

Northwestern College
State Authorization Documentation
April 7, 2015

Compiled for the United State Department of Education Federal Student Aid School Eligibility Service
Group, Program Compliance

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Status of State Authorization

State	Status	Notes
Alabama	Northwestern does not accept online students from Alabama.	
Alaska	Exempt	Recertify before 10/15/15
Arizona	Exempt	
Arkansas	Northwestern does not accept online students from Alabama.	
California	Exempt	
Colorado	Exempt	
Connecticut	Exempt	
Delaware	Exempt	
District of Columbia	Northwestern does not accept online students from the District of Columbia	
Florida	Our online programs do not fall within the jurisdiction for authorization.	
Georgia	Exempt	Recertify before June 30, 2015
Hawaii	Exempt	
Idaho	Exempt	
Illinois	Exempt	
Indiana	Exempt	
Kansas	Exempt	
Kentucky	Exempt	
Louisiana	Exempt	
Maine	Exempt	
Maryland	Northwestern does not accept online students from Maryland.	
Massachusetts	Exempt	
Michigan	Exempt	
Minnesota	Authorized	Renew before May 6, 2015
Mississippi	Exempt	
Missouri	Exempt	
Montana	Authorized to offer post-secondary degree programs	
Nebraska	Exempt	
Nevada	Certified exempt	
New Hampshire	Exempt	
New Jersey	Exempt	
New Mexico	Exempt	
New York	Exempt	
North Carolina	Exempt	
North Dakota	Exempt	Renew before July 28, 2015
Ohio	Exempt	
Oklahoma	Exempt	
Oregon	Submitted preliminary screening form 6/5/14, no response	
Pennsylvania	Exempt	Through 2015

Rhode Island	Exempt	
South Carolina	Exempt	
South Dakota	Authorized	No time limit noted
Tennessee	Exempt	
Texas	Exempt	
Utah	Authorized	No time limit noted
Vermont	Exempt	
Virginia	Exempt	
Washington	Authorized for recruiting and promotion. Online programs exempt.	Renew before January 10, 2016
West Virginia	Exempt	
Wisconsin	Not exempt	Must authorize if we accept a student from Wisconsin.
Wyoming	Certified	Must recertify before June 30, 2015

Record of Communication

Excel workbook, converted to pdf

Alaska
Date

Event

Result

Follow-up Required

Notes

9/26/2011	Initial Review. Exemption form completed 9/21 and given to Jill to have Greg Christy sign on Monday, September 26, 2011.	Exempt through 2013	Renew every-other year	Must apply for exempt status (should qualify). There is a \$100 fee. Must re-apply biannually, but there is no fee for that. Requires conspicuous statements on our website. Nursing, ed, etc., require additional approval. Adjunct in Alaska would change us to physical presence in the state. However, clinicals and practicums do not mean a physical presence.
10/3/2013	Submitted renewal 10/03/13, approved 10/10/13	Exempt through October 15, 2015	Recertify prior to October 15, 15	Email filed

Arizona
Date

Event

Result

Follow-up Required

Notes

No authorization is required unless there is physical presence. Private nonprofit colleges do not need authorization. Complete a letter of intent, they will respond with a letter indicating no authorization is necessary. Teacher ed and nursing do need separate authorizations. Letter of intent was completed and sent. Email returned from Keith Blachard. No statement of exemption or waiver is required.

Not-for-profit private colleges with no physical presence do not need to take further action

9/27/2011 Letter of intent sent

Email received
9/27/11
indicating no
further action is
required

None

6/3/2013 Reviewed requirements

No further
action

None

California

Date	Event	Result	Follow-up Required	Notes
11/15/2011	Called to verify with the Bureau for Private Postsecondary Education.	Exempt	None	Spoke with Lila Esquivel. She indicated there was essentially no difference in what we are allowed to do in CA if we declare exempt, or if we file an application for approval to operate an accredited institution. She indicated that we do not even need to complete the application for verification of exempt status (fee of \$250), though some institutions do just to get the verification in writing. As long as we continue to be accredited by the HLC, we are exempt from authorization in CA.

institutions with a physical presence in the state of CA are eligible for Bureau regulation and oversight. We are also exempt from the authorization process based on:

http://www.bppe.ca.gov/lawsregs/ppe_act.shtml#94874

Article 4. Exemptions

94874. Categories of Exempt Institutions

94874.1. Non-WASC Regional Accreditation

(a) An institution that is accredited by a regional accrediting agency that is recognized by the United States Department of Education, and is not an agency described in subdivision (i) of Section 94874, is exempt from this chapter, except Article 14 (commencing with Section 94923).

(b) This section shall remain

5/28/2014 Reviewed requirements

Exempt

Colorado

Date	Event	Result	Follow-up Required	Notes
				... , online, but authorization required for education, nursing, etc. Sent to Heather DeLange on 9/20: Greetings from Northwestern College in Iowa. Northwestern, a private nonprofit liberal arts college with religious affiliation, is developing online courses and programs and would like to be able to offer those to students located in Colorado. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It does not appear there are any requirements outside of being accredited by an accrediting body. Northwestern is HLC accredited. Do we need any type of letter from you granting authorization? Do we need to submit anything
9/20/2011	Contacted CO Dept of Higher Ed through email	Email from Heather Delange of Colorado Dept of Higher Ed affirming we are exempt. Filed.	Review regs periodically	

6/3/2014 Reviewed requirements	NWC does not trigger physical presence; we are exempt and no additional paperwork is necessary.	Review regs periodically	Reviewed these two sources: http://highered.colorado.gov/Academics/DegreeAuth/ http://highered.colorado.gov/Publications/Policies/Current/i-partj.pdf
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Connecticut

Date	Event	Result	Follow-up Required	Notes
10/5/2011	Emailed Patricia Santoro of State of CT for clarification	Received letter on 10/24 with laws. NWC is exempt.	Review regs annually	10/05: Greetings Ms. Santoro- Northwestern College of Orange City, Iowa is a private nonprofit liberal arts college affiliated with the Reformed Church of America. We have been in operation in Iowa since 1882, and are accredited by the Higher Learning Commission of the North Central Association of Colleges and Universities. Recently Northwestern made a commitment to develop online courses and programs to meet the needs of adult learners interested in a quality Christian education but who cannot move or commute to Orange City to do so. It is our hope to provide opportunities to students in Connecticut, and to that end we seek clarification of your authorization process. I have

Received letter with laws from State of Connecticut. 10/24/2011 Filed.	NWC is exempt, and no letter of exemption is required.	Review regs annually
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6/3/2014 Reviewed requirements	NWC does not trigger physical presence; we are exempt and no additional paperwork is necessary.	Review regs annually	Reviewed the following sources: http://www.ctohe.org/Postsecondary/pdfs/RegulationsLicenseAccreditation.pdf http://www.ctohe.org/Postsecondary/OutsideOfCT.shtml In addition to SHEEO
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Delaware
Date

Event

Result

Follow-up Required

Notes

Wayne Barton
emailed the
following on
10/13/11: If
your institution
is not
incorporated in
Delaware and
does not have a
physical
presence
(offices or
classroom) in
Delaware, we
do not require
DOE approval.
We do ask that
notify us of
Delaware
students

Sent email to Wayne Barton
10/5/2013 requesting clarification

receiving federal financial aid. Review regulations annually

6/3/2014 Reviewed requirements	NWC does not trigger physical presence; we are exempt and no additional paperwork is necessary.	Review regulations annually	Internships, externships, field experiences, proctored exams and tests in DE whether we arrange or the student arranges mean physical presence.
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Washington DC

Date	Event	Result	Follow-up Required	Notes
12/14/2011	Completed letter with responses to ten questions, sent to Dorothy Thomas	No response		Ten questions located here: https://sites.google.com/site/stateauthorizationnetworkohio/share-information/region-a-g
6/3/2014	Emailed dorothea.thomas@dc.gov to inquire about a possible exemption			It appears some are waived from fully licensure. Full licensure is involved. Requirements for licensure are found: http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/FINAL%20CLEAN%20DEGREE%20REGS%20EFF.%203.18.11.pdf Information on distance learning providers are here: http://osse.dc.gov/service/distanceonline-education-programs-inquiries

Florida Date	Event	Result	Follow-up Required	Notes
				College in Iowa. Northwestern, a private nonprofit liberal arts college with religious affiliation, is developing online courses and programs and would like to be able to offer those to students located in Florida. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It appears the Florida Commission for Independent Education only regulates schools with a physical presence in Florida, and that your agency does not require providers of online education to be authorized if there is no physical presence. If Northwestern College has no intention of establishing a physical presence in Florida, does that make us exempt? Do we need any type of letter Inquired about physical presence.
9/21/2011	Email to Max Kettermann	He forwarded our email to Susan Hood.		
9/22/2011	Email to Susan Hood	No response		

contacted your office
 regarding state authorization.
 You asked the questions
 (below) and my responses
 were sent. I have yet to hear
 back, and wanted to follow
 up. Northwestern College
 has no physical presence in
 Florida based on the
 indicators of physical
 presence noted in your
 submission to SHEEO:
<http://www.sheeo.org/statea>
[uth/AgencyResponses/Florid](http://www.sheeo.org/statea)
[a_Commission%20for%20Ind](http://www.sheeo.org/statea)
[ependent%20Education.pdf](http://www.sheeo.org/statea)
 Our faculty have no face to
 face contact with Florida
 students within Florida, and
 we do not send a recruiter to
 Florida. Based on that
 information, can
 Northwestern go forward
 with the understanding that
 we are exempt from state
 authorization in Florida as
 long as our online courses

11/11/2011 Second email to Susan Hood	Response received on 11/28/11 with letter of exemption	
Received letter of exemption 11/28/2011 through email	NWC is 'not under jurisdiction' because we have no physical presence	Review regulations annually

6/4/2014 Reviewed requirements	NWC does not need to authorize unless we establish physical presence	Review regulations annually	Be careful of physical presence triggers including college-initiated internships and recruiting
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Georgia

Date	Event	Result	Follow-up Required	Notes
12/14/2011	Submitted letter of non-engagement			
	Received letter of exemption from the Nonpublic Postsecondary Education Commission	Exempt for 2012	Renew annually	
1/3/2012	Submitted letter of non-engagement			
12/4/2012	Received letter of exemption from the Nonpublic Postsecondary Education Commission	Exempt for 2013	Renew annually	
12/19/2012	Submitted letter of non-engagement			
11/4/2013				

Greetings from Northwestern College in Orange City, Iowa. Northwestern pursued and received exemption in Georgia to offer online-only courses and programs in 2012 and 2013. A recent review of our records shows that though we sent a letter of non-engagement in early November of 2013, we have not received the confirmation letter that has typically followed. Would you please review our case and let me know if we need to provide anything further?

		Adam Hawk responded and said we needed a new notarized letter
6/4/2014	Emailed Dr. Carl Camann to request letter of exemption Updated the letter with today's date, gave it to Jill who will notarize when Greg	
6/16/2014	signs Sent notarized letter to Dr.	
6/24/2014	Carl Camann Received letter of exemption from the Nonpublic Postsecondary Education Commission	
7/8/2014		Exempt through June 30, 2015

Hawaii
Date

Event

Result

Follow-up Required

Notes

9/21/2011	Initial review of requirements	Exempt due to accreditation	Review regulations annually	Hawaii does not approve or authorize any accredited postsecondary institutions.
6/4/2014	Reviewed requirements	NWC does not trigger physical presence; we are exempt and no additional paperwork is necessary.	Review regulations annually	Physical presence is having a physical location in the state of any kind, for any purpose.

Idaho
Date

Event

Result

Follow-up Required

Notes

The Idaho State Board of Education (SBOE) does not currently require any institution lacking a physical presence inside the state to register. After July 1, 2011, online-only schools, recruiting agents, practicum/internships, supervised clinicals, etc, are no longer considered 'presence' for the purposes of registration. Only 'brick & mortar' classroom or business office operations will be considered presence for registration. Same statement as above continues to apply.

9/21/2011	Initial review of regulations	Exempt	Review regs annually
5/28/2014	Reviewed regulations	Exempt	Review regs annually

Illinois

Date	Event	Result	Follow-up Required	Notes
11/11/2011	Submitted Distance Education Programs Online Request form:	Exempt, we do not reach physical presence triggers		Form found here: http://www.ibhe.org/ODA/distanceEd/printApp.asp?O=00188300&R=248
12/22/2011	Letter received from Bob Blankenberger, Deputy Director. Filed.	Exempt, we do not reach physical presence triggers	Review annually	
5/28/2014	Reviewed regulations	Exempt, we do not reach physical presence triggers	Review annually	

Indiana

Date	Event	Result	Follow-up Required	Notes
9/21/2011	Submitted letter requesting exemption to Dir of Accreditation and Regulatory Compliance			Sent to Ross Miller
				After a phone call with you on September 21st, I mailed the letter you requested regarding Northwestern College's accreditation and lack of physical presence in Indiana. We hope to be exempt from state authorization, and allowed to offer Indiana residents an opportunity to take our online courses. I have not yet received a response to our letter, and am therefore following up. Do you require any additional information from us to proceed?
11/11/2011	Email follow-up to Ross Miller	He indicated through email our letter was not received	Resent letter 11/11/11	
12/19/2011	Letter of exemption from Ross Miller	Exempt based on their interpretation of our status as a Bible college	Review regulations annually	

6/4/2014 Reviewed regulations.

Indiana updated
their SHEEO
report 4/24/14
to note
procedures for
out-of-state
nonprofit are
under
development. I
am unable to
find anything on
their CHE site.

Review in August, 2014

"Postsecondary credit
bearing proprietary
educational institution....(b)
The term does not include
the following....(6) Out-of-
state public and nonprofit
degree granting institutions
offering instructional or
educational services or
training in Indiana."
[http://www.in.gov/legislative
/ic/code/title21/ar18.5/ch2.p
df](http://www.in.gov/legislative/ic/code/title21/ar18.5/ch2.pdf)

Emailed Ross Miller for
6/4/2014 clarification.

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Greetings from Northwestern
College in Orange City, Iowa.
Northwestern is a private non-
profit Christian college
accredited by the Higher
Learning Commission. In
2011 we received a letter
from your office affirming
that we would not be
required to authorize in
Indiana because of the
religious nature of our
institution. In a recent
review of your policies, I
believe this may need to be
clarified. Though
Northwestern is a distinctly
Christian college, we offer
programs online that are not
strictly religious in nature.

My question stems from this
definition, located in your
regulations: "Postsecondary
credit bearing proprietary
educational

He requested a
hard copy letter
indicating our
programs have
faith
integration.
He will exempt
us based on

Spoke with Ross Miller on the 6/4/2014 phone that, as a Bible college.

Sent letter to Ross Miller,
Director of Accreditation and
6/16/2014 Regulatory Compliance

We must
complete
application for
Initial
Authorization -
No Physical
Presence

Received letter from
Commission for Higher
7/1/2014 Education

When we accept our first
student from IN, complete
this form:
[http://www.in.gov/bpe/files/
Initial_Authorization_-
_No_Physical_Presence_V15
%281%29.pdf](http://www.in.gov/bpe/files/Initial_Authorization_-_No_Physical_Presence_V15%281%29.pdf)
There is a \$2000 fee, so I'm
not going to file this until we
actually have a student from
Indiana.

	Sent follow-up email to Ross Miller asking to clarify whether we would be given exemption as a Bible college based on the phone call from 6/4/14.		
8/18/2014	Received exemption from Indiana Commission for Higher Education	Exempt	Review regs annually

Kansas

Date	Event	Result	Follow-up Required	Notes
10/5/2011	Email to Crystal Puderbaugh with responses to questionnaire			Exempt until/unless we: significantly increase its Kansas enrollments, decide to direct market to Kansas residents (including email campaigns to Kansas teachers), or hire faculty that reside and teach within Kansas, we ask that you contact our office to begin the process of applying for a Certificate of Approval. Please note, Kansas statutes also require your institution be approved to operate should its programs require an externship, internship, mentorship or clinical be completed in the state of Kansas.
10/11/2011	Response received from Crystal Puderbaugh	Exempt until we trigger physical presence	Review regulations annually	

6/4/2014 Reviewed regulations

Exempt until we
trigger physical presence
Review regulations
annually

quote from SHEEO, which
was updated in May of 2014,
we continue to be exempt
based on our letter from
10/2011: "If an online school
is engaging in activities that
indicate they are "operating"
in Kansas, they will be
required to obtain a
certificate of authority. Lack
of physical presence alone
will not exempt a school from
compliance with state law, if
the facts indicate that the
school is soliciting students in
Kansas or otherwise
operating in Kansas. The
review to determine
application of Kansas statutes
to such online programs is
fact specific and utilizes tests
typically associated with
"long-arm jurisdiction"
principles. On the other hand,
a purely "passive" program
will not usually be subject to
Kansas authority."

Kentucky

Date	Event	Result	Follow-up Required	Notes
10/7/2011	Submitted letter to Director of Postsecondary Licensing requesting exemption	Exempt based on physical		Sarah Levy, Council on Postsecondary Licensing
10/14/2011	Confirmation email, affirming exemption in Kentucky	presence triggers	Review regulations annually	Clinicals, internships, student teaching are physical triggers
6/4/2014	Reviewed regulations	Exempt based on physical presence triggers	Review regulations annually	KY updated SHEEO on 4/24/14 with exact same language that was provided to us in the email from 10/14/11. It also required institutions to verify in a letter that they do not have physical presence. We already did that in 2011, so we should be fine.

Louisiana

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Email to Louisiana Board of Regents to clarify requirements	Email response from Nancy Beall		
				"For institutions domiciled outside Louisiana, the term operate shall mean the offering of courses that are physically delivered in the state of Louisiana and/or require clinical experiences in the state of Louisiana."
9/22/2011	Email from Nancy Beall with policies attached	Review of policies confirms NWC is exempt based on physical presence Exempt based on lack of physical presence	Review regulations annually	NOTE: clinicals means any site-based learning activity, including internships and student teaching
6/4/2014	Reviewed regulations	physical presence	Review regulations annually	Be mindful of onsite experiences, as noted above.

Maine
Date

Event

Result

Follow-up Required

Notes

9/22/2011	Reviewed regulations	No authorization for online with no physical presence because their congress finds it unconstitutional to interfere with interstate commerce.		Adjunct faculty do constitute physical presence.
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6/4/2014	Reviewed regulations	No authorization for online with no physical presence because their congress finds it unconstitutional to (a) interfere with interstate commerce, and (b) police beyond state borders		Adjunct faculty do constitute physical presence.
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Maryland

Date	Event	Result	Follow-up Required	Notes
2011				Unfortunately when I updated for the 4/14 communication I removed the history in our archive.
4/24/2014	Notice from MHEC regarding MD students in online programs	Submitted verification that no MD students attend online programs		"In accordance with COMAR 13B.05.01, we must apply for registration within 3 months of enrolling the first MD student. We understand that a financial guarantee is required, and that the amount of financial guarantee shall be five times the average total program tuition and fee costs payable by an individual MD student enrolled at the institution."

6/4/2014 Reviewed regulations

We must
register any
online program
where a MD
student
registers

This does not prevent us
from accepting students, but
will force us through their
process if any student does.
Fortunately having an adjunct
faculty does not constitute
physical presence; Daniela
Cambetas-Syed is from
Maryland. More information
here:
[https://www.mhec.state.md.
us/higherEd/acadAff/OOS_O
nline/OOS_Online_Registrati
on.asp](https://www.mhec.state.md.us/higherEd/acadAff/OOS_Online/OOS_Online_Registrations.asp)

Massachusetts

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Reviewed regulations			My notes from that time only indicate their policies were too large and expensive to pursue given the lack of students from that state
6/4/2014	Reviewed regulations	Exempt based on physical presence triggers	Review regulations annually	As reported to SHEEO on 4/30/14, "Purely online distance education programs delivered wholly on line by out-of-state institutions (without the incorporation of the on-the-ground activities described above as part of the curriculum) are not subject to MBHE approval. However, out-of-state institutions..may fall under the purview of the board...that require...internships, externships, clinical residencies, mentorships, shadowing experiences, student teaching experiences, etc."

Michigan

Date	Event	Result	Follow-up Required	Notes
10/7/2011	Emailed Michael Beamish for clarification on policies			Establishing a Non-Public Postsecondary Education Institute in Michigan includes the following statement, which makes us exempt: 2) Distance Education Approval or licensure by the State of Michigan is not required to provide online instruction to Michigan residents unless the school has a physical presence in the state. Physical presence does not include conducting courses such as internships, clinicals, practicum's, etc. An institution having faculty working from the state requires approval if the institution wishes to incorporate or file a certificate of authority to operate.
10/7/2011	Response from Michael included document titled Establishing Non-Public Postsecondary Education Institute in Michigan	Exempt; lack of physical presence triggers	Review regulations annually	

6/4/2014 Reviewed regulations	Exempt; lack of physical presence triggers	Review regulations annually
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Minnesota

Date	Event	Result	Follow-up Required	Notes
11/22/2011	Submitted application materials to MN Office of Higher Education			
12/16/2012	Approval of our online courses	Authorized to offer online courses in MN Authorized to offer ECIS endorsement online to MN residents	Renew annually	
5/10/2012	Confirmation of approval for ECIS endorsement		Renew annually	
12/5/2012	Submitted application materials to MN Office of Higher Education			
1/7/2013	Approval of RN-BSN program	Authorized to offer RN-BSN program to MN residents	Renew annually	
3/21/2013	Approval of online courses and programs	Authorized to offer online courses and programs to MN residents	Renew annually	
6/17/2013	Submitted application materials to MN Office of Higher Education			
6/21/2013	Approval of online courses and programs	Authorized to offer online courses and programs to MN residents	Renew annually	

7/11/2013	Approval of analytics certificate Submitted application materials to MN Office of Higher Education	Authorized to offer analytics certificate to MN residents	Renew annually
4/15/2014		Authorized to offer online courses and programs to MN residents	Renew annually
5/6/2014	Approval of online courses and programs		

Mississippi

Date	Event	Result	Follow-up Required	Notes
12/12/2011	Greg signed a letter to MS regarding our online programs and lack of physical presence			MCCA website: http://www.mississippi.edu/mcca/downloads/federal-online-ed-requirements.pdf
3/21/2012	Letter of exemption from Mississippi Commission on College Accreditation	Exempt based on lack of physical presence	Review regulations annually	Based on this: "not domiciled, incorporated, or otherwise located in Mississippi"
6/4/2014	Reviewed regulations	Exempt based on lack of physical presence	Review regulations annually	Same language applies, as noted on SHEEO site, updated 4/28/14

Missouri
Date

Event

Result

Follow-up Required

Notes

<http://www.sos.mo.gov/adrules/csr/current/6csr/6c10-5.pdf>

(3) Exemption.

(A) Schools That Shall Be Exempt by Statute. The following schools, training programs, and courses of instruction shall be exempt from the provisions of sections 173.600 to 173.619, RSMo and formal application for that exemption is waived:

#4) A not-for-profit religious school that is accredited by the American Association of Bible Colleges, the Association of Theological Schools in the United States and Canada, or a regional accrediting association, such as the North Central Association, that is recognized by the Council on Postsecondary Accreditation and the United States Department of Education.

9/29/2011 Reviewed regulations

Assume exemption based on legislation

6/4/2014 Reviewed regulations	Exempt based on lack of physical presence	Review regulations annually	From SHEEO, updated 5/2/14: For non-public institutions, establishment of a physical presence, as defined by the Department of Higher Education, is necessary before distance education must be authorized. If we arrange an onsite experience in the state, that is physical presence. If the student does, it is not.
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Montana

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Letter to Thomas Gibson, Director of Academic Processes & eLearning		Must apply as a foreign nonprofit to transact business in MT	Attached HLC documentation, as required
10/3/2011	Letter of authorization from State of MT University System	authorized	No renewal noted in the letter	
11/17/2011	Letter to Robert Vander Aarde, registered agent for NWC in MT			
12/20/2011	Submitted application for Certificate of Authority to MT Secretary of State			
1/6/2012	Notification 'certification of filing' from MT Secretary of State	certified	Annual report due each year between January 1 and April 15	
1/10/2012	Application for Certificate of Authority for a Foreign Nonprofit Corporation filed			

6/5/2014	Reviewed regulations	continued authorization	Review annually	As verified on this website, we continue to be deemed 'authorized' in MT by the Montana University System. http://mus.edu/Qtools/Degrees/states_authorized.asp Comptroller files documentation to Secretary of State annually.
9/25/2014	Received letter from Montana University System notifying Northwestern of new state authorization regulations based on SARA membership	Northwestern needs to re- authorize with the new form		
10/1/2014	Completed the Application for State Authorization - For- Profit/Non-Profit Institutions and submitted electronically to stateauthorization@montana .edu			

Received email from MT Univ
System indicating "This letter
shall serve as formal notice
that Northwestern College
remains authorized to offer
post-secondary degree
programs in the State of
Montana." No end date was

11/21/2014 noted.

authorized

No end date was
noted. Unknown.

Nebraska

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Letter requesting exemption sent to Kathleen Fimple.			Exempt based on this: Rule 41 003.01 Not-for-profit private colleges, universities, and entities which award baccalaureate or higher degrees, which maintain and operate educational programs for which credit is given, which are in compliance with sections 85-1105 to 85-1111 R.R.S. "To claim an exemption they need to send us a letter requesting an exemption which must fall within the exemption rules as stated above. We then respond with a letter indicating there status – exempt or not exempt."
10/22/2011	Received letter of exemption from NE's Coordinating Commission for Postsecondary Education	exempt based on physical presence	Review regulations annually	Physical presence does <u>not</u> include experiences arranged for an individual student within the state
12/5/2012	Email to Sheila Exstrom from DHHS-Licensure Unit-Nursing Program requesting clarification			

12/5/2012	Response verifying no further communication is needed to offer RN-BSN to NE students	exempt based on physical presence	Review regulations annually
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NE updated SHEEO survey 5/8/14, noted institutions offering courses and programs entirely online with no physical presence do not need authorization. Physical presence does not include onsite experiences arranged for an individual student.

6/5/2014	Reviewed regulations	exempt based on physical presence	Review regulations annually
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Nevada

Date	Event	Result	Follow-up Required	Notes
9/20/2011	Submitted Form 100-Online Education Certification to State of NV Commission on Postsecondary Education			
9/26/2011	Received signed Form 100	Certified based on 5 statements regarding physical presence		Authorization would be required if we establish physical presence including direct advertising or solicitation and no part of the experience will take part in NV. That includes internships, externships, clinicals and student teaching but does NOT include adjunct.
6/5/2011	Reviewed regulations	Exempt due to lack of physical presence		Continue to be mindful that any experience in the state would mean physical presence.

New Hampshire

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Requested clarification of criteria in email to Patricia Edes	Exempt from authorization based on physical presence		Internships and practicums are not exempt
9/22/2011	Received email reply from Patricia Edes	Exempt from authorization based on physical presence		Internships and practicums are not exempt
6/5/2014	Reviewed regulations			

New Jersey

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Email to Academic Affairs Unit to clarify criteria	no response		
12/8/2011	Email to nj_che@che.state.nj.us to clarify criteria			
12/8/2011	Received email exemption from Iris Duffield of che.state.nj.us.	Exempt due to lack of physical presence	Review annually	"Physical presence means that an entity offers credit- bearing courses from or conducts some portion of the learning experience at a location established in NJ by the entity, whether established directly or under the auspices of another entity or an institution."

6/5/2011 Reviewed regulations

Exempt due to
lack of physical
presence

Review annually

structure than in 2011.

Licensure rules state "(a) Out-of-State institutions (see N.J.A.C. 9A1-5) that wish to offer credit-bearing distance learning with a physical presence in New Jersey must first be licensed by the Commission, with advice from the Presidents' Council, to offer specific courses or degree programs." (p. 28). "Physical presence means that an entity offers credit-bearing courses from or conducts some portion of the learning experience at a location established in New Jersey by the entity, whether established directly or under the auspices of another entity or an institution" (p. 5). Because we do not trigger that physical presence requirement, we appear to continue to be exempt.
<http://www.nj.gov/highered>

New Mexico**Date****Event****Result****Follow-up Required****Notes**

	Letter to Stephanie Ellis, Private & Proprietary School Administration, requesting 9/23/2011 exemption			
	Completed FY2012 Claim for 10/11/2011 Exemption			
	Received letter of Exemption		Submit yearly update to	
3/16/2012	Registration	Exempt based on accreditation	NMHED by July 15, 2012	
	Completed FY2013 Annual	No updated letter, exemption	Submit yearly update to	
6/9/2012	Update	assumed	NMHED by July 15, 2013	
	Email question to Diane Vigil, NMHED, regarding change in 6/27/2013 FY2014 Annual Update form			
		"Regarding distance education being offered in NM, if a school is strictly offering distance education or online education with no physical presence including internships/externships or it does not conduct student recruiting then currently the school will not need to do anything."		
6/27/2013	Received email from Diane with new legislation			

		Because we are strictly online with no physical presence and do not recruit NM students, "we do not need to comply"	
Received letter from New Mexico Higher Ed Dept			
8/6/2013	regarding change in regulations	(complete registration). Exempt due to lack of physical presence	None noted
6/5/2014	Reviewed regulations		Review regulations annually

New York
Date

Event

Result

Follow-up Required

Notes

Email sent to Office of College
and University Evaluation
requesting confirmation of
9/22/2011 exemption

Received email confirming
9/23/2011 exemption from Ellen Zunon

6/5/2014 Reviewed regulations

Exempt due to lack of physical
presence
Exempt due to lack of physical
presence

Review annually

Physical presence can be found
here:
<http://www.highered.nysed.gov/ocue/ded/policies.html>
Clinicals with licensed
professionals is considered
physical presence
Same physical presence
triggers remain

North Carolina

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Emailed to Maggie Ryan requesting exemption			"Activities which do not require licensure: proctored exams, attendance at college fairs, adjunct faculty residing in North Carolina, and teaching an online course."
10/10/2011	Received response from Maggie Ryan containing an attachment of their legislation	NWC determines it is exempt in NC due to lack of physical presence		"Activities which require licensure: practicums, clinical experiences, and student teaching."
6/5/2014	Reviewed regulations	Exempt due to lack of physical presence		Internships/externships are not physical presence, but clinicals, practicums, field experiences and student teaching are.

North Dakota**Date****Event****Result****Follow-up Required****Notes**

9/22/2011 Letter to Wayne Kutzer, Dept
of Career & Technical Ed
requesting exemption

9/26/2011 Received letter from Debra
Huber instructing NWC to
complete Exemption Request -
Distance Education online

9/29/2011 Submitted Exemption Request -
Distance Education

12/13/2011 Email from Debra Huber
Exempt from ND Board for
Career and Tech Ed

3/12/2013 Email from Debra Huber -
Exempt from ND Board for
Career and Tech Ed Expires July 31, 2013

6/12/2013 Submitted Exemption Request -
Distance Education

8/1/2013 Change in State Authorization
Governance - per SHEEO
Due to change in exemption
system, NWC needed to
request username and
password from

6/3/2013 ndus.edvera.com
Username:
rebecca.hoey@nwc Iowa.edu;

6/6/2014 password ndussams

From document "Exemptions
are effective for a maximum of
two years, and expire on July
31st of any legislative year"
May explain why no response
was received from 6/12/13
application

Submitted "Initial Inquiry" form
6/16/2014 online through NDUS SAMS

NDUS routed our initial
application to Exemption
Application, requested we
complete application and
6/23/2014 submit \$50

Completed Exemption
Application online, submitted
check requisition for \$50
6/24/2014 payable to NDUS

7/28/2014 NDUS approved exemption

Exempt from North Dakota University System	Expires July 28, 2015
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Comment in NDUS-SAMS
(alerted through email) "I have
routed your application to the
Exemption Application. You
can log back in and go to the
"Documents" tab and fill out
the "Exemption Application." I
will complete your review once
you complete that form and
send your \$50 payment to
[address]."

North Dakota**Date****Event****Result****Follow-up Required****Notes**

9/22/2011	Sent to Shane DeGarmo requesting statement of exemption	
9/28/2011	Received letter from Shane DeGarmo with exemption	Exempt due to lack of physical presence

5/28/2014	Reviewed regulations	Exempt due to lack of physical presence
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Authorization only required if there is a physical presence including 'brick and mortar' facilities, if the online program has a component that must be completed in Ohio (clinicals, student teaching, etc.) and for for-profits, if it solicits residents for its programs.

North Dakota**Date****Event****Result****Follow-up Required****Notes**

9/22/2011 Emailed Jose Dela Crus to
request letter of exemption

11/7/2011 Received letter of exemption
from Houston Davis, OK State
Regents for Higher Ed

Exempt due to lack of physical
presence

Be very careful about OK. Even
hiring adjunct constitutes
physical presence.

6/5/2014 Reviewed regulations

Exempt due to lack of physical
presence

Internships/externships may be
arranged by someone in IA and
not flip their trigger, or
arranged by the student, but
no instruction or assessment
can occur or it means physical
presence. Servers in the state,
adjuncts, recruiting, proctored
exams, are all physical
presence.

Oregon

Date	Event	Result	Follow-up Required	Notes
9/20/2011	Completed Oregon Student Assistance Commission Office of Degree Authorization preliminary screening form	No response		
12/8/2011	Sent email to Commission Office asking about status of our screening form			
12/8/2011	Email from Jennifer Diallo - Approvals are being processed currently and should be communicated at the beginning of January.			
9/30/2013	Received email from Alethia Miller indicating they have our paperwork from two years ago, but no record of their response. I responded that we haven't received anything and asked how to proceed.			Provides exemptions to online programs through accredited out-of-state providers, but must seek exemption. Any in-state person "helping", so adjunct, recruiter, etc, constitutes physical presence so be careful. All practicums, clinicals, etc., constitute physical presence. NOTE: if the program requires proctoring, it constitutes "help" and therefore needs separate approval!

Alethea Miller responded and
instructed us to apply, as
online programs are not
exempt from the application
10/29/2013 process

Application here:
<http://www.oregonstudentaid.gov/oda-degree-authorization-academic-programs-apply.aspx>

SHEEO report, updated 5/2014,
indicated in December 2013
the ODA's Oregon
Administrative Rules. Based on
that, institutions are exempt if
they are 100% online and have
no physical presence, no local
advertising, and no onsite
component like an internship
or clinical. Based on that, NWC
is exempt from authorization
but must submit Preliminary
Screening Form for Out-of-
State Institutions

6/5/2014 Reviewed regulations
Exempt due to lack of physical
presence

Completed Preliminary
Screening Form Required for
Out-of-State Institutions,
6/5/2014 emailed to Alethia Miller

Pennsylvania**Date****Event****Result****Follow-up Required****Notes**

9/22/2011	Requested questionnaire to determine whether we qualify for exemption from authorization.			Used email address: ra-collunivseminfo@state.pa.us
9/23/2011	Received questionnaire, completed it and sent it to Greg for signature			
10/13/2011	Mailed completed questionnaire			
11/21/2011	Pennsylvania Department of Education requested a list of the specific programs and the degrees to which they lead for all of the programs to be offered by distance education to Pennsylvania students.			
11/30/2014	Responded to request from Pennsylvania Dept of Education			
1/5/2012	Received letter of exemption from Pennsylvania Department of Education for specific courses	Exempt unless approved courses trigger physical presence		
5/31/2012	Received letter of exemption from PDE good through July 30, 2013	Exempt unless we trigger physical presence	Renew every other year	Physical presence includes address, recruiters, instructors in PA, advertising in local media

Received letter from PDE
amending previous exemption;
we are not prohibited from
field experiences in PA, they do Exemption encompasses field
10/15/2012 not count as physical presence. experiences Renew in 2013
Completed and sent renewal
6/12/2013 application

Received letter indicating
"there are no restrictions on
Northwestern College" on any Exempt valid through June 30,
7/12/2013 of our online programs 15 Renew in 2015

**Rhode Island
Date**

Event

Result

Follow-up Required

Notes

9/22/2011 Email to Rhode Island Office of Higher Ed requesting statement of exemption
12/8/2011 Follow-up to email from 9/22/11

no response

12/9/2011 Email received from Deanna Velletri with their regulations

12/9/2011 Second email received from Deanna Velletri indicates we are not considered exempt, we "just do not need to comply because of [y]our lack of physical presence."

Essentially exempt due to lack of physical presence

6/5/2014 Reviewed regulations

Exempt due to lack of physical presence

Physical presence does include recruiters, adjunct, internships, clinicals, and proctoring

**South Carolina
Date**

Event

Result

Follow-up Required

Notes

9/22/2011 Email to Renea Eshleman to request confirmation of exemption

9/23/2011 Response from Renea Eshelman

6/5/2014 Reviewed regulations

Exempt based on lack of physical presence

Exempt based on lack of physical presence

Clinicals, practicums and student teaching do not count as physical presence. Be careful of employing full-time or adjuncts; it would 'require additional information' if we also had students from South Carolina in their class. Recruiting is physical presence, but college fairs are not. Can't advertise in local media, but can in national media. Be mindful of adjunct; this would require additional clarification

South Dakota

Date	Event	Result	Follow-up Required	Notes
9/19/2011	Email request to Paul Gough for statement of exemption	no response		
11/16/2012	Regulations changed. Applied for certificate of authorization			
11/19/2012	Received Certificate of Authorization from Secretary of State	authorized in South Dakota		
12/10/2012	Received email with approval for RN-BSN from SD BON	authorized in South Dakota		
2/22/2013	Application for Certificate			
2/22/2013	Received Certificate of Authorization from Secretary of State	authorized in South Dakota		Based on "13-48-38 Continuation of authorization. Authorization to provide educational programs at physical locations in this state, once granted by the secretary, is continuous so long as the postsecondary institution continues to meet the requirements set forth in 13-48-37." As found on the SHEEO survey.

**South Dakota
Date**

Event

Result

Follow-up Required

Notes

				Physical presence is tight here-- a recruiter, marketing, any type of clinical, practicum, student teaching, externship, internship, etc. that is arranged by the college. A faculty member from TN DOES constitute a physical presence-- no TN faculty or adjuncts. College fairs are ok. National media is ok, but not local.
9/22/2011	Sent email to Nicholas Cook requesting statement of exemption based on lack of physical presence in Tennessee	No response		
9/26/2011	On their government website, they write: An institution is only required to demonstrate upon request from the USDOE that state authorization is not required. As a result, THEC will not issue "Authorization Not Needed" letters at this time.	Exempt due to lack of physical presence		http://www.tn.gov/thec/Divisions/LRA/PostsecondaryAuth/pdf/Distance%20Education%20Authorization%20Requirements%20-%20Final.PDF

6/6/2014 Reviewed regulations

Exempt due to lack of physical
presence

As noted above, physical
presence is tight here. Specifics
at
<http://www.tn.gov/thec/Divisions/LRA/PostsecondaryAuth/pdf/2014forms/Distance%20Education%20Authorization%20Requirements%20-%20November%202013.pdf>

Texas
Date

Event

Result

Follow-up Required

Notes

				Website must have these three things: 1. that your career school or college is not regulated in Texas under Chapter 132 of the Texas Education Code; 2. the name of any regulatory agencies that approve and regulate your school's programs in the state where your school is physically located and in which it has legal authorization to operate; and 3. how to file complaints or make other contact with applicable regulatory agencies.
9/19/2011	Spoke with Michael DeLong on the phone Received email from Fred Smith noting we did not need authorization	We meet their requirements for exemption without additional paperwork. Updated website with disclaimer		
9/21/2011				
10/26/2011	Dr. Gaye Bumsted Perry requested another letter with information regarding physical presence and accreditation.			It appears there isn't communication occurring in their office. An additional letter was sent, but then also a follow-up email noting that we already received exemption from the College Board and the Texas Workforce agency.

11/4/2011 Sent letter as requested above
Received email from Gaye Exempt in TX due to
Bumsted Perry noting new regs accreditation and lack of
12/8/2011 make us exempt physical presence

6/6/2014 Reviewed regulations

Exempt in TX due to
accreditation and lack of
physical presence

tightened up and become more defined:

recruiting students (excluding the occasional participation in a college/career fair involving multiple institutions or other event similarly limited in scope in the state of Texas), teaching or proctoring courses including internships, clinicals, externships, practicums, and other similarly constructed educational activities, (B) the institution has any location within the state of Texas which would include any address, physical site, telephone number, or facsimile number within or originating from within the boundaries of the state of Texas. The Texas definition of physical presence may be found in Texas Administrative Code 7.3(29), [http://info.sos.state.tx.us/pls/pub/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc](http://info.sos.state.tx.us/pls/pub/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc)

**Utah
Date**

Utah Date	Event	Result	Follow-up Required	Notes
11/3/2011	Letter from Utah Dept of Commerce clarifying requirement for Certificate of Exemption	Completed application for Certificate of Exemption with \$1500 fee		http://consumerprotection.utah.gov/registrations/schools.html
11/9/2011	Received Accredited Institution Certificate of Exemption	Exempt in Utah	Review of registration by 12/10/12, expires on 12/10/13	
12/12/2012	Received acknowledgement of review of Accredited Institution Certificate of Exemption Submitted application for Accredited Institution Certificate of Exemption, with	Exemption remains in effect	Expires 12/10/13, review status due before 12/10/14	Receipt for \$1500 filing fee
10/3/2013	\$1500 fee			
11/4/2013	Received Accredited Institution Certificate of Exemption	Exempt in Utah	Review is due before 12/10/14, expires on 12/10/15	Receipt for \$1500 filing fee

Received notification of change
in Utah regulation regarding
postsecondary state
5/5/2014 authorization

Reviewed new legislation. We
should remain exempt based
on our accreditation.

Sent email to Marla Winegar to
ask whether new legislation
means we no longer need to
review/renew and pay fee
6/6/2014 annually

Marla wrote that nonprofit
private colleges now have a
one-time fee. She wrote more
about yearly reviews, though,
so I sent a follow-up asking for
6/12/2014 clarification

According to the Utah
Postsecondary Proprietary
School Act, §13-34-105(1)(e) a
school or institution which is
accredited by a regional or
national accrediting agency
recognized by the United
States Department of
Education is exempt from
registration with the Division, if
it establishes an exemption
with the Division. [Click here for
the Request for Exemption
form.](#) This filing is a one-time
filing with no application fee.

Emailed Marla, asked whether
the new regulation meant we
no longer need to pay \$1500
6/16/2014 annually

Marla wrote "For the private
nonprofit application it is a one
time filing (application and
\$1,500 fee). The school is
issued a certificate with no
expiration date. Our law does
not define physical presence
but defines operate. Enrolling
a Utah resident would trigger
operating in the state of Utah. File one more time before
6/16/2014 " 12/10/14

Received Certificate of
Postsecondary State
Authorization, no end date
11/13/2014 noted Authorized

Vermont
Date

Date	Event	Result	Follow-up Required	Notes
9/22/2011	Emailed Cathy Hilgendorf, Postsecondary Approval Coordinator, VT Dept of Ed, to request statement of exemption	Exempt in Vermont due to lack of physical presence		
9/22/2011	Received statement of exemption from Cathy Hilgendorf	Exempt in Vermont due to lack of physical presence		
6/6/2014	Reviewed regulations			Physical presence more relaxed here

Virginia

Date	Event	Result	Follow-up Required	Notes
9/20/2011	Email to Linda Woodley requesting statement of exemption			
9/20/2011	Response from Linda Woodley verifying exemption	Exempt due to lack of physical presence		
6/6/2014	Reviewed regulations	Exempt due to lack of physical presence		I was concerned that because Blackboard's servers are in Virginia, and Virginia notes that a server in VA is presence, that we would need to authorize. However, their SHEEO response indicates that a server alone would not require certification

Washington Date	Event	Result	Follow-up Required	Notes
9/20/2011	Emailed inquiry to Karen Oeschlager regarding physical presence			
9/20/2011	Karen emailed questionnaire to determine physical presence			
9/20/2011	Returned questionnaire to Karen	We must authorize due to recruiters in their state		
11/7/2011	Sent package with complete application materials to State of Washington Higher Education Coordinating Board, check for \$2000			
12/5/2011	Letter acknowledging receipt of package			
1/12/2012	Received letter granting authorization to operate in Washington	Authorized in Washington ONLY for recruiting and promotion	Must renew for 2013	
11/4/2013	Sent package with complete application materials to State of Washington Higher Education Coordinating Board, check for \$2000			
12/23/2013	Received letter granting authorization to operate in Washington	Authorized in Washington ONLY for recruiting and promotion	Must renew for 2016	Expires January 10, 2016

Sent updated catalog
containing required wording, at
1/24/2014 their request

Karen Oelschlager emailed with
a follow-up to our approval
letter to ask about the nursing
program. I responded on 1/20
to indicate we have no field
placements in Washington
State, but understand if we do
we'll need to go through their
Nursing Commission's approval
12/18/2014 process.

Karen responded with
appreciation of our
confirmation. I believe we are
1/20/2015 ok. We are still ok.

Karen sent another email
asking if we were going to
respond to her December
email. I responded that we had
just corresponded. She had
inadvertently lost our
response. She indicated her
question was about the online
RN-BSN. She did not believe it
needed to be on their
authorized list for recruitment
and advertising since we don't
admit students from WA to the
1/26/2015 program. I agreed. We are still ok. We can't
advertise or recruit for the RN-
BSN in WA, with my approval.

West Virginia**Date****Event****Result****Follow-up Required****Notes**

Completed brief questionnaire
required to determine extent
of physical presence. Sent to
9/22/2011 Mark Stotler

Received letter confirming
9/26/2011 exemption

Exempt in West Virginia due to
lack of physical presence

6/6/2014 Reviewed regulations

Exempt in West Virginia due to
lack of physical presence

Internships, externships, etc,
are presence. Recruiting is,
advertising is, but NOT hiring
adjunct

**Wisconsin
Date**

Event

Result

Follow-up Required

Notes

10/5/2011 Email to Pat Sweeney
attempting to clarify
exemption based on religious
affiliation

10/10/2011 Phone call and email from Pat
Sweeney

Exempt for now

When we develop a fully online
program AND enroll a
Wisconsin resident, this needs
to be revisited

6/6/2014 Reviewed regulations

Must authorize to accept any
student from WI

Authorize here:
<http://eab.state.wi.us/>

"If a school has approval from
another state, which is
substantially equivalent to the
requirements of s.EAB 4.03 and
meets the standards of s.EAB 1
1.03, the board may accept
that state's approval as
fulfilling all or parts of the
approval process"
<http://eab.state.wi.us/board/eab011.pdf>

Wyoming
Date

Event	Result	Follow-up Required	Notes
10/5/2011 Email to Elaine Merces requesting statement of exemption based on religious affiliation	No response		
12/12/2011 Re-reviewed state cite. Completed application for registration, sent \$100			
12/20/2011 Received Private School Registration certification	May offer distance education to Wyoming residents through online programs		
6/11/2012 Completed annual application for registration, sent \$100			
7/9/2012 Received Private School Registration certification	May offer distance education to Wyoming residents through online programs		
6/12/2013 Completed annual application for registration, sent \$100			
8/30/2013 Received Private School Registration certification	May offer distance education to Wyoming residents through online programs		
5/28/2014 Completed annual application for registration, sent \$100			
6/25/2014 Received email notice of registration	May offer distance education to Wyoming residents through online programs	Renew on or before June 30, 2015	

Individual State Documentation

Alaska



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Alaska Commission on
Postsecondary Education**

INSTITUTIONAL AUTHORIZATION

P.O. Box 110505
Juneau, Alaska 99811-0505
Phone: (907) 465-6741
Fax: (907) 465-5316
acpe.alaska.gov

October 16, 2013

Greg Christy, President
Northwestern College
101 7th Street SW
Orange City, IA 51041

Dear President Christy:

Your Application for Exemption from Authorization to Operate a Postsecondary Educational Institution for Northwestern College was received by the Alaska Commission on Postsecondary Education (ACPE) on October 10, 2013. Upon review, the institution and its identified programs have been determined to meet the criteria for exemption from the authorization provisions of AS 14.48 per regulation 20 AAC 17.015 (a) (8).

20 AAC 17.015. Exemptions. (a) Upon receipt of the written application, fee, and specimen copies of each certificate or diploma the institution issues that document that the applicant qualifies under this subsection, the commission staff shall exempt from the authorization provisions of AS 14.48 and this chapter the following educational programs, and institutions providing only the following educational programs: (8) an on-line or distance delivered program that does not have a physical presence within the state

This determination is predicated on the information provided in the Application for Exemption from Authorization. Should a change occur in the organization or program from what has been approved for exemption it will be necessary to notify the Commission at which time the institution's exempt status may be re-evaluated.

Institutions determined to be exempt from authorization provisions under 20 AAC 17.015 (a) (8) are required to **recertify biennially** that the educational program and institution continue to qualify for exemption. The institution will be required to recertify prior to October 15, 2015.

Finally, it is an institution's responsibility to ensure it is fully aware of all applicable Alaska statutes and regulations and any associated compliance requirements relative to exemption from authorization. If you have any questions, please contact me at (907) 465-6741 or kierke.kussart@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kierke A. Kussart".

Kierke A Kussart
Institutional Authorization

Arizona

Hoey, Rebecca

From: Keith Blanchard <Keith.Blanchard@azppse.gov>
Sent: Tuesday, September 27, 2011 11:08 AM
To: Hoey, Rebecca
Subject: Distance Education Regulation Compliance

Rebecca,

The Arizona State Board would not require licensure of distance education programs as long as there will be no physical presence in Arizona, as defined by A.R.S. § 32-3001(5). The Board defines physical presence as the use of any Arizona address, Arizona phone numbers, contact information of anyone listing an Arizona address or program offerings in Arizona. Based on the information you provided, the operation of Northwestern College would not require licensure by this Board.

Persons who are not operating private postsecondary programs under the Board's jurisdiction are not required by law to obtain a statement of exemption or waiver from the Board. Similarly, the Board is not required to issue statements of exemption or waiver.

We appreciate your attention to Arizona licensure requirements.

Sincerely,

Keith Blanchard, MBA
Deputy Director

*Keith E. Blanchard, MBA
Deputy Director
Arizona State Board for Private Postsecondary Education
1400 W. Washington Street, Room 260
Phoenix, Arizona 85007
Phone (602) 542-5769
FAX (602) 542-1253
Website: www.azppse.gov*

Colorado

Hoey, Rebecca

From: Delange, Heather <heather.delange@dhe.state.co.us>
Sent: Tuesday, September 20, 2011 10:49 AM
To: Hoey, Rebecca
Subject: RE: state authorization question

Dear Ms. Hoey,


Thank you for your inquiry. You are correct, under current policy, institutions must have a physical presence in the state to qualify for state authorization. The definition of physical presence under this policy is a main campus or headquarters, a branch campus, or a place of business as determined by the Department (CCHE policy, Section I, Part J). Colorado does not have an authorization process for pure online delivery instruction and out-of-state public institutions are handled the same way private institutions are.

Please note that the regulations for the degree-granting schools are under review and will likely change in the near future. Our recommendation to you is to check back with this office periodically to ensure compliance with the state authorization regulations.

Please let me know if you have any further questions.

Best,
Heather

Heather DeLange
Academic Policy Officer
Colorado Department of Higher Education
1560 Broadway, Suite 1600
Denver, CO 80202
Phone: (303) 866-2723
Fax: (303) 866-4266
Email: heather.delange@dhe.state.co.us

 Please consider our environment before you print this e-mail

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Tuesday, September 20, 2011 8:19 AM
To: Delange, Heather
Subject: state authorization question

Greetings from Northwestern College in Iowa. Northwestern, a private nonprofit liberal arts college with religious affiliation, is developing online courses and programs and would like to be able to offer those to students located in Colorado. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It does not appear there are any requirements outside of being accredited by an accrediting body. Northwestern is HLC accredited. Do we need any type of letter from you granting authorization? Do we need to submit anything to you? Your reply is appreciated.

Connecticut



STATE OF CONNECTICUT
Office of Financial and Academic Affairs
For Higher Education

October 24, 2011

Ms. Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th Street, SW
Orange City, IA 51041

Dear Ms. Hoey:

In response to your institution's inquiry about offering online programming to residents in the State of Connecticut, the Office of Financial and Academic Affairs for Higher Education is providing you with sections 10a-34-23 and 10a-34-24 of the Connecticut Regulations for Licensure and Accreditation of Institutions and Programs of Higher Education. Further information may be found on the following website: <http://www.ctdhe.org/Regs/default.htm>.

Section 10a-34-23. Off-Campus Instruction, Correspondence Courses, and Use of Electronic Media.

All credit instruction offered by an accredited institution away from the institution's primary campus or by correspondence, or through the electronic media, or other means of distance education, shall meet the same standards required of instruction offered on campus, including but not limited to the following:

- (a) All credit instruction shall be consistent with the overall purposes and objectives of the offering institution.
- (b) Standards for admission shall be the same as the standards applicable to students enrolled on the primary campus.
- (c) There shall be qualified faculty or staff responsible for the coordination of off-campus instruction.
- (d) The quality of off-campus instruction, including faculty selection and course approval, shall be the responsibility of the same academic unit which administers the program on the primary campus.
- (e) All curricula shall be derived directly from approved programs. Each course shall be consistent in quality, content and standards with resident courses offered on the primary campus.
- (f) Instruction shall be delivered by qualified instructional staff pursuant to Section 10a-34-13 of the Regulations of Connecticut State Agencies.
- (g) All students shall have access to adequate facilities, equipment, library resources, academic advising and other necessary instructional support services, in accordance with the provisions of Sections 10a-34-9 through 10a-34-24, inclusive, of the Regulations of Connecticut State Agencies. An institution providing instruction and programs by means of distance education may demonstrate compliance with the Board's approval standards through means equivalent to those used for resident instruction.

61 Woodland Street • Hartford, Connecticut 06105-2326

www.ctohe.org

An Equal Opportunity Employer

Section 10a-34-24. Programs Offered by Out-of-State Institutions.

- (a) Eligibility. Any institution with a physical presence in the state shall be subject to the requirements of the Regulations of Connecticut State Agencies. To be eligible for licensure to operate a program in Connecticut, an institution chartered or incorporated in another state must be fully accredited by a nationally recognized regional accrediting association and legally authorized to operate as an institution of higher learning and confer degrees in its home state.
- (b) Licensure requirements. The institution shall be required to demonstrate compliance with all applicable procedures and standards in Sections 10a-34-9 through 10a-34-24, inclusive, of the Regulations of Connecticut State Agencies as they apply to the program(s) to be offered in Connecticut. In addition, there shall be qualified on-site administrative staff responsible for the overall administrative operation of all educational activities, to include instruction, counseling, advising, library services and maintenance of academic records.


At present, the Office of Financial and Academic Affairs for Higher Education does not regulate placement of students in experiential settings, unless the institution has a physical presence in Connecticut (see 10a-34-24 above). Until 2009, the agency did regulate student teacher placements in Connecticut from out-of-state institutions, but since that time, the agency has no longer required these placements to be licensed.

In addition, according to guidance released by the U.S. Dept. of Education on March 17, 2011 (GEN-11-05), a document verifying no authorization is required by a state is not necessary for institutions to comply with the regulations for state authorization (see #22), and the Office of Financial and Academic Affairs for Higher Education does not issue such letters.

Also please note, on June 7, 2011 Governor Dannel Malloy signed into law Public Act 11-48, which reorganizes a large segment of higher education in the state, including the regulatory process. It is uncertain how transfer of regulatory powers to the a new Office of Financial and Academic Affairs for Higher Education with approval by the State Board of Education may affect the regulatory process or the interpretation of "physical presence" going forward.

If you have any questions, please contact the Office of Financial and Academic Affairs for Higher Education at (860) 947-1822.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia A. Santoro". The signature is fluid and cursive, with the first name "Patricia" being more prominent and the last name "Santoro" following in a similar style.

Patricia A. Santoro
Director of Academic Affairs

Delaware

From: [Barton Wayne](#)
To: [Hoey, Rebecca](#)
Subject: Northwestern College in Iowa
Date: Thursday, October 13, 2011 10:16:14 AM
Attachments: [image001.gif](#)

If your institution is not incorporated in Delaware and does not have a physical presence (offices or classroom) in Delaware, we do not require DOE approval. We do ask that notify us of Delaware students receiving federal financial aid.

Wayne A. Barton, Ed. D.
Director, Teacher & Administrator Quality Development
Delaware Department of Education
401 Federal Street, Suite #2
Dover, DE 19901
302.735.4120 (T) 302.739.5894 (F)
wbarton@doe.k12.de.us

This email and any attachments may be confidential or legally privileged. Any dissemination, copying or use of this communication by or to anyone other than the designated and intended recipient(s) is unauthorized. If you are not the intended recipient, please delete or destroy this communication immediately.



Please consider the environment before printing this e-mail

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Wednesday, October 05, 2011 1:02 PM
To: Barton Wayne
Subject: clarification on state authorization

Mr. Barton-

Greetings from Northwestern College in Iowa. Northwestern is a private nonprofit liberal arts college affiliated with the Reformed Church of America and accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are currently developing online courses and programs and would like to be able to offer those to students located in Delaware. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization http://www.sheeo.org/stateauth/AgencyResponses/Delaware_Department%20of%20Education.pdf. It appears the Delaware Department of Education only regulates schools with a physical presence in Delaware, and that your agency does not require providers of online education to be authorized if there is no physical presence. If Northwestern College has no intention of establishing a physical presence in Delaware, does that make us exempt? Do we need any type of letter from you granting authorization or exemption? Your reply is appreciated.



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciowa.edu

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101 7th St. SW
Orange City, IA 51041
www.nwciowa.edu

Florida

FLORIDA DEPARTMENT OF EDUCATION



STATE BOARD OF EDUCATION

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Gerard Robinson
Commissioner of Education



November 28, 2011

Rebecca Hoey,
Director of Online Learning
Northwestern College

Dear Ms. Hoey:

We are in receipt of your correspondence dated November 11, 2011 requesting state approval to offer distance learning courses to students in Florida in order to comply with 34 C.F.R. § 600.9(c). This regulation provides for the following:

If an institution is offering postsecondary education through distance or correspondence education to students in a state in which it is not physically located or in which it is otherwise subject to state jurisdiction as determined by the state, the institution must meet any state requirements for it to be legally offering postsecondary distance or correspondence education in that state. An institution must be able to document to the Secretary the state approval upon request.

The guidance issued by the United States Department of Education with regard to this regulation provides that "if a state does not regulate such activities by out-of-state institutions, the institution is considered to be legally operating in that state."

The Florida Commission for Independent Education does not regulate postsecondary educational institutions that do not have a physical presence in Florida. Consequently, as long as your institution does not establish a physical presence in Florida and continues to offer only distance learning education, such as online and correspondence courses, you are not under the jurisdiction of the Commission.

I trust that this letter will be sufficient to serve as documentation necessary for compliance with the federal regulation found above.

Sincerely,

A handwritten signature in cursive script that reads "Samuel L. Ferguson".

SAMUEL L. FERGUSON
Executive Director
Commission for Independent Education

Georgia



Nonpublic Postsecondary Education Commission

2082 East Exchange Place, Suite 220

Tucker, Georgia 30084-5305

(770) 414-3300

Fax (770) 414-3309

Nathan Deal

Governor

William C. Crews

Executive Director

TO WHOM IT MAY CONCERN

The Nonpublic Postsecondary Education Commission (NPEC) of Georgia has determined that:

Northwestern College
101 7th Street SW
Orange City, IA 51041

need take no further action to provide on-line, distance, or correspondence education to Georgia residents under the procedures in effect as of the issuance of this letter. This determination will extend to whichever of the following dates occurs first: a.) June 30, 2015; or b.) the date this institution first engages in an activity determined to require an application for a Certificate of Authorization.

It shall be the institution's responsibility: 1.) to review the NPEC Website www.gnpec.org prior to June 30, 2015; 2.) to follow the process posted on the Website for the period July 1, 2015 through June 30, 2016; 3.) to permit Georgia students to follow the Complaint Process posted on the NPEC Website; and 4.) to alert Georgia students to the existence and location of this Website and Complaint Process.

NPEC reserves the right to alter the process stated which would require an application for a Certificate of Authorization to be initiated during the period July 1, 2014 to June 30, 2015. Institutions which intend to participate in the Southern Regional Education Board Electronic Campus Regional Reciprocal Agreement (SECRRRA) are responsible for ensuring that courses and programs so submitted also adhere to the FEDERAL ONLINE/DISTANCE EDUCATION criteria which have been used to issue this statement.

This statement has been mailed to:

Dr. Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IA 51041

William C. Crews
Executive Director

Illinois



ILLINOIS BOARD OF HIGHER EDUCATION

431 EAST ADAMS STREET, 2ND FLOOR
SPRINGFIELD, ILLINOIS 62701-1404

Pat Quinn
Governor

December 22, 2011

Carrie J. Hightman
Chicago
Chairwoman

Ms. Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IA 51041

Members

Jay D. Bergman
Joliet

Dear Ms. Hoey:

Frances G. Carroll
Chicago

This letter is in response to the 11/11/2011 electronic submission (request ID: 248) describing the necessity to obtain approvals in Illinois. It is understood from the correspondence that the institution meets the description of an Institution with Limited Physical Presence in Illinois as defined under 23 Illinois Administrative Code Section 1030.10. The institution is reporting that it is:

Alexi Giannoulis
Chicago

Heba Hamouda
Chicago

- authorized to operate in at least one other state; and
- is accredited by a body recognized by the U.S. Department of Education and/or the Council for Higher Education Accreditation;
- will offer ten percent or less of coursework, as measured by academic credits, for a degree program in the State of Illinois, or offering degrees through one hundred percent asynchronous versus synchronous on-line instruction from an out-of-state site or sites;
- and is not providing core academic support services in the State of Illinois.

Kym Hubbard
Chicago

Allan Karnes
Carbondale

John P. Minogue
Norridge

Proshanta K. Nandi
Springfield

Santos Rivera
Chicago

Robert J. Ruiz
Oak Lawn

Based on the information provided, there is no need for additional approvals at this time. Should conditions change and the above no longer be true, please notify Board staff as soon as possible.

Elmer L. Washington
Park Forest

Thank you for keeping our office informed of program development at your institution.

Addison E. Woodward, Jr.
Palos Park

Student Members
David Anderson
Chicago

Bob Blankenberger, Ph.D.
Deputy Director
Academic Affairs and Student Success

Ari Shroyer
Chicago

BB: nt

Executive Director
G. W. Reid

Indiana



INDIANA *for* COMMISSION
HIGHER EDUCATION

August 21, 2014

REBECCA HOEY
DIRECTOR OF ONLINE LEARNING
NORTHWESTERN COLLEGE
101 7TH ST SW
ORANGE CITY IA 51041-1996

Ms. Hoey:

The Indiana Commission for Higher Education – combined with the Indiana Board for Proprietary Education, which is administered and staffed by the Commission for Higher Education – has the responsibility to authorize all online, onsite, and blended instruction offered in Indiana by public, not-for-profit, and for-profit out-of-state institutions.

The Commission staff has reviewed the letter of request for state authorization submitted on behalf of the Northwestern College at Orange City, Iowa. As outlined in the letter of request for authorization, programs referenced indicated courses of a religious nature.

The Indiana Code defines “postsecondary credit bearing proprietary educational institution” to mean a degree granting and credit bearing institution that provides instructional or educational services or training, whether onsite and/or online, and is accredited by an accrediting agency recognized by the United State Department of Education. The definition does not include “a religious institution that offers educational instruction or an educational program of a clearly religious nature.” An institution that offers programs of a clearly religious nature would not be considered a “postsecondary credit bearing proprietary educational institution.”

In the context of the Indiana Code 21-18.5-2-12, “clearly religious nature” would mean an educational instruction or an educational program that is undoubtedly related to the faithful devotion of an acknowledged deity or ultimate reality. In order to be exempt from the definition of a “postsecondary credit bearing proprietary educational institution”, an institution could meet two prongs. The institution must be a “religious institution” that offers educational instruction or an educational program of a “clearly religious nature.”

A religious institution offering programs of a clearly religious nature may offer several programs of a secular nature and remain exempt from the authorization process of the Board. The primary overall focus of the religious institution as a whole rather than the nature of the individual programs are considered in making the determination to exempt an institution from the Commission/Board authority.

The programs proposed by the Northwestern College at Orange City, Iowa are of a sufficiently religious nature that no further authorization from the Board for Proprietary Education is needed at this time. Should any changes in the institution’s course offerings occur, the Board should be notified prior to their implementation. At that time a further review of the institution’s status will be conducted.

Sincerely,

Ross Miller

Ross Miller
Director of Authorization

Kansas

From: [Geier, Katharine](#)
To: [Hoey, Rebecca](#)
Subject: FW: Out-of-State Private Postsecondary Institution Questionnaire
Date: Tuesday, October 11, 2011 10:37:46 AM
Attachments: [2 Kansas Postsecondary Questionnaire 06-24-11.docx](#)
[image001.gif](#)

October 10, 2011

Dear Ms. Hoey:

Thank you for your reply to our questionnaire. At this time, Northwestern College does not need to apply with the Kansas Board of Regents for a Certificate of Approval. Should Northwestern College significantly increase its Kansas enrollments, decide to direct market to Kansas residents (including email campaigns to Kansas teachers), or hire faculty that reside and teach within Kansas, we ask that you contact our office to begin the process of applying for a Certificate of Approval. Please note, Kansas statutes also require your institution be approved to operate should its programs require an externship, internship, mentorship or clinical be completed in the state of Kansas.

Best regards,

Katie Geier
Kansas Board of Regents
Office Operations Associate
Private/Out-of-State Postsecondary Education
1000 SW Jackson, Ste 520
Topeka, KS 66612-1368
kgeier@ksbor.org
(785) 296.2410
Fax - (785) 296.0983

From: Puderbaugh, Crystal
Sent: Wednesday, October 05, 2011 2:21 PM
To: Geier, Katharine
Subject: FW: Out-of-State Private Postsecondary Institution Questionnaire

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwcsiowa.edu>]
Sent: Wednesday, October 05, 2011 1:43 PM
To: Puderbaugh, Crystal
Subject: Out-of-State Private Postsecondary Institution Questionnaire

Hello Ms. Puderbaugh-

Attached you will find a completed questionnaire for Northwestern College to determine physical presence in order to be exempt from seeking state authorization in Kansas. Please let me know if additional information is needed.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwciova.edu

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101 7th St. SW

Orange City, IA 51041

www.nwciova.edu

Kentucky

Hoey, Rebecca

From: CPE Custhelp <cpe@custhelp.com>
Sent: Friday, October 14, 2011 3:31 PM
To: Hoey, Rebecca
Subject: Northwestern College - re: licensure requirements [Incident: 111014-000034]

Recently you requested personal assistance from our on-line support center. Below is a summary of your request and our response.

If this issue is not resolved to your satisfaction, you may reopen it within the next 14 days.

Thank you for allowing us to be of service to you.

To access your question from our support site, click here.

Subject

Northwestern College - re: licensure requirements

Discussion Thread

Response Via Email (Jevonda Keith)

10/14/2011 04:31 PM

----- SENT ON BEHALF OF SARAH LEVY -----

Director Hoey,

Thank you for your letter dated October 7, 2011, which we received from you via email on the same date.

Based upon your certification that Northwestern College is not engaging in any of the "operating or soliciting" activities listed in the licensing regulation 13 KAR 1:020 Section 1(8)(a)-(e), licensure is not required at this time.

(8) "Operating or soliciting" means having a physical presence within Kentucky and includes:

- (a) An instructional or administrative site within Kentucky whether owned, leased, rented, or provided without charge;
- (b) Instruction whether theory or clinical, originating from or delivered within Kentucky utilizing teachers, trainers, counselors, advisors, sponsors, or mentors;
- (c) An agent, recruiter, in-state liaison personnel, institution, or business located in Kentucky that advises, promotes, or solicits for enrollment, credit, or award of an educational or occupational credential;
- (d) An articulation agreement with a Kentucky licensed college or state-supported institution; or
- (e) Advertising, promotional material, or public solicitation in any form that targets Kentucky residents through distribution or advertising in the state.

We hope this helps. If we may be of further assistance, please submit inquiries and information through your newly created CPE Online Support Center account, which can be accessed here: <http://cpe.custhelp.com>. You will need to login from the *My Account* tab using the email address (rebecca.hoey@nwciova.edu).

Thank you,
Jevonda Keith

--

Senior Associate, Operations and Internal Affairs
Postsecondary Licensing
Council on Postsecondary Education
1024 Capital Center Drive, Suite 320
Frankfort, KY 40601

Tel: 502-573-1555 x268
Fax: 502-573-1535

www.cpe.ky.gov

-----Original Message-----

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciova.edu]
Sent: Friday, October 07, 2011 10:33 AM
To: Levy, Sarah (CPE)
Subject: letter requesting exemption

Dear Ms. Levy-

A letter requesting exemption from state authorization in the state of Kentucky is attached, as recommended within information provided to SHEEO:

http://www.sheeo.org/stateauth/AgencyResponses/Kentucky_Council%20on%20Postsecondary%20Education.pdf
Please do not let me know if you have questions after you review it.

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Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciova.edu
Northwestern College
101 7th St. SW
Orange City, IA 51041
www.nwciova.edu

Question Reference #111014-000034

Product Level 1: Licensure

Date Created: 10/14/2011 04:31 PM

Last Updated: 10/14/2011 04:31 PM

Status: Solved

First Name: Rebecca

Last Name: Hoey

Phone Number:

Contact Type: Licensure Contact

Referral Source:

Verify Email Address:

College/Organization

NWCIOWA

Verify Email Reason

[---001:002818:16446---]

Louisiana

From: [Nancy Beall](#)
To: [Hoey, Rebecca](#)
Subject: FW: state authorization question
Date: Friday, September 23, 2011 8:15:13 AM
Attachments: [CLARIFICATION OF JURISDICTION.docx](#)
[Special Instructions for Teacher and Leader Programs \(7 20 11\).pdf](#)
[image001.gif](#)
Importance: High

Ms. Hoey:

Your email has been forwarded to me for response. Please review the attached documents. After review, if you feel your institution should be licensed you can find the application on our website at: www.regents.state.la.us under Planning, Research and Performance, license application (new institutions). Please let me know if you have any questions and if you will be seeking licensure.

Sincerely,

Nancy Beall
Assistant Program Manager
Louisiana Board of Regents
PO Box 3677
Baton Rouge, LA 70821
Phone (225) 342-4253
Fax (225) 342-9318

From: Larry Tremblay
Sent: Thursday, September 22, 2011 11:07 AM
To: Nancy Beall
Subject: FW: state authorization question

Larry Tremblay, Ph.D.
Interim Deputy Commissioner for
Academic and Student Affairs
Louisiana Board of Regents
(225) 342-4253 (phone)
(225) 342-9318 (fax)
larry.tremblay@la.gov

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Thursday, September 22, 2011 9:37 AM
To: Larry Tremblay
Subject: state authorization question

Greetings from Northwestern College in Iowa. Northwestern, a private nonprofit liberal arts college with religious affiliation accredited by the HLC, is developing online courses and programs and would like to be able to offer those to students located in Louisiana. I

have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. The information in that form suggests programs that are strictly online with no physical presence may not require additional authorization. I have linked to the website indicated, <http://regents.state.ia.us>, but cannot find the forms or information regarding this issue. Could you either provide me with information on requesting an exemption based on lack of physical presence, or direct me specifically to where your forms are located on the website?

Your reply is appreciated.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwciova.edu

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Orange City, IA 51041

www.nwciova.edu

Minnesota

May 6, 2014

Dr. Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th St SW
Orange City, IA 51041

Dear Dr. Hoey:

I am pleased to inform you that your Degree Granting Institution Registration Renewal application is complete and that Northwestern College - Iowa is on the list of private post-secondary education institutions maintained by the Minnesota Office of Higher Education. The list includes post-secondary education institutions operating in Minnesota whose name and degrees are approved by the Office of Higher Education and can be found on the web at: <http://www.ohe.state.mn.us/sPages/PIRAll.cfm>

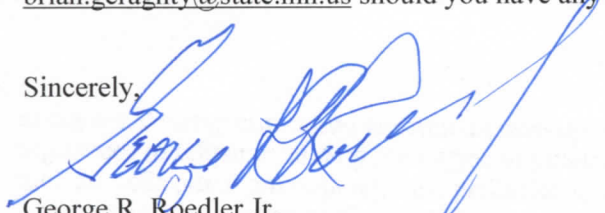
We would like to remind you that the Degree Granting Institution Registration statute (Minn. Stat. 136A.67) prohibit institutions, their officials, and employees from advertising or representing that they are approved or accredited by this office or by the state of Minnesota. Registered or approved institutions may indicate that they are registered, but only with the language specified by statute. You are not required to make any references to registration with the Office of Higher Education in publications or promotional materials *except in catalogs, applications and enrollment materials* in which, the following language must be included in its entirety:

"Northwestern College – Iowa is registered as a private institution with the Minnesota Office of Higher Education pursuant to sections 136A.61 to 136A.71. Registration is not an endorsement of the institution. Credits earned at the institution may not transfer to all other institutions."

Degree Granting Institution Registration must be renewed annually but remains in effect unless voluntarily surrendered by a school or withdrawn by this office. (See Minn. Rules 4840.0700)

We believe this program helps to support a healthy climate in Minnesota for a vital and diverse sector of post-secondary education. We greatly appreciate your cooperation in this program. Please do not hesitate to contact me at (651) 259-3975 george.roedler@state.mn.us or Brian Geraghty - (651) 259-3976 brian.geraghty@state.mn.us should you have any concerns or questions about this program.

Sincerely,



George R. Roedler Jr.
Manager, Institutional Registration and Licensing

GRR:btg

Mississippi

**Mississippi Commission on
College Accreditation**

3825 Ridgewood Road
Jackson, MS 39211-6453

March 21, 2012

Dr. Greg Christy
President

Attn: Rebecca Hoey, Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IO 51041-1996

Re: USDE Regulatory Changes

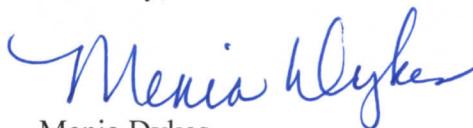
Dear Dr. Christy:

The Mississippi Commission on College Accreditation (Commission or MCCA) is the approval authority for academic degree-granting postsecondary institutions domiciled, incorporated, or otherwise located in Mississippi (www.mississippi.edu/mcca/). Currently, the Commission does not regulate academic degree-granting institutions that are not domiciled, incorporated, or otherwise located in Mississippi that offer academic courses and/or programs solely online.

Accordingly, as **Northwestern College** stipulates that it only offers online academic courses and/or programs from its Iowa location(s) and is not domiciled, incorporated, or otherwise located in Mississippi, MCCA authorization is not required. No further action is needed by the institution to provide online programming to Mississippi residents under the procedures in effect as of the date of issuance of this statement.

We encourage you to revisit the state requirements on a regular basis to verify that MCCA approval is not needed. We anticipate that various questions relating to authorization of distance courses and programs will be addressed in more detail and amendments to our current standards and regulations could become necessary.

Sincerely,



Menia Dykes
For E. Harold Fisher, Chair

Montana



MONTANA UNIVERSITY SYSTEM
OFFICE OF THE COMMISSIONER OF HIGHER EDUCATION

2500 Broadway – PO Box 203201 – Helena, Montana 59620-3201
(406) 444-6570 – FAX (406) 444-1469

November 21, 2014

SENT VIA EMAIL

Rebecca Hoey, PhD
Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IA 51041

Re: Authorization for Northwestern College

Dear Dr. Hoey:

Thank you for resubmitting state authorization documentation to the Board of Regents of the Montana University System in response to our recent change in regulations. Your submittal establishes that Northwestern College is accredited by the Higher Learning Commission and maintains a Financial Responsibility Composite Score of 2.8. This submittal satisfies the requirements of Montana Code Annotated § 20-25-107 and Board of Regents Policy §221, which regulate the award of post-secondary degrees by educational institutions in the State of Montana. This letter shall serve as formal notice that Northwestern College remains authorized to offer post-secondary degree programs in the State of Montana.

Thank you for your interest in Montana, and please do not hesitate to contact my office with any questions or concerns.

Regards,

R. Neil Moisey

R. Neil Moisey, PhD
Deputy Commissioner – Academics, Research & Student Affairs
Office of the Commissioner of Higher Education

Nebraska



P.O. Box 95005, Lincoln, NE 68509-5005 • 140 N. 8th St., Suite 300, Lincoln, NE 68508
Telephone: 402/471-2847 • Fax: 402/471-2886 • www.ccpe.state.ne.us
Marshall A. Hill, Ph.D., Executive Director

*Promoting high quality, ready access, and efficient use of resources
in Nebraska higher education.*

October 17, 2011

Rebecca Hoey
Northwestern College
101 7th St. SW
Orange City, IA 51041

Dear Ms. Hoey:

Current Nebraska state law specifies that no postsecondary institution shall operate in the state by establishing a physical presence until it has received authorization from the Coordinating Commission for Postsecondary Education (Neb. Rev. Stat. §85-2408).

Physical presence is defined as establishing an administrative office or mailing address in the state or offering a course for college credit or a degree program, including:

- establishing a location for synchronous or asynchronous instruction and
- requiring students to meet in one location for instructional purposes more than once during the course.

Physical presence does NOT include:

- a short course or seminar where instruction for the segment takes not more than twenty classroom hours
- course offerings on a military installation solely for military personnel or civilians employed on such installation
- an educational experience arranged for an individual student, such as a clinical placement, practicum, residency, or internship
- courses delivered online or through the U.S. mail which do not require the physical meeting of a student with instructional staff (Neb. Rev. Stat. §85-2403).

Clearly, institutions offering exclusively online courses or programs with no physical presence in Nebraska are not required to seek authorization. However, approval by a professional board may be required for certain program areas. Should an institution delivering instruction completely online decide to offer courses or programs physically in the state, the institution must apply to the Coordinating Commission for authorization.

The Nebraska Department of Education oversees private career schools, generally defined as any organization or business enterprise offering instruction for the purpose of training, preparing, or improving the person for an occupation. Your offerings may fall under their jurisdiction. You can obtain information for the Department's Private Postsecondary Career Schools and Veterans Education unit at (402)-471-4825 or <http://www.education.ne.gov/PPCS/>

Based on existing statutes and the information provided in your correspondence of October 3, 2011, Northwestern College of Orange City, Iowa is not required to seek authorization from the Coordinating Commission for Postsecondary Education to offer in Nebraska the courses or programs described in the referenced correspondence.

Sincerely,

Marshall A. Hill

Commissioners

Dr. Joyce D. Simmons, Chair
Valentine

Dr. Ron Hunter, Vice Chair
Hay Springs

Colleen A. Adam
Hastings

Clark Anderson
Ogallala

Riko Bishop
Lincoln

Dr. Dick C.E. Davis
Omaha

Mary Lauritzen
West Point

Eric Seacrest
North Platte

W. Scott Wilson
Papillion

John Winkleblack
Tilden

Carol Zink
Lincoln

Hoey, Rebecca

From: Exstrom, Sheila <Sheila.Exstrom@nebraska.gov>
Sent: Wednesday, December 05, 2012 12:06 PM
To: Hoey, Rebecca
Subject: RE: RN to BSN completion option

We also, just like the Commission on Higher Learning do not require that you submit anything to us, the Nebraska Board of Nursing for approval for your on-line RN to BSN program. We would assume that you are an approved program in your own state or by a nursing accreditation organization, and this is what we always remind the nurses to be aware of. Thank you for asking and best wishes as you progress with your new program.

Sheila Exstrom, PhD, RN Nursing Education Consultant
DHHS--Licensure Unit--Nursing Program
301 Centennial Mall South--3rd Floor
Lincoln, NE 68509-4986
Phone: (402)471-4917, Fax: (402)471-1066
sheila.exstrom@nebraska.gov

"The difference between school and life? In school you're taught a lesson and then given a test. In life, you're given a test that teaches you a lesson." Tom Bodett

"I have always wished that my computer would be as easy to use as my telephone. My wish has come true. I no longer know how to use my telephone." Bjarne Stroustrup, Danish Computer Scientist

"Some folks call me an agitator; it's the agitator that gets the clothes clean." Ernie Chambers, Nebraska State Senator

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciova.edu>]
Sent: Wednesday, December 05, 2012 11:00 AM
To: Exstrom, Sheila
Subject: RN to BSN completion option

Dr. Exstrom-

Greetings from Northwestern College, located in Orange City, Iowa. Northwestern College has an established and strong nursing program, granting bachelors of science in nursing degrees to our traditional students. Recently Northwestern has made a commitment to serve the needs of adult learners, and as a result developed an RN to BSN completion option for registered nurses who wish to complete a bachelor's degree. The program will be available online, with onsite clinicals at a location near the nurse and mutually agreed on by the college. To clarify, only nurses who are already licensed in their home state will be admitted to the program. With appropriate approvals, we will make this option available to RNs in Iowa, Nebraska, South Dakota, and Minnesota.

Northwestern has been exempt from authorization by Nebraska's Coordinating Commission for Postsecondary Education, and therefore is approved to offer online courses to students in Nebraska. We would like to know if there is anything that we need to submit to the Nebraska Board of Nursing to obtain your approval, as well. Any information you could provide would be valuable. Thank you!

Rebecca Hoey, Ed.D.
Director of Online Learning



Nevada



Commission on Postsecondary Education

FORM 100 – ONLINE EDUCATION CERTIFICATION

Click within the brackets to type information. Mail original copy to address above

NAME & ADDRESS OF TRAINING PROVIDER/POSTSECONDARY EDUCATIONAL INSTITUTION Northwestern College 101 7 th Street SW Orange City, IA 51041		WEB SITE URL www.nwciowa.edu
NAME OF SCHOOL REPRESENTATIVE Rebecca Hoey		PHONE NUMBER (712) 707-7388
POSITION Director of Online Learning		FAX NUMBER
E-MAIL ADDRESS rebecca.hoey@nwciowa.edu	NAME OF ACCREDITING BODY Higher Learning Commission	
CERTIFICATIONS 1. The training provider/postsecondary educational institution identified on this form does not and will not have a physical presence in Nevada; 2. The training provider/postsecondary educational institution identified on this form does not and will not solicit students in Nevada by means such as direct mailing, e-mailings, phone calls, local advertisements or employees or contractors located within Nevada; 3. No part of the training provided by the training provider/postsecondary educational institution identified on this form will take part in Nevada; 4. The training provider/postsecondary educational institution identified on this form may employ Nevada residents for the sole purpose of teaching online course work; and, 5. The above named institution is accredited by a U.S. Department of Education-recognized accrediting agency.		

UNDER PERJURY OF LAW I HEREBY DECLARE THE ABOVE FIVE STATEMENTS TO BE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AS IT PERTAINS TO THE TRAINING PROVIDER/POSTSECONDARY EDUCATIONAL INSTITUTION IDENTIFIED ABOVE.

Rebecca Hoey

TYPED NAME OF SCHOOL REPRESENTATIVE

SIGNATURE AND DATE SIGNED

NOTARY SIGNATURE AND SEAL

Sworn and subscribed to me on this 20 day of September 2011



CPE USE ONLY BELOW THIS LINE

Based on the information attested to above, the training provider/postsecondary educational institution described above is not required to be licensed in Nevada by the Commission on Postsecondary Education. Any change to the five statements above automatically rescinds this authorization and the institution must reapply.

SIGNATURE OF CPE REPRESENTATIVE/DATE SIGNED

NOT VALID
WITHOUT
RAISED CPE
SEAL

New Hampshire

Hoey, Rebecca

From: Edes, Patricia <Patricia.Edes@doe.nh.gov>
Sent: Thursday, September 22, 2011 10:56 AM
To: Hoey, Rebecca
Subject: RE: state authorization request for exemption
Attachments: TO PUBLIC - Adopted Rules 10-29-10.doc

Rebecca,

Our physical presence definition exempts institutions with absolutely no physical presence in New Hampshire as follows: "If an educational institution/entity establishes any physical location or place of contact in N.H., e.g., a N.H. telephone exchange or P.O. Box mail drop, or if advising/mentoring or instruction in person is taking place inside the boundaries of the State, then that educational entity is subject to Commission jurisdiction."

If your institution only offers online education to New Hampshire residents, but does not otherwise satisfy the physical presence definition, there is no requirement for you to go through an authorization process with our Commission. Internships and/or practicums, however, are not exempt (see attached N.H. Code of Administrative Rules).

I also encourage you to check with specific professional licensing boards in the State of New Hampshire as some have an educational requirement (typically understood as an academic residency) of students seeking New Hampshire licensure.

Please let us know if you have any further questions.

Patti

Patricia M. Edes, Assistant to Director
NH Department of Education
Division of Higher Education - Higher Education Commission
101 Pleasant Street
Concord, NH 03301-3860
Telephone: (603) 271-0257
Fax: (603) 271-1953
E-Mail: patricia.edes@ed.state.nh.us

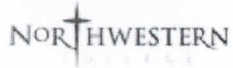
Statement of Confidentiality: The contents of this message are confidential. Any unauthorized disclosure, reproduction, use or dissemination (either whole or in part) is prohibited. If you are not the intended recipient of this message, please notify the sender immediately and delete the message from your system.

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Thursday, September 22, 2011 11:20 AM

To: Edes, Patricia

Subject: state authorization request for exemption

Greetings from Northwestern College in Iowa. Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in New Hampshire. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It appears that Northwestern qualifies as exempt from seeking authorization from New Hampshire as long as we have no physical presence in your state, including any face-to-face instruction or mentoring, and do not use a New Hampshire P.O. box or phone number. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwciova.edu

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Northwestern College

101 7th St. SW

Orange City, IA 51041

www.nwciova.edu

New Jersey

From: [Iris Duffield](#)
To: [Hoey, Rebecca](#)
Subject: FW: exemption for Northwestern College
Date: Thursday, December 08, 2011 10:21:37 AM

Dear Ms. Hoey:

Your email inquiry about distance education regulations in New Jersey was forwarded to me.

If an institution with recognized regional accreditation only plans to offer distance education programs to New Jersey residents and there is no physical presence then licensure is not required. The definition for physical presence means that an entity offers credit-bearing courses from or conducts some portion of the learning experience at a location established in New Jersey by the entity, whether established directly or under the auspices of another entity or an institution.

The Commission does not have a exemptions form so please let this email serve as confirmation about licensure. If you have additional questions, I can be reached via email or telephone.

Sincerely,
Iris Duffield

NJ Higher Education
P.O. Box 542
Trenton, NJ 08625-0542
609-292-2955 phone
609-292-7225 fax

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciova.edu>]
Sent: Thursday, December 08, 2011 10:41 AM
To: nj_che@che.state.nj.us
Subject: exemption for Northwestern College

Greetings from Northwestern College in Orange City, Iowa. In September, I sent an email inquiry regarding exemption for Northwestern College from the state of New Jersey. We are developing online courses and programs, and wish to offer those opportunities to interested students in your state. I have reviewed the rules regarding physical presence located on your website

http://www.state.nj.us/highereducation/More_HE_Resources/Licensure.htm. Northwestern has no physical presence in New Jersey, and therefore I am writing to request an exemption. I see no other paperwork or procedures for this type of request on your website, but would be happy to complete your forms or requirements if you can direct me to them. Otherwise, would you please respond with a statement acknowledging that Northwestern College is exempt in New Jersey to offer online courses as long as we continue to adhere to your requirements for lack of physical presence? Thank you.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwcsiowa.edu

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Orange City, IA 51041

www.nwcsiowa.edu

New Mexico

From: [Vigil, Diane, NMHED](#)
To: [Hoey, Rebecca](#)
Subject: RE: exemption renewal
Date: Thursday, June 27, 2013 12:07:39 PM
Attachments: [image001.png](#)
[image003.png](#)

Hi Rebecca:

Yes, the statute was amended in March 2013, and part of the amendment included the deletion of regional accreditation from the qualifying criteria for exemption of schools. Northwestern College will no longer qualify for exemption. This Fall we will be conducting a rule hearing to bring our rules in line with the statute. At that time, we will be amending our rules. These efforts are currently being made to comply with the Program Integrity Rules handed down by the U.S. Dept. of Education (USDOE). The goal is to bring schools into compliance not only with federal, but state laws as well.

Regarding distance education being offered in NM, if a school is strictly offering distance education or online education with no physical presence including internships/externships or it does not conduct student recruiting then currently the school will not need to do anything. If a school does have a physical presence then it would apply for initial licensure (5.100.2 NMAC), or if a school is recruiting in NM then it would apply for registration (5.100.3 NMAC). All the forms are posted to the website for your reference and use.

It appears that you may wish to visit 5.100.2 NMAC for the language specific to exemption. I believe you are referring to the Out-of State Proprietary School Act for registration of a school.

Again, please let me know if you have any other questions. Thanks, Diane

Diane Vigil-Hayes

School Administrator and Compliance Officer

New Mexico Higher Education Dept.
Private & Proprietary Schools Division
2048 Galisteo Street
Santa Fe, NM 87505
Direct # 505-476-8418
www.hed.state.nm.us

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Thursday, June 27, 2013 7:41 AM
To: Vigil, Diane, NMHED
Subject: exemption renewal

Hello Diane-

Northwestern College, located in Iowa, is due to update our exemption. In completing the form Claim for Exemption & Annual Update Report, I see that accreditation no longer exists as an option—though in the document provided on your [website](#), it continues to remain a choice. As well, in the document it indicates “Out of state institutions that conduct general advertising through print or electronic media but do not have agents working within New Mexico and do not solicit students through individual canvassing are not subject to the act. Institutions that send employees only to participate in occasional college fairs or other assemblies of institutions collectively providing information to prospective students are not subject to the act.” We meet that provision as well, but this does not appear on the form.

We would like to remain in compliance of your regulations. How should I proceed with your form?

Rebecca Hoey, Ed.D.

Director of Online Learning

(712) 707-7388

rebecca.hoey@nwciova.edu

Let us not grow weary while doing good, for in due season we shall reap if we do not lose heart. –Galatians 6: 4-6, 9

New York

From: [Ellen Zunon](#)
To: [Hoey, Rebecca](#)
Subject: Re: state authorization exemption request
Date: Friday, September 23, 2011 2:09:12 PM

Dear Ms. Hoey,

This email is in response to your inquiry to the Office of College and University Evaluation regarding clarification about the need for Northwestern College to apply for approval to offer its online programs to New York State residents.

If an institution has a "Physical Presence" in New York, then it must apply to the New York State Education Department for permission to operate in New York State. The Physical Presence policy can be found at the following link: <http://www.highered.nysed.gov/ocue/ded/policies.html>

In short, you DO NOT need to apply for approval from the NYS Education Department if your institution merely:

- Communicates electronically with students in New York State (e.g., by computer or broadcast) in ways that do NOT involve an instructional site or an organized group activity;
- Advertises in New York State media;
- Recruits students, e.g., at college fairs, job fairs, or trade shows;
- Conducts alumni activities within the State, such as alumni clubs.

You DO need to apply for approval if your institution does any of the following:

- Operates an instructional site (a physical location at which instruction is given by a faculty member to a group of students) in New York State.
- Sponsors organized activities within New York State that are related to the academic program (e.g., advising, mentoring, study groups, examination administration for groups of students).
- Has a representative, whether paid or not, acting on its behalf within New York State to arrange or conduct instructional or academic support activities.

In addition, please note the following:

- For information regarding clinical internships in areas that lead to professional licensure in New York State, please contact the Office of Professional Education and Program Review at: OPPROGS@mail.nysed.gov. You can find a list of the Professions at: <http://www.op.nysed.gov/prof>.
- For information regarding out-of-state college teacher preparation programs and student teaching placements in New York State, please see: <http://www.highered.nysed.gov/tcert/certificate/distance.html>.
- For any further clarification, or to inquire about applying for Permission to Operate in New York State, please contact the Office of

College and University Evaluation at: ocueinfo@mail.nysed.gov .

Sincerely,
Ellen Zunon
Associate in Higher Education
Office of College and University Evaluation
New York State Education Department

>>> "Hoey, Rebecca" <rebecca.hoey@nwciova.edu> 9/22/2011 12:20 PM >>>
Greetings from Northwestern College in Iowa. Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in New York. I have reviewed the information regarding "physical presence" from the following website, published by the New York State Education Department:
<http://www.highered.nysed.gov/ocue/ded/policies.html>. It appears that Northwestern College qualifies as exempt from seeking authorization from New York as long as we continue to have no physical presence in your state as defined by the policy. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.

a whole education

for your whole life

Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwciova.edu <<mailto:rebecca.hoey@nwciova.edu>>

Northwestern College

101 7th St. SW

Orange City, IA 51041

www.nwciova.edu <<http://www.nwciova.edu/>>

North Carolina

From: [Maggie Ryan](#)
To: [Hoey, Rebecca](#)
Subject: RE: state authorization exemption verification
Date: Monday, October 10, 2011 10:57:11 AM
Attachments: [Distance Ed responses.pdf](#)
[image001.gif](#)

Good morning – Thank you for your recent inquiry regarding the licensure process in North Carolina for your institution. Attached is a document that will provide you with the relevant information.

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Thursday, September 22, 2011 12:28 PM
To: Maggie Ryan
Subject: state authorization exemption verification

Greetings from Northwestern College in Iowa. Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in North Carolina. I have reviewed the information regarding “physical presence” in the state of North Carolina. It appears that Northwestern College qualifies as exempt from seeking authorization as long as we continue to have no physical presence in your state as defined by the policy. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.



Rebecca Hoey

Director of Online Learning
712-707-7388
rebecca.hoey@nwciowa.edu

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Thank you for contacting our office. To ensure quality education, the North Carolina General Assembly has delegated the authority to license post-secondary degree activity in North Carolina (creditable to an associate, bachelor, master's, or doctoral degree) to the Board of Governors of the University of North Carolina. Institutions offering diploma and/or certificate programs are licensed separately by the North Carolina State Board of Community Colleges. The UNC Board of Governors has adopted Rules and Standards which define post-secondary degree activity to include conduct with respect to either a complete post-secondary degree program, or any study or experience or testing represented as creditable toward a post-secondary degree.

Section III of the Rules and Standards specifically provide that an institution undertakes post-secondary degree activity in this State when it commences the activity by:

- a. Use of employees or agents within North Carolina; or
- b. Transmission, presentation, or dissemination of information over or through electronic equipment that is located in North Carolina and owned, leased, rented, licensed, or otherwise reserved for use by the institution; or
- c. Use of real property or facilities that are located in North Carolina and owned, leased, rented, licensed, or otherwise reserved for use by the institution; or
- d. Agreement with a third party to transmit, present, or disseminate information on behalf of the institution through any of the means described in a, b, or c, above.

Exemptions from licensure for certain religious education and post-secondary degree activity within the military are addressed in Section X of the Rules and Standards.

For illustration purposes, the Board of Governors has made the following determinations in the past regarding online post-secondary degree activity:

- Activities which require licensure: practicums, clinical experiences, and student teaching.
- Activities which do not require licensure: proctored exams, attendance at college fairs, adjunct faculty residing in North Carolina and teaching an online course.

These determinations are subject to change depending upon specific factual circumstances or changes in the law or interpretations of the law.

In determining whether to seek licensure, the following resources are available online:

UNC Board of Governors Rules and Standards,
http://www.northcarolina.edu/aa_planning/licensure/Rules__Standards__Master_Updated_1-081.pdf

UNC General Administration Licensure Web site,
http://www.northcarolina.edu/aa_planning/licensure/index.htm

North Dakota



1815 Schafer Street, Suite 202
Bismarck ND 58501-1217
Phone: 701.224.2590 Fax: 701.224.5707
E-mail: ndus.office@ndus.edu Web: ndus.edu

July 28, 2014

Northwestern College

101 7th Street SW
Orange City IA 51041

Dear Rebecca Hoey:

Thank you for submitting an application to the State Authorization Management System for North Dakota found at <https://ndus.edvera.com>. I am happy to inform you that **Northwestern College** has met the requirements for ND Century Code 15-18.1-02.8 Exemptions. Your institution's exemption runs from **July 28, 2014** through **July 28, 2015**. Yearly applications are required to remain exempt.

Sincerely,

A handwritten signature in cursive script that reads "Tanya M. Spilovoy, D. Ed.".

Tanya M. Spilovoy, Ed. D.
Director of Distance Education and State Authorization
North Dakota University System

Ohio



John R. Kasich, Governor
Jim Petro, Chancellor

University System of Ohio
Board of Regents

September 22, 2011

Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IA 51041

Dear Rebecca Hoey:

Thank you for your letter September 22, 2011, requesting an exemption from the Chancellor of the Ohio Board of Regents to deliver online programs to Ohio residents. Since Northwestern College will not maintain a "brick and mortar" presence in the state, and because the institution's online programs do not contain a component that will need to be completed within the state, Northwestern College is not required to attain authorization from the Chancellor to offer its online programs to Ohio residents. If, in the future, Northwestern College intends to engage in activities that require the Chancellor's authorization, please contact me to initiate the process.

Please contact me at (614) 387-1215 or sdegarmo@regents.state.oh.us if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shane DeGarmo'.

Shane DeGarmo
Director, Program Approval

Oklahoma



OKLAHOMA STATE REGENTS FOR HIGHER EDUCATION

November 7, 2011

Improving our future by degrees

Ms. Rebecca Hoey
Director of Online Learning
Northwestern College
101 Seventh Street Southwest
Orange City, Iowa 51041

Dear Ms. Hoey:

Re: Coordination with the Oklahoma State Regents for Higher Education

This letter responds to your correspondence dated September 22, 2011 and subsequent information provided, regarding Oklahoma State Regents for Higher Education (OSRHE) policy pertaining to regulating distance education programs offered in Oklahoma. Current policy does not require institutions outside of Oklahoma to be licensed or authorized by the OSRHE to offer courses or academic programs that will be delivered exclusively through an online format. It is understood that Northwestern College (NWC) does not and will not lease or maintain any buildings, instructional sites, administrative offices, equipment or facilities of any kind in Oklahoma. Further, NWC will not provide instruction, tutoring or student support services from any location in Oklahoma, and students will not take examinations at a site in Oklahoma.

As indicated in your correspondence, NWC currently does not have any distance education programs requiring experiential learning activities (e.g., externships, internships, clinical practica, etc.) within Oklahoma. Additionally, it is noted that NWC currently does not employ any Oklahoma residents as adjunct faculty. To that end, it is determined NWC will not have a physical presence in Oklahoma. If, at any time, NWC employs Oklahoma residents as adjunct faculty, it is understood that faculty and student contact will be exclusively online and adjunct faculty will not convene students within the state for any reason.

As further indicated in your correspondence, NWC may offer a degree completion program in nursing in the near future; therefore, it may be necessary to coordinate with the Oklahoma Board of Nursing if the degree program will be offered to Oklahoma residents.

If students who live in Oklahoma are enrolled in your institution, it is required that your institution make available for review to any enrolled or prospective student upon request, a copy of the documents describing the institution's accreditation and its state, federal, or tribal approval or licensing. Catalogs and student information documents must state your institution's complaint procedures including an appeal process. Moreover, your institution should provide its students or prospective students with contact information for filing complaints with its accreditor, its state approval (i.e., this agency) or licensing entity and any other relevant state official or agency that would appropriately handle a student's complaint. This is consistent with the United States Department of Education Code of Federal Regulations § 668.43(b).

Additionally, NWC will not expressly or implicitly publicize that the institution is recognized in any form by the OSRHE. Please notify this office immediately if NWC plans to establish a physical presence in Oklahoma.

Thank you for your inquiry about Oklahoma requirements. If you have further questions, please contact Ms. Gina M. Wekke, Assistant Vice Chancellor for Academic Affairs, at gwekke@osrhe.edu or (405) 225-9142.

Sincerely,

Houston D. Davis, Ph.D.
Vice Chancellor for Academic Affairs

HDD/jd

Oregon



Oregon

John A. Kitzhaber, MD, Governor

Higher Education Coordinating Commission

Private Postsecondary Education

Office of Degree Authorization

775 Court Street NE, Salem, OR 97301

PRELIMINARY SCREENING FORM REQUIRED FOR OUT-OF-STATE INSTITUTIONS

If you are an out-of-state institution, your institution may qualify for the Exclusionary Rule. Please confirm you meet the below requirements in order to qualify for the Exclusionary Rule, OAR 583-030-0009. If you do not meet the requirements on pages 2-4 then please apply using the out-of-state application for Authorization found on the website.

INSTITUTION INFORMATION

Section 1.1 Name of school, address and contact information:

Name of school as it appears on diploma: Northwestern College

Address Line 1: 101 7th Street SW Line 2: Orange City, IA 51041

City State Zip Code

Name of School contact: Rebecca Hoey

First Last

Email: rebecca.hoey@nwciowa.edu Phone: (707-7388) 707-7388

CERTIFICATION OF OFFICER

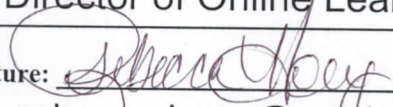
CERTIFICATION STATEMENT FOR ENTIRELY ONLINE PROGRAMS WITH NO PRESENCE IN THE STATE OF OREGON:

By signing below, I certify that all the below information is correct to the best of my knowledge, and the above institution will not operate outside the scope of OAR 583-030-0009 by engaging in activities that fall outside the scope of the exclusionary rule. The activities are stipulated below and by signing this document the institution agrees to not engage in any of the below named activities.

Name of Signatory Officer: Rebecca Hoey, Ed.D.

First Last

Title: Director of Online Learning

Signature: 

Email: rebecca.hoey@nwciowa.edu Phone: (712) 707-7388

1 | Out-of-State Application

"Onsite Placement" refers to experiential learning and is defined as practicum, clinical, internship, externship, mentoring or any other placement field work in the State of Oregon.



Oregon

John A. Kitzhaber, MD, Governor

Higher Education Coordinating Commission

Private Postsecondary Education

Office of Degree Authorization

775 Court Street NE, Salem, OR 97301

PART I: ADMINISTRATIVE OFFICE

Please complete the following form in order for our office to determine whether your institution qualifies for the exclusionary rule, OAR 583-030-0009. If the above listed institution meets all the requirements (marks all the boxes) then the institution qualifies for exclusion.

Our institution intends to offer degree programs or courses for-credit with no physical presence in the State of Oregon to Oregon residents, and these programs are purely online with no on-the-ground components. Please mark all boxes that apply. Please see OAR § 583-030-0009(1)

1. Our institution does not intend to have a physical presence in the State of Oregon, which can include a branch campus, administrative office, or use of an Oregon based address. Please see OAR § 583-030-0005(2)(A)

Our institution will not have...

- ☒ An administrative office in the State of Oregon. See OAR § 583-030-0005(2)(a)
- ☒ Any branch campus located in the State of Oregon. See OAR § 583-030-0020
- ☒ Any physical address of any kind in the State of Oregon. See OAR § 583-030-0005(2)(a)
- ☒ Any type of physical or direct instruction of any kind in the State of Oregon. See OAR § 583-030-0005(3)(a)

Please Note: Hiring Oregon residents to teach distance education in out of state schools does not require approval or state authorization. Out-of-state institutions may hire Oregon residents to teach an online degree program that is operating exclusively out of state.

2 | Out-of-State Application

"Onsite Placement" refers to experiential learning and is defined as practicum, clinical, internship, externship, mentoring or any other placement field work in the State of Oregon.



Oregon

John A. Kitzhaber, MD, Governor

Higher Education Coordinating Commission

Private Postsecondary Education

Office of Degree Authorization

775 Court Street NE, Salem, OR 97301

PART II: RECRUITMENT & MARKETING

2. Our institution does not intend to conduct local advertisement and recruitment in the state that would specifically target Oregon students, such as ads in local media, marketing of any kind or recruiting of based in the state of Oregon.

Our institution will not have...

- ☒ Ads of any kind in local media, including Oregon-based TV stations, radio, or any other public broadcasting system. See *OAR* § 583-030-0015(23)
- ☒ Marketing and advertising that extends beyond mailers, flyers, or any direct mail that are **directly** targeting Oregon residents
- ☒ Individual recruiters in the State of Oregon of any kind, directly or indirectly marketing to Oregon residents. See *OAR* § 583-030-0015(23)
- ☒ Any person affiliated with the institution that is on the ground, in the State of Oregon marketing or advertising to Oregon residents. This refers to participation in college fairs. See *OAR* § 583-030-0015(23)
- ☒ Recruiting or marketing **office locations** in the State of Oregon. See *OAR* § 583-030-0005(2)(a)
- ☒ Marketing that directly targets Oregon residents via social media or web advertising of any other web-based communication.

Please Note: Graduate and undergraduate students, along with faculty and administrators, attending conferences in the State of Oregon with the purpose of presenting research does not require state authorization. This research may include discussion of degree program(s) at the university. This does not qualify as marketing and advertising requiring state authorization.

3 | Out-of-State Application

"Onsite Placement" refers to experiential learning and is defined as practicum, clinical, internship, externship, mentoring or any other placement field work in the State of Oregon.



PART III: ONSITE PLACEMENT & PLACEMENT PROGRAMS

3. Our institution does not intend to have degree programs including a component in which the student is required to complete an internship, externship, mentoring, practicum, clinical placement etc. or any clinical placement at a location in the State of Oregon. For definition of Person Assisting a School, please see *OAR* § 583-030-0015(23)

Our institution will not have...

- ☒ Onsite placement requiring coordination with the State of Oregon licensing boards- including but not limited to the Teacher Standards Practices Commission (TSPC) and Oregon State Board of Nursing (OSBN). See Oregon Administrative Rules and Oregon Administrative Statutes for TSPC and OSBN
- ☒ Onsite placement associated with any degree program that is **required** in order to complete the program. See *OAR* § 583-030-0005(2) & *OAR* § 583-030-0020(1)
- ☒ Onsite placement associated with any degree program that is an **optional** component in order to complete the program. See *OAR* § 583-030-0005(2) & *OAR* § 583-030-0020(1)
- ☒ Onsite Placement in the State of Oregon which refers to experiential learning, and is defined as practicum, clinical, internship, externship, mentoring or any other placement fieldwork in the State of Oregon, whether supervised or unsupervised, or with faculty that does or does not receive compensation for evaluating the student. See *OAR* § 583-030-0005(2) & *OAR* § 583-030-0020(1)

4|Out-of-State Application

"Onsite Placement" refers to experiential learning and is defined as practicum, clinical, internship, externship, mentoring or any other placement field work in the State of Oregon.



Oregon

John A. Kitzhaber, MD, Governor

Higher Education Coordinating Commission

Private Postsecondary Education

Office of Degree Authorization

775 Court Street NE, Salem, OR 97301

If your institution is unclear as to whether it requires state authorization, please indicate below what of the three exclusion requirements concern you:

Administrative Office (Provide details):

Recruiting and Marketing (Provide details):

Onsite Placement (Provide details):

Please E-Mail the Final copy of this document filled out by the institution to the Office of Degree Authorization Out-of-State Evaluator. Thank you.

5 | Out-of-State Application

"Onsite Placement" refers to experiential learning and is defined as practicum, clinical, internship, externship, mentoring or any other placement field work in the State of Oregon.

Pennsylvania



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
333 MARKET STREET
HARRISBURG, PENNSYLVANIA 17126-0333

DEPUTY SECRETARY FOR
POSTSECONDARY AND HIGHER EDUCATION

PHONE: 717-787-5041
FAX: 717-783-0583
TTY: 717-783-8445

July 12, 2013

Dr. Rebecca Hoey
Director of Online Learning
Northwestern College
101 Seventh Street Southwest
Orange City, IA 51041

Dear Dr. Hoey:

Thank you for completing the Pennsylvania Department of Education application form on behalf of Northwestern College for state confirmation as a distance education provider to comply with federal financial aid requirements under 34 CFR 600.9.

Based on review of the application form and the information you provided to confirm approval by your state of residence and accreditation by an approved accrediting agency, at this time, there are no restrictions on Northwestern College in connection with offering the following by distance education to students who are residents of Pennsylvania:

- Online program RN to BSN degree completion
- Online program Analytics Undergraduate Certificate
- Online program Early Childhood Integrated Setting endorsement, with required observation hours and student teaching
- Online program Early Childhood endorsement, with required observation hours and student teaching
- Online program Coaching endorsement

This authorization is valid until June 30, 2015. Please note that it is the responsibility of the institution to contact the Pennsylvania Department of Education to request authorization beyond June 30, 2015. This office will not contact your institution to initiate renewal or extension of this authorization.

Please note that this letter does not convey degree-granting authority in Pennsylvania. All degrees awarded must be awarded under the authority of the institution's home state.

In addition, please note that this letter does not convey authority to establish a physical presence in Pennsylvania. A physical presence requires additional authorization from the Pennsylvania

Dr. Rebecca Hoey

Page 2

July 12, 2013

Department of Education under 22 Pa. Code Chapter 36. While residents of Pennsylvania may be employed by your institution to conduct instruction via distance education, any classroom instruction would constitute a physical presence requiring prior approval under 22 Pa. Code Chapter 36.

Out-of-state teacher certification program providers offering Pennsylvania certification must meet all Pennsylvania program approval requirements. Please contact the Bureau of School Leadership and Teacher Quality at (717) 787-3470 for information on teacher preparation.

This authorization may be rescinded by written notification if the institution is found to have misrepresented any information in the information form or if the institution fails to maintain accreditation or violates any laws, regulations or policies in Pennsylvania.

Please contact the office at (717) 787-4313 with any questions regarding this approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Jill Hans".

L. Jill Hans

Rhode Island

From: [Velletri, Deanna](#)
To: [Hoey, Rebecca](#)
Subject: RE: follow up
Date: Friday, December 09, 2011 1:15:47 PM
Attachments: [jimage001.gif](#)

Your welcome! Good luck.

Deanna Velletri

Rhode Island Office of Higher Education
Academic and Student Affairs
The Shepard Building
80 Washington Street
Providence, RI 02903
Phone 401-456-6010
Fax 401-456-6028
Email dvellettri@ribghe.org
Web www.ribghe.org

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Friday, December 09, 2011 2:14 PM
To: Velletri Deanna
Cc: Hoey, Rebecca
Subject: RE: follow up

Yes, thank you! I consider us 'exempt' from going through the authorization process. The way you have phrased it makes perfect sense to me. From your perspective, Northwestern does not need to take any further action and may provide online opportunities to Rhode Island residents as long as we do not establish a physical presence in any way defined by your legislation. I know you must be swamped with these questions; thanks so much for responding to me so promptly!



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciowa.edu

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101 7th St. SW
Orange City, IA 51041
www.nwciowa.edu

From: Velletri Deanna [<mailto:dvellettri@ribghe.org>]
Sent: Friday, December 09, 2011 1:11 PM
To: Hoey, Rebecca
Subject: RE: follow up

Hi Rebecca:

The thing is, I don't believe you are exempt... you just do not need to comply because of your lack of physical presence.

Does this help?

Deanna Velletri

Rhode Island Office of Higher Education
Academic and Student Affairs
The Shepard Building
80 Washington Street
Providence, RI 02903
Phone 401-456-6010
Fax 401-456-6028
Email dvellettri@ribghe.org
Web www.ribghe.org

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciowa.edu>]
Sent: Friday, December 09, 2011 2:08 PM
To: Velletri Deanna
Subject: RE: follow up

Good Afternoon Ms. Velletri-

Thank you for the information. I had read it on your website, as well, and believe I understand it. My request was to receive an

acknowledgement of our exempt status because we do meet the requirement set forth by your state; we will provide only distance learning opportunities with no physical presence. If you do not provide notification of exemption, but leave it to the determination of the out-of-state school, then I will simply consider us exempt without your formal acknowledgement if that is your preference. We just want to be compliant with your expectations!

Happy holidays!



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwcioa.edu

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101 7th St. SW
Orange City, IA 51041
www.nwcioa.edu

From: Velletri Deanna [<mailto:dvellettri@ribghe.org>]
Sent: Friday, December 09, 2011 12:28 PM
To: Hoey, Rebecca
Subject: RE: follow up

Dear Sir or Madam:

In response to your recent inquiry regarding the Rhode Island Board of Governors for Higher Education's authorization (state authorization) for online degree granting programs by out of state institutions, please be advised that Rhode Island General Laws and the Board's current regulations provide as follows:

Degree Granting Institutions.

Chapter 40 of Title 16 of the Rhode Island General Laws indicates that to transact business in this state and to grant academic, collegiate, professional, or similar degrees, an institution must be non-profit, must receive the prior authorization of the Rhode Island Board of Governors for Higher Education ("Board"), and must have received full New England Association of Schools and Colleges (NEASC) accreditation within "five years of its incorporation or establishment within this state or five years of being permitted to transact business within this state." (RIGL§16-40-1 and §16-40-2) As such, a for-profit institution that wishes to grant academic, collegiate, professional, or similar degrees within this state must obtain such authorization through the enactment of specific legislation by the state's General Assembly.

Additional procedures, standards, and requirements regarding the authorization of non-profit degree granting institutions are set forth in the Board's *Regulations Governing Institutions of Higher Education Operating in Rhode Island*, which may be found at <http://www.ribghe.org/hiedreg.htm>. These regulations also set forth a definition for "operate or operating" a degree granting institution in Rhode Island.

Non-degree Granting Proprietary Schools.

For non-degree granting (granting no awards above the pre-associate level) proprietary schools, both for profit and non-profit, RIGL§16-40-1 and §16-40-2 also require prior authorization from the Board prior to operating and/or doing business in this state. The procedures, conditions, standards, and requirements for obtaining Board authorization (initial, conditional, and annual) and exemptions, as well as the standards for the operation of proprietary schools are set forth in the Board's *Regulations Governing Proprietary Schools in Rhode Island*, which may be found at <http://www.ribghe.org/propreg.htm>. These regulations also provide a definition for "operate or operating" a non-degree granting proprietary school in Rhode Island and set forth specific exemptions. It should be noted that these exemptions are not automatic, and an entity is required to apply for either approved or exempt status.

Distance Learning.

The Board's *Policy on Distance Learning* may be found at <http://www.ribghe.org/distance%20learning.pdf>. There, the Board indicates that:

- 1) It shall be the policy of the Board of Governors for Higher Education that, so long as a provider of distance learning has no physical presence in Rhode Island, it will not be subject to Board of Governors regulations. [Please see page A-3.2 of the policy for a definition of physical presence.]
- 2) If a provider has or seeks to establish a physical presence in Rhode Island, it shall be subject to the appropriate set of Board of Governors regulations and Rhode Island Office of Higher Education standards... [These regulations and standards are cited above].

Student Complaint Procedure/Process.

At present, the Board does not have a formal procedure or process to address complaints from students who are attending non-public degree granting institutions or non-degree granting proprietary schools operating within this state that are not under the Board's jurisdiction. However, complaints received by the Board's Office of Higher Education ("OHE") from students attending non-degree granting proprietary schools are handled in the manner set forth in Standard 3.5(c) of the Board's *Regulations Governing Proprietary Schools in Rhode Island*. Students with complaints involving possible illegal or criminal activity are referred to the local or the Rhode Island State Police, and complaints of discriminatory practices are referred to the Rhode Island Commission for Human Rights.

Other State Departments.

Out of state entities that wish to operate in Rhode Island should also contact the office of the Rhode Island Secretary of State (www.sos.ri.gov) for information regarding its authorization process and requirements. In addition, institutions offering programs and/or training leading to occupations regulated by the Rhode Island Department of Health (healthcare, nursing, cosmetology, tattooing, etc) should contact that department (www.health.ri.gov).

I hope that this information is helpful to you and answers your inquiry. Should you require any additional information please contact me at 401-456-6010 or dvellettri@ribghe.org.

Very truly yours,

Deanna Velletri

Rhode Island Office of Higher Education

Academic and Student Affairs

The Shepard Building

80 Washington Street

Providence, RI 02903

Phone 401-456-6010

Fax 401-456-6028

Email dvellettri@ribghe.org

Web www.ribghe.org

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwcioowa.edu>]

Sent: Thursday, December 08, 2011 11:36 AM

To: Velletri Deanna

Subject: follow up

Hello Ms. Velletri:

In September I sent you an email regarding exemption from state authorization in Rhode Island to offer distance learning opportunities to students in your state. As noted in my previous email, Northwestern College has no physical presence in your state, as defined by the policy set forth in this document: <http://www.ribghe.org/distance%20learning.pdf>. I have not received a response to my email, and therefore wished to follow up. A copy of the email is below. I would appreciate your reply acknowledging our exempt status, or requesting additional information. Thank you!

Sent 9/22/11: Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in Rhode Island. I have reviewed the information provided to the State Higher Education Executive Officers at:

http://www.sheeo.org/stateauth/AgencyResponses/Rhode%20Island_Board%20of%20governors%20for%20Higher%20Education.pdf

. It appears that Northwestern College qualifies as exempt from seeking authorization from Rhode Island as long as we continue to have no brick and mortar facility and maintain or send no employees or paid representatives to Rhode Island for recruiting, advising, offering courses or programs, or administration of examinations. I acknowledge it is understood that any future activity that constitutes physical presence would necessitate the authorization process in Rhode Island. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwcioowa.edu

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Northwestern College

101 7th St. SW

Orange City, IA 51041

www.nwcioowa.edu

South Carolina

From: [Renea Eshleman](#)
To: [Hoey, Rebecca](#)
Subject: Northwestern College, Orange City, IA
Date: Friday, September 23, 2011 10:51:35 AM
Attachments: [image001.gif](#)

You have correctly interpreted the information on licensing in SC. Unless the institution conducts activities that create a physical presence, it is exempt from the Commission's oversight.

Renea H. Eshleman, Program Manager
Nonpublic Postsecondary Institution Licensing
SC Commission on Higher Education
1122 Lady Street Street, Suite 300
Columbia, SC 29201
Telephone 803.737.2281
Fax 803.737.2297
E-mail reshleman@che.sc.gov

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciova.edu>]
Sent: Thursday, September 22, 2011 2:47 PM
To: Renea Eshleman
Subject: state authorization exemption confirmation

Hello Ms. Eshleman:

Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in South Carolina. I have reviewed the information provided to the State Higher Education Executive Officers at:

http://www.sheeo.org/stateauth/AgencyResponses/South%20Carolina_Commission%20on%20Higher%20Education.pdf

. It appears that Northwestern College qualifies as exempt from seeking authorization from South Carolina as long as we continue to have no brick and mortar facility in your state, no organized consistent recruiting and no advertising in local media. I acknowledge it is understood that any future activity that constitutes physical presence would necessitate the authorization process in South Carolina. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciova.edu

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Orange City, IA 51041
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South Dakota

State of South Dakota



OFFICE OF THE SECRETARY OF STATE

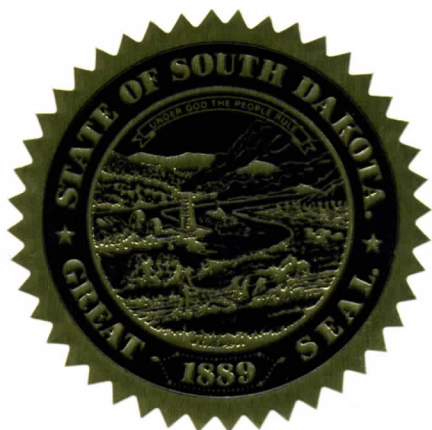
Certificate of Authorization Postsecondary Education

I, **Jason M. Gant**, Secretary of State of the State of South Dakota, do hereby certify that

NORTHWESTERN COLLEGE

was filed with our office on **February 22, 2013** and is on the active list of Post-Secondary Education Institutions.

IN TESTIMONY WHEREOF, I
have hereunto set my hand and
affixed the Great Seal of the State of
South Dakota, at Pierre, the Capital,
this February 22, 2013.



Jason M. Gant
Secretary of State

From: [Orth, Stephanie](#)
To: [Hoey, Rebecca](#)
Subject: RE: RN to BSN completion option
Date: Monday, December 10, 2012 3:20:20 PM
Attachments: [image001.png](#)
[image003.png](#)
[image006.jpg](#)
[image007.jpg](#)

Good afternoon,

The BON does not have to monitor these programs. As long as the programs complete a Certificate of Authorization with the Secr. of State, we at the Board have no separate approval process. As long as the program is from a compact state (like Iowa), the students and teachers can do clinicals in SD with appropriate licensure.

- **Good Faith Effort** - The USDOE will not limit distance education activities before July 1, 2014, so long as the institution is 'making good faith efforts to obtain necessary state authorizations before that date. The extensions apply only to the state in which the institution is located. For distance and correspondence education, institutions must follow the regulations of each state in which it 'operates'. Guidelines for a "good faith" effort include, but not limited to:
 - *Documentation that an institution is developing a distance education management process for tracking students' place of residence when engaged in distance education
 - *Documentation that an institution has contacted a State directly to discuss programs the institution is providing to students in that State to determine whether authorization is needed
 - *An application to a State, even if it is not yet approved
 - *Documentation from a State that an application is pending

Sincerely,

Stephanie Orth, MS, RN
Nursing Program Specialist
South Dakota Board of Nursing
722 Main Street, Suite 3
Spearfish, SD 57783
Stephanie.orth@state.sd.us
605-642-1388 (Ph)
605-642-1389 (Fax)

Happiness is an attitude. We either make ourselves miserable,
or happy and strong. The amount of work is the same.
~Francesca Reigler

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Wednesday, December 05, 2012 9:46 AM
To: Orth, Stephanie (DOH)
Subject: RN to BSN completion option

Stephanie-

Greetings from Northwestern College, located in Orange City, Iowa. Northwestern College has an established and strong nursing program, granting bachelors of science in nursing degrees to our traditional students. Recently Northwestern has made a commitment to serve the needs of adult learners, and as a result developed an RN to BSN completion option for registered nurses who wish to complete a bachelor's degree. The program will be available online, with onsite clinicals at a location

near the nurse and mutually agreed on by the college. To clarify, only nurses who are already licensed in their home state will be admitted to the program. With appropriate approvals, we will make this option available to RNs in Iowa, South Dakota, Minnesota and Nebraska.

Northwestern has been authorized by the South Dakota Secretary of State to offer online courses to students in South Dakota. We would like to know if there is anything that we need to submit to the South Dakota Board of Nursing to obtain your approval, as well. Any information you could provide would be valuable. Thank you!

Rebecca Hoey, Ed.D.

Director of Online Learning

(712) 707-7388

rebecca.hoey@nwciova.edu

Let us not grow weary while doing good, for in due season we shall reap if we do not lose heart. —Galatians 6: 4-6, 9

Tennessee



RICHARD G. RHODA
Executive Director

STATE OF TENNESSEE
HIGHER EDUCATION COMMISSION
PARKWAY TOWERS, SUITE 1900
NASHVILLE, TENNESSEE 37243-0830
(615) 741-3605
FAX: (615) 741-6230

BILL HASLAM
Governor

Distance Education Authorization Requirements in Tennessee

On October 29, 2010, the U.S. Department of Education released its final program integrity regulations regarding postsecondary educational institutions, including state authorization requirements in 34 C.F.R. § 600.9. The Tennessee Higher Education Commission (THEC or Commission) offers the following information regarding authorization requirements for providers of distance education in order to assist institutions in their efforts to comply with the new federal requirements.

If after reviewing the following explanation, you believe that your institution does not engage in any activity requiring authorization, no further action by your institution is required. However, if you believe that your institution should obtain authorization, you must submit an Initial Authorization Application. The application process is described in the “Obtaining Authorization” section of this document. Questions concerning this information should be directed in writing to Julie Woodruff, Director of Regulatory Affairs, at julie.woodruff@tn.gov or Nicholas Cook, Assistant Director of Regulatory Affairs, at nicholas.cook@tn.gov.

Statutes and Rules: The text of Tennessee’s statutes and rules governing postsecondary educational institutions may be obtained by clicking on the appropriate link at the top of the webpage located at: <http://state.tn.us/thec/Divisions/LRA/PostsecondaryAuth/psa.html>.

Rule 1540-01-02-.04(1) prohibits non-exempt postsecondary educational institutions from advertising, soliciting, recruiting, enrolling, or operating in Tennessee without authorization from THEC. The exemptions are listed in Tenn. Code Ann. § 49-7-2004 and Rules 1540-01-02-.05 and .08(8) and (10); however, Tennessee does not specifically exempt distance education providers.

A distance education provider engages in the activities described in Rule 1540-01-02-.04(1) if it establishes a physical presence. The definition of physical presence as found in Rule 1540-01-02-.03(1)(ii) provides:

“Physical presence” means actual presence within the state of Tennessee for the purpose of conducting activity related to: a postsecondary educational institution; an educational service; dissemination of educational credentials; enrollment; solicitation; or, advertising. Physical presence as further outlined for purposes of authorization shall include but not be limited to:

1. An instructional site within the state;
2. Instruction within or originating from Tennessee designed to impart knowledge with response utilizing teachers, trainers, counselors, etc., or computer resources, or computer linking (e.g. Internet), or any form of electronic telecommunications;
3. Dissemination of an educational credential from a location within the state;
4. An agent, recruiter, institution or business that solicits for enrollment or credits or for the award of an educational credential;
5. Advertising, promotional material or public solicitation in any form that targets Tennessee residents or uses local advertising markets in the state for institutions seeking, holding or required to hold a certificate of authorization.

THEC interprets the definition of physical presence to:

- include having an instructor lead a distance education course from within the state;
- include advertisements that appear on the webpage of a local newspaper;
- include facilitating and/or entering into an arrangement with any business, organization, or similar entity located in Tennessee for the purpose of providing an internship, externship, practicum, clinical, student teaching, or similar opportunity; and
- not include enrolling a Tennessee student if the recruitment of the student did not involve any of the prohibited activities.

If an institution engages in any of the activities listed in the definition of physical presence, it must obtain authorization by filing an Initial Authorization Application with THEC. Otherwise, an institution that does not engage in any of the listed activities does not have to take any action.

Obtaining “Authorization Not Needed” Letter: On March 17, 2011, the U.S. Department of Education (USDOE) released a Dear Colleague Letter, GEN-11-05, regarding implementation of the program integrity regulations. Pursuant to GEN-11-05, the USDOE does not require an institution to obtain a document from the appropriate state agency stating that authorization is not required. An institution is only required to demonstrate upon request from the USDOE that state authorization is not required. As a result, THEC will not issue “Authorization Not Needed” letters at this time. Instead, THEC will consider whether issuance of such a letter is appropriate at such time that the USDOE requests that an institution demonstrate that state authorization is not required. If your institution receives a request from the USDOE, you may request that THEC issue an “Authorization Not Needed” letter by submitting a written request, along with the request from the USDOE, to:

**Tennessee Higher Education Commission
Attn: Director of Regulatory Affairs, DPSA
404 James Robertson Parkway, Suite 1900
Nashville, TN 37243-0830**

Obtaining Authorization: The first step to obtaining authorization in Tennessee is to file an Initial Authorization Application. If you determine that your institution is required to be authorized, you should contact Teresa Warren at teresa.warren@tn.gov to obtain an electronic version of the Initial Authorization Application.

Once your application and fee are received, the application will be reviewed by a staff member of the Division of Postsecondary School Authorization (DPSA). If the application is incomplete, DPSA will defer it with instructions that corrections be filed by the next due date (see below).

If the application is complete, DPSA will refer the application to the Committee on Postsecondary Educational Institutions. The Committee will review the application and determine whether to make a recommendation to the Commission that your institution be approved. If the Committee makes a favorable recommendation, the application is placed on the agenda for the next Commission meeting for approval.

The relevant dates for 2011 are as follows:

Deadline for Application	Committee Meeting	Commission Meeting
1/14/2011	4/7/2011	4/28/2011
4/8/2011	7/7/2011	7/28/2011
8/12/2011	10/27/2011	11/17/2011
11/4/2011	TBA	TBA

Texas

From: [White, Fred](#)
To: [Hoey, Rebecca](#)
Subject: RE: Application for a Certificate of Authorization
Date: Wednesday, September 21, 2011 11:20:55 AM

Ms. Hoey,

Thanks for spending some time with me today and explaining the purpose of the application for a certificate of authorization that you submitted. As I mentioned the fact that Northwestern College is accredited by a recognized accreditor and does not intend to have a presence in Texas makes it exempt from oversight by our agency and approval is not required.

I will not act on the application and if you have any questions please contact me.

Fred White
Program Director
Texas Higher Education Coordinating Board
Career Technical Programs
1200 East Anderson Lane
Austin, Texas 78752
Phone (512) 427-6238
Fax (512) 427-6168
E-mail fred.white@theccb.state.tx.us
Web Site www.theccb.state.tx.us

-----Original Message-----

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciova.edu>]
Sent: Monday, September 19, 2011 12:47 PM
To: White, Fred
Subject: Application for a Certificate of Authorization

The attached file contains data that was entered into a form. It is not the form itself.

The recipient of this data file should save it locally with a unique name. Adobe Acrobat Professional 7 or later can process this data by importing it back into the blank form or creating a spreadsheet from several data files. See Help in Adobe Acrobat Professional 7 or later for more details.

From: [De Long, Michael](#)
To: [Hoey, Rebecca](#); [Career Schools](#)
Subject: RE: question on exemption
Date: Monday, September 19, 2011 11:34:01 AM
Attachments: [image002.jpg](#)
[image003.gif](#)

Dear Ms. Hoey-

Thank you for your inquiry regarding approval for your institution to provide postsecondary training to Texans. I could not tell if you want to offer just online courses from your College. Depending on your school's particular circumstances, it may or may not fall under regulation by the Texas Workforce Commission (Agency).

A recent amendment to the Texas Education Code excludes certain institutions from the definition of the schools and colleges required to have either a license or exemption from the Agency prior to enrolling Texas residents. These are schools that are:

1. physically located in a state other than Texas;
2. legally authorized by the state of its physical location to offer postsecondary education and award degrees;
3. accredited by a regional or national accrediting organization recognized by the United States secretary of education under the Higher Education Act of 1965 (20 U.S.C. Section 1001 et seq.); and
4. offer in Texas only postsecondary distance or correspondence programs of instruction.

If your school meets the above listed qualifications, the only action is required is to post the following notice in a conspicuous place on your website:

1. that your career school or college is not regulated in Texas under Chapter 132 of the Texas Education Code;
2. the name of any regulatory agencies that approve and regulate your school's programs in the state where your school is physically located and in which it has legal authorization to operate; and
3. how to file complaints or make other contact with applicable regulatory agencies.

Otherwise, an explanation of both our licensing and exemption processes is contained at our web site: <http://csc/twc/state/tx/us>. Click on the "[Considering Opening a Career School?](#)" link and then on the [General Information Sheet on Career Schools and Colleges](#). Our statute, rules and forms are also available from the web site. As you will see, the available exemptions, as well as the necessary qualifications, are explained in form PS-017, General Exemptions.

Additionally, to ensure your institution has appropriate authority to offer degree programs in Texas, you should contact the Texas Higher Education Coordinating Board. Dr. Gaye Bumsted Perry, (512) 427-6528, gaye.bumstedperry@thehb.state.tx.us is the best contact on this. Also, depending on the types of courses you intend to offer online to Texans, other State of Texas agencies may be required to approve some of your courses.

If you have additional questions, please contact me via e-mail or at 512.936.3104.

J. Michael De Long



TEXAS HIGHER EDUCATION COORDINATING BOARD

P.O. Box 12788 Austin, Texas 78711

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512/ 427-6101
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Web site:
<http://www.theceb.state.tx.us>

Statement of Exemption Based on Accredited Distance Education

Chapter 7.14 of Texas Higher Education Coordinating Board rules outlines provisions for out-of-state institutions wishing to offer distance education in Texas.

A non-religious institution or a religious institution offering programs not in a religious discipline is exempt from Coordinating Board oversight if it fulfills the following:

- 1) Accredited to offer degrees at a specific level by an accrediting agency recognized by the Coordinating Board or approved by a Texas state agency which authorizes the school's graduates to take a professional or career and technical state licensing examination administered by that agency; and
- 2) No physical presence in the state. Section 7.3 of Coordinating Board rules defines physical presence as the following:
 - a) While in Texas a representative of the school or a person being paid by the school who conducts an activity related to postsecondary education, including for the purposes of recruiting students (excluding the occasional participation in a college/career fair involving multiple institutions or other event similarly limited in scope in the state of Texas), teaching or proctoring courses including internships, clinicals, externships, practicums, and other similarly constructed educational activities(excluding those individuals that are involved in teaching courses in which there is no physical contact with Texas students), or grants certificates or degrees; and/or
 - b) The institution has any location within the state of Texas which would include any address, physical site, telephone number, or facsimile number within or originating from within the boundaries of the state of Texas. Advertising to Texas students, whether through print, billboard, internet, radio, television, or other medium alone does not constitute a physical presence.

An institution's exemption applies only to the degree level for which the programs or institution is accredited and continues as long as it is in compliance with Section 7.14. If an institution is no longer accredited by an accreditor recognized by Texas and/or maintains a physical presence in Texas, the institution is no longer eligible for an exemption and must receive Coordinating Board authority to offer distance education to Texas students.

From: [Bumsted Perry, Gaye](#)
To: [Hoey, Rebecca](#)
Subject: Texas State Authorization for Distance Education-Northwestern College
Date: Wednesday, October 26, 2011 1:11:52 PM

Good afternoon,

At this time Texas has not finalized its policy on out of state distance education. We anticipate that we will have to proceed with a rule change in October and will not have a finalized policy until November.

We are requesting that institutions submit formal letters of inquiry to us that include the following information: institution's name, address, accreditor, type (i.e., public, private, proprietary), degree programs effected, and whether or not there is a physical presence or agent in the state (this would include a location or any face-to-face contact with students through practica, clinicals, internships, externships, etc.). You may pdf the letter and email it directly to Dr. Gaye Bumsted Perry at gaye.bumstedperry@theccb.state.tx.us.

We will keep the letter on file and respond in November when our policy is finalized. In addition to the Coordinating Board, institutions should also contact the Texas Workforce Commission as they are the agency which has legal authority to authorize the operation of an institution within the state.

D. Gaye Bumsted Perry, Ph.D.
Program Director
Division of Academic Affairs and Research
Texas Higher Education Coordinating Board
P.O. Box 12788
Austin, TX 78711
office 512-427-6528
fax 512-427-6168
gaye.bumstedperry@theccb.state.tx.us
<http://www.theccb.state.tx.us>

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Monday, September 19, 2011 11:53 AM
To: Bumsted Perry, Gaye
Subject: state authorization question

Greetings from Iowa. Northwestern College is pursuing state authorization in Texas to offer distance education coursework. At this time we have no specific certificates or programs ready to be delivered online, though we are working on developing them. We have one undergraduate-level endorsement specific to early childhood education in Iowa, and general education coursework ready to go. Two questions regarding your Application for Authorization:

- 1) Because we have no specific certificates or programs, I am uncertain of how the form should be completed in the degrees/programs fields. I have completed it as I believe is correct. Will someone contact me for clarification, or will the application be rejected outright if there is a question?
- 2) Your form requires the submission of a copy of our approval from our accreditor (HLC). However, the form is submitted electronically. How would you like us to submit a copy of our approval?

I look forward to your reply.



Rebecca Hoey

Director of Online Learning

712-707-7388

[10.19.2011](#)

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Northwestern College

101 7th St. SW
Orange City, IA 51041

www.nwciowa.edu

J Michael De Long



From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Monday, September 19, 2011 11:30 AM
To: Career Schools
Subject: question on exemption

Greetings from Iowa. Northwestern College is a private religious nonprofit traditional residential liberal arts college pursuing state authorization in Texas. We are not a career school or college. Are we still required to seek an exemption from the Texas Workforce Commission?



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciowa.edu

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Utah



State of Utah Department of Commerce

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

FRANCINE A. GIANI
Executive Director

THOMAS A. BRADY
Deputy Director

DANIEL O'BANNON
Director, Division of Consumer Protection

November 13, 2014

NORTHWESTERN COLLEGE
ATTN DR REBECCA HOEY
101 7TH STREET SW
ORANGE CITY IA 51041

Re: Certificate of Postsecondary State Authorization No. 8149556-9986

Dear Dr Rebecca Hoey,


The Certificate of Postsecondary State Authorization verifies that **Northwestern College** has met the requirements of Utah Code Ann. §13-34a-203 to be a registered postsecondary school required under 34 C.F.R 600.9 to be legally authorized by the State of Utah.

This Certificate confirms the Division's finding that **Northwestern College** is a private, nonprofit postsecondary school that has been in continuous operation for at least 20 years. This finding is based solely on the information provided to the Division by **Northwestern College**.

You must notify the Division in writing within thirty (30) days of any change in circumstance which may affect the postsecondary school's status.

Should you have any questions or concerns please contact our office 801-530-6601.

Sincerely,


Marla Winegar, Manager
Utah Division of Consumer Protection
mwinegar@utah.gov
www.dcp.utah.gov

Utah
Department of Commerce
Licensing and Enforcement System

Payer: Northwestern College
Drawer ID: terminalid
User : erecksiek
Date: 11/12/2014
Administrative fe 1 1,500.00 1,500.00
Check \$1,500.00
Amount Due: \$1,500.00
Amount Paid: \$1,500.00
Receipt #: 5778617

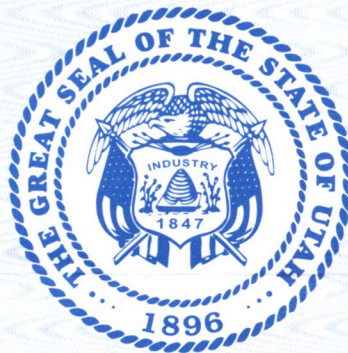
STATE OF UTAH
DEPARTMENT OF COMMERCE
DIVISION OF CONSUMER PROTECTION
CERTIFICATE OF POSTSECONDARY STATE AUTHORIZATION
Nonprofit Private Postsecondary School

EFFECTIVE DATE: 11/13/2014

EXPIRATION DATE:

ISSUED TO:

Northwestern College
101 7th Street SW
Orange City, IA 51041



REFERENCE NUMBER(S), CLASSIFICATION(S) & DETAIL(S)

Registration No. 8149556-9986

This Certificate of State Authorization verifies that the school has met the requirements of Utah Code Ann. §13-34a-203 to be a registered postsecondary school required under 34 C.F.R 600.9 to be legally authorized by the State of Utah.

Daniel L. O'Banion

Director, Division of Consumer Protection

**THIS AUTHORIZATION IS NOT AN ENDORSEMENT OF THE INSTITUTION BY EITHER
THE DIVISION OF CONSUMER PROTECTION OR THE STATE OF UTAH.**

Vermont

From: [Hilgendorf, Cathy](#)
To: [Hoey, Rebecca](#)
Subject: RE: state authorization exemption confirmation
Date: Thursday, September 22, 2011 3:03:01 PM
Attachments: [image001.gif](#)

If a school has no physical presence in Vermont, it does not need Vermont approval in order to enroll Vermont students in online programs. It sounds to me like you are exempt.

Cathy Hilgendorf
Postsecondary Approval Coordinator
Vermont Dept. of Education

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciova.edu]
Sent: Thursday, September 22, 2011 4:00 PM
To: Hilgendorf, Cathy
Subject: state authorization exemption confirmation

Greetings from Northwestern College in Iowa. Northwestern is a private nonprofit liberal arts Christian college accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. We are developing online courses and programs and would like to be able to offer those to students located in Vermont. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It appears that Northwestern qualifies as exempt from seeking authorization from Vermont based on Vermont Statute Title 16 Section 176a, as we have no physical presence in Vermont including offices, direct services to students or requirements for physical gatherings in Vermont. If I have interpreted that correctly, would you please provide a statement (email is fine) indicating our exempt status? If I have misinterpreted your legislation, your guidance would be appreciated.



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciova.edu

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Northwestern College

101 7th St. SW
Orange City, IA 51041
www.nwciova.edu

Virginia

From: [Woodley, Linda \(SCHEV\)](#)
To: [Hoey, Rebecca](#)
Subject: RE: state authorization question
Date: Tuesday, September 20, 2011 1:34:33 PM
Attachments: [image001.gif](#)

Ms. Hoey:

Please review the link below from the SCHEV website which defines Virginia's requirement of physical presence in order to be eligible for certification (authorization) to operate in Virginia. The memo should satisfy the documentation needed for the new state authorization regulations for out-of-state distance education programs. No action is required for the situation described below.

<http://www.schev.edu/higherEd/POPE/PhysicalPresenceMemo.pdf>

Linda H. Woodley, M.Ed.
Director, Private & Out-of-State Postsecondary Education
State Council of Higher Education for Virginia
James Monroe Building
101 N. 14th Street, 9th Floor
Richmond, VA 23219
Office phone: 804-371-2938
Fax phone: 804-786-2027 or 804-225-2604
E-mail: lindawoodley@schev.edu
Website: www.schev.edu
Live Simply. Love Generously. Care Deeply. Speak Kindly. Leave the Rest to God.

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciowa.edu]
Sent: Tuesday, September 20, 2011 10:34 AM
To: Woodley, Linda (SCHEV)
Subject: state authorization question

Greetings from Northwestern College in Iowa. Northwestern, a private nonprofit liberal arts college with religious affiliation, is developing online courses and programs and would like to be able to offer those to students located in Virginia. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization. It does not appear there are any requirements outside of being accredited by an accrediting body. Northwestern is HLC accredited. Do we need any type of letter from you granting authorization? Do we need to submit anything to you? Your reply is appreciated.



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciowa.edu

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101 7th St. SW
Orange City, IA 51041
www.nwciowa.edu

Washington

January 28, 2015

Greg Christy
President
Northwestern College
101 7th Street SW
Orange City, IA 51041

Dear Mr. Christy:

This letter is in response to information provided by Dr. Rebecca Hoey, Director of Online Learning. It is our understanding that the Registered Nurse to Bachelor of Science in Nursing (RN-BSN) program, which we had previously included in the authorization for advertisement and recruitment in Washington State, is not being made available to Washington residents and there is no current intent to make it available in the near future.

Consequently, authorization for this program is not required, therefore the Washington Student Achievement Council withdraws the authorization for the RN-BSN program as of this date. Northwestern College may not advertise or recruit for this program in Washington State. Should it wish to do so in the future, please contact our office for application information.

Thank you for keeping the WSAC informed of changes that can affect the authorization granted to Northwestern College. If you have any questions about this issue, please contact us at 360-753-7869.

Sincerely,



Michael J. Ball
Associate Director

Enclosure: Revised Program Chart

cc: Dr. Rebecca Hoey, Director of Online Learning, Northwestern College



STATE OF WASHINGTON
WASHINGTON STUDENT ACHIEVEMENT COUNCIL

917 Lakeridge Way SW • PO Box 43430 • Olympia, WA 98504-3430 • (360) 753-7800 • FAX (360) 753-7808 • www.wsac.wa.gov

December 23, 2013

Greg Christy
President
Northwestern College
101 7th Street SW
Orange City, IA 51041

Dear Mr. Christy:

Northwestern College has been found to be in compliance with the requirements of the Degree-Granting Institutions Act (RCW 28B.85 and WAC 250-61). This letter renews the authorization for Northwestern College to advertise and recruit for the degree programs shown on the included listing. The authorization granted is effective until January 12, 2016, subject to a biennial renewal process. Authorization is not an endorsement by the Washington Student Achievement Council of the institution, a program offered by the institution or the contents of a program.

Authorization is granted under the following conditions:

1. Northwestern College is to ensure that the following statement is included in any catalogs, websites, general bulletins, and course schedules distributed to Washington State citizens using the exact wording as provided herein. ***Please note that the statement has changed since the last authorization.***

“Northwestern College is authorized by the Washington Student Achievement Council and meets the requirements and minimum educational standards established for degree-granting institutions under the Degree-Granting Institutions Act. This authorization is subject to periodic review and authorizes Northwestern College to advertise and recruit for specific degree programs. The Council may be contacted for a list of currently authorized programs. Authorization by the Council does not carry with it an endorsement by the Council of the institution or its programs. Any person desiring information about the requirements of the act or the applicability of those requirements to the institution may contact the Council at P.O. Box 43430, Olympia, WA 98504-3430.”

Please provide the Council with a hard copy of the catalog when available.



Greg Christy
Northwestern College
December 23, 2013
Page Two

2. Northwestern College is to ensure that the following statement is included in any promotional materials provided to Washington residents wherever degree programs that are intended to lead to educator licensure or certification are included:

“Eligibility for initial educator certification in Washington is based on completion of a state approved educator preparation program. This program is approved in Iowa. Even though you may be residing in Washington while in this program, your application for educator certification in Washington will be processed as an out-of-state application. Go to <http://pathway.pesb.wa.gov/outofstate> for more information. Educators are advised to contact their individual school districts as to whether this program may qualify for educator advancement.”

3. Northwestern College is to ensure that the following statement is included in any promotional materials provided to Washington residents wherever education endorsement programs are included:

“This program is not intended to lead to educator certification. Educators are advised to contact their individual school districts as to whether this program may qualify for salary advancement.”

Northwestern College is reminded that if the Bachelor of Science in Nursing program, which is offered at the main campus, includes any field placement components that could take place in Washington State, it should contact the Washington State Nursing Commission. The commission has an approval process for all out-of-state institutions offering field placement components for nursing programs in the state.

The individual to contact there is:

Dr. Mindy Schaffner
Nursing Education Advisor
Washington State Nursing Commission
Phone: 360-236-4745
Email: mindy.schaffner@doh.wa.gov

Please note that in addition to the change in the catalog statement, the Council no longer issues a certificate of authorization, but rather provides a chart listing programs, locations and modes of delivery.

Please send any and all requested materials to the following address:

Degree Authorization
Washington Student Achievement Council
P.O. Box 43430
Olympia, WA 98504-3430

Greg Christy
Northwestern College
December 23, 2013
Page Three

In agreeing to comply with the Act, you have assumed responsibility for institutional compliance with all of the Act's requirements, including those that are not explicitly covered in the authorization application. A designated member of your staff should be familiar with the Act's major provisions and minimum educational standards.

Should the institution have any significant changes in its operation, such as new key administrative staff, or significant changes in its programs, including substantial curriculum changes, it is to inform the Council at the time of the change.

If you wish to add or delete programs, or change, add or delete locations, please contact this office immediately for guidance on the appropriate materials to submit for such requests. The application form or request letter must be submitted to this office at least 90 days in advance of the intended begin date.

You will be notified at least 120 days in advance that a renewal application is due prior to the anniversary date of the authorization. If you have questions regarding any of these matters, please contact us at 360-753-7869. Thank you for your continued cooperation.

Sincerely,



Michael J. Ball
Associate Director

Enclosure: Program/ Mode of Delivery Chart

cc: Dr. Rebecca Hoey, Director of Online Learning, Northwestern College
Dr. Randy Spaulding, Director of Academic Affairs and Policy, Washington Student
Achievement Council

Northwestern College

Programs authorized to be advertised and recruited for in Washington State as of
December 23, 2013

Authorization by the Washington Student Achievement Council to operate as a degree-granting institution does not imply approval of the educational offerings by other state agencies (e.g., Washington State Professional Educators Standards Board, Washington State Nursing Care Quality Assurance Commission, etc.). The institution is responsible for ensuring it meets the standards of these other agencies, if applicable to its offerings.

Mode of delivery:

Residentially at the home campus in Iowa

Main Campus Location: (no locations in Washington State)

Northwestern College
101 7th Street SW
Orange City, IA 51041

Program Name	Advertisement and recruitment only
Bachelor of Arts in Accounting	X
Bachelor of Arts in Actuarial Science	X
Bachelor of Arts in Art	X
Bachelor of Arts in Art with Graphic Design Option	X
Bachelor of Arts in Athletic Training	X
Bachelor of Arts in Biology Ecological Science	X
Bachelor of Arts in Biology	X
Bachelor of Arts in Biology Health Professions	X
Bachelor of Arts in Business Administration	X
Bachelor of Arts in Business Education	X
Bachelor of Arts in Chemistry	X
Bachelor of Arts in Christian Education and Youth Ministry	X
Bachelor of Arts in Computer Information Systems	X
Bachelor of Arts in Computer Science	X
Bachelor of Arts in Economics	X
Bachelor of Arts in Elementary Education with endorsements in:	X
• Art	X
• Early Childhood Education	X
• Early Childhood Integrated Setting	X
• English	X
• General Science	X
• History	X
• Instructional Strategist I: Mild and Moderate	X

• Mathematics	X
• Middle School	X
• Music	X
• Physical Education	X
• Reading	X
• Science	X
• Secondary Education	X
• Social Studies	X
• Spanish	X
• TESL	X
Bachelor of Arts in English Teaching	X
Bachelor of Arts in Exercise Science	X
Bachelor of Arts in History	X
Bachelor of Arts in Humanities	X
Bachelor of Arts in Journalism	X
Bachelor of Arts in Literature	X
Bachelor of Arts in Mathematics	X
Bachelor of Arts in Medical Laboratory Science	X
Bachelor of Arts in Modified Music with Elementary Education	X
Bachelor of Arts in Music	X
Bachelor of Arts in Music Ministry	X
Bachelor of Science in Nursing	X
RN to BSN – <i>is not made available to WA residents</i>	-
Bachelor of Arts in Philosophy	X
Bachelor of Arts in Physical Education	X
Bachelor of Arts in Political Science	X
Bachelor of Arts in Psychology	X
Bachelor of Arts in Public Relations	X
Bachelor of Arts in Religion	X
Bachelor of Arts in Social Work	X
Bachelor of Arts in Sociology	X
Bachelor of Arts in Spanish	X
Bachelor of Arts in Sport Management	X
Bachelor of Arts in Theatre and Speech	X
Bachelor of Arts in Theater	X
Bachelor of Arts in Translation and Interpretation: Spanish-English	X
Bachelor of Arts in Writing and Rhetoric	X

Although the Council does not specifically authorize certificate programs, it reviews and authorizes the credit-bearing courses that comprise the programs. Consequently, the credit-bearing courses that comprise the following certificate programs are also authorized:

- Analytics Certificate

Northwestern College

Programs authorized to be advertised and recruited for in Washington State as of January 28, 2015

Authorization by the Washington Student Achievement Council to operate as a degree-granting institution does not imply approval of the educational offerings by other state agencies (e.g., Washington State Professional Educators Standards Board, Washington State Nursing Care Quality Assurance Commission, etc.). The institution is responsible for ensuring it meets the standards of these other agencies, if applicable to its offerings.

Mode of delivery:

Residentially at the home campus in Iowa

Main Campus Location: (no locations in Washington State)

Northwestern College

101 7th Street SW

Orange City, IA 51041

Program Name	Advertisement and recruitment only
Bachelor of Arts in Accounting	X
Bachelor of Arts in Actuarial Science	X
Bachelor of Arts in Art	X
Bachelor of Arts in Art with Graphic Design Option	X
Bachelor of Arts in Athletic Training	X
Bachelor of Arts in Biology Ecological Science	X
Bachelor of Arts in Biology	X
Bachelor of Arts in Biology Health Professions	X
Bachelor of Arts in Business Administration	X
Bachelor of Arts in Business Education	X
Bachelor of Arts in Chemistry	X
Bachelor of Arts in Christian Education and Youth Ministry	X
Bachelor of Arts in Computer Information Systems	X
Bachelor of Arts in Computer Science	X
Bachelor of Arts in Economics	X
Bachelor of Arts in Elementary Education with endorsements in:	X
• Art	X
• Early Childhood Education	X
• Early Childhood Integrated Setting	X
• English	X
• General Science	X
• History	X
• Instructional Strategist I: Mild and Moderate	X

• Mathematics	X
• Middle School	X
• Music	X
• Physical Education	X
• Reading	X
• Science	X
• Secondary Education	X
• Social Studies	X
• Spanish	X
• TESL	X
Bachelor of Arts in English Teaching	X
Bachelor of Arts in Exercise Science	X
Bachelor of Arts in History	X
Bachelor of Arts in Humanities	X
Bachelor of Arts in Journalism	X
Bachelor of Arts in Literature	X
Bachelor of Arts in Mathematics	X
Bachelor of Arts in Medical Laboratory Science	X
Bachelor of Arts in Modified Music with Elementary Education	X
Bachelor of Arts in Music	X
Bachelor of Arts in Music Ministry	X
Bachelor of Science in Nursing	X
Bachelor of Arts in Philosophy	X
Bachelor of Arts in Physical Education	X
Bachelor of Arts in Political Science	X
Bachelor of Arts in Psychology	X
Bachelor of Arts in Public Relations	X
Bachelor of Arts in Religion	X
Bachelor of Arts in Social Work	X
Bachelor of Arts in Sociology	X
Bachelor of Arts in Spanish	X
Bachelor of Arts in Sport Management	X
Bachelor of Arts in Theatre and Speech	X
Bachelor of Arts in Theater	X
Bachelor of Arts in Translation and Interpretation: Spanish-English	X
Bachelor of Arts in Writing and Rhetoric	X

Although the Council does not specifically authorize certificate programs, it reviews and authorizes the credit-bearing courses that comprise the programs. Consequently, the credit-bearing courses that comprise the following certificate programs are also authorized:

- Analytics Certificate

West Virginia



David Hendrickson
Chairman

Brian Noland
Chancellor
(304) 558-0699

**West Virginia Higher Education Policy Commission
West Virginia Community and Technical College System**

1018 Kanawha Boulevard East, Suite 700
Charleston, WV 25301
www.hepc.wvnet.edu
www.wvctcs.org



Robert Brown
Chairman

James Skidmore
Chancellor
(304) 558-0265

September 26, 2011

Ms. Rebecca Hoey
Director of Online Learning
Northwestern College
101 7th Street SW
Orange City, IA 51041

Dear Ms. Hoey:

Based on information provided, the online offerings of Northwestern College do not meet the definition of physical presence as defined in Series 20, *Authorization of Degree Granting Institutions*. Since physical presence has not been established, authorization to offer online programs to West Virginia residents is not required. If there are any changes in the conditions that supported this decision, please contact this office to determine if authorization is required.

Contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mark W. Stotler".

Mark W. Stotler
Assistant Director of Academic Affairs

Wisconsin

From: [Sweeney, Pat](#)
To: [Hoey, Rebecca](#)
Subject: RE: clarification of EAB requirements
Date: Monday, October 10, 2011 3:10:12 PM
Attachments: [image001.gif](#)

Ms. Hoey:

Thank you for the informative telephone conversation. Since Northwestern College currently has no online programs, it does not require Educational Approval Board (EAB) authorization. You mentioned that Northwestern does offer some online courses but the EAB approves programs not individual courses so again no EAB authorization is required. If in the future Northwestern develops online degree programs and begins enrolling Wisconsin residents, please contact me so we can discuss the required EAB approval.

Thank you for your timely inquiry-

Patrick Sweeney
School Administration Consultant

From: Hoey, Rebecca [mailto:rebecca.hoey@nwciova.edu]
Sent: Friday, October 07, 2011 8:38 AM
To: Sweeney, Pat
Subject: RE: clarification of EAB requirements

Patrick, thank you for your communication. In your literature, the following note is made: In Chapter 11 of its Administrative Code, the EAB acknowledges that distance learning presents a materially new context for Wisconsin to protect consumers. Because the oversight of online programs differs from those offered on-ground, EAB 11 makes several "accommodations" for distance learning providers in its approval process and fees. For example, if a school has approval from another state whose requirements are substantially equivalent to those of the EAB, then the board may accept that state's approval as fulfilling all or parts of the approval process.

Would you please identify these other states so that we can determine if we fit within this category? I'm uncertain of whether it is appropriate to have to complete a "Start a New School" application with the state of Wisconsin, as Northwestern has been operating successfully in the state of Iowa since 1882.



Rebecca Hoey
Director of Online Learning
712-707-7388
rebecca.hoey@nwciova.edu

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101 7th St. SW
Orange City, IA 51041
www.nwciova.edu

From: Sweeney, Pat [mailto:Pat.Sweeney@eab.state.wi.us]
Sent: Wednesday, October 05, 2011 2:51 PM

To: Hoey, Rebecca
Subject: RE: clarification of EAB requirements

Ms. Hoey:

Thank you for your inquiry. I will explain why the exemptions you cite do not apply to Northwestern College.

Since you refer to Northwestern College's accreditation by the Higher Learning Commission, I assume you are referring to s.38.50 (1) (e) 8 which exempts "schools accredited by accrediting agencies recognized by the board." While the EAB has authority to exempt institutions accredited by certain accreditors, it has never chosen to delegate its authority to any accrediting agency. The exemption language dates back to the 1970s and is essentially a dormant statutory provision. In fact, because of the confusion it creates, there is currently a legislative proposal to delete the provision.

You also cite s.38.50 (1) (e) 3 which exempts institutions "of a parochial or denominational character offering course having a sectarian object." EAB has always interpreted this "religious exemption" to apply to such programs as education and training for the ministry not for liberal arts degrees, nursing training, and teacher training as offered by Northwestern which are clearly not sectarian.

If Northwestern College offers online degree programs to Wisconsin residents it must have EAB approval to operate legally. The EAB website www.eab.state.wi.us has at the top of the page a link to a memo explaining EAB requirements for institutions offering online programs. The EAB School application is also available by clicking on "Starting a New School" on the left side of the page. I can be reached at 608.266.1354.

Patrick Sweeney
School Administration Consultant

From: Hoey, Rebecca [<mailto:rebecca.hoey@nwciova.edu>]
Sent: Wednesday, October 05, 2011 11:11 AM
To: Sweeney, Pat
Subject: clarification of EAB requirements

Greetings from Northwestern College in Iowa (www.nwciova.edu). Northwestern, a private nonprofit liberal arts college with religious affiliation, is developing online courses and programs and would like to be able to offer those to students located in Wisconsin. I have reviewed the information you provided to the State Higher Education Executive Officers (SHEEO) regarding state authorization, specifically with respect to the exemption noted from s.38.50 (1)(e) indicating exemption for "Schools, courses of instruction, and training programs that are approved or licensed and supervised by other state agencies and boards." Northwestern is accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools. As well, the mission of Northwestern

College is “engaging students in courageous and faithful learning and living that empowers them to follow Christ and pursue God’s redeeming work in the world.” Due to our mission and affiliation with the Reformed Church of America, we are also exempt based on our “parochial or denominational character offering courses having a sectarian objective.”

Can we interpret that to mean that we do not need to seek authorization in the state of Wisconsin, and that we are in effect exempt? Do we need any type of letter from you granting authorization or exemption? Your reply is appreciated.



Rebecca Hoey

Director of Online Learning

712-707-7388

rebecca.hoey@nwciova.edu

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Northwestern College

101 7th St. SW

Orange City, IA 51041

www.nwciova.edu

Wyoming



Wyoming Department of Education

Cindy Hill, Superintendent of Public Instruction
Hathaway Building, 2nd Floor, 2300 Capitol Avenue
Cheyenne WY 82002-0050

Phone: (307) 777-7675 | Fax: (307) 777-6234 | Website: edu.wyoming.gov

June 16, 2014

Dr. Rebecca Hoey
Northwestern College
101 7th St. SW
Orange City, IA 51041

Dear Dr. Rebecca Hoey:

Thank you for completing the required registration application for accredited postsecondary degree granting institutions as required by Wyoming statute (§§ W.S. 21-2-401 through 21-2-407). Your institution's application has been reviewed and approved. Your institution is authorized to offer education services in Wyoming starting July 1, 2014 and expires June 30, 2015.

In an effort to streamline Wyoming's approval process, this letter will serve as notification of approval. An official certificate will no longer be sent unless specifically requested by the institution. Schools who submitted registered agent applications will continue to receive agent cards.

Additional information relative to Wyoming Private School Licensing may be found at <http://edu.wyoming.gov/beyond-the-classroom/school-programs/private-school-licensing/>.

Should you have any questions or wish to request an official Chapter 30 certificate, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elaine Marces".

Private School Licensing Program Manager
307-777-6210
elaine.marces@wyo.gov

