), all interviews were conducted by telephone or internet conferencing. The average interview session lasted approximately 40 minutes. One interview session included four participants, two sessions included two participants, and the remainder were individual interviews. The interview protocol (attached as Appendix 1) contained questions about processes and procedures for authorizing institutions and managing

student complaints, challenges that have been encountered in responding to federal policy, and other questions regarding the state's response to federal policy on state authorization. All but one of the interviews were audio recorded, with interviewees' consent, and the audio recordings were transcribed. For the one interview that was not audio recorded, detailed field notes were taken regarding the conversation.

Table 2

Interviewees by Role in State Government

State	Role	Number of Interviewees
California	Consumer agency personnel	4
	State university system personnel	1
	Community college system personnel	1
Total California		6
Illinois	Higher education board personnel	4
	Community college board personnel	1
Total Illinois		5
Massachusetts	Higher education department personnel	6
Total Massachusetts		6
North Carolina	State university system personnel	3
	Community college system personnel	1
	Other state agency personnel	1
Total North Carolina		5
Pennsylvania	Higher education department personnel	2
	Public two-year institution personnel	1
Total Pennsylvania		3
Total Interviewees		25

Documentary Data

This study also involved the analysis of policy-relevant documents, including federal and state statutes, regulations, guidance, student complaint forms, information on agency websites regarding state authorization processes and requirements, news reports of state authorization policies and practices, and similar documents. Documentary data helped to provide a fuller account of state authorization processes and challenges, and also served as a form of triangulation to corroborate and clarify statements made by interviewees (Natow, 2020). The document collection protocol is attached as Appendix 2.

Data Analysis

Data analysis occurred in multiple cycles. For documentary data, we analyzed documents reflecting each state's authorization policies and practices prior to conducting interviews with individuals from the state. This was done to provide the research team with familiarity regarding each state's authorizing policies prior to interviews. Other documentary data were analyzed concurrently with interview data to provide corroboration and additional details with regard to information provided by interviewees. Content analysis of documentary data (Lune & Berg, 2017) identified: (1) each state's postsecondary authorization procedures; (2) each state's student complaint procedures; (3) evidence of challenges faced by each state in implementing federal policy on state authorization; (4) evidence of steps taken by each state to address such challenges; and (5) other aspects of each state's implementation of their functions under Title IV of the HEA.

For interview data, the first cycle of analysis involved open coding of interview transcripts (Gibbs, 2018). The initial coding scheme included a priori codes based on this study's research questions, which were supplemented with emergent codes based on themes identified in the data (Saldaña 2016). During the second cycle of interview data analysis, excerpts of data that had been given the same codes during the first cycle were analyzed concurrently to identify relationships between concepts and other patterns (Miles et al., 2019). Coding decisions were agreed upon by two members of the research team. During the final cycle, we conducted a cross-case analysis among the five case-study states to identify overarching themes as well as similarities and differences across the states (Gibbs, 2018; Merriam & Tisdell, 2016; Miles et al., 2019; Saldaña 2016).

FINDINGS

This research revealed several themes in response to each of the research subquestions. These themes included methods for state officials to learn about federal policy change on state authorization, actions state officials took in response to federal policy on state authorization, common challenges faced by state officials when responding to federal policy on state authorization, and actions state officials took to address those challenges.

Learning About Federal Policies

State officials have learned about federal policies on state authorization from a variety of sources, running on a continuum from receiving direct, in-person

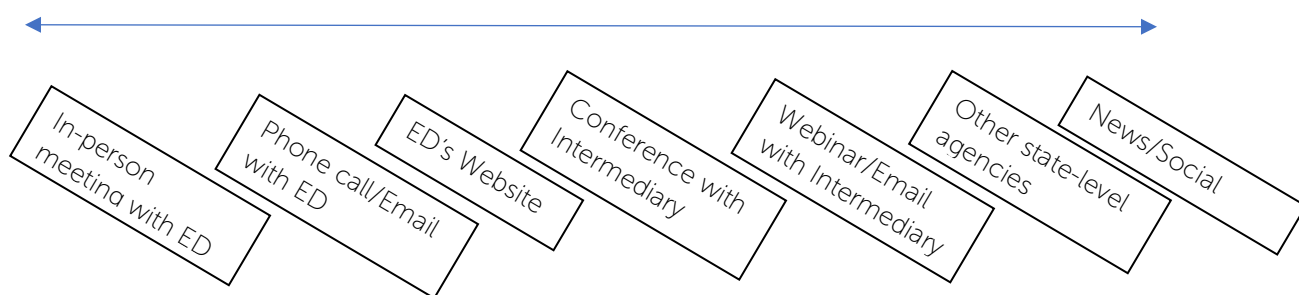
communications from ED to learning about policy change in the media. Figure 1 depicts this continuum.

Figure 1

How State Officials Have Learned About Federal Policy Change

More Direct Communications from ED

Less Direct Communications from ED



Respondents in all five states have received direct communications from ED about federal policy. Some respondents said that state officials had received information about state authorization policies at in-person meetings with ED, including a conference ED sponsored for members of the Program Integrity Triad, attended by ED representatives, state authorizers, and accreditors. Additionally, interviewees described participating in quarterly calls with ED representatives at which policy updates and other matters were discussed. Some respondents also said that ED has sent information to state authorizers via email as well. For example, one respondent reported receiving multiple emails directly from ED about federal policy, and another respondent said that ED had “a reasonably good mailing list of state authorizers [and] that they do from time-to-time push information out” via Listserv.

Proximity between state-level and ED officials sometimes served to facilitate communication about changes in federal policy regarding state authorization. For example, some state agencies had federal relations staff located in Washington, D.C., who received information about federal policy and communicated that information to state authorizing agencies in their home states. Moreover, ED has several regional offices located across the United States, including in Boston, Chicago, Philadelphia, San Francisco, and other locations (U.S. Department of Education, 2010). State officials in Illinois and California reported receiving information about state authorization policy from their nearby regional office of ED. Sometimes state officials received information indirectly from ED—that is, ED would publish the information in a publicly accessible forum, and state authorizers would proactively seek out that information. Sources of indirect information included the Federal Register and ED’s website.

Also in all five case-study states, respondents learned about federal policy on state authorization from associations and other non-governmental organizations, such as the National Association of State Administrators and Supervisors of Private Schools (NASASPS), the State Higher Education Executive Officers Association (SHEEO), NC-SARA, regional higher education compacts, and others. Such organizations were instrumental in spreading the word about federal policy on state authorization and facilitating the implementation of federal policy at the state level. As a respondent from California explained, these organizations have been valuable

sources of information because they “do a lot of the analysis. They see what’s coming.”

Respondents mentioned regional compacts and sub-organizations within them as particularly useful for obtaining information about federal policy change. For example, the Western Interstate Commission for Higher Education (WICHE) hosts a division called the WICHE Cooperative for Educational Technologies (WCET), which in 2011 created the State Authorization Network (SAN) to provide information and resources regarding state authorization compliance (State Authorization Network, n.d.). Respondents in all five states reported learning about federal policy change from WCET, SAN, or another regional compact. This includes Pennsylvania, which is one of the few states that is not a member of a regional compact but was able to affiliate with one for purposes of joining SARA (see also Longanecker & Hill, 2014). Moreover, a respondent from California said that although the state is not a member of SARA, the state did join WCET. This respondent explained, “We do belong to the network because we like to track what’s going on and see what’s happening. So it’s our way of staying informed of changes and things that are going on.”

Information about federal policy was provided by intermediary organizations to state authorizers in a variety of formats. This included learning about federal policy on state authorization at in-person conferences hosted or attended by intermediary organizations, participating in virtual conferences or webinars with intermediaries, or receiving email communications from intermediaries that contained information about federal policy change.

Another source of information for state authorizers, mentioned by respondents in all five states, was other state policy implementers. This included state-level veterans' affairs departments, attorneys general, and others. State agencies handling veterans' affairs often serve as state approving agencies for higher education programs eligible to receive GI Bill funding (National Association of State Approving Agencies, n.d.). As such, their work was closely related to the work of state authorizing agencies. Similarly, attorneys general have often dealt with consumer-protection issues, including in the higher education sector (Dundon, 2015). This role overlaps with state authorizers' responsibilities under the Program Integrity Triad.

Although less frequently than other state agencies, higher education institutions sometimes served as a source of information for state authorizers about federal policy. For example, an interviewee in Massachusetts stated, "We also do hear sometimes from colleagues at some of our institutions or at other institutions" about changes to federal policy. An Illinois respondent similarly said that an individual who worked for a public institution on distance learning matters provided the state agency with updated information about federal policy.

Finally, state officials in all five states have also learned about federal policy on state authorization from various forms of media. The most frequently reported media source was the specialized higher education news media, although other news media sources were also mentioned. As an interviewee from Massachusetts said, "I try to get as many news articles related to higher ed in my inbox in the mornings... That just helps me to keep my eyes out for something else coming down the road from

U.S. ED.” State officials have also learned about federal policy regarding state authorization from social media. An Illinois official, for example, followed interstate compact personnel on social media and learned of some state authorization policy changes that way.

Responding to Federal Policy on State Authorization

Changes to federal policies on postsecondary state authorization have led state agencies to implement the new policies and facilitate institutional compliance with the changes. Such responses included reviewing states’ existing authorization practices and revising them if necessary, informing and training institutions regarding federal policy change, and in all case-study states except California, joining SARA.

Reviewing and Updating State Authorization Practices

One way state officials in all five states responded to federal policy change was to review existing state authorization practices to determine whether they complied with new federal rules. Respondents described conferring with other state officials to review their state’s procedures and determine whether they were in compliance with new federal policy. A California respondent described comparing that state’s practices with those of other states to get a sense for what practices could be adopted to comply with federal law. In some states, changing certain practices required a change in state law before the people who work in state authorizing agencies could implement changes.

State officials also adjusted their practices if they concluded after a review that the practices would not comply with new federal policy. Most frequently, this

involved making adjustments to student complaint processes. For example, an Illinois respondent explained, "We are now taking even complaints from Illinois residents that are not attending the Illinois schools. They can file their complaint with us." A different respondent said that Massachusetts also changed its student complaint process to comply with new federal regulations. This interviewee said that prior to the federal rule change, "we didn't really consider ... our complaint process to be open and available to Massachusetts-based students who were taking online programs at schools located in other states." However, the state altered its student complaint procedures to allow such students to make use of it, "because otherwise, those schools wouldn't be considered to be authorized here." The loss of authorization would have affected only out-of-state schools, but state officials were mindful of ripple effects that would negatively impact Massachusetts stakeholders. When describing the agency's decision-making process for this adjustment to student complaint procedures, the same interviewee said:

If we had taken the other course and said, we're not going to do this... we'd be getting a lot of calls from legislators that they would have gotten calls from their constituents, and we'd be getting a lot of calls from the governor's office and from ... our board members about what they were hearing from people that they knew that were impacted by that.

State officials were also mindful that the federal regulation on student complaint processes targeted institutions rather than states. But again, the potential for ripple effects influenced state officials to make changes to their procedures. The same

interviewee from Massachusetts explained that because the regulation did not target states, the agency was “not required to do it, but in reality, the implementation of it ... you were almost required to do it.”

Joining SARA

Four of the five states (California being the only exception) also responded to federal policy change by joining SARA. As one interviewee said, the development of SARA “was a response to that clarification that the feds considered state authorization to mean state authorization by the state where the student was, not state authorization just by the state where the institution was.” SARA member-states have their authorization of postsecondary institutions recognized by other SARA-participating states, obviating the need for institutions to get authorized in every state in which they enroll students. Participating institutions must comply with certain standards set by NC-SARA, including requirements regarding accreditation, student complaint processes, and standards of program quality (Longanecker & Hill, 2014; Tandberg et al., 2019). Respondents observed that when a state joined SARA, it removed the burden for its institutions to obtain authorization individually from a large number of states.

Some state authorizers reported that their state joined SARA in response to pressure from institutions who wanted a more streamlined process for obtaining out-of-state authorization. As a respondent from Massachusetts – a state that was one of the last to join SARA – explained, “Our institutions were very ready for it, they were advocating very strongly for it and really... wanted us to move forward.” A respondent

from a different state said, “The decision to join SARA in [this state] was precipitated explicitly in the interest of our institutions,” and that prior to the state joining SARA, “our institutions were definitely at a disadvantage because they needed to get approval from other states.” Another official likewise shared that “the institutions wanted to join, wanted [this state] to become a member of SARA.”

As the statements above indicate, the purpose of states joining SARA was to help institutions more easily comply with federal law and was often done in response to pressure from institutions. But a common critique of SARA has been that it restricts a state’s ability to enforce consumer protection for in-state students attending out-of-state institutions (e.g., The Institute for College Access & Success, 2018). Some respondents echoed these concerns. For example, a respondent from a SARA member-state said, “There’s recognition that there’s limitations in terms of what the state can do where you don’t have oversight towards the out-of-state institution.” Also, a respondent from California said that the state has considered joining SARA, but has thus far opted not to do so due to concerns raised by consumer advocates. According to this respondent, advocates explained to state policymakers that under SARA, “the state could execute general laws against a bad actor, but they couldn’t necessarily impose additional laws” specifically to address consumer-protection issues against higher education institutions.

Informing and Training Institutions

Respondents in all five states indicated that when federal policy reform on state authorization has occurred, state officials have informed and trained institutions

regarding the changes. Specifically, state officials provided information to institutions within their jurisdiction regarding changes in federal law and whether institutions were in compliance with the new policies. A Massachusetts official illustrated this practice as follows:

We're cueing up some communications now for institutions, and for some of them it's going to be either a reminder of what they knew long ago, or it's going to be new information ... about what our role is ongoing, and what's new about it.

For states participating in SARA, informing and training institutions also involved helping institutions to ensure compliance with SARA requirements. A different respondent from Massachusetts explained that this included "talking to institutions about what they are intending to offer pursuant to SARA ... and review[ing] draft email notifications to students to be able to confirm that the notifications to students meet the elements of the NC-SARA policy."

State officials used a variety of methods for informing and training institutions about federal policy regarding state authorization. The most common method of communicating with institutions was via email, which was readily available and enabled state officials to put in writing the information institutions would need. A North Carolina respondent found email useful for providing details about the policies, "putting them in layman's terms" and "offer[ing] my telephone number and email in the event an institution needs to call." Indeed, another common method for keeping institutions informed about federal policy was via telephone, either conference calls

or individual phone calls. State officials also provided information to institutions through conferences, webinars, and state agency websites.

Respondents in all five states described how intermediary organizations were useful in keeping institutions informed. For example, a Pennsylvania respondent said:

NC-SARA has been very instrumental in helping the states and the institutions with these new regulations. They just hosted a federal licensure disclosure webinar and have invited all of the institutions to give some clarification on the questions that they had. So I think that NC-SARA, with this particular portion of the federal regulations, has kind of lightened the load by including the institutions and not just having the states trying to facilitate this information on their behalf.

A different respondent said that information from SAN was useful for “giv[ing] the colleges more detailed information so that they can post that on their website.” A respondent from Illinois provided a link to information on WCET’s website in an email that updated institutions regarding federal policy, because this official believed that “WCET had done a nice job” of providing information on its website.

States’ Challenges and Responses to Challenges

State officials reported a number of challenges they experienced when implementing federal policy on state authorization. The most prominent were insufficient staff capacity in state agencies, limited communications with ED, difficulties presented by the complexity of federal policy, and costs associated with compliance.

Insufficient Staff Capacity

Respondents in all five states reported insufficient staff capacity at state agencies as one challenge faced when implementing federal policy on postsecondary state authorization. State agencies have experienced budget and resource constraints in recent years, and without more resources to dedicate to policy matters, state officials were sometimes unable to give implementing federal policy the time and attention it warranted. As a state official in Illinois observed, “There’s some key resources that are not at our disposal, and having folks that can be dedicated to looking at policy is something that’s ... not currently at our disposal... We’re stretched pretty thin on a number of fronts.” A respondent from Pennsylvania recognized that resource constraints were not specifically a result of having to implement federal policy, as this was “just the nature of working in a state government where resources are limited.” However, the same respondent agreed that insufficient staff capacity has been a challenge for the agency in responding to federal policy on state authorization.

Some respondents dealt with the challenge of insufficient staff capacity by collaborating with other state-level actors on federal policy work, sometimes across agencies. For example, one respondent said, “We work very closely with our state Department of Veteran’s Affairs and their school approving agency... Because we’re all stretched so very thin, we try to really help and cue each other.” A different official

said, "A lot of it's through either working groups or relationships of people who are tasked with certain shared activities or joint activities, or ... carrying messages back and forth" across agencies.

Limited Communications with ED

Another challenge identified by respondents in all five states was limited communications with ED. State officials tended to characterize these limitations either as unclear statements sent from ED, or in terms of quantity rather than quality. In the words of one respondent, "For state authorization, I think that when we do speak, the interaction is very good. I think there's probably not as much communication as there could be." Another respondent emphasized that this problem was not a complaint about ED so much as "an overall theme" that "communication could be improved" between state and federal agencies, and that all parties could be "more proactive or more responsive." A different state official observed that limited communications between members of the Program Integrity Triad (ED, accreditors, and state agencies) have led to delays in determining whether institutions were in danger of failing. This interviewee said:

Sometimes the state is waiting for the federal government, ED, to take action. Sometimes the ED is waiting for the state to take action. Sometimes it's the state waiting for the accrediting agency to take action. It seems that to happen in a perfect world, with better communication, then the early warnings will be tuned into, and a school that is at risk would be caught on time and to prevent any kind of catastrophic closure.

Some state officials indicated that communications with ED had been improving in recent years, and that the meeting ED sponsored for members of the Program Integrity Triad was useful. Also, several respondents said that taking steps to cultivate a positive relationship with ED was a way they had addressed the limited-communications challenge. As an interviewee from California said, “We’ve been intentional about trying to reach out to ED,” particularly by communicating with officials in ED’s regional office. A respondent in a different state said that when institutions or systems have DC-based federal relations staff, those individuals often had a “very good relationship” with ED officials, which served to improve communications between the agencies. Other respondents indicated that information from ED sometimes arrived indirectly via intermediary organizations. For example, an official from Illinois explained that a colleague who “routinely participates in our Midwest Higher Education Compact meetings” is a “primary source” of information on federal policy issues.

Complexity of Federal Policies

Respondents in all five case-study states also identified the inherent complexity of federal regulations as a challenge for their agencies. One state official, for example, said that implementing federal policy was “always a lot of work, and sometimes some of the challenge is just the interpretation of the guidelines.” Another respondent relayed that a recent federal regulation on licensure programs was “pretty complex to implement.” The complexity of federal regulations was further complicated by the fact that the state authorization regulations had changed several

times within a decade, with new regulations having been issued in 2010, 2016, and 2019 (State Authorization, 2019; Tandberg et al., 2019). As observed by a Massachusetts official, these somewhat rapid changes in policy provided an “additional level of analysis of, okay, so the language changed, but what was the ultimate effect of the language change?” The same respondent illustrated how this challenge intersected with the challenge of insufficient communications with ED in that understanding complex regulations “tends to be the more challenging aspect without a direct ear into [ED’s] thinking.”

In California, some of the complexity has revolved around institutions having to obtain authorization from other states on an individual basis because the state is not a participant in SARA. As one California respondent observed, some states “have very cumbersome paperwork” for institutions to complete to receive authorization, and some states require institutional representatives “to physically go to the state and present” to state officials. Given this complexity, some institutions asked state-level officials if they could provide assistance. But as the same respondent noted, “We’d have to hire people, because we really do not have a department that is dedicated to this.” This statement illustrates how the challenge of insufficient staff capacity complicates the challenge of complying with complex federal regulations.

State officials attempted to address the complexity challenge by taking steps to learn as much as they could about federal policy. This sometimes involved consulting with those who had more policy knowledge, including intermediary organizations. For example, a Massachusetts official referred institutions with

questions about federal regulations to the website of NC-SARA, which “makes a great effort at trying to post interpretations and guidance from both law firms and also nonprofit organizations.” Similarly, another respondent said that to better understand complex regulations, state officials would “study up on it,” and also contact the regional compact with questions, because “they always have the latest and greatest information.”

High Costs of Compliance

A final challenge identified by respondents in all five states was the high cost of federal policy compliance that is borne by both state and institutional actors. There is a substantial cost of time and money for institutions to seek authorization individually from a number of states. A California respondent told us that because the state is not a member of SARA, institutions incur costs whenever they apply for authorization from another state. A North Carolina official said that one of the reasons institutions in that state advocated for joining SARA was because “going through multiple state authorization processes can be time-consuming and expensive for one institution.” However, there were costs associated with joining SARA as well, as some respondents said they viewed the fees associated with joining SARA as expensive. One interviewee from a SARA member-state said that some institutions in the state chose not to join SARA due to the fees. This respondent said that larger institutions “can afford the fees and it’s not a problem, but at a lot of our smaller colleges, it’s a significant hit.” Additionally, for Pennsylvania, there were costs associated with affiliating with a regional compact for the purpose of joining SARA.

One way some respondents reported addressing this challenge was to encourage institutions within the state to determine whether joining SARA would be financially practicable. A respondent from a SARA member-state said that the state authorization agency helped “to facilitate information to provide whatever [institutions] need in order to meet the federal regulations as well as state regulation,” but that ultimately, “we allow them to make their own choice” about whether to join SARA, based on whether doing so would make financial sense for the institution.

Another way some states dealt with increased costs was to charge institutions fees for joining SARA. These fees were to be paid to the state, and they were assessed in addition to the annual fee participating institutions must pay NC-SARA (NC-SARA, n.d.-a). Such fees ranged from a few hundred to tens of thousands of dollars (NC-SARA, n.d.-c). One respondent expressed concern that addressing the issue of high compliance costs might lead institutions to pass these costs along to students by raising the price of attending college.

DISCUSSION

This study has made several contributions to the knowledge base on state authorization policies. First, several themes were present across all five case-study states (and in the case of joining SARA, across four of the five states), indicating a strong level of consistency regarding states’ implementation of federal policy on postsecondary state authorization. Table 3 indicates those common responses and challenges. The purpose of state authorization regulations is to strengthen the state’s role in the Program Integrity Triad as a pillar of higher education quality and

accountability (McCann & Laitinen, 2019; Tandberg et al., 2019). Understanding how states learn about, respond to, and face challenges regarding these regulations can help higher education policy actors of all kinds to improve the implementation of these policies.

Findings from this research highlight the importance of intermediary organizations in implementing federal higher education policy at the state level. Indeed, intermediary organizations have played an indispensable role in helping states understand and respond to federal policy on state authorization. These included interstate compacts, NC-SARA, SHEEO, and NASASPS. Intermediaries provided information to state officials about changes in federal policy and helped states to implement federal policy by, for example, developing and coordinating SARA and providing resources states found useful in keeping their institutions informed about federal policy. Intermediary organizations also helped states respond to challenges by facilitating communications with ED and helping states to navigate complicated and rapidly changing federal regulations. State officials repeatedly described intermediaries as useful resources for states in implementing federal policy. These findings regarding the ubiquity of intermediaries in the implementation of federal policy on state authorization demonstrate how, when government resources at both the state and federal levels have fallen short, intermediary organizations have stepped in to fill the void. The assistance provided by intermediaries was valuable to states, but also brought some new challenges in the form of additional costs and complexities. Previous studies have documented the function of intermediary organizations in policy implementation (e.g., Honig, 2004; Wohlstetter et al., 2015). This study expands upon that literature by demonstrating how intermediaries function as partners of states in the implementation of federal policy on postsecondary state authorization. Specifically, new (e.g., NC-SARA) and existing

(e.g., regional higher education compacts) nongovernmental organizations have emerged to address the limitations of both the state and federal governments with respect to communicating about, implementing, and addressing challenges associated with federal policy on higher education state authorization.

This study's findings also expand upon conceptualizations of federalism in the higher education policy arena. Recent efforts to improve communications between the components of the Program Integrity Triad, such as ED's conference to provide information on state authorization policy developments, indicate an attempt to move toward a relationship of cooperative federalism in implementing Title IV of the HEA. However, challenges experienced by state officials—such as limited communications with ED, resource constraints, and having to inform and train institutions regarding complex and frequently changing regulations—are less reflective of cooperation and more indicative of difficulties that have hampered states' implementation of federal policies in other contexts as well (see also Creek & Karnes, 2009; Dahill-Brown & Lavery, 2012). Importantly, this study also found that states took certain actions in the implementation process—such as joining SARA and altering student complaint procedures—under pressure from institutions within their state. This indicates that ED's state authorization regulations are coercive on states, but mainly indirectly, by imposing obligations on institutions who then ask states to adapt their policies and practices to help institutions meet federal requirements (see also Poulin & Dowd, 2017; U.S. Department of Education, 2015). Thus, coercive federalism, in which the federal government coerces states to act, can operate in a "roundabout" way—by

imposing obligations not on states but on other stakeholders (i.e., higher education institutions), who in turn pressure state officials to take actions that help achieve federal policy objectives. In other words, even though the regulations did not use the same compulsory language that was used in Title IV of the HEA (i.e., states “shall” take certain actions as part of the Program Integrity Triad), the end result involved states taking action to further federal policy goals.

This research also highlights the important roles that institutions play in implementing federal policy. Previous studies have observed how individuals working in colleges and universities use discretion to implement or resist public policy (Brower et al., 2017). This study has shown that institutions further impact policy implementation by pressuring state governments to take certain acts, such as joining SARA, to make policy compliance easier at the institutional level.

This study also underscores the function and importance of networks and intermediary organizations in cooperative, coercive, and intrastatutory federalism within the higher education policy arena. Abrams et al. (2018) observed that if “higher-level governmental actors... devolve only enough authority to increase efficacy in meeting mutual objectives without creating openings within which governmental authority more broadly comes under challenge,” then the “roles and actions of intermediary actors may prove to be determinative” (p. 259). In the context of states implementing federal policy on postsecondary state authorization, intermediary organizations acted to fill crucial gaps experienced by states in terms of information, coordination, and regulatory compliance. Intermediaries, state agencies,

institutions, and ED also formed crucial networks that have helped states to understand and implement federal policy on state authorization. Specifically, these different actors provided information and resources that kept states informed and active on implementing federal policy. At the same time, intermediaries posed additional challenges for states. For example, some respondents perceived a shortcoming of joining SARA to be the inability to apply greater consumer protection for their state's residents who attend out-of-state institutions. This study also found that state officials' relationships with ED representatives—whether through contacts at ED's regional branches or state agencies' federal relations staff in Washington, D.C.—provided information and otherwise facilitated the implementation process for states. These findings reiterate the importance of networks in intergovernmental policy implementation (Abrams et al., 2018), and underscore the value of good “working relationships” between state and federal officials (Scheberle, 1997).

RECOMMENDATIONS & CONCLUSION

Findings from this study have implications for state and federal policy and practice regarding postsecondary institutional authorization. First, ED should take steps to build stronger relationships with state authorizers. As this study has shown, high-quality relationships between state and federal officials can foster more effective communications between these actors, which can aid state officials in learning about and understanding the complex federal policies they are expected to implement. By cultivating relationships and holding more frequent meetings and other interactive communications with state authorizers, ED can help reduce

uncertainty about the requirements of federal policy and how states can help institutions understand and comply with them. Regional ED offices may be useful in developing positive working relationships with state authorizers in the region.

Second, state authorizers across different states should communicate with each other to share information and resources regarding federal policy. Although there are a good number of differences across states regarding authorization processes and higher education governance, state officials may find it useful to learn about how other states are interpreting and complying with federal policy.

Third, ED and intermediary organizations should include institutions as well as states in conferences, training, and other communications regarding federal policy on state authorization. Providing information directly to institutions as well as states relieves states of the burden of passing along this information to institutions, which can help address the challenges of limited agency capacity and increased costs for states associated with implementing federal policy.

Fourth, in recognition of the costs states and institutions incur due to complying with and implementing federal policy, state and federal policymakers should provide additional resources to help mitigate those costs. This may include additional personnel for state authorizers to dedicate to federal higher education policy compliance, as some respondents indicated such a resource would be particularly useful. Additionally, small increases in appropriations to institutions could help offset the cost of federal compliance, such as fees associated with joining SARA. Finally, because state officials indicated that the complexity of federal regulations

posed a challenge for state-level implementation of those rules, an additional capacity-building exercise could include providing professional development to state-level actors regarding the purpose and content of federal regulations and resources regarding how to implement the rules.

The state's role in safeguarding the quality of higher education is essential. Although the Program Integrity Triad has been subject to criticism over the years (McCann & Laitinen, 2019; Tandberg et al., 2019), this study found evidence that communication between members of the Triad is improving. This study also found that state authorizers' efforts to maintain educational quality and oversight are sometimes hampered by insufficient resources and limited communications with ED. By fostering stronger relationships between state and federal actors and providing more resources for state authorizers to fulfill their roles, the challenges associated with implementing federal policy at the state level can be reduced, and states would be better positioned to safeguard the quality of higher education programs.

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APPENDIX 1: INTERVIEW PROTOCOL²

Background

1. Interviewee's Background (current and previous professional positions)
2. Please describe the process for higher education institutions to obtain authorization to operate in your state.
3. How does your agency communicate with institutions regarding state authorization requirements?
4. Regarding participation in the State Authorization Reciprocity Agreement (SARA):
 - a. All states except California: Has participation in SARA been beneficial for your state? Why or why not?
 - b. California: Has not participating in SARA been beneficial for your state? Why or why not? Has there been any consideration of participating in SARA? Please explain.

Role of State Authorizers in Implementing Federal Policy

5. Please describe the following:
 - a. Your agency's role in the Program Integrity Triad under Title IV of the Higher Education Act, through which states – together with accreditors and the U.S. Department of Education – are charged with maintaining educational quality for institutions receiving federal student aid funds.
 - b. Your state's process for collecting and addressing student complaints about higher education institutions.
 - c. Your state's process for responding to federal reporting requirements for state authorizers.

² Almost all interviewees were either employed by state authorizing agencies or state-level higher education agencies or systems. In a few cases, some interview protocol questions (e.g., regarding the agency's role in the Program Integrity Triad or in collecting student complaints) were not applicable to the interviewee's role. Most questions in the protocol, however, were applicable to all interviewees.

- d. How your state provides verification of institutional authorization to the federal government.
- e. Your state's process for determining whether an institution is religious for purposes of exemption from Title IV requirements.
- f. [For each aspect of Title IV implementation listed above, ask the following probes/follow-up questions:
 - i. Has your state or agency experienced any difficulties in fulfilling this role? If yes:
 - 1. What were those difficulties?
 - 2. What do you believe caused them?
 - 3. How did your agency address those difficulties?
 - ii. How does your agency communicate with the U.S. Department of Education regarding this role?
 - iii. How does your agency communicate with institutions regarding this role?]

State Authorizers' Responses to Federal Policy Change

- 6. How did your agency learn about the following changes in federal policy (for each policy listed in this section, the interviewer will provide a summary of the policy's main points if the interviewee asks for clarification of the policy):
 - a. The 2010 Department of Education state authorization regulations?
 - i. What was your state's response to this policy change?
 - ii. Did your state encounter any difficulties in responding to this policy change? If yes, please describe what those challenges were and how your agency addressed them.
 - b. The 2016 Department of Education state authorization regulations?
 - i. What was your state's response to this policy change?
 - ii. Did your state encounter any difficulties in responding to this policy change? If yes, please describe what those challenges were and how your agency addressed them.
 - c. The 2019 Department of Education state authorization regulations?
 - i. What was your state's response to this policy change?
 - ii. Did your state encounter any difficulties in responding to this policy change? If yes, please describe what those challenges were and how your agency addressed them.

7. From time to time, the U.S. Department of Education issues guidance in the form of "Dear Colleague" letters, providing instructions or clarifications about regulations. Since 2010, the Department of Education has issued several "Dear Colleague" letters regarding state authorization regulations. Are you familiar with any of the state authorization "Dear Colleague" letters? If yes:
 - a. Which ones?
 - b. How did you become aware of them?
 - c. How did your agency respond to the letters?
 - d. Did your agency communicate with higher education institutions about the letters? Please explain.

Working Relationships and Other Challenges

8. What is your overall assessment of your state's working relationship with the federal government regarding federal policy on the Program Integrity Triad and state authorization regulations? How might that working relationship be improved?
9. Other than what we have already discussed, what challenges has your state faced in fulfilling its obligations under Title IV of the Higher Education Act?

Conclusion

10. Are there any important issues regarding your state's responses to federal policy on postsecondary state authorization that we have not yet discussed?
11. How can we obtain access to documents that reflect your state's response to federal policy on state authorization?
12. [For earlier interviews] Who are some other individuals in your state that we may contact for an interview on this topic?

APPENDIX 2: DOCUMENT COLLECTION PROTOCOL

Document Type	Federal/National	All Five Case-Study States
Laws, Policy, and Guidance	HEA, Title IV ED's state authorization regulations and guidance	State-level statutes, regulations, and sub-regulatory guidance regarding higher education authorization relating to federal policy on state authorization or the Program Integrity Triad
Forms and Procedures	Instructions and forms relating to state authorization issues and the Program Integrity Triad	State authorization instructions and forms Student complaint process instructions and forms Other instructions and forms relating to federal policy on state authorization or the Program Integrity Triad
Reports/News Articles	Reports and articles obtained through Internet and news database searches regarding obligations for states and state-level implementation of federal state authorization policy and the Program Integrity Triad	Reports and articles obtained through Internet and news database searches regarding the case-study states' implementation of federal state authorization policy and the Program Integrity Triad
Websites	Website searches of ED, NC-SARA, associations representing higher education leaders and administrators, associations representing state authorizers, higher education compacts, accreditors, and similar organizations for information about state-level implementation of federal state authorization policy and the Program Integrity Triad	Website searches for state authorizers and other relevant state higher education agencies, state-level associations representing higher education leaders and administrators, and similar organizations for information about the case-study states' implementation of federal state authorization policy and the Program Integrity Triad