

## Policy on Approval of Off-Campus or Online Courses and Programs

**Version: 1.0**

**Responsible University Official: Provost**

**Effective Date: July 1, 2016**

### 1.0 Introduction

The fundamental purpose of this policy is to ensure full and perpetual compliance with all Higher Learning Commission (HLC), U.S. Department of Education (DOE), and state authorization policies and laws related to the offering of courses and programs at any location other than SLU's St. Louis campus and Madrid, Spain campus.

### 2.0 Scope

This policy applies to all academic units (and all courses and programs therein) throughout the University, including the Madrid campus.

### 3.0 Context

3.1. SLU's authorization to offer any course or academic program (including internships, practica, and clinical experiences) at any physical location in the State of Missouri other than on our main St. Louis, MO, campus is strictly governed by our institutional accreditor, the HLC. Similarly, SLU's authorization to provide Title IV federal financial aid to any student enrolled in any course or program at any such off-campus location in Missouri is strictly governed by the DOE. Failure to gain – in advance – HLC and DOE approval to offer on-ground, off-campus courses or programs at any off-campus location in Missouri may result in any of the following deleterious actions from the HLC and/or DOE:

- an immediate order to “cease and desist” all such academic programming.
- an order to “cease and desist” all such programming at the end of the current academic term and thereafter.
- a requirement to refund to the DOE every dollar of federal financial aid awarded to any student ever enrolled in a course or program at a non-DOE or HLC-approved off-campus location.
- the prohibition of offering any new on-ground, off-campus courses or programs either indefinitely or for a defined period of time.

The HLC also prohibits any advertising/marketing/student recruitment related to such courses/programs without prior HLC approval.

3.2. SLU's authorization to offer any course or academic program (including internships, practica, and clinical experiences) – either on-ground at a physical location or online – in any U.S. state other than Missouri is strictly governed by a) the HLC (see above), b) the U.S. DOE (see above), and c) the “State Authorization” laws of each such state. Failure to gain – in advance – explicit approval from each and every such state agency to offer even one on-ground, off-campus course or program or one online

course/program may result in any of the following consequences from the state(s) in question, as well as from the HLC and/or DOE:

- an immediate order to “cease and desist” all such academic programming.
- an order to “cease and desist” all such programming at the end of the current academic term and thereafter.
- a requirement to refund to the DOE every dollar of federal financial aid awarded to any student ever enrolled in a course or program at a non-DOE-, HLC-, and/or state-approved off-campus location.
- the prohibition of offering any new on-ground, off-campus courses or programs, or any online programs to residents of a particular state, either indefinitely or for a defined period of time

The HLC and most states also prohibit any related advertising/marketing/student recruitment without prior HLC and state approval.

- 3.3. Both initial applications for authorization to operate in any state, as well as applications to renew previously-awarded authorization, typically require significant application fees by each state – and often on a per-program basis. Academic units should be aware that significant University resources – both fiscal and human – are required to garner state-by-state authorization. Currently, these resources are provided from the budget of the Office of the Provost.

#### 4.0 Policy Statement

- 4.1 No credit-bearing course(s) or program(s) shall be offered on-ground at any location other than the St. Louis, MO, campus (which includes the North and South “campuses” as well as the Law School building) or the Madrid, Spain, campus without the explicit approval, in writing, of each of the following:
- the University Registrar
  - the University’s HLC liaison
  - the University’s Director of Student Financial Services
  - the University’s Coordinator for State Authorization (in the Office of the Provost)
- 4.2 An electronic or paper-based authorization form – on which signature approvals from each of the above are to be collected – must be completed by the governing dean. Only upon formal notice from the Office of the Provost that authorization has been granted by the Provost is any such requested educational activity (or related advertising/marketing/recruitment) to commence.
- 4.3 Approval records will be maintained by the Office of the Provost and serve as the University’s official record of all off-campus educational activity. Banner coding of off-campus and distance education courses and programs is governed by data standards established by the Student Academic Data Committee and overseen by the University Registrar.
- 4.4 Failure to comply with this policy may result in the non-compliant academic unit having to incur all or part of any financial penalty, refund of student financial aid, or legal fees related to a finding of SLU non-compliance by the HLC and/or DOE.

#### 5.0 Guidance for Academic Units

- 5.1 Securing advance approval from any one of the governance bodies noted above (i.e., DOE, HLC, and individual U.S. states) typically requires a minimum of three months beyond the formal submission of all required institutional documents and governance body application forms – which themselves may require several months to complete by staff of the Office of the Provost and representatives of the academic unit proposing to offer the course/program in question.

- 5.2 It is often the case that documented approval from one entity (e.g., the HLC) is required before an application for approval for another required entity (e.g., the DOE and/or a state board of higher education) may even be submitted. Accordingly, academic unit plans for the offering of any on-ground off-campus or online course/program must include adequate time (at least six months) for full approval from all pertinent governing bodies.

## 6.0 Approvals

### **This policy was:**

1. Approved by CADD: *August 17, 2016*
2. Adopted without amendment by Provost Nancy Brickhouse: *August 17, 2016*