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State Postsecondary Authorization: A Mixed-Methods Analysis of Reauthorization Processes and Agency Capacity

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Abstract

States serve as the central authority in higher education oversight, playing a critical role in consumer protection and quality assurance within the regulatory triad and as an independent regulatory entity. However, there is a notable gap in understanding the components of renewal processes, how agencies implement them in practice, and the practical and capacity challenges these agencies face. To address this, we developed a systematic 50-state inventory and conducted interviews with 24 staff members to evaluate state reauthorization processes. We examined agency capacity and the stringency of processes using accountability metrics across reauthorization and reporting, supported by insights from the interviews. This analysis revealed significant variation in governance structures and the approaches state regulators use to make sense of their roles and maintain continuous oversight and regulation. It also highlighted discrepancies between formal laws, regulations, and applications and what occurs in practice. Despite limited capacity among most agencies, we identified several states employing noteworthy strategies, such as leveraging robust data systems, other state actors and intermediary networks, consultants, and other resources, to enhance their regulatory effectiveness.

Keywords: state authorization, reauthorization, accountability, governance, regulatory agencies

State Postsecondary Authorization: A Mixed-Methods Analysis of State Reauthorization Processes and Agency Capacity

State authorization—the process by which states grant postsecondary institutions the authority to operate and/or award degrees—has taken on greater significance in higher education amid rising concerns about predatory colleges, institutional closures, and increased scrutiny of accreditors’ role in ensuring quality and accountability (Burns et al., 2023a; Contreras, 2013; Tandberg et al., 2019). Grounded in the 10th Amendment’s reserve clause, state authorization serves as the strongest leg of the regulatory triad, alongside the federal government and accreditors. Together, these entities form the core of the broader accountability system for institutional quality and financial aid eligibility, while organizations like NC-SARA provide additional oversight in distance and inter-state education. As the foundational requirement upon which the other actors rely, state authorization is critical to the system’s function. However, the triad has not consistently delivered the intended interlocking oversight, often leaving states with the primary responsibility for consumer protection (Harnisch et al., 2016; Natow et al., 2021). Moreover, state authorization also remains the primary quality-control mechanism for nonaccredited, nondegree-granting, and private career institutions, which often lie outside the scope of accreditation (Merisotis, 1991; Ness et al., 2021). This broad reach makes state authorization a vital safeguard in ensuring institutional accountability and consumer protection across higher education.

Across the United States, state authorization agencies operate within a diverse array of governance structures and regulatory frameworks. Some are housed within consolidated governing or coordinating boards, while others function independently or outside traditional higher education governance entirely (Ness et al., 2021). Agency size varies widely both within and across states. The initial authorization of postsecondary institutions has been studied (Jung et al., 1977; Ness et al., 2021), but less attention has been given to reauthorization processes and the ongoing responsibilities of state agencies, despite their equally critical role. Many states require institutions to renew authorization to safeguard student interests, protect consumers, and ensure financial solvency (Arnold et al., 2022). However, many agencies face capacity constraints—limited staffing, technology, and resources—while managing a range of complex responsibilities (Hall-Martin, 2021). These include serving as transcript repositories for closed institutions, overseeing active institutions, providing customer service, conducting site visits, and coordinating with accreditors and other state regulators. State authorizers have sought ways to manage capacity and streamline the authorization process through improved data systems and collaboration. State associations, in particular, play a key role by facilitating convenings and listservs for knowledge sharing. However, questions remain about how effectively agencies oversee institutions beyond initial authorization and whether agencies have the capacity to fulfill their regulatory obligations.

Purpose & Research Questions

This study explores how states oversee institutions beyond initial authorization and assesses the capacity of authorizing agencies to fulfill their regulatory responsibilities. Specifically, we examine:

1. How do states renew postsecondary institutions?
 - How do state agencies use academic, consumer protection, and student outcome metrics in reauthorization and reporting?

- Which data elements are collected and used for reauthorization and reporting?
 - How do these metrics differ by agency type, institutional type, and credential offered?
2. How do agency resources and staffing affect reauthorization processes?
- What staff time, resources, and technology support the reauthorization process?
 - How do capacity needs vary by agency type, credential, institutional control, and modality?

Literature Review

The body of research on state authorization has evolved unevenly over time and largely lies in the grey literature. Early foundational studies laid out key frameworks and identified broad concerns (Jung et al., 1977; Millard, 1979), but follow-up inquiries remained sporadic for decades (Merisotis, 1991). More recent efforts have reinvigorated attention to consumer protection and institutional accountability (Boatman & Borowiec, 2021; Burns et al., 2023a; Contreras, 2013; Hall-Martin, 2021; Tandberg et al., 2019), yet the scholarly landscape still shows significant gaps in understanding how reauthorization processes unfold in practice (Baser, 2024).

Several studies have provided extensive context on the state authorization landscape through inventory analyses (Delgado, 2018; Jung et al., 1977; Ness et al., 2021). Notably, Jung et al. (1977) mapped and examined 184 oversight agencies across all 50 states, highlighting a wide range of regulations and inconsistent enforcement by institution type. Their call for stronger, more uniform regulatory standards remains relevant today, particularly as states contend with predatory, poor-performing, or low-quality institutions. Building on this and other earlier work (Tandberg et al., 2019), Ness et al. (2021) conducted one of the most comprehensive modern analyses of state authorization, introducing a process-level stringency framework that quantifies regulatory rigor across 41 metrics by institution type. Their findings, based on 65 agencies and more than 100 processes, underscore the significant variation in the stringency and comprehensiveness of front-end authorization policies. They found that states often rely on accreditors to handle much of the quality control for degree-granting institutions, allowing agencies to allocate limited capacity toward institutions requiring greater oversight. Taken together, these studies highlight the wide variation in state processes and the critical role of authorization in ensuring effective oversight and student safeguards.

Researchers and advocates have called for further examination of how initial authorization policies compare to reauthorization and reporting processes. At the same time, persistent capacity challenges—staffing, technology, and financial resources—can weaken even the strongest regulatory standards and processes. Understanding the relationship between these regulatory processes and the capacity required to sustain them is essential for identifying solutions that strengthen state oversight, improve the regulatory triad, and protect students and taxpayers.

Conceptual Framework

We used principal-agent theory and sensemaking theory to examine state renewal policies and how agency staff interpret and implement them (Eisenhardt, 1989; Weick, 1995). Principal-agent theory explains how state authorizing agencies (principals) oversee postsecondary institutions (agents) despite information asymmetries. These asymmetries create risks such as adverse selection (initially approving an institution that may not meet standards) and moral hazards (an institution failing to uphold commitments after approval). To mitigate these risks, agencies implement monitoring mechanisms—

such as renewal processes, reporting requirements, and compliance reviews—to ensure institutions adhere to regulatory standards and fulfill their commitments over time. Sensemaking theory helps explain how agency staff make sense of their roles and organization within complex regulatory environments and capacity limitations (Hall-Martin, 2021; Ness et al., 2021; Weick, 1995). These staff members navigate evolving federal, state, and accreditor expectations, balancing competing demands while making policy decisions (Lipsky, 1980). Together, these frameworks illuminate both the structural challenges of state authorization and the decision-making processes of agency staff.

Research Approach

We employed a convergent parallel mixed methods design (Creswell, 2014), combining a nationwide policy inventory of state renewal requirements with qualitative interviews of agency staff. This two-phase approach allowed us to examine broad trends while also capturing the practical realities that staff face in carrying out reauthorization. Full methodological details—including data sources, coding procedures, and analytic protocols—are provided in the technical appendix.¹

In the policy inventory, we reviewed each state’s statutes, regulations, applications, and official agency materials to identify the governing entities and agencies responsible for authorization, as well as the specific processes each agency administers. This allowed us to develop conceptual maps of state authorization actors and the institution types they oversee, reflecting the extent to which authority is consolidated or dispersed. Guided by the Ness et al. (2021) framework, we cataloged 22 key metrics across organizational and academic standards, consumer protection measures, and student outcome requirements for reauthorization and reporting. Each metric was assigned a three-point stringency score (range: 0 to 2), with sourcing (statutes, regulations, applications) independently inventoried. We then collapsed the 0-to-2 metric scores into a four-band ordinal scale (Minimum, Low, Moderate, Maximum) by (i) summing the 22 metric points for each renewal or reporting process and slotting the raw total into its appropriate bin, and (ii) averaging those process totals to create parallel agency- and state-level means before assigning the same four-band labels. This approach enables systematic comparisons of how states and agencies manage renewal and reporting and how these processes vary based on specific metrics.

Next, we conducted 24 interviews with staff from 16 agencies in 11 states. We recruited participants at both frontline and managerial levels to explore how agencies use (or struggle to use) reauthorization policies in practice as well as the capacity of these agencies. Interview data were recorded, transcribed, and coded in MAXQDA to reveal themes around capacity constraints, practical enforcement challenges, and the interplay between policy design and actual oversight. This mixed methods design integrates quantitative and qualitative findings, shedding light on both the formal rules guiding reauthorization and the on-the-ground realities that shape whether these rules effectively protect students and uphold institutional quality.

¹ Baser, S. M., Dean, M. T., Walker, W. B., Jr., & Maldonado, M., (2025). *State reauthorization research: Technical Appendix*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2025/07/StateAuthorization_TechnicalAppendix.pdf

Inventory Findings

Postsecondary Authorization Structures

Our inventory analysis reveals significant variation in how states organize postsecondary authorization processes and their stringency. As shown in *Table 1*, the inventory includes 48 state higher education agencies, 10 independent authorizing agencies, seven departments of education, five departments of consumer affairs, four departments of labor or workforce, two dual responsibility agencies, and South Dakota’s Secretary of State. Among the 48 state higher education agencies in our inventory, structures vary: 29 operate as coordinating boards, 10 as governing boards, and nine as service agencies. Two states use multiple agencies to administer a single authorization process.

Table 1

Counts of Agencies by Type Responsible for Authorization Processes

AGENCY TYPE	COUNT
State Higher Education Agency	48
Independent Authorizing Agency	10
Department of Education	7
Department of Consumer Affairs	5
Department of Labor/Workforce	4
Dual-Agency Responsibility	2
Secretary of State	1
Total	77

Notes:

¹ Some state higher education agencies operate within state departments of education, but are SHEEO members and considered distinct higher education agencies.

² The New Jersey Department of Labor and Workforce and the New Jersey Department of Education are combined under the Dual-Agency Responsibility category, rather than listed separately under the Department of Labor/Workforce or Department of Education categories.

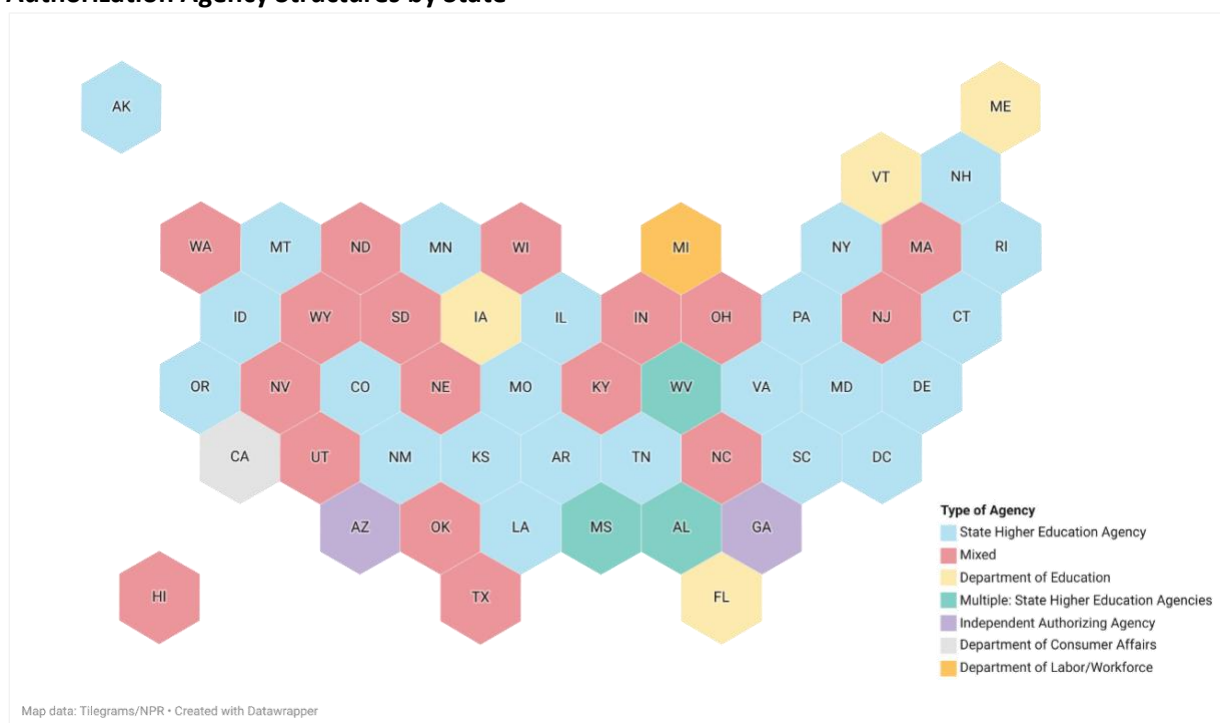
³ The bifurcated process overseen by the Alabama Commission on Higher Education and the Alabama Community College System is included in the Dual-Agency Responsibility category. Because each oversees a separate process, both are also counted under the state higher education agency category.

While most states assign clear and centralized responsibility to a single agency, a few adopt more complex or functionally divided models that warrant closer examination. In New Jersey, multiple agencies (the Office of Higher Education, Department of Labor, and Department of Education) share responsibility for authorization. The state uses a dual process for private career schools: the Department of Labor oversees the application process and business function review, while the Department of Education handles the quality review of educational programs. Alabama presents a similarly distinct structure. The Alabama Community College System serves as the primary administrator for private career schools and degree-granting institutions, while the Alabama Commission on Higher Education provides support through degree program review. These two states stand out for dividing core authorization responsibilities across agencies based on function. Several other states—Indiana, Arkansas, Mississippi, North Carolina, and Pennsylvania—employ a governance model in which authorization responsibilities are administered by a state higher education agency but overseen by a separate board or commission. For example, in Indiana, the Commission for Higher Education (office) manages authorization but operates under the oversight of the Indiana Board of Proprietary Education,

rather than its standard governance entity. Similar arrangements in the other states create parallel governance structures, where authorization functions are partially decoupled from the broader administrative oversight of the agency. These hybrid models further illustrate the diverse and sometimes fragmented ways states approach authorization.

To support cross-state comparison, we created a state-level classification to categorize how authorization responsibilities are structured across the United States. As shown in *Figure 1*, 23 states assign this responsibility to a single state higher education agency, while 17 states use a mixed model involving two or more different agency types. Four states rely solely on their department of education, and three states administer authorization through multiple state higher education agencies. Two states assign the function to a single independent authorizing agency², one state uses a department of consumer affairs, and another state uses a labor/workforce agency. This classification offers a useful state-level view but necessarily oversimplifies some in-state variation, particularly with the mixed category, which includes every other agency type in some combination.

Figure 1
Authorization Agency Structures by State



Note:

Agency types reflect the primary structure for authorization in each state; all categories except “Mixed” and “Multiple: State Higher Education Agencies” indicate that a single agency of that type is solely responsible. “Mixed” includes states with two or more different agency types, while “Multiple: State Higher Education Agencies” includes states with more than one SHEEO-member agency sharing responsibility.

² Arizona operates two independent authorizing bodies—one focused on SARA and one on private postsecondary oversight—but for mapping, it’s treated as a single Independent Authorizing category.

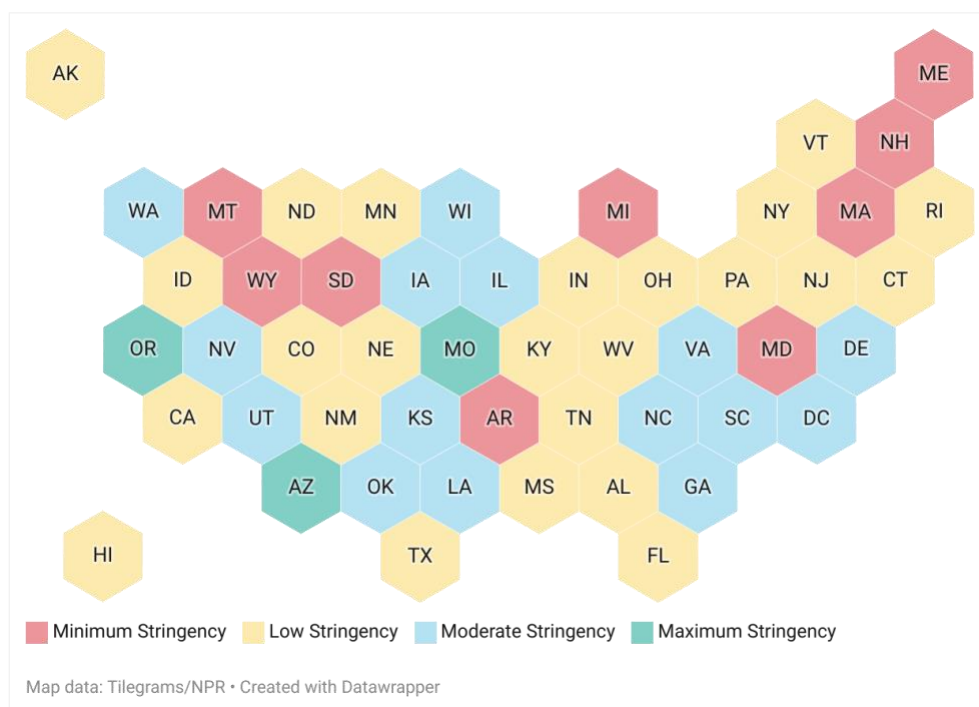
Renewal and Reporting Frequency

Reauthorization frequency and reporting requirements vary significantly across processes. We examined whether each process mandates reauthorization or reporting and at what intervals, analyzing these data at the process level. Annual renewal ($\approx 40\%$) is most common, followed by a 2- or 3-year cycle ($\approx 27\%$), while 4–5-year cycles and variable intervals occur less often. Several agencies tie renewal to accreditation cycles. Reporting requirements beyond standard renewal are less frequent and, when required, focus on student outcomes, financial statements, or accreditation information. Some states (e.g., New York and Maryland) impose no renewal requirement but mandate periodic reporting for certain institutions. In New Jersey, nondegree institutions face annual reauthorization with quarterly student-level reports, whereas Connecticut requires renewal only every three years with no annual reporting. Overall, annual renewal prevails as the most popular strategy for renewal, particularly for nonaccredited and nondegree institutions.

Stringency of Renewal and Reporting Processes

Preliminary scoring of renewal data shows that, on average, most states have agencies that collect academic, consumer protection, and student outcome metrics, though differences exist across categories, agencies, renewal processes, and additional reporting requirements. Of the 22 metrics evaluated, nine states demonstrate minimum stringency, 24 have low stringency, 16 show moderate stringency, and Arizona and Oregon exhibit maximum stringency for reauthorization (see *Figure 2*). Arizona and Oregon have two categories with maximum stringency and one with moderate stringency. Their scores are not diluted by other agencies because they are the sole authorizers for non-SARA processes in their respective states.

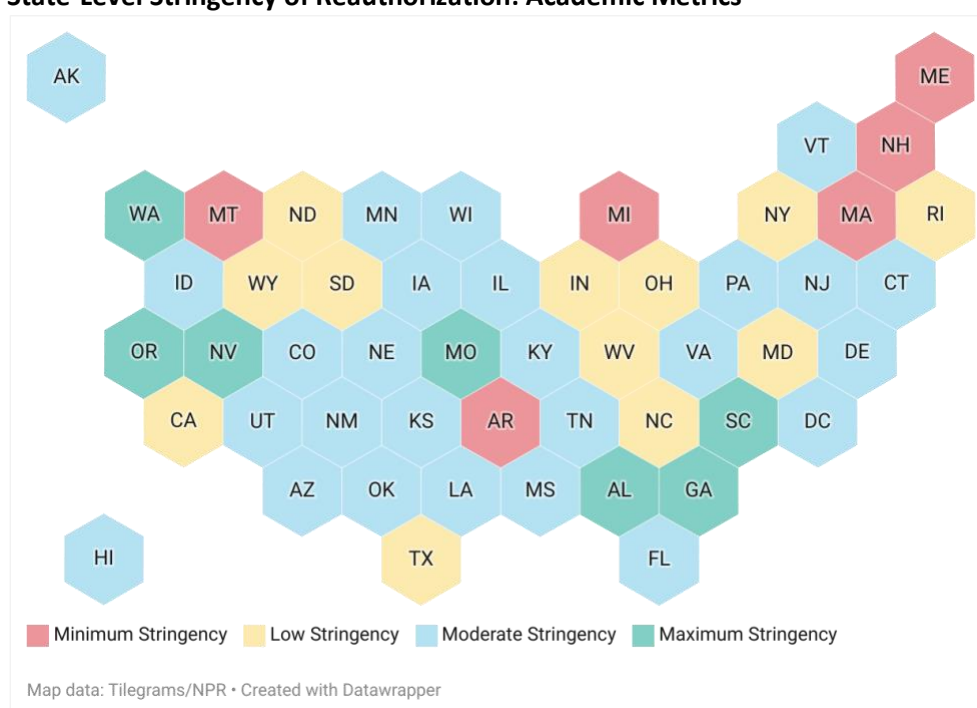
Figure 2
State-Level Stringency of Reauthorization: All Metrics



Academic metrics play a central role in helping states assess the educational quality and transparency of institutions. The metrics collected included accreditation documentation, commonly shared student materials (i.e., catalogs, handbooks), enrollment agreements or student contracts, and tuition and fee schedules. *Figure 3* displays our stringency ratings for academic reauthorization metrics across all 50 states and the District of Columbia. Of the 51 jurisdictions analyzed, seven received a maximum stringency rating, 26 received a moderate stringency rating, 12 received a low stringency rating, and six received a minimum stringency rating. These results indicate that most states apply a moderate level of oversight to academic metrics, while only a few enforce either the most or least stringent requirements.

Academic Metrics

Figure 3
State-Level Stringency of Reauthorization: Academic Metrics



A closer analysis of academic metrics uncovers important differences in how states apply them across process types (reauthorization vs. reporting), institution types, and the specific ways these metrics are collected, used, and enforced. Most states rely on reauthorization processes, rather than annual reporting, as the primary method for regulating academic metrics. Across all processes and metric categories, institutional accreditation information was the most collected metric. States gathered this information in various ways, ranging from basic entries of accreditor name and last approval date to requirements for reporting sanctions or adverse actions (Iowa), publishing accreditation details in course catalogs (Missouri), submitting full accreditation documentation (Florida), and even allowing participation in site visits. Interestingly, some states, such as Georgia, require nonaccredited institutions to disclose their accreditation status to students in an enrollment agreement or catalog. Nondegree and nonaccredited institutions were the most likely to be required to collect enrollment contracts (Alaska, Connecticut, Louisiana). Detailed checklists with page numbers and descriptions of updates to catalogs

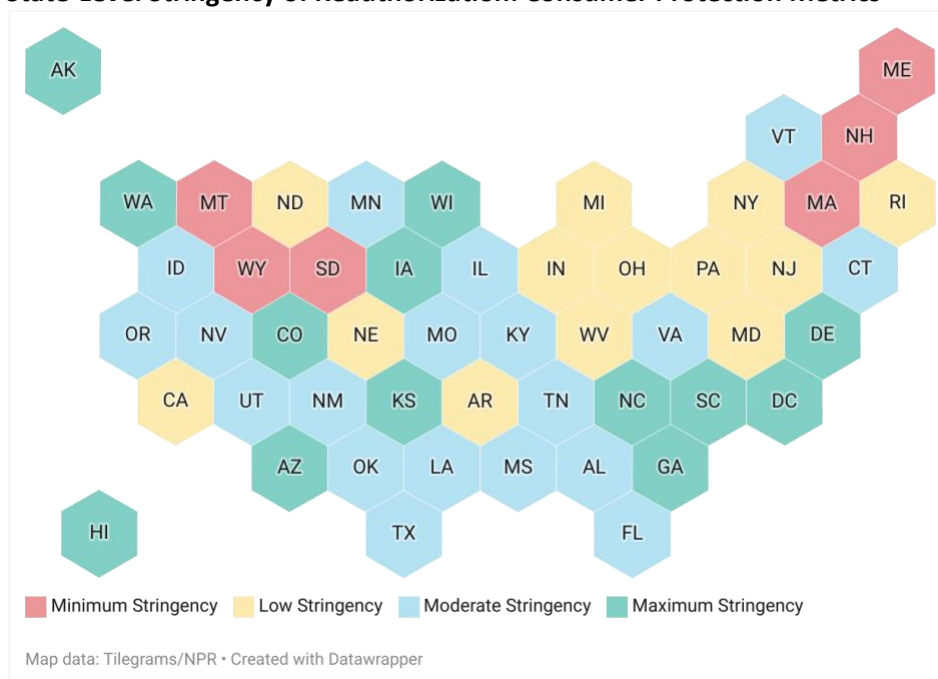
and enrollment agreements since the last reauthorization are common (Missouri, Oregon, Virginia), serving not only to verify these documents but also to assess broader institutional characteristics and student records; similar requirements for student handbooks were less prevalent. Tuition and fee schedules were the second most commonly collected academic metric, ranking ahead of catalogs. States often collected tuition and fee schedules both as stand-alone items in application forms and as embedded elements within catalogs, enrollment agreements, and other student records (Colorado, Kansas, North Dakota). These values frequently appeared in refund and cancellation policies. Academic metrics provide state regulators with essential information to assess institutional quality, uphold their role within the triad of oversight, and ensure students receive accessible, reliable information through required disclosures.

Consumer Protection Metrics

Consumer protection metrics safeguard student rights and ensure institutions meet their commitments and maintain financial stability. Consumer protection metrics included agency requirements related to student complaint policies, student record procedures, school closure or teach-out plans, tuition refund policies, financial statements, and site visits. *Figure 4* presents the stringency ratings for consumer protection metrics for reauthorization processes. Of the 51 jurisdictions analyzed, 13 received a maximum stringency rating, 19 received a moderate rating, 13 received a low rating, and six received a minimum rating. Like academic metrics, most states collect consumer protection metrics through the reauthorization process rather than through ongoing reporting.

Figure 4

State-Level Stringency of Reauthorization: Consumer Protection Metrics



State agencies approach consumer protection through a wide range of policies and practices, reflecting differences in how they monitor institutions and apply oversight strategies. Student grievance and complaint policies, along with tuition refund policies, are among the most common consumer protection metrics collected in state reauthorization processes, providing students with clear pathways to resolve

disputes and seek financial redress when institutions fail to meet advertised services or obligations. Agencies often require these policies to be published in accessible formats, such as catalogs, enrollment agreements, or websites (Virginia, Washington, Wisconsin). For refund policies, many states mandate calculated refund tables based on cancellation timing to standardize refund amounts (North Carolina, Nebraska, Oklahoma). Some agencies further strengthen complaint procedures by requiring institutions to outline how students can escalate unresolved issues to the authorizing agency or other governmental entities (Indiana, Iowa, North Carolina).

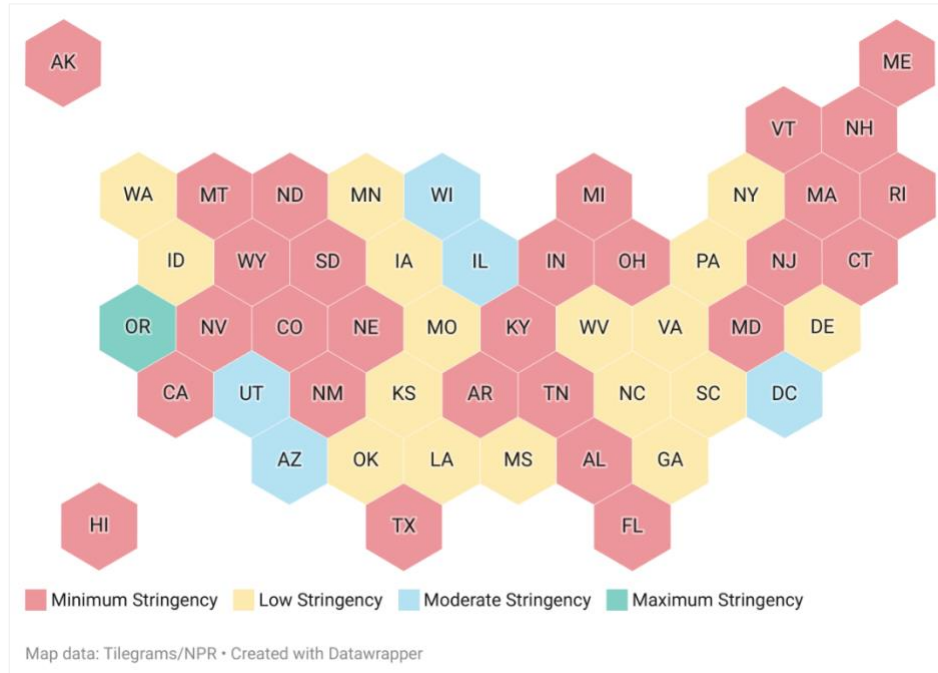
Surety bonds and tuition recovery funds both serve as financial safeguards, aiming to protect students from losses due to institutional closures or fraud. While recovery funds are less common, some agencies require institutions (namely, nondegree-granting institutions) to contribute as part of the renewal process, often limiting this obligation to a set number of years before granting exemptions (Iowa, Florida, New York, Ohio, Florida). States also monitor financial stability by requiring annual proof of surety bonds and adjusting bond amounts for poor performing institutions as permitted by law or regulation (New Hampshire, Tennessee, Wyoming). Audited financial statements are another critical tool for assessing an institution's financial health and long-term viability, and many agencies require them as part of the reauthorization process (Arizona, Arkansas, Colorado, Georgia). To further verify institutional operations, some agencies conduct site visits beyond initial authorization (California, Washington, D.C., Oklahoma), retain the right to make unannounced visits (Hawai'i), or partner with accreditors and other state agencies (Ohio, Texas). In certain cases, agencies also require institutions to cover the costs of these visits as a condition of renewal (New Jersey, Pennsylvania).

Student record procedures and school closure plans are closely linked. Agencies often specify which records must be maintained (Colorado, Georgia), require institutions to inform students how to access them (Mississippi, Missouri, Vermont), and in some cases, actively request example records during renewal or closure (Connecticut, Nebraska, New Jersey). While many agencies require institutions to notify them of closures as they occur, stronger practices mandate detailed closure plans, including teach-out arrangements, as part of routine reauthorization rather than at the time of closure (Maryland, Vermont, Rhode Island).

Student Outcome Metrics

Student outcomes metrics are key indicators of both student success and institutional performance. These included measures of persistence, enrollment, graduation, job placement, wage data, debt-to-income ratios, loan default rates, and state licensing exam results. Despite their importance, student outcomes metrics are the least commonly collected among all categories in state reauthorization processes. *Figure 5* displays the stringency ratings for student outcomes metrics across all 51 jurisdictions. Only Oregon received a maximum stringency rating. Five jurisdictions received a moderate rating, 17 received a low rating, and 28 received a minimum rating. Although this is an improvement compared to initial authorization, these results suggest that few states currently incorporate robust student outcomes data into their reauthorization processes across all agencies and processes.

Figure 5
State-Level Stringency of Reauthorization: Student Outcome Metrics



States differ in how they define, collect, and apply student outcomes metrics. Some rely on a single institution-level aggregate figure, while others require detailed program-level data disaggregated by demographics. Most often, data is collected directly on the application via entry boxes or spreadsheets. A few states have developed integrated systems to collect validated student-level data, allowing them to verify accuracy across reporting cycles and link to external systems such as workforce, licensure, and longitudinal student records (New Jersey). An important outlier for student outcomes is their prevalence in additional reporting requirements. While some states collect all metrics through annual or biennial reauthorization, others—such as Florida, Alaska, California, Tennessee, Nevada, New Mexico, and Texas—specifically require student outcomes data through separate reporting processes. Some state agencies (Indiana, New Jersey) require these reports on a quarterly basis. In states with reporting requirements, metrics like enrollment, graduation, job placement, and persistence are collected more frequently than any academic or consumer protection metrics. States vary widely in whether agencies require this information for internal use only or for public reporting through catalogs, institutional websites, or agency websites.

Although student outcomes are among the least collected metric categories overall, enrollment ranks among the top 10 most commonly required metrics for reauthorization. Enrollment data are used not only to measure student success and assess institutional health but also to determine other requirements, such as surety bond amounts (Delaware, Louisiana, North Dakota). Importantly, enrollment often serves as the foundation for calculating other key outcome metrics, including graduation, job placement, and persistence rates. In contrast, wage data, cohort default rates, and debt-to-income ratios were rarely collected (Oregon). These metrics present greater challenges, requiring access to employment and financial records that are difficult to obtain and validate. Despite these hurdles, some state agencies, such as New Jersey’s Department of Labor & Workforce Development, have successfully linked wage data to inform both consumer information and internal oversight.

Dissecting Renewal Stringency: Institutional Type, Accreditation Status, and State Approach

Examining these metrics across states, agencies, and institution types uncovers further nuances. For example, Arizona's private board is one of the most stringent regulatory bodies on paper, with annual renewal requirements and data collection across nearly all inventoried metrics. There is substantial overlap in requirements for both accredited and nonaccredited institutions; however, Arizona does not require nonaccredited institutions to submit certain information. In contrast, California demonstrates significant variation across its three processes—accredited, nonaccredited, and out-of-state—with the only commonalities being annual reporting, tuition protection fund requirements, and a five-year reauthorization cycle. The California Bureau for Private Postsecondary Education requires accredited institutions to submit minimal data during initial authorization or reauthorization (limited to accreditation and ownership information), but the agency mandates an annual performance report and additional documentation (e.g., catalogs and enrollment agreements) covering specific metrics on graduation rates, job placement, wage data, and state exam passage rates. For nonaccredited institutions, reauthorization and annual reporting requirements are more extensive, with a strong emphasis on consumer protection. Out-of-state institutions, as an alternative to SARA, undergo a registration process with a simplified application focused on accreditation and participation in a student protection fund, with no annual reporting requirements. Taken together, our sample shows that most states have more stringent requirements for nonaccredited and nondegree-granting institutions (e.g., Arizona, Indiana, Minnesota, Connecticut, Georgia), the least stringent requirements for exclusively out-of-state (no physical presence) institutions, and a frequent reliance on accreditors or the state of initial authorization to fulfill much of the quality control function.

Emergent Considerations for Consumer Protection Oversight

In addition to the metrics explicitly targeted in our inventory, we identified several emerging practices that may be of interest to agencies seeking to strengthen consumer protection efforts. While not universally required, some agencies collect additional indicators that serve as early warnings of institutional instability or declining quality. These include data on faculty or administrator turnover, student complaint statistics, and other markers that may signal organizational turmoil or an inconsistent student experience. States also continue to rely on accreditation to evaluate degree-granting and accredited institutions, influencing evaluation frequency and site visit practices. For example, agencies may use accreditor site visit reports instead of conducting their own and they may waive requirements for student outcomes, financial statements, surety bonds, or tuition recovery funds for these institutions.

Several states have revised existing policies or are in the process of introducing new ones specifically addressing cross-border distance education and non-NC-SARA institutions. For example, Oklahoma is implementing substantial legislative changes to address distance-only programs and adjust processes for degree-granting institutions, while California recently amended its laws to clarify requirements and timelines for out-of-state institutions. We also observed that in some states, particularly in parts of the Northeast and the West, smaller student populations or fewer institutions corresponded with less stringent consumer protection practices, possibly reflecting a perception of lower risk or a smaller scale of potential harm.

Interview Findings

Data Infrastructure, Data Collection, and Data Use

Interviews revealed significant variation in data infrastructure, collection, and use practices across state agencies. In addition to application information, state regulators described collecting and managing vast datasets for legislative requests, compliance reporting, FOIA requests, site visits, student transcripts, and complaint data. States vary significantly in their approaches, using systems that range from paper-based applications to PDF storage, to more advanced integrated or third-party solutions like EDvera. One regulator described their agency's shift from a basic Microsoft Access database and paper applications to an integrated third-party platform that captures workflows and centralizes processes:

"One of a couple of nice things about [the system] is that it captures workflows, whereas Access was just a repository of data...we put all our application processes into the system.... So, there's no more paper stuff. We have schools fill out their applications online. We review it online. We leave comments online, we invite the experts to come in. You know, we do scheduling online."

This transition allowed for comprehensive data management. As the regulator explained, "Everything's done in [the system]... Our NC SARA application is on there. We keep records of staffing...transcripts, and third-party education verification requests...So, it's the whole everything and the kitchen sink." Although the platform lacks public-facing dashboards, its centralized functions have streamlined audits and simplified record access, making the administrative process more efficient over time.

Several state regulators discussed migrating to or considering the adoption of regulatory software, notably EDvera, to streamline database management and data collection. One regulator at an authorizing agency highlighted the platform's impact, stating it "digitized all of our applications." Another agency staff member, considering a similar transition, explained:

"So, it's about a year and a half, two years ago now, on a Saturday, I saw a demo of EDvera and with seven years of experience with a database in an hour and a half demo or so, I never could come up with something that they weren't already geared to do. The neighboring states, I think [State], [State], maybe [State], you know, but states we know about use EDvera.... It's a smart system, you know, the schools only have to touch certain information once. Boom. They upload it, they're done. It would save their time. And then we could go on to more advanced data analysis. You know, so, some sort of comprehensive database is our dream."

Despite these improvements, gaps in data collection, particularly around private career institutions and nondegree-granting programs, left some regulators wanting more in terms of quantity and quality. As one state authorizer at a higher education coordinating board noted:

"Currently with [private career] institutions, we're doing a simple survey of students in the program and graduates, of course, you could go further and get student-level data as we do...with the public institutions. That's an area that we've had a lot of difficulty with. I found that over the years when we try to get student-level data from [private career] institutions, it was with some institutions it was nearly impossible to get accurate data. They just could not do it. It's, you know, [4-year flagship], [4-year public], they have entire data departments. But when you're dealing with one individual or just a few individuals operating in, they're also instructing,

teaching the programs. They're not capable of submitting data into a system. So, there are some areas that could be, that could use some help."

Another recurring challenge is the lack of expertise and capacity within the agency to thoroughly evaluate data collected from institutions. Several regulators noted the need for specialized expertise to analyze institutional financial information. For instance, when asked how they interpret financial documents required in the authorization application or whether they have access to external CPAs for assistance, an authorizer for private career schools admitted: "That's where I would say we lack.... I just look at the documents that they provide us and use my best judgment... We just don't have the funding... I do go through all that. But that really isn't my background." Another agency executive director highlighted the value of having multiple CPAs for investigations and monitoring underperforming institutions, while also noting certain limitations:

"I have 2 CPAs on that, so it's very helpful to me, because I'm not a CPA and they dig deep...one of them is a forensic CPA, so it's very helpful to us to be able to rely on those CPAs to provide us the right types of questions to ask these institutions."

However, they later added that his top capacity need is a dedicated professional to get "in the weeds" of the data, saying, "I have two board CPAs, but they get paid \$50 a meeting...and they have real jobs. So, it would be great to have, like an investigative forensic CPA that would be able to help us with the questions."

Other agency staff echoed similar concerns about the need for additional FTEs to use the data and manage the workload. Reflecting on the number of staff they have, one authorizer for degree-granting and nondegree-granting institutions stated: "It's not sufficient...I think we need maybe 2 or 3 more full time." Others reported being overwhelmed by the need to handle a significant number of transcript requests and complaints. A state authorizer for private postsecondary institutions emphasized this need, noting they required a dedicated FTE solely to fulfill transcript requests:

"We are the repository for any school that goes out of business...So, we have some big institutions that went out.... We have, you know, the ITT, Corinthian, Art Institutes, Argosy University.... So, we have currently about 2.9 million documents that are acquired from these institutions that have closed. So then, we have countless requests for students to ID my transcript because I want to transfer, or I want a job.... So that's her responsibility. That's a full-time position that does nothing but transcript request information."

While some agencies struggled with staff capacity to manage the information they collect, others have benefited from existing infrastructure and technological investments to maximize data use and reduce the need for FTEs in specific areas. An executive leader of an authorizing agency for private schools emphasized a culture shift around the use of data and the value of transitioning to EDvera and other data systems:

"I made everybody get rid of their printers so that they can't buy ink. They can't buy paper because I don't care what's on your desk. I care what's in the system because that's the thing that I can hold someone accountable to, so that process has been great.... Where in some cases it might take some people months to prepare a FOIA Request, I could probably get it done in a week or less because everything is right there. It's just a matter of formulating the query and going, pulling, and extracting the information. And I can. And we've had some big FOIA

requests...And I don't need to hire a team to go out and do that. I can pretty much on the fly figure it out."

This cultural shift toward improving data systems and use highlights how strategic data infrastructure can streamline processes, reduce reliance on additional staffing, and embed data accountability within agency operations.

Networks and Knowledge Sharing for Effective Regulation

Another key finding from conversations with state authorizers was the critical role of building networks and engaging in knowledge sharing to navigate the regulatory responsibilities of the agency. Regulators noted that the complexity of the regulatory landscape has intensified the challenge of managing relationships within the triad, often creating tensions around communication. To overcome this challenge, some agencies have prioritized building strong, individualized relationships with other members of the triad. As the executive leader of a private postsecondary authorizing agency explained:

"I think it's important to have the relationships with [other members of the triad]. You find your key couple of people in the Department of Ed., and they'll help you. And that has been helpful to me, and then the other part [*sic*] is the accreditation."

Another state authorizer of degree- and nondegree granting institutions described this relationship building process with triad members as "this mini ecosystem of working more collaboratively with folks." In fact, this intentional investment in building their network has helped this authorizer improve oversight of their respective institutions by gathering valuable insights when concerns arise from other triad members:

"And I think it's important to have that connection, so that if there is an issue. I currently have a school [with a] fairly serious problem [*sic*], and the accreditor and I have been working back and forth. Every couple of weeks we have a conversation about what our next steps could be or should be."

While many regulators acknowledged the importance of collaborating with accreditors and the U.S. Department of Education to facilitate information sharing, they frequently reported significant gaps in communication, especially with accreditors. As a regulator for an independent authorizing agency stated:

"We all need to be pretty equally responsible and active in the processes and in the communication, because sometimes they're [accreditor] privy to information that we were not made aware of. And we find out at a later date. And then it's affected some actions in the state or their operations in the state that if we had known earlier, maybe we could have made some movement towards."

Regulators also described frustrations with infrequent interactions and a lack of transparency amongst the triad members, like sharing specific instances where key information was withheld by other members of the triad during critical events like closures:

"I was very aggravated with the way that the triad worked. When the Art Institute closed, this left about 400 students in the lurch here. We had a meeting with the Education Department,

with [accreditor], and then with the states. So, it was us, [State], [State], and [State] all on that call. And [accreditor] said, 'Well, we required a teach-out plan last year,' but none of that was communicated with us. We didn't know that they had required a teach-out plan back in 2022. If they had, we would have probably tried to escalate our efforts with them, but in any case, when we asked for some information, they said, 'Well, we really can't give that to you. We have to give that to [ED] and then they can give that to you if they want,' and my head almost exploded. Because, I said, you know, we're the triad. We're supposed to be working together here. We're not working at opposite ends. If you see something, say something. And if you have something that can benefit us, let us know, because in the end, [accreditor], when this institution closes, you wipe your hands. It's done with. But then the students are with us, and we have to deal with the fallout."

The inability to access key information from other triad members was described by several state regulators as a barrier to fulfilling their responsibilities. Participants noted that communication breakdowns limited their ability to respond effectively to institutional concerns, particularly during high-stakes events such as closures. In addition to working within the regulatory triad, state regulators build networks with each other to facilitate collaboration on shared oversight, share best practices, and foster a sense of community and support. One way authorizers build these networks is by attending conferences of accreditors and membership organizations. As one executive leader noted:

"It's important to be seen, be heard. Ask questions. I attend NASASPS, and obviously invite them all to attend our conferences. I go to every HLC Regulatory conference. I mean really everything that you can go to be seen."

Staff reported building these networks through formal channels such as joining membership associations (e.g., NASASPS and SHEEO) and attending conferences and similar convenings, where they connect with other state authorizers, co-regulators (e.g., licensing boards), and accreditors. By meeting officials conducting similar work at other agencies and states, authorizers can stay in touch and communicate over shared struggles or concerns about institutions. One executive at a state higher education agency described a network of actors for knowledge sharing:

"Through SHEEO, I know all of the SHEEOs. And, Aaron Thompson and I have become very good friends...[It's] not uncommon for me to call Aaron and find out what he's up to.... [or ask] Have you heard of this? These players, what do you think about this? [It] was not uncommon at all for me to call Harrison Keller in Texas and ask similar questions. I have a feeling I'll be doing that with the SHEEO in Ohio now, Mike as well. [sic] There is a sort of group of people who call each other and talk when they need, when they need help, or just want to talk through something."

Beyond SHEEO, other state regulators emphasized the importance of a broader network for sharing best practices and addressing common challenges:

"We all have a common interest of finding best practices and ways of handling things. Every state seems to be different, but, a lot of times, I think the private institutions, we have less resources because the focus is on publics. And so, having colleagues that you can call up and say, 'You know, like, how are you handling this?' or, 'what do you know about this school that's also in your state?' has been very helpful."

In addition to informal networks, many regulators highlighted the value of the NASASPS Listserv, where officials frequently exchange emails to gather insights or address concerns about specific institutions:

“We’re on a listserv. So, we’re all on an email chain where we can say, you know, this institution emailed us and, you know, their application was really spotty. Has anybody else had any, you know, correspondence with them? Oftentimes, it’s ‘oh, I have worked with them and they’re great people. They are just not, they’re just practitioners. They’re not, you know, they’re not administrators. They just need a little bit of support’ or, ‘you know, we think this might be a diploma mill issue.’ So it helps us sort of share those resources and share information. You know, a lot of times, [sic] we’ll be able to share that, oh, you know, we’ve actually gone through some sort of regulatory action with them. And these are the steps that we’ve taken so far. And that helps us inform our process when we’re looking and reviewing applications as well.”

Overall, state regulators reported that the networks they build through membership organizations, convenings, listservs, and co-regulating agencies, such as licensing boards, serve as vital tools in their continuous monitoring of institutions.

Balancing Capacity & Enforcement

While all authorizing agencies are tasked with regulating their respective institutions, the degree to which they are empowered to conduct ongoing oversight and enforce compliance with state laws, regulations, and processes varies widely due to resources, politics, and statutory power. Without adequate staffing in place, state authorizers reported glaring oversight issues—reduced site visits and limited monitoring—may go unaddressed, potentially leaving students unprotected. One state regulator shared a powerful example illustrating the risks posed by insufficient oversight and the urgent need for stronger regulatory authority and coordination with criminal justice agencies:

“I was given wind of the fact from the board of massage that there had been some complaints from Texas, actually, that they were taking students from [respondent state] who had graduated from this particular massage school, and they thought that they were victims of human trafficking, sex trafficking.... The board of massage came to us and said, ‘what do you know about this school?’ And I just immediately, and I think anybody who’s ever worked for the public sector knows your biggest nightmare. I mean, biggest nightmare is people being harmed. But, the other big nightmare in a professional capacity is that something hits the papers that you weren’t aware of. It’s like getting called to the principal’s office, you know? And I thought, oh my God, what is going on in these schools? Right. So, I don’t know. There are too many of them. And we’re not out there in the field really doing the kind of check that we need to do. And I think that was what ended up under underlying [it].... So, we really wanted to strengthen our oversight, strengthen our relationships with the criminal justice enforcement side.”

Some agencies reported conducting site visits less frequently than they would prefer, citing workload, cost, and other constraints that limited their ability to monitor institutions effectively. Highlighting the implications of limited staffing for ongoing oversight, one director of nondegree-granting institutions expressed concern about how far behind her agency had fallen on renewing institutions:

“So, we have three months, six months.... some of them are like one year late in reauthorizing and, you know, that frightens me quite a bit, that we have the potential of there being dozens of

schools out there that have certificates of approval [that] I haven't renewed, and they haven't shut down."

Another regulator reported a lack of staff capacity to address cases where institutions knowingly misreport information, submitting outdated student outcome data: "And then there's our internal capacity to actually address a legitimate issue that could be a borrower's defense to repayment claim. That's crazy to me that we can't even get the workload to address those bare minimum issues."

Reflecting on the agency's current capacity to conduct oversight, a state authorizer for private postsecondary education expressed concerns about maintaining quality oversight if additional staff are not hired:

"So right now, we're okay. I think in the next couple of years, if we continue to have the increase in schools that we've had, that there would be the potential, that we would not be staffed well enough, and that at some point either we'll have to reallocate money to different positions or potentially, I mean, we would never say it out loud, but I mean, kind of maybe trim some of the oversight that we're doing to try to expedite the application process."

In cases where authorizers are not provided with sufficient resources, they are forced to respond to the aftermath of bad actors rather than proactively monitoring institutions. This challenge was highlighted by an executive at a state higher education agency: "Our capacity now is only such that I have the ability to put the fire out when it's already lit. I'd really like there to not be so many fires."

Beyond resource and staffing challenges, some state authorizers highlighted limitations in statutory power as another significant barrier to effective oversight. One regulator for private career schools described this gap between what they felt was necessary to protect students and the legal authority to enforce it:

"We do not have the right to require some kind of treatment of the transcripts for closed schools.... We begged for a stronger statute. Now, many schools, including the ones that closed, did take care of their students and their records. But we can't make them. I mean, our rules say that you will hold a transcript permanently, meaning forever. But if you don't, you know, we take probably 15 calls a week from schools going back to the 70s that the transcripts are nowhere."

This authorizer also shared their experience with unsuccessful efforts to lobby for stronger regulatory oversight.

"We have lobbied as an agency for, I believe, six of the last seven years to get stronger after those closures. We wanted to make our...our regulatory oversight a little stronger. By that, I mean, we have begged to have the opportunity to ask schools for a corrective action plan. Now, even going back to the closures in 2016, schools gave them to us. But they didn't have to. There was not statutory authority. So, our attorney general has said that, 'you know, that's great they cooperate. But you really can't hold them to it.'"

However, interviews with other state regulators highlighted how additional resources—such as increased funding, staffing, technology, and supportive legislation—have empowered some authorizers to more effectively monitor institutions on an ongoing basis. The largest state authorizing agency, for

example, has a staff of about 110, with “20 investigators who investigate complaints that come in and significant portion of their work, of course, is visiting institutions as needed to gather evidence and see what’s going on, and we also separately have a team of compliance inspectors.” The agency has compliance inspectors who proactively review each institution twice every five years, and investigators who react to the complaints they receive.

Beyond staffing and funding, legislative empowerment was another important lever in supporting the enforcement capacity of authorizers. In one state, the agency manager reported drafting legislative wish list items, sharing these with the Commissioner and Governor’s office, and conducting stakeholder meetings that include institutions to gather feedback before the final draft of the bill goes before the state legislature. Through this back-and-forth process to build consensus, this authorizing manager shared:

“And then we tweak it with them, which makes it easier for us to...counter negative feedback to legislators. I’ll be like, we hosted these meetings. They agreed on this language. They may not agree on the proposals as a whole, but they also helped write it to minimize the regulatory burden and impact on them and still get the outcome that we’re seeking for consumer protections. And so it makes it harder for the schools to refuse and try to manipulate and get those parts out of the bill.”

This is one example of how having legal liaisons or building strong relationships with the state legislature has allowed authorizers to draft proposal legislation and strengthen the stringency of their authorization processes and enforcement capabilities.

Other officials reported having strong authority, supported by both state laws and the Attorney General’s office, to take action against institutions that fail to apply for licensure, renew, or meet other requirements. In one case, an agency has been empowered to start issuing “stop work” orders, forcing unauthorized schools to cease operations if they have not renewed:

“So, recently our [agency director] got some legislation passed that allows us to do stop work orders... We’ll be sending out a notice, a seven-day notice, that we’re going to be coming and serving them with a stop work order, and they have to shut down. And they literally are going to have, like, their doors sealed with big red stickers that say, ‘stop work.’ And everybody who is around them is basically going to know that they shouldn’t be operating. And students, most importantly, will know not to walk through those doors.”

For state authorizers, there is often a significant gap between having the responsibility to authorize and monitor institutions and the capacity to enforce compliance. While in some cases state authorizing agencies lack the resources through funding, staffing, and even legal power to ensure institutions comply with state regulations, other states are succeeding in supporting the work of authorizers through legislation that empowers agencies to go after bad actors.

Discussion

The findings from our study reveal key insights on the state-level reauthorization process and on the significant variation across states based on the type of authorizing agency, type of postsecondary institutions seeking reauthorization, and the credentials that these institutions offer. Our inventory data analysis, for example, shows that reauthorization varies in frequency from quarterly reporting

requirements to renewal processes of six or more years. Our analysis also reveals that the stringency and scope of reauthorization efforts varies significantly between accredited and nonaccredited degree programs, with the latter—along with nondegree-granting programs irrespective of the accreditation status—receiving far more scrutiny, especially as it relates to consumer protection. Principal-agent theory suggests that at least some of this variation is explained by differences in the goals of the principals, which could be either accrediting agencies or state governments, and how these goals lead to different objectives and monitoring strategies to oversee the agents (institutions). In the sections below, we discuss further how principal-agent theory and sensemaking may explain our three thematic findings.

Data Infrastructure and Use: Agency Monitoring and Information Asymmetries

Our findings demonstrate that the infrastructure to collect data (or the lack thereof) influences the ability of authorizing units to effectively oversee the institutions under their jurisdiction. Despite significant efforts to improve postsecondary data systems and state longitudinal data systems (Klein & Colorado, 2024), state authorizing agencies and units are often not integrated into these systems. We recognize that the infrastructure and capacity limitations are largely beyond the control of these agencies. A strong data infrastructure and data-informed culture facilitates the administrative workflow for managing applications, renewals, and other reporting requirements, ultimately reducing the burden on limited staff and resources. This streamlined process also eases the renewal process for institutions by allowing updates to existing information rather than requiring PDFs or binders full of paper submissions. According to principal-agent theory, this situation reflects an information asymmetry between the principal (authorizing agency) and agent (institutions), where the institutions hold more operational details than the agency. The asymmetry is much more pronounced when agencies lack the infrastructure, data, or staff to monitor institutions seeking reauthorization.

In the case of New Jersey, by contrast, a strong culture of data has facilitated the use of data to improve accountability through risk-based renewal approaches and to inform potential students about training options and their outcomes. Because the Department of Labor & Workforce shares responsibility for regulating private career schools, it can link institutional data and in-house labor statistics with quarterly student unit record data (e.g., SSN, name, address, race/ethnicity, disability status, entry date, exit date) for students. This linkage allows the agency to calculate important consumer protection metrics—enrollments, retention, dropout rates, completion rates, and in-state wage statistics and job placement outcomes—by cross-referencing previous reports to ensure compliance, reducing the reliance on self-reported aggregate data that was difficult to verify. The information was also used to develop operational dashboards for the agency to administer processes as well as a dashboard for consumers and students. These strong systems and collaborative efforts among multiple principals (i.e., departments of labor and education) provide effective monitoring strategies that not only reduce information asymmetries but also minimize the opportunity for shirking by postsecondary institutions. By developing the New Jersey Training Explorer, the agency has also shifted from acting solely as a principal to embracing a role as a knowledge broker (Rubin & Ness, 2021), addressing a less explicit principal—the public—by connecting consumers, students, and institutions through an accessible source of data.

Networks and Knowledge Sharing: Sensemaking via Collaboration Among States and Regulatory Triad

Our findings demonstrate that authorizing agencies rely on their networks not only within their states, but also with the regulatory triad and with their counterparts in other states. In our interviews with

authorizing agency officials, they consistently reflected on the importance of these networks to understand the broader authorization context and to fulfill their responsibilities as authorizers. They mentioned their fellow triad agencies (U.S. Department of Education, accrediting agencies), but more often they discussed the significance of knowledge sharing between agencies in other states, often facilitated by national professional association networks, such as NASASPS and SHEEO, to overcome the inefficiencies of miscommunication within the triad.

Sensemaking theory would suggest that these networks are critical as agency officials create their “map of a shifting world” (Ancona, 2012). Through in-person convening, email listservs, and phone calls to agency officials in other states, authorizing agency staff sharpen their perception of their roles and responsibilities and learn from other states' experiences. These inter-state networks then influence the strategies that agency officials pursue in their states. Indeed, our findings suggest that state agency officials act as “street-level bureaucrats” interpreting federal policy in their distinct state contexts. As such, it appears that the networks and knowledge sharing among bureaucratic colleagues from different streets (states) matter at least as much as their fellow regulatory triad members.

Capacity and Enforcement: Multiple Principals and Agency Monitoring

This finding illuminates the significant variation in agency capacity among state authorizers and the implications of this variation on oversight through enforcement and monitoring. As we report, agency capacity in our sample of states ranges from a handful of staff members to agency staff of more than 100 with significant professional expertise, including 20 investigators to monitor institutions. Some agencies benefit from access to credentialed professionals—including CPAs and, in rare cases, forensic CPAs—who provide specialized support for financial investigations and institutional oversight. Others, however, lack the resources to rigorously analyze financial documentation, leaving staff to rely on judgment rather than formal expertise. In addition to this agency-level variation, we also find that there is significant variation in state governments with respect to statutory power granted to authorizing agencies. When taken together, this means that some state authorizing agencies have limited formal statutory power and barebones staffing, while other states have strong statutory power and robust, professional staffing. Although examination of the effects of state authorization structure lies outside the scope of our study, it seems reasonable to expect that these differences may lead to different results in consumer protection and student outcomes (Burns et al., 2023b).

As we discussed with our first finding, principal-agent theory would suggest that authorizers' data infrastructure influences their monitoring capability. Authorizing agencies' staff capacity would similarly influence their monitoring of postsecondary institutions. This finding, however, reveals the potential nested influence of multiple principals: authorizing agencies and state governments. In addition to the influence of multiple principals on institutions as agents, this nested principal-agent relationship places authorizing agencies as agents to state governments as principals. Our findings reveal some goal conflict between authorizing officials' desire to hold institutions accountable and state governments, often through the attorney general, to clarify the extent to which authorizers can (or cannot) intervene. Similar to findings from Rubin and Ness (2021) on nested principal-agent structures in statewide college completion efforts, we find that this places authorizing agencies in a buffering role between state governments and institutions. The variation in state statutes (and in other potential state influences, such as political party preferences) and in authorizing agency capacity suggests that postsecondary institutions experience vastly different authorization landscapes.

Recommendations for Practice, Policy, and Research

This section presents recommendations for improving practice, policy, and research in state authorization, renewal processes, and agency capacity. For state authorizers, building a collaborative community with other regulators is vital. Engaging with cross-state peers through Listservs and attending joint events with accreditors facilitates sharing best practices, identifying trusted contacts, and collectively promoting student protection. Additionally, investing in scalable data infrastructure, from simple Excel-based systems to comprehensive data platforms, enables agencies to streamline compliance processes, flag issues, and improve reporting. Agencies facing capacity limitations might consider innovative staffing solutions, such as part-time or contract staff, and explore alternative approaches to site visits, including virtual or collaborative site visits with accreditors, to manage workload effectively. Agencies with more capacity and in states with substantive statutory power may leverage these resources to strengthen oversight through increased data collection and analysis. For example, one agency has developed a monitoring system to identify institutions at risk of closure, and once identified, these institutions are placed on a performance improvement plan.

For state policymakers, modernizing laws and policies to better align with current practices and data needs is essential. Increasing funding for data infrastructure and enhancing staff capacity to leverage these systems will help agencies regulate more effectively and efficiently. State authorizers stand to benefit significantly from even minor infrastructure upgrades or integration into existing postsecondary or state longitudinal data systems. Open-source software and affordable tools could provide cost-effective solutions for agencies with limited FTE and financial resources, and learning networks can further support staff in building data literacy and maximizing system capabilities. State policymakers should also invest in student unit record data systems. These systems enable streamlined compliance reporting, more accurate data validation, and facilitate connections with other state agency data, particularly workforce systems. Our inventory analysis finds that job placement rates are one of the most commonly collected student outcome metrics. More robust data systems will help states identify the most effective and problematic pathways from K-12 to postsecondary education and the workforce, assess the value and return on investment of programs, and allocate the appropriate incentives and resources more effectively.

Funders and supporters of state authorizers, including intermediary organizations, can further support state authorizers by fostering learning networks and communities of practice, enabling shared learning and collaboration within and across state borders. Organizations like NASASPS and SHEEO provide valuable resources to the field and have the potential to expand beyond their current structures, where collaboration mainly occurs through shared members and convenings. There is an opportunity and need to foster more cross-pollination among regulators, accreditors, veterans affairs offices, researchers, and other actors in postsecondary accountability (Baser, 2024). Indeed, our analysis finds that authorizing agencies rely heavily on accreditors' oversight of institutions in their states and that authorizing agencies are often frustrated by a lack of information sharing from their regulatory triad counterparts. Building networks that bring together diverse organizations, including Career Schools Private Education Network (CSPEN) and other sector-specific groups, could enhance coordination, share best practices, and strengthen the collective impact of these agencies.

For researchers, our analysis is a starting point that should yield many questions about the associations between a state's authorization approach and its broader governmental, societal, and higher education landscapes. For instance, authorizing agencies take widely varying approaches to consumer protection metrics depending on the type of institutions. Further research could examine the extent to which the

varying stringency approaches relate to other state factors. This exploration could uncover patterns and trends, possibly between degree-granting and nondegree-granting institutions, that may inform policy decisions and educational reforms.

Further research is also needed to understand the role of additional state actors, such as licensure programs and the impact of exemptions in postsecondary authorization on a state's authorization approach. Such studies could investigate the criteria states use to exempt institutions from authorization, including factors such as institutional age, accreditation status, nonprofit designation, or religious affiliation. Research should assess how these exemptions affect oversight, student protection, and equity across institutional types. Additionally, examining how state authorization and other postsecondary accountability structures—especially those regulating private and out-of-state nonpublic institutions—interact with traditional governance frameworks is essential. This includes exploring the influence of boards and executive entities, which may be shaped by political appointments or regulatory capture, on the authorization process. Such research could illuminate how various policies, partnerships, and governance dynamics contribute to the effectiveness and equity of state authorization systems on student and institutional outcomes.

Conclusion

This study highlights the essential role of state authorization in maintaining accountability and quality in postsecondary education. Our analysis reveals variations in governance structures, agency types, renewal and reporting frequency, risk-sharing relationships with accreditors and SARA, and levels of stringency across agency and institution types. Although many agencies operate with limited resources (human capital, time, funding), strategic investments in data systems, collaboration with state entities and accreditors, and participation in shared networks can improve regulatory effectiveness. Continued modernization of policy frameworks, data systems and use, and capacity-building support are crucial for agencies to fulfill their oversight roles and adapt to evolving demands in postsecondary education.

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