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State Higher Education
Executive Officers Association

State Reauthorization Research: Technical Appendix

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This Technical Appendix provides supplementary resources for a mixed-methods study of state reauthorization and agency capacity, including a description of the Research Approach and an FAQ.

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RESEARCH APPROACH

We employed a convergent parallel mixed methods design to investigate the renewal processes and capacity challenges faced by state agencies that oversee postsecondary education. This approach combined a policy inventory documenting state-specific renewal and reporting requirements with qualitative interviews of agency staff. Data were collected between Fall 2023 and Spring 2025, with most of our inventory data reflecting laws, regulations, and processes from 2023–24. The inventories, aggregate tables, and corresponding codebooks are available for download as part of the project data.

QUALITATIVE METHODOLOGY

We employed a basic qualitative research design and used interviews to examine state postsecondary reauthorization processes and the capacity of state authorizing agencies to fulfill their responsibilities. This qualitative approach provided insight into the experiences, challenges, and sensemaking of agency staff responsible for translating policy into action. By centering the voices of these practitioners, this methodological approach helped uncover the organizational dynamics and capacity constraints that shape the effectiveness of reauthorization systems.

STATE & PARTICIPANT SELECTION

States were selected based on several factors designed to ensure diversity in governance structures, agency types, and policy contexts ([Appendix A](#)). These criteria included higher education governance type (e.g., coordinating or governing board models), postsecondary accountability approach, regional compact membership (e.g., SREB, WICHE, MHEC, NEBHE), NC-SARA membership, politico-institutional context, institutional sector focus (e.g., degree-granting, non-degree, for-profit, private), and the type of agency responsible for oversight. These characteristics were chosen to capture a range of approaches to postsecondary authorization across the United States.

We invited agencies from 15 states to participate, and ultimately, 11 states agreed (*Figure 1*). Within these states, we identified participants representing various roles and responsibilities to ensure a range of perspectives. These included executive leaders responsible for setting agency priorities, mid-level managers overseeing reauthorization workflows, and frontline staff responsible for processing institutional applications. This sampling approach allowed us to explore how perspectives differed based on organizational role and proximity to the day-to-day implementation of reauthorization policies. In total, this study included interviews with 25 state authorizing officials from 16 agencies across 11 states.

Figure 1



In selecting participants within each agency, we included a range of roles to capture the full scope of staff involvement, from personnel who support institutions with applications and reporting to executive leaders who set the agenda and address broader policy issues. *Table 1* summarizes the agency staff included in the interviews, with participants spanning executive (12), mid-level (8), and entry-level (5) positions.

Table 1

Role Level	Generalized Titles	Count
Executive Leaders	Executive directors, commissioners, chancellors, vice chancellors, division and bureau heads, state authorization directors	12
Mid-Level Managers	Deputy directors, program managers, state portal coordinators, office directors, assistant directors, compliance managers	8
Entry-Level Staff	Program specialists, institutional monitoring staff, workforce development staff, registration and licensing staff	5

Recognizing that state authorization responsibilities vary by institutional sector, we included staff whose work focused on different types of institutions. *Table 2* summarizes the institutional focus of agency staff interviewed, including 12 focused on nondegree-granting institutions, eight on degree-granting institutions, three overseeing both, and two focused on SARA and out-of-state providers.

Table 2
Interview Participants by Institutional Focus

Institutional Focus	Generalized Descriptions	Count
Nondegree-Granting	Private career schools, proprietary schools, non-degree training providers	12
Degree-Granting	In-state and out-of-state degree-granting institutions (public, private, and proprietary)	8
Degree-Granting & Nondegree-Granting	Agencies overseeing both degree- and non-degree-granting institutions	3
SARA and Out-of-State	Agencies with a focus on NC-SARA member institutions and out-of-state providers	2

DATA COLLECTION

We conducted semi-structured interviews with state agency staff to gather detailed accounts of how agencies manage reauthorization processes, including their relationships with other regulatory actors and their strategies for overcoming capacity challenges. We conducted the interviews between spring 2024 and fall 2024. Interviews lasted between 45 and 60 minutes and were conducted virtually via Zoom. The interview protocol ([Appendix B](#)) included open-ended questions designed to explore:

- The agency’s organizational structure and state context
- The agency’s role in the regulatory triad alongside accreditors and the federal government
- Specific steps and decision points in the reauthorization process
- Resource and staffing capacity
- Strategies for balancing enforcement with institutional support

Of the 24 interviews conducted, all but one were individual interviews. One session involved two agency representatives participating together. All interviews were recorded using Zoom and initially transcribed using MAXQDA’s automatic transcription service (powered by the Speechmatics model). Prior to analysis each transcript was manually reviewed and edited by a member of the research team for accuracy.

DATA ANALYSIS

Our analysis combined deductive and inductive approaches to ensure that the findings aligned with both the study’s conceptual framework and the realities expressed by participants. Using MAXQDA (a qualitative data analysis software), we began by applying an a priori coding framework based on previous research and principal-agent and sensemaking theories, while also identifying in vivo codes that captured participants’ own language and emergent themes. This first-round coding process generated over 75 unique codes (see *Table 3*).

Table 3
Qualitative Analysis Codebook

Parent Code	Sub Codes
Accreditors	Accreditors - Negative; Accreditors - Positive; Use of Accreditation
Capacity	Data Capacity; Institutional Capacity; Regulatory Capacity; Resource/Financial Capacity; Staff Capacity; Statutory Capacity
Data	Data Collection; Data Infrastructure; Data Use
Networks & Knowledge Sharing	Co-Regulators; State Regulators; Triad Relationships
Organizations, Actors, Stakeholders	Intermediary Organizations; Media/Public; Regulatory Triad; State Actors
Postsecondary Accountability Issues	College Closures; For-profit Institutions; Negotiated Rulemaking; Regulatory Capture
Principal-Agent Theory	Key Elements (Contracting Problems; Human Assumptions; Information Assumption; Organizational Assumptions; Information Asymmetry; Goal Conflict; Shirking; Unit of Analysis (P-A Relationship)) Other Elements (Enforcement; Knowledge Brokering; Monitoring & Oversight; Multiple Principals)
Relational Dynamics	Building Relationships; Communication Challenges; Complexity of Relationships; Punting Responsibility
Sensemaking Theory	Action; Formulation/Collage of Meanings (Understanding); Sensemaking Dimensions; Triggering Event/Condition
State Authorization Practices, Knowledge Sharing, and Tools	Convenings / Conferences; Data System / EDvera; Innovative Strategy/Best Practice; NASASPS Listserv
State Authorization Purpose/Roles	Academic Quality Control; Consumer Protection; Customer Service

We then conducted second-round axial coding to consolidate these codes into three overarching themes:

1. **Data Infrastructure, Data Collection, and Data Use:** Highlighting the infrastructures and methods agencies employ to collect, manage, and apply data to support oversight and consumer protection.
2. **Networks and Knowledge Sharing for Effective Regulation:** Exploring relationships among agencies, accreditors, federal partners, intermediaries, and other networks that influence oversight effectiveness.
3. **Balancing Capacity & Enforcement:** Examining how agencies manage enforcement duties within resource constraints, including the challenges they face and the innovative strategies they employ to maintain effective oversight despite these obstacles.

TRUSTWORTHINESS

Throughout our iterative research process, our research team drafted analytic memos, held regular team meetings to discuss emerging insights, discussed findings with experts in the field, ensured consistency in coding decisions through detailed protocols with definitions, and triangulated findings with documents and web sources. These strategies of trustworthiness strengthened the integrity and credibility of our analysis. They allowed us to move beyond descriptive data and develop deeper, conceptual insights into how reauthorization policies are applied in practice.

INVENTORY METHODOLOGY

We used a descriptive inventory and policy analysis approach to examine state postsecondary authorization renewal policies in the United States. The method emphasizes systematic data collection to develop typologies and identify cross-state patterns in governance, process structure, and regulatory requirements. Our process unfolded in three iterative phases: (1) construction of an agency and process-level inventory, (2) development of a metric-level inventory, and (3) descriptive analysis.

PHASE 1: AGENCY- AND PROCESS-LEVEL INVENTORY CONSTRUCTION

We began by identifying the state agencies and governing bodies responsible for institutional authorization and renewal. The phase aimed to distinguish unique degree- and nondegree-granting processes, using NC-SARA's *State Authorization Guide* institutional classifications to identify agencies overseeing each type.¹ Key differentiators included distinctions in application requirements, relevant laws and regulations (including exemptions, definitions, and minimum standards), accreditation mandates, and the frequency of reauthorization or reporting—many of which were identified directly by the agencies themselves when providing information about their distinct processes (e.g., degree-granting, nondegree-granting, non-SARA distance education). Ultimately, we aimed to simulate the full renewal process for each institution type based on these differentiating factors, tracing the laws, regulations, and application materials they must follow and submit. We specifically identified each process not covered under SARA to ensure a comprehensive assessment.

The data collection for the agency- and process-level inventories involved sourcing laws, regulations, agency websites, intermediary organization websites (SHEEO, NASASPS) and prior inventories.^{2,3} In cases where information was by-request, incomplete, or unclear, we reached out to the agency for documentation, access, or additional context about processes.⁴ For the process-level inventory, data were compiled into a 52-field Excel spreadsheet covering governance structure, key links, frequency of renewals and reporting, and the institutional classifications to which the process applied. Institution types were categorized using NC-SARA's typology, including distinctions by control (public/private), location (in-state and out-of-state), and sector (degree- and non-degree-granting; for-profit and nonprofit). Concurrently, we developed a 27-field agency-level table detailing each agency responsible for administering institutional reauthorization and reporting processes. This table included agency identifiers, governance structures, SARA participation status, NASASPS and SHEEO membership, and the number and types of processes administered. Agencies with shared or dual authority are noted within

¹ NC-SARA. (2024). *The state authorization guide*. <https://www.nc-sara.org/guide/state-authorization-guide>

² Ness, E. C., Baser, S. M., & Dean, M. (2021). *State authorization landscape and process: An inventory, classification, and analysis*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>

³ NC-SARA. (2024). *The state authorization guide*. <https://www.nc-sara.org/guide/state-authorization-guide>

⁴ Several agencies did not respond to outreach.

the dataset. Ultimately, we identified 164 unique processes and more than 77 agencies involved in some form of postsecondary authorization. This phase established the foundational dataset to identify the agencies and processes that would be scored, forming the basis for developing the metric inventory.

PHASE 2: METRIC INVENTORY DEVELOPMENT

With the agencies and processes identified, we proceeded to develop a metric inventory to score the stringency of common metrics collected in reauthorization and reporting processes. We adapted the Ness et al. (2021) metric framework to collect 22 metrics across three domains: academic, consumer protection, and student outcomes ([Appendix C](#)). Compared to the Ness et al. (2021) inventory, this effort added site visits as a key consumer protection metric and combined organization and governance with academic sections due to fewer metrics in these areas. We developed summary documents to compile detailed information about each state, agency, and institutional process.

The primary data collection focused on scoring the stringency of 22 metrics and occurred between fall 2023 and spring 2025. For each institutional process, we gathered process-specific information and research notes, along with statutory, regulatory, and application links in a summary table. For each metric, we recorded the metric name, a scoring synopsis explaining whether the agency met our definition of stringency, the stringency score, and sourcing details such as citations, links, and official language from laws, regulations, or applications ([Appendix D](#)).

The inclusion of official citations and language for each source type was a new feature that allowed for more granular analyses of how processes vary based on legal or application requirements. We developed a comprehensive data collection protocol, supported by training materials and hands-on sessions, to guide the research team in completing the inventory and scoring the metrics. To ensure consistent scoring, definitions and examples were provided throughout the process. Data were collected primarily from official statutes, regulations, applications, and web resources. When information was not readily available, we requested it directly from agencies, with mostly successful responses. The collected data underwent a systematic process of review and cleaning, involving initial scoring, team review, and consolidation into a final metric inventory using Microsoft Forms, Power Automate, and Excel for data management and analysis, which could be easily linked to the process- and agency-level inventories. It also enabled the creation of a state-level inventory containing descriptive information about authorization structures, the number of processes, and regional compact participation in SARA.

PHASE 3: ANALYSIS AND SCORING

We used descriptive methods to develop conceptual maps and examine variation in authorization structure and metric stringency. 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 and the specific processes each agency administers. This approach enabled us to create conceptual maps of state authorization actors and the institution types they oversee, highlighting the degree to which authority is consolidated or dispersed.

To assess stringency, we assigned each metric a three-point score ranging from 0 to 2, with sourcing from statutes, regulations, and applications independently inventoried. We then developed a four-point ordinal scale—Minimum, Low, Moderate, Maximum—to calculate overall stringency at the process, agency, and state levels, as well as within metric categories (academic, consumer protection, and student outcomes). For example, the overall process score was calculated by summing the 22 metric scores for each renewal or reporting process (maximum 44 points), dividing this range into four equal bins of 11 points each, and placing the raw total into the appropriate bin. A similar approach was

applied to the subcategories. Agency- and state-level stringency scores were derived by averaging all process totals and assigning them to the same four-level bands. This method allowed systematic comparisons of how states and agencies manage renewal and reporting, and how these processes vary by specific metrics. The inventories, aggregate tables, and corresponding codebooks are available for download as part of the project data.⁵

FAQ

What Is State Authorization?

State authorization is the process by which states grant postsecondary institutions the authority to operate and/or award degrees.

What is the Difference Between Initial Authorization, Reauthorization, and Reporting in this Study?

Initial authorization refers to the process, if required, by which state agencies or other state actors permit postsecondary institutions to operate and offer degrees within the state—initial authorization policies were not inventoried in this project (see Ness et al., 2021). **Reauthorization** refers to the process by which an institution seeks to renew its authorization to operate, typically following a defined schedule (e.g., annually, every five years). **Reporting** refers to additional data submissions or updates required outside of the reauthorization cycle. These reporting requirements often occur quarterly or annually and are submitted at points in time that are different from the reauthorization process. Some agencies authorize institutions indefinitely and only require periodic reporting, while others use frequent reauthorization with no separate reporting.

When comparing agency practices, particularly for metrics such as student outcomes, it is helpful to consider the overall timing and frequency of data collection, regardless of whether the process is labeled as reauthorization or reporting. Therefore, to ensure consistent comparisons, our study accounts for both the duration and frequency of reauthorization and reporting. For example, one agency may require reauthorization every five years with annual reporting, while another may require annual reauthorization with no separate reporting. In both cases, agencies may collect similar types of information on an annual basis, but through different procedural structures.

How is the State Authorization Reciprocity Agreement Considered in this Study?

The State Authorization Reciprocity Agreement (SARA), managed by the National Council for State Authorization Reciprocity Agreements (NC-SARA), is an arrangement among member states, districts, and territories that establishes comparable national standards for interstate distance education. This participation supports agency capacity by reducing the need to evaluate individual out-of-state providers, while also easing the compliance burden for institutions by allowing them to operate across state lines without securing authorization in each state.

Interstate distance education processes authorized through SARA are not scored in our inventory metrics. We focused on scoring the state-level processes outside of SARA. However, SARA participation is included in the agency inventory and conceptual maps, particularly when a standalone agency or

⁵ Baser, S. M. (2025). *State reauthorization: Data download* [Dataset]. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx

authorizing body oversees participation (as in Arizona and North Carolina), and is reflected in both interview sampling and content.

What Factors Were Used to Distinguish Institutional Reauthorization Processes?

We identified state agencies responsible for authorization and renewal, differentiating processes using a modified version of the institution types defined in NC-SARA's State Authorization Guide. These included combinations of public, private nonprofit, for-profit, in-state, and out-of-state. We specifically noted and scored the authorization processes that are not covered under SARA (e.g., processes for non-distance education institutions/programs) to ensure a complete assessment. Agencies often helped identify their distinct processes through specific application forms or through email correspondence.

Key factors in identifying distance processes included application requirements, relevant laws and regulations (including exemptions and standards), accreditation mandates, and reauthorization or reporting frequency. An agency's specific stipulations for certain institution types (e.g., for-profit institutions) also served as another way to distinguish separate authorization and renewal processes.

How are Exemptions Considered in this Study?

This remains an area in need of further research. Exemptions vary widely by state in terms of which institutions are covered, how they are exempted, and from what requirements. Therefore, exemptions are not explicitly scored in this metric inventory but were used alongside definitions to determine which institutions are subject to specific application processes, laws, and regulations.

Where can I Find the Inventory Data Tables Mentioned in the Research Approach?

The inventories, aggregate tables, and corresponding codebooks are available for download as part of the project data: https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx.

What Years Do the Inventory Data Cover?

Data were collected between fall 2023 and spring 2025, with most reflecting laws, regulations, and processes from 2023–24.

Where Should I Start if I Want to Learn More About State Authorization and Reauthorization?

The resources associated with this project represent the most up-to-date and comprehensive materials available on state reauthorization policies. For those new to the topic, we recommend starting with key overviews, practical guides, and applied research produced by SHEEO and others. These sources cover the history of state authorization, common regulatory practices, challenges in oversight, and emerging policy directions. You can find many of these materials on SHEEO's [State Authorization Research Projects](#), [State Authorization Resources](#), and [Learning Community](#) pages.

Beyond these sources, we provide additional resources below, organized into four categories that reflect different entry points into the landscape of state authorization.

Introductory articles, histories, and handbooks on state authorization

These foundational resources offer historical and conceptual context for understanding state authorization policy.

- Baser, S. M. (2024). *Fields of action: Charting the dynamics of state authorization and campus-state tensions in postsecondary oversight* [Doctoral dissertation, University of Georgia]. <https://www.proquest.com/openview/58dfa460bfd6e4b403e93ba031a1457c/1>
- Contreras, A. L. (Ed.). (2017). *State authorization of colleges and universities: A handbook for institutions and agencies* (2nd ed.). CreateSpace Independent Publishing Platform.
- Contreras, A. L. (Ed.). (2020). *State authorization of colleges and universities* (2nd ed.). Oregon Review Books.
- Tandberg, D. A., Bruecker, E. M., & Weeden, D. D. (2019). *Improving state authorization: The state role in ensuring quality and consumer protection in higher education*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2019/07/SHEEO_StateAuth.pdf

Research Inventories and Policy Analyses

These studies provide typologies and cross-state comparisons of authorization processes and oversight structures.

- Baser, S. M., Maldonado, M., Walker, W. B., Jr., Dean, M. T., & Ness, E. C. (2025). *State postsecondary authorization: A mixed-methods analysis of reauthorization processes and agency capacity*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2025/07/Baser-et-al_StateRenewalProcesses_SHEEOReport.pdf
- Jung, S. M., Hamilton, J. A., Wheeler, J. D., & Helliwell, C. B. (1977b). *A study of state oversight in postsecondary education [Executive summary]*. American Institutes of Research. <https://files.eric.ed.gov/fulltext/ED169822.pdf>
- Ness, E. C., Baser, S. M., & Dean, M. T. (2021). *State authorization landscape and process: An inventory, classification, and analysis*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2021/09/StateAuthorizationLandscape_NessBaser.pdf

State Authorization Research and Reports

This research highlights recent findings on agency capacity, student protections, institutional risk, and closure response.

- Boatman, A., & Borowiec, K. (2021). *Authorization for alternative educational credentials: Evidence from five states*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Bruecker, E. M., & Seldin, A. (2021). *Sex trafficking in state-authorized massage schools: A case study*. Seldin/Haring-Smith Foundation. <https://www.shs.foundation/sex-trafficking-and-higher-education-state-authorization-for-profit-schools>
- Burns, R., Weeden, D. D., Bryer, E., Heckert, K., & Brown, L. (2023). *A dream derailed? Investigating the causal effects of student protection authorization policies on student outcomes after college closure*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2023/08/SHEEO_CollegeClosures_Report3.pdf
- Dell, M. (2021). *State authorization research: Findings, themes, and future directions*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>

- Dell, M., Lee, J. C., & Weeden, D. D. (2021). *Investigating factors associated with college openings and closures: The role of state authorization policies*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Fowles, J. (2021). *Exploring state authorization stringency: A machine learning approach*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Hall-Martin, M. E. (2021). *Capacity to protect: A survey of state authorization agencies and offices*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2021/07/SHEEO_CapacityProtect_StateAuthorization.pdf
- Hutchens, N., Fernandez, F., & Edmondson, M. (2021). *Toward a consumer protection framework to protect students from predatory practices: A legal analysis of judicial opinions and state laws, regulations*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Natow, R. S., Reddy, V., & Ionnou, V. (2021). *How states respond to federal policy on state authorization for higher education: Findings from a multi-case study*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Ward, J. D., Booth, H., Pisacreta, E. D., & Weintraut, B. (2021). *Breaking down barriers: The impact of state authorization reciprocity on online enrollment*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>
- Weeden, D. D., Lee, J. C., Tandberg, D. A., & Bruecker, E. M. (2021). Exploring the relationship between community colleges' participation in SARA and enrollment in distance education. *New Directions for Community Colleges*, 2021(196), 107–115. <https://doi.org/10.1002/cc.20487>

Other Organizational Resources

These organizations offer guidance, tools, and communities of practice related to state authorization and oversight.

- NC-SARA. (2024). *The state authorization guide*. National Council for State Authorization Reciprocity Agreements. <https://www.nc-sara.org/guide/state-authorization-guide>
- National Association of State Administrators & Supervisors of Private Schools. (2025). *Home*. <https://nasasps.org>
- State Authorization Network. (2025). *Home*. Western Interstate Commission for Higher Education. <https://wcetsan.wiche.edu/>

How should I cite the materials from this study?

To reference the reports, toolkit, dataset, or dashboard produced from this study, please use the following APA-formatted citations:

Primary Report

Baser, S. M., Maldonado, M., Walker, W. B., Jr., Dean, M. T., & Ness, E. C. (2025). *State postsecondary authorization: A mixed-methods analysis of reauthorization processes and agency capacity*. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2025/07/Baser-et-al_StateRenewalProcesses_SHEEOReport.pdf

Toolkit

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

Technical Appendix

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

Dataset

Baser, S. M. (2025). *State reauthorization research: Data download* [Dataset]. State Higher Education Executive Officers Association. https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx

Dashboard

Baser, S. M. (2025). *State reauthorization research: Data dashboard*. State Higher Education Executive Officers Association. [\[coming soon\]](#)

APPENDIX

APPENDIX A. CHARACTERISTICS OF INTERVIEWED STATES

State	Organization & Policy Context		Postsecondary Accountability					Politico-Institutional Context	
	State Public Governance Type (2023) ¹	Regional Compact ²	Authorization Governance Type (2021) ³	State Authorization Quadrant (2021) ³	Authorization Processes (2021) ³	NC-SARA Membership	Regional Accrediting Agency ⁴	Party of Governor (2024) ⁵	State Legislature Control (2024) ⁵
Arizona	Federated	WICHE	Independent Authorization Agency	Measured/Protective	2	Yes	WSCUC	Democrat	Republican
California	Segmented	WICHE	Consumer Affairs	Independent	3	No	WSCUC & ACCJC	Democrat	Democrat
Connecticut	Federated	NEBHE	SHEEO Agency	Protective	4	Yes	NECHE	Democrat	Democrat
Georgia	Partially Consolidated	SREB	Independent Authorization Agency	Protective	2	Yes	SACSCOC	Republican	Republican
Indiana	Coordinating	MHEC	Multiple Agencies (w/SHEEO)	Autonomous	4	Yes	HLC	Republican	Republican
Minnesota	Federated	MHEC	SHEEO Agency	Protective	3	Yes	HLC	Democrat	Democrat
New Jersey	Coordinating	NEBHE (only for SARA)	Multiple Agencies (w/SHEEO)	Measured	3	Yes	MSCHE	Democrat	Democrat
Oklahoma	Federated	SREB	Multiple Agencies (w/SHEEO)	Measured	4	Yes	HLC	Republican	Republican
Texas	Coordinating	SREB	Multiple Agencies (w/SHEEO)	Autonomous	4	Yes	SACSCOC	Republican	Republican
Utah	Fully Consolidated	WICHE	Consumer Affairs	Autonomous	4	Yes	NWCCU	Republican	Republican
West Virginia	Segmented Coordinating	SREB	Multiple Agencies (w/SHEEO)	Measured	5	Yes	HLC	Republican	Republican

NOTES:

¹ Combined governance categories were developed by the authors, drawing on historical typologies (Kerr & Gade, 1989; McGuinness, 2016).

Fully Consolidated: One board governs all two-year and four-year public campuses

Partially Consolidated: One board governs all four-year public campuses while another board governs all two-year public colleges

Coordinating Systems: A statewide coordinating agency has authority to review, plan, and approve academic programs and budgets, while governing authority remains with institutional or system boards

Segmented Systems: Separate boards govern specific sectors of the public higher education system, such as research universities, regional universities, and community colleges

Federated Systems: State governance includes a partially or fully consolidated governing board along with a higher education service agency or campus-level boards

² NC-SARA. (n.d.). Regional Education Compacts. <https://nc-sara.org/regional-education-compacts>

MHEC = Midwestern Higher Education Compact; NEBHE = New England Board of Higher Education; SREB = Southern Regional Education Board; WICHE = Western Interstate Commission for Higher Education

³ Ness, E. C., Baser, S. M., & Dean, M. (2021). *State Authorization Landscape and Process: An inventory, classification, and analysis*. State Higher Education Executive Officers Association. <https://sheeo.org/state-authorization-research-projects/>

⁴ CHEA. (n.d.). Regional Accrediting Organizations. <https://www.chea.org/regional-accrediting-organizations>

ACCJC = Accrediting Commission for Community and Junior Colleges; HLC = Higher Learning Commission; MSCHE = Middle States Commission on Higher Education; NECHE = New England Commission of Higher Education; NWCCU = Northwest Commission on Colleges and Universities; SACSCOC = Southern Association of Colleges and Schools Commission on Colleges; WSCUC = WASC Senior College and University Commission

⁵ NCSL. (n.d.). State Partisan Composition. <https://web.archive.org/web/20240221132220/https://www.ncsl.org/about-state-legislatures/state-partisan-composition>



APPENDIX B. INTERVIEW PROTOCOL

Introduction script:

Hello [NAME], thank you for joining us on this Zoom call today. As stated in previous communications, we are conducting a research study to learn more about state reauthorization and staff capacity for state authorization. We expect this interview to be about 60 minutes in length. We plan to record this interview to be transcribed later. Out of respect for your privacy, when we write up the results from your interview, we will not name you by name or agency. We will refer to you as the [TITLE] of the [AGENCY NAME], so please keep that in mind as you consider the responses you share with us. We may also reach out to you after the interview to clarify any statements made and ensure we accurately represent your experiences.

You are welcome to end this interview or your participation altogether in this study at any time. Do you have any questions about the process or the interview?

Would you still like to move forward with the interview? If yes, then we will begin the recording now.

*****Transition to questions.***

Broad agency/state context questions:

1. To get us started, could you please share your thoughts on what you see as the primary purpose of state authorization?
2. How do other state factors influence the reauthorization approach? From your experience, to what extent do the political environment and the governance structure come into play?
3. Considering the Regulatory triad (Federal - U.S. Department of Education, Accreditors, and States – Authorization), who do you see as primarily responsible for protecting students?

Reauthorization questions:

4. Please walk me through the reauthorization process for postsecondary approval in your agency.
 - a. Probe: Describe from an institution's perspective how they would apply for reauthorization
 - b. Probe: How does this differ from your initial authorization process?
 - c. Probe: Could you explain the development process of annual reporting and how it contrasts with the procedures for reauthorization?
5. How much autonomy does your agency have in determining the guidelines for authorization and renewal? When was the last time the process was examined? And how often does it get updated?

Capacity questions:

We are going to shift gears a bit now. We have a few questions related to the capacity of your agency to oversee the authorization process. By capacity, we are thinking about staffing, data systems, technology, and other resources necessary to carry out the work expected for authorization.

6. To get us started, on a scale of 1-5 with 5 being the highest, how would you rate your agency's capacity to oversee the authorization process? What are the main drivers of your rating?
7. How is your office funded? In what ways does this influence, if any, the capacity your agency has to oversee authorization and renewal?
8. How many full-time staff work on state authorization? Do you think this is sufficient to do the work?
 - a. What is the background of the staff? Do you rely on contractors, consultants or retired employees?
9. Besides staff, what are other tools or software that your agency depends on to streamline the administrative capacity of authorization that support your work with oversight.
 - a. Probe: Consider EDvera or other portals
 - b. Probe: What is the role of data in monitoring authorization and renewal?
10. Can you share how your agency collaborates with other agencies/stakeholders, or focuses on particular institutions to overcome capacity constraints in oversight activities?
 - a. Probes: Accreditors, Exemptions, NC-SARA
11. Could you describe any innovative solutions or strategies your agency has developed to effectively manage and carry out your responsibilities despite facing capacity challenges?
12. What are the things you wish you could do with your agency but don't have the capacity to enact at your current resource level?
 - a. For example, does your agency conduct site visits? What about enforcement of policies and regulations?
13. Similarly, if resources were not an object, what more could you do with greater capacity? Would you require renewal/reauthorization more frequently? How might you change what institutions are required to submit as part of reauthorization?

Wrapping-up

14. Is there anything else you would like to add about your experiences with working in authorizing postsecondary programs?
15. Is there anyone else who you would recommend that we talk with in [your state] about postsecondary education authorization? Anyone who might see things similar to or different from your perspective?

Conclusion script:

Thank you once again for your time. We greatly appreciate the information you've shared with us about your experiences working with state authorization. Are there any questions you have for us?

If anything else comes up later, please let us know. Otherwise, we will be in touch if we have any clarifications after transcribing and analyzing your responses.

APPENDIX C. REAUTHORIZATION AND REPORTING METRICS

Category/Element	Definition
Academic Metrics	
Institutional Accreditation Information	Requirement to provide institutional accreditation details.
Program/Specialized Accreditation Information	Requirement to provide program-specific accreditation details.
Course Catalog	Requirement to provide a course catalog, possibly with content stipulations.
Enrollment Agreement	Requirement to provide a student enrollment agreement form, possibly with specific content.
Student Handbook	Requirement to provide a student handbook, possibly with content stipulations.
Tuition and Fee Schedule	Requirement to report detailed tuition and fee information.
Consumer Protection Metrics	
Student Grievance/Complaint Policy	Requirement to report student grievance policies, possibly with implementation details.
Student Record Procedures	Requirement to report student record management procedures, possibly with specific stipulations.
School Closure Plans	Requirement to report school closure or teach-out plans, possibly prepared in advance.
Tuition Refund Policy	Requirement to report tuition refund policies, possibly with specific implementation requirements.
Tuition Recovery Fund (or Student Protection Fund)	Requirement to manage tuition recovery funds, possibly with specific stipulations.
Surety Bond	Requirement to maintain a surety bond, possibly with specific conditions.
Financial Statements	Requirement to provide financial statements, possibly with specific details or requirements (audited)
Site Visit	Requirement to allow agency site visits, possibly mandatory for renewal.
Student Outcome Metrics	
Enrollment Metrics	Requirement to report student enrollment metrics.
Persistence Metrics	Requirement to report student retention or dropout metrics.
Graduation Metrics	Requirement to report student graduation or completion metrics.
Job Placement Metrics	Requirement to report graduates' job placement metrics.
Cohort Default Metrics	Requirement to report student loan default metrics.
Wage Data	Requirement to report graduates' wage data.
Debt-to-Income Ratio	Requirement to report graduates' debt-to-income ratios.
State Licensing/professional Certification Examination Passage Metrics	Requirement to report licensing exam pass metrics.

APPENDIX D. EXAMPLE METRIC SCORING TEMPLATE

Descriptive Information

State: Georgia

Governing Entity: Georgia Nonpublic Education Commission

Agency/Department: Georgia Nonpublic Education Commission

Process: ga_GNPEC_2: Non-Accredited Institutions

Reauthorization/Reporting: Reauthorization

Metric Overview

Metric: Institutional Accreditation Information

Synopsis:

The agency requires applying institutions to provide information about accreditation for authorization (**Baseline**).

The agency specifically stipulates that the institution provides students with a disclosure form that the institution is not accredited and requires them to sign it to fulfill the conditions of state authorization (**Threshold**).

Score: 2

Metric Sourcing

Source: Application

- **Metric Located in Application:** Yes
- **Metric Source for Application (Link):**
<https://web.archive.org/web/20230614120731/https://gnpec.georgia.gov/authorization/authorization-application/how-do-i-renew-my-institutions-certificate-authorization>
- **Citation:** Online Portal (EDvera)
- **Official language or reference to the metric in the application:** N/A

Source: Administrative Rules

- **Metric Located in Administrative Rules:** Yes
- **Metric Source for Administrative Rules (Link):**
<https://web.archive.org/web/20230614115655/https://gnpec.georgia.gov/book/export/html/301>
- **Citation:** Minimum Standards - Standard Four: Catalog and Enrollment Agreement
- **Official language or reference to the metric in the administrative rules:**
 - Standard 4(2): Students must be provided documentation of the following: Prior year's enrollment, graduation, and job placement statistics; Accreditation status; and Any disclosures specified by the Executive Director.

Source: Statutes

- **Metric Located in Statutes:** No
- **Metric Source for Statutes (Link):** N/A
- **Citation:** N/A
- **Official language or reference to the metric in the statutes:** N/A

Notes

Notes (If Applicable):

This was rated as a 2 because of the student disclosure form (gnpec.georgia.gov/document/publication/gnpec-student-disclosure-form/download) that requires the institution to gather a student's signature to confirm they understand that this institution is authorized as an unaccredited institution, and it's in the catalog.

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