

Spring 2018

# Placement Reporting Guide: How to Report Out-of-State Learning Placements to NC-SARA

A Guide for SARA Institutions

Spring 2018 (PILOT YEAR)



**National Council for  
State Authorization Reciprocity Agreements**

*A voluntary, regional approach to state oversight of distance education*

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## Background

In spring 2016, SARA institutions first reported to NC-SARA their out-of-state distance education enrollments, disaggregated by state. Similar reporting was done in spring 2017<sup>1</sup>.

For both reporting cycles, NC-SARA used the definitions and protocols of the U. S. Department of Education (ED), promulgated through the Integrated Postsecondary Education Data System (IPEDS) operated by the National Center for Education Statistics (NCES).

Enrollments captured and reported under those provisions do not include on-the-ground, out-of-state learning placements (clinical rotations, student teaching, internships, etc.), even though those activities are important parts of many academic programs and the number and extent of such placements are of great interest and concern to educators, practitioners, licensing bodies and state regulators. During the development of SARA, parties agreed to work toward having SARA institutions provide information on such placements.

## Learning Placements

Learning placements (clinical rotations, student teaching, internships, etc.) are important parts of many instructional programs. Though they occur in a variety of disciplines, they are particularly common in certain fields, such as health-related disciplines and education. They are often a required part of obtaining a degree and/or license to practice a particular profession.

While for most institutions, the majority of such placements made through their academic programs are likely located in the same state as the institution, placements do occur across state lines. In making such placements, institutions are obliged to comply with the relevant laws, rules and regulations of the state in which such placements are made. Rules and regulations on such matters may be those of a state education agency or may come from a professional licensure board located in the particular state. As recent studies indicate, there is enormous variety among how states oversee the estimated 1,300 or so professions that one state or another may license.<sup>2</sup>

SARA institutions, under specified conditions, may place a limited number of students in such learning placements in other SARA states without securing prior authorization for those placements. Importantly, though, if such placements are part of a degree program intended to prepare students for professional licensure in another state, prior approval by the other state's professional licensure board that oversees practice of the discipline may be required; *SARA participation does not include such professional licensure approval*. (In some states, an even broader range of activities falls under the jurisdiction of licensing boards.) SARA policies require institutions to inform students whether completion of the institution's program will enable a student to take licensure exams in their state. New rules from the U.S. Department of Education, set to take effect July 1, 2018, are far more prescriptive about such disclosures and notifications<sup>3</sup>.

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<sup>1</sup> Those reported enrollments and analyses of each are available at [www.nc-sara.org](http://www.nc-sara.org)

<sup>2</sup> <http://knowledgecenter.csg.org/kc/content/us-licensing-system>

To meet commitments made to the state regulator community during the development of SARA, to help institutions better attend to and meet professional licensure obligations in the states in which they enroll students, and to prepare for compliance with coming federal regulations affecting institutions' ability to participate in federal Title IV student assistance programs, this spring NC-SARA is asking SARA institutions to report their learning placements in all states, territories and districts other than their own. *This 2018 pilot reporting to NC-SARA is voluntary for SARA institutions in spring 2018.* The NC-SARA Board at its May 3, 2018 meeting will consider making such reporting mandatory for spring 2019.

## Classification of Instructional Programs (CIP)

One fundamental characteristic of SARA is its reliance on certain previously existing, workable mechanisms (such as accreditation, federal financial responsibility composite scores, etc.), rather than inventing similar mechanisms anew. *Classification of Instructional Programs (CIP)* codes have been developed by the U.S. Department of Education's National Center for Education Statistics (NCES) and virtually every campus, state and accrediting body in the nation uses them in some fashion. See Appendix I for additional information.

Institutions have already assigned CIP codes to their academic programs, and *NC-SARA doesn't expect or desire institutions to revisit those decisions for the purpose of SARA reporting.* Rather, SARA institutions are to report learning placements categorized by the codes already assigned to the related programs.

## What do SARA institutions report?

NC-SARA asks for reporting by two-digit CIP code. For example, a SARA institution would report, for each state other than its own, the number of students placed during calendar year 2017, disaggregated by two-digit CIP code and the state in which the placement was made.

There is infinite variety in these "placements," including what they are called (internships, rotations, student teaching, etc.), how long they last, whether they are required or not, whether they are arranged by the student or the institution, whether they are "supervised" or "unsupervised," and so forth. NC-SARA does not intend to have institutions identify and capture all such possible activities. (Nor is this reporting designed to capture short courses, field trips, etc.)

### **Institutions should report out-of-state placements that meet *all* of the following criteria:**

- The placement is outside the "home state" of the SARA institution;
- The placement involves the physical presence of the student at the out-of-state location(s);
- The placement is an activity required for degree completion (a requirement of the student's major, rather than a general institutional requirement) or professional licensure;
- The placement is carried out under the provisions of a formal agreement between the institution and the placement location; and
- The placement started between January 1, 2017 and December 31, 2017.

**Placements that meet the above criteria should be reported as follows:**

- Report unduplicated headcounts;
- Disaggregated by two-digit CIP code; and
- Disaggregated by the state in which the placement was made.

*Example:* Three University of Texas at El Paso nursing students each do a single clinical rotation at each of two hospitals in Las Cruces, New Mexico and one rotation at a hospital in Phoenix, Arizona. UTEP would report three placements in New Mexico and three placements in Arizona, all under CIP code 51.

Reporting will be done on a dedicated form, separate from the reporting of distance education/online enrollments. The new form will look like this:

*Numbers of Students Placed in Out-of-State Learning Activities  
January 1 – December 31, 2017*

The screenshot shows a web form titled "Numbers of Students Placed in Out-of-State Learning Activities January 1 – December 31, 2017". At the top, there is a text input field for "Institution" containing "Test Institution of the South". Below this is a section titled "CIP Code By State" which contains two rows of data. Each row has a "CIP Type" dropdown menu, a "State" dropdown menu, and an "Enrollment Number" text input field. The first row shows "Construction Trades" for CIP Type, "Alabama" for State, and "23" for Enrollment Number. The second row shows "Engineering" for CIP Type, "Georgia" for State, and "44" for Enrollment Number. To the right of the second row is a "Remove" link. At the bottom right of the "CIP Code By State" section is a link that says "Add another CIP/State Enrollment". Below the main form area are two buttons: "Previous Page" and "Next Page".

CIP Type	State	Enrollment Number
Construction Trades	Alabama	23
Engineering	Georgia	44

## Where on campus are these numbers kept?

Some institutions already collect this information from their various academic departments; many haven't consolidated it in a centralized location, such as a compliance office. To obtain the data, start with the person/people carrying out the Institutional Research function on campus. Inevitably, a certain amount of institutional canvassing will be needed. Because related programs (and their CIP codes) tend to be housed in the same department or college, collecting the information at the college level (for large universities) or department level (for smaller institutions) can provide a good starting point.

NC-SARA strongly believes that regulatory attention to these matters (clinical placements, adherence to the rules of states' professional licensing boards, and the intersection between postsecondary education and professional licensure) will most certainly increase in the coming years. If an institution cannot document where its students are, and whether completion of these out-of-state learning placements will help enable students to sit for licensure exams in their desired location, the institution is vulnerable on a number of fronts, including possible violations of state or ED regulations or exposure to costly lawsuits. Assembling this information is a necessary component to reducing such risks.

## COMMON QUESTIONS

1. Does NC-SARA have a basic form that my institution could adapt to survey our academic departments or colleges for this information?

Answer: Yes. Download a spreadsheet that you can adapt [HERE](#) .

2. We are to report placements that are required for “professional licensure, degree completion or both?

Answer: Both.

3. Since some students will have multiple placements, do we count the number of individual placements in the various states or the number of students who were placed?

Answer: Count the number of students – unduplicated headcount.

4. How will this data be used by NC-SARA?

Answer: It will appear on the NC-SARA website, similar to the way institutional enrollment data now appears.

5. Will the data sharing agreement be adjusted to include reference to the collection of out-of-state learning placements?

Answer: Yes

6. What if my institution has none of this information?

Answer: Use this document over the coming year to establish a system to collect the information and be ready for mandatory reporting of this data in spring 2019.

7. What if the U.S. Department of Education somehow delays or changes the rules on state authorization and related matters that are to come into effect in July, 2018? Will that affect this collection?

Answer: No. Placement of students in other states is considered distance learning by SARA. Many placements align with and are “covered’ by SARA policies and others require additional permissions to be acquired. Tracking the quantity of such placements is an institutional responsibility and also information that SARA has committed to provide to its member states. This state interest in learning placements is not going away, and regardless of federal action or inaction, many states are interested in having SARA fulfill its earlier commitment to help gather this information.

8. Will NC-SARA be providing any additional help about this for institutions that need it?

Answer: Yes. NC-SARA will work with partners such as WCET’s State Authorization Network (SAN) and others to further assist institutions. Any SARA institution may contribute voluntarily to the 2017 pilot effort to collect placement data. Invitations will be

extended to certain institutions to ensure that feedback will be collected from a variety of types of institutions to inform the (likely) required submission in 2019. Additionally, NC-SARA will provide additional information through webcasts, blogs and written materials.

- 9.. What about reporting placements in non-SARA states/territories: California, Massachusetts and Puerto Rico?

Answer: Report them as you are reporting students placed in SARA states. NC-SARA will aggregate and report those placements under the designation “Placements in Non-SARA States,” as was done with enrollment reporting as states gradually joined SARA. If -- or as -- those states join, their related placement data will be broken out and reported separately by state on the NC-SARA website.

10. Do we report undergraduate students, graduate students, or both?

Answer: Both, combined into a single number.

11. If a student is doing her student teaching in another state, and she’s going to be a math teacher, do we report her placement under CIP code 27 (Mathematics and Statistics) or CIP code 13 (Education)?

Answer: Report under the CIP code for the discipline within which the activity is managed by the institution. In this case, that’s most likely to be CIP code 13, but institutions differ in their assignment of these codes. Use the codes assigned by your institution.

12. How will we report?

Answer: Just as you report enrollments. Institution SARA contacts will be sent a link to a specific form on which to report out-of-state learning placements.

13. When will we report?

**ANSWER: The NC-SARA reporting period for spring 2018 will be May 21-June 11, 2018. As in enrollment reporting, links will be sent to each institution’s SARA coordinators on May 21.**



## Appendix 1

### Classification of Instructional Programs (CIP)

*Classification of Instructional Programs* (CIP) codes were developed by the U.S. Department of Education's National Center for Education Statistics (NCES) in 1980, with revisions in 1985, 1990, 2000 and 2010<sup>3</sup>. Virtually every campus, state and accrediting body in the nation uses them in some fashion. They are used to maintain and categorize academic program inventories, report completions, and, in some states, they affect funding for public institutions. In health-related fields, they can affect the pricing of delivered services, insurance reimbursement to providers, and limits of coverage and practice.

The codes provide a taxonomy (a hierarchical organizational scheme) of fields of study, with greater or lesser subdivision within broad subject areas. For example, CIP Code 51 (Health Professions and Related Programs, with more than 200 sub-categories – 26 within nursing, alone) contains far more narrowly specified programs than does CIP Code 54 (History, with nine specified sub areas).

The highest order of the taxonomy has 47 two-digit CIP codes and subdivides each of them according to the scheme in Appendix I, using either two digits (xx), four digits (xx.xx), or six digits (xx.xxxx). In Appendix 1, if reading on a computer, you can click on a two-digit field, be taken to an online definition of that code, and then further click on any of the indicated sub-fields. Definitions are provided for each sub-field. (The table is directly available at: <https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55> )

Institutions have already assigned CIP codes to their academic programs, and *NC-SARA doesn't expect or desire institutions to revisit those decisions for the purpose of SARA reporting*. Rather, SARA institutions are to report learning placements categorized by the codes already assigned to the related programs.

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<sup>3</sup> <https://nces.ed.gov/ipeds/cipcode/Default.aspx?y=55>

## Appendix I (continued)

### National Center for Education Statistics

**The Integrated Postsecondary Education Data System Help Documentation Version 1.1, July 2009** CIP Website, CIP Wizard, and CIP Selector CIP 2010  
(<https://nces.ed.gov/ipeds/cipcode/Help/CIP2010Help.pdf>)

CIP 2010 Resources -- <https://nces.ed.gov/ipeds/cipcode/resources.aspx?y=55>

1. What is the CIP? The Classification of Instructional Programs (CIP) provides a taxonomic scheme that supports the accurate tracking and reporting of fields of study and program completions activity.

2. Who creates the CIP? CIP was originally developed by the U.S. Department of Education's National Center for Education Statistics (NCES) in 1980, with revisions occurring in 1985, 1990, 2000, and 2010.

Two-digit CIP Codes, CIP 2010 -- <https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55>  
(Accessed 12/18/2017)

- [01\) AGRICULTURE, AGRICULTURE OPERATIONS, AND RELATED SCIENCES.](#)
- [⊕ 03\) NATURAL RESOURCES AND CONSERVATION.](#)
- [⊕ 04\) ARCHITECTURE AND RELATED SERVICES.](#)
- [⊕ 05\) AREA, ETHNIC, CULTURAL, GENDER, AND GROUP STUDIES.](#)
- [⊕ 09\) COMMUNICATION, JOURNALISM, AND RELATED PROGRAMS.](#)
- [⊕ 10\) COMMUNICATIONS TECHNOLOGIES/TECHNICIANS AND SUPPORT SERVICES.](#)
- [⊕ 11\) COMPUTER AND INFORMATION SCIENCES AND SUPPORT SERVICES.](#)
- [⊕ 12\) PERSONAL AND CULINARY SERVICES.](#)
- [⊕ 13\) EDUCATION.](#)
- [⊕ 14\) ENGINEERING.](#)
- [⊕ 15\) ENGINEERING TECHNOLOGIES AND ENGINEERING-RELATED FIELDS.](#)
- [⊕ 16\) FOREIGN LANGUAGES, LITERATURES, AND LINGUISTICS.](#)
- [⊕ 19\) FAMILY AND CONSUMER SCIENCES/HUMAN SCIENCES.](#)
- [⊕ 22\) LEGAL PROFESSIONS AND STUDIES.](#)
- [⊕ 23\) ENGLISH LANGUAGE AND LITERATURE/LETTERS.](#)
- [⊕ 24\) LIBERAL ARTS AND SCIENCES, GENERAL STUDIES AND HUMANITIES.](#)
- [⊕ 25\) LIBRARY SCIENCE.](#)
- [⊕ 26\) BIOLOGICAL AND BIOMEDICAL SCIENCES.](#)

- [⊕ 27\) MATHEMATICS AND STATISTICS.](#)
- [⊕ 28\) MILITARY SCIENCE, LEADERSHIP AND OPERATIONAL ART.](#)
- [⊕ 29\) MILITARY TECHNOLOGIES AND APPLIED SCIENCES.](#)
- [⊕ 30\) MULTI/INTERDISCIPLINARY STUDIES.](#)
- [⊕ 31\) PARKS, RECREATION, LEISURE, AND FITNESS STUDIES.](#)
- [⊕ 32\) BASIC SKILLS AND DEVELOPMENTAL/REMEDIAL EDUCATION.](#)
- [⊕ 33\) CITIZENSHIP ACTIVITIES.](#)
- [⊕ 34\) HEALTH-RELATED KNOWLEDGE AND SKILLS.](#)
- [⊕ 35\) INTERPERSONAL AND SOCIAL SKILLS.](#)
- [⊕ 36\) LEISURE AND RECREATIONAL ACTIVITIES.](#)
- [⊕ 37\) PERSONAL AWARENESS AND SELF-IMPROVEMENT.](#)
- [⊕ 38\) PHILOSOPHY AND RELIGIOUS STUDIES.](#)
- [⊕ 39\) THEOLOGY AND RELIGIOUS VOCATIONS.](#)
- [⊕ 40\) PHYSICAL SCIENCES.](#)
- [⊕ 41\) SCIENCE TECHNOLOGIES/TECHNICIANS.](#)
- [⊕ 42\) PSYCHOLOGY.](#)
- [⊕ 43\) HOMELAND SECURITY, LAW ENFORCEMENT, FIREFIGHTING AND RELATED PROTECTIVE SERVICES.](#)
- [⊕ 44\) PUBLIC ADMINISTRATION AND SOCIAL SERVICE PROFESSIONS.](#)
- [⊕ 45\) SOCIAL SCIENCES.](#)
- [⊕ 46\) CONSTRUCTION TRADES.](#)
- [⊕ 47\) MECHANIC AND REPAIR TECHNOLOGIES/TECHNICIANS.](#)
- [⊕ 48\) PRECISION PRODUCTION.](#)
- [⊕ 49\) TRANSPORTATION AND MATERIALS MOVING.](#)
- [⊕ 50\) VISUAL AND PERFORMING ARTS.](#)
- [⊕ 51\) HEALTH PROFESSIONS AND RELATED PROGRAMS.](#)
- [⊕ 52\) BUSINESS, MANAGEMENT, MARKETING, AND RELATED SUPPORT SERVICES.](#)
- [⊕ 53\) HIGH SCHOOL/SECONDARY DIPLOMAS AND CERTIFICATES.](#)
- [⊕ 54\) HISTORY.](#)
- [⊕ 60\) RESIDENCY PROGRAMS.](#)