TOPcast Episode 112: Breaking News: SARA (and More!) Under Siege

Narrator: When you know what you want for the future, you need the present to line up with your goals. UCF Online offers more than 100 fully online programs in healthcare, engineering, criminal justice, and more so you can get to your future and beyond.

(Musical transition)

Kelvin Thompson: From the University of Central Florida's Center for Distributed Learning, I'm Kelvin Thompson.

Tom Cavanagh: And I am Tom Cavanagh.

Kelvin: And you are listening to TOPcast: the Teaching Online Podcast. Hey, Tom.

Tom: Hey, Kelvin. How's things?

Kelvin: Well, depends on the things. [Laughter]

Tom: I guess, yeah. Which things, Tom? "All the things," as they say.

Kelvin: All the things.

Tom: All the things.

Kelvin: In that case, they're about fair to middling. They're kind of average if they're all the things.

Tom: How many blank platitude cliches can we throw at each other?

Kelvin: I don't know. Let's see.

Tom: Yeah.

Kelvin: This is the fair to middling podcast signing off for today. [Laughter] Yes, that is it. Now I guess some things are better and some things are worse, but if you put all the things together, then they're probably average.

Tom: Yes, right in the middle as they should be. Yes.

Kelvin: So...

Tom: So, Kelvin, you did not pour me a cup of coffee today.

Kelvin: What was I thinking, Tom? [Laughter]

Tom: I know. Well, we are physically separated…

Kelvin: That's why.

Tom: ...for a lot of scheduling reasons today. So, we've each gone a little DIY, the coffee connection here.

Kelvin: Yes. What you got? What you got?

Tom: What do I... you know what, because it's late afternoon as we're recording this, and I went with the iced coffee.

Kelvin: Ooh.

Tom: This is a Starbucks Pikes Place, I think.

Kelvin: Okay.

Tom: I've froufed it up. And so, yeah, and I do have a connection to the topic.

Kelvin: All right. I'll listen. Am I supposed to find a connection there?

Tom: No, that's it. Yeah, sorry. Hey, I'm not as good at this as you are.

Kelvin: [Laughter] All right. Well, you want me to tell you what I'm drinking?

Tom: Yeah.

Kelvin: In my lovely, Tatooine Star Wars, when it was called Star Wars, travel mug? This is a Single-origin Ethiopia – Guji, Ethiopia, from Cooperative Coffee Roasters in Asheville, North Carolina. And it came to me – and you know a little bit about this – it came to me by way of a sudden and unexpected family trip that I took recently, that I ended up gifted with this coffee along the journey, sudden and unexpected. But it is quite tasty,

I must say. I assume yours is, too.

Tom: Yes.

Kelvin: I don't know. See if you can find a connection to mine, and I'll think about a connection to yours.

Tom: I think I got yours.

Kelvin: All right. Go for it.

Tom: All right. So, yours, because I know that you did have this sudden and unexpected road trip that you took, we've got some sudden and unexpected things to talk about today on the podcast.

Kelvin: That was it.

Tom: Yeah. Okay. That's cool.

Kelvin: That's all I got. That's all. I'm still working on the iced Pike Place, though.

Tom: Yeah. So, Pike Place doesn't have anything to do with it so much, but the iced part, because nothing leaves people feeling colder than government regulations.

Kelvin: Oh, oh, that's good! [Laughter]

Tom: Yeah.

Kelvin: That's a good segue is what that is.

Tom: That's right, that's right.

Kelvin: That's a good segue.

Tom: Today. We are talking regs. Woo hoo.

Kelvin: But don't turn off the podcast. It's going to be good!

Tom: No.

Kelvin: We promise.

Tom: It's going to be good, I promise, and entertaining. Because it's really an important topic, and we actually adjusted our release schedule a little bit because of it because there is some late breaking news and stuff that potentially has a genuine impact on distance learning in this country. So, if you do distance learning, especially across state lines, you need to know about this. In fact, it's even broader than just distance learning. It involves any sort of instruction across state lines, like internships and co-ops, and if you're placing somebody in a clinical, and all kinds of other things are actually touched by this.

Kelvin: Now we should say, you've hinted at it, but we should say to our listeners, this is going to be a very US-centric episode, but you might stick it out anyway.

Tom: Yeah, absolutely. And you may find something interesting in that if you're in Canada or Mexico or someplace.

Kelvin: So, Tom you interviewed a couple of our colleagues recently, as in, I think what? Three, four days ago?

Tom: Yeah, it was literally a couple days ago.

Kelvin: Within this week on this topic. Shall I introduce them? And you can talk a little bit more about this framing before we cut to the interview?

Tom: Sounds good.

Kelvin: All right. So, you interviewed Russ Poulin and Cheryl Dowd for this interview. Our listeners might recall both of those names for folks who are not already acquainted with Russ and Cheryl because they were with us back in Episode 58, which was “Fun with Regulations,” that was released in January of 2020. Can you remember that?

Tom: Maybe this will be, “More Fun with Regulations.”

Kelvin: Yes. More fun.

Tom: Or, “Son of Fun with Regulations.”

Kelvin: That's right. You had just interviewed them at the end of 2019, and we released in January 2020 before all manner of things shifted in the earth.

Tom: That's right. It was right before that. Yeah.

Kelvin: Russ, for those who don't know is Executive Director of WCET, which is the WICHE Cooperative for Educational Technologies, and Vice President for Technology Enhanced Education at WICHE, which of course is the Western Interstate Commission on Higher Education, which is one of the four regional higher ed compacts in the United States. And Cheryl Dowd is WCET's Director for the State Authorization Network. Why should people keep listening at this point to this interview that you're about to have, Tom?

Tom: Frankly, there are not two more knowledgeable involved people to help us walk through and understand the regulations and the impact that they potentially will have on all of us than Russ and Cheryl. If you're not reading their blog, if you're not reading the WCET policy blog, then you're missing out because they really break it down in there. It's always timely. Let us know what's happening up to the moment. Russ has actually served on negotiating rule making committees before. So, he's got an insider perspective and yeah, I think you'll be doing yourself a favor to stick this one out and listen all the way to the "I'm Kelvin, I'm Tom," at the very end.

Kelvin: [Laughter] That's right. There are potentially, as I understand it, looking at some of those blog postings, new regulations in the midst of this that you all will talk about that could either go into effect July 2023, or could go into effect July 2024. That sounds like a long time from now, but it really isn't when you are talking about having to maybe make adjustments to the way you do things. You all do get rather technical and some of the terminology will be familiar with some listeners and some might not. Shall we just maybe quickly touch base on a couple of things? Could I do the easy ones and you do the harder ones?

Tom: Okay. [Laughter]

Kelvin: Okay. So, Title IV is mentioned, and that is just another way of referring to our US Federal financial aid, the eligibility to be able to offer, get that. So, you got to follow certain guidelines to be eligible. And we talk about NC-SARA or SARA, which we refer to the State Authorization Reciprocity network, which I love our colleague, Bob Reed here at UCF, always talks about it's like, how we have in the US. We have state driver's licenses, but you can cross, as I did recently, state lines with your out of state license, and they don't stop you at the border and say, "Now, you've

got to take another driving test," right? You can do that, and we respect each other's rules. So, it's like that for online education.

Tom: Yeah, that's exactly right. That's how I describe it, too. And I think NC is National Compact and…

Kelvin: That's it. Thank you.

Tom: ... SARA is State Authorization Reciprocity Agreement, and it is exactly that. It allows you to operate educationally across state lines, and we all agree to the same foundational set of rules. Yeah. So, that's one way of looking at it. There's one state, our friends in California, God bless you, California, that are not part of NC-SARA, but otherwise everybody else is, as well as some territories. So, there's some other things – professional licensure – we talk about a lot because some of these changes to these Federal rules are impacting licensure. So, there are a number of current disclosures that institutions have to make about whether or not programs that lead to licensure, like a nursing program, or a teacher certification program, or something that has a professional license attached to it. You have to declare whether or not you satisfy the requirements for particular states. Cheryl and I talk a little bit about that. Then the 90/10 rule, which isn't quite as relevant to distance learning specifically because it doesn't apply to any particular modality, but there are a lot of, particularly like, for-profit schools that are a lot online that serve a large military population. So, the 90/10 rule says that at least 10% of your revenue must come from something other than Federal financial aid or GI benefits or tuition assistance through the military. You have to get it through some other means. So, you can't just basically be operating a business that is 100% funded by government funds.

Kelvin: Yep.

Tom: So, that's 90/10.

Kelvin: Thank you for that. One other thing that maybe we didn't say, and we maybe should say, although I think you all touch on it, is maybe another bit of framing. These regulations aren't there just to make everybody have headaches, right? The intention behind all of this is consumer protection for students, right? So, that's a good thing, right? At least in concept, in theory, it's a good thing. So, it's all the details of how you get there.

Tom: Yeah. I agree especially given you and I are in the State of Florida, and we are something of a magnet for hucksters and shenanigans and ne'er-do-wells. They seem to all sometimes filter down to the right bottom of the

country and collect in South Florida. We actually have very strong consumer protection laws here as a result of that, and that's a good thing, and other states do as well. These regulations are designed to protect them. The concern I have, as somebody responsible for distance learning that operates across state lines, is that we spent years getting the SARA agreement stood up, and everybody compromising a little, but agreeing to it, and it's allowed us to really, I think, expand access to education, to give people choice across these different options and different state lines. A lot of these regulations goes and completely neutralize that, and it goes back to, you're going to have to get certified in every single state, and every state's got different rules, and 99% of institutions just don't have the resources or bandwidth to do that. So, what's going to happen is they're just going to say, I'm not going to serve students from that state. I'm going to start serving students only from my state, and I don't think that's good for students. So, I have some real concerns. But Russ and Cheryl, they are the primo experts in this, and I was really glad that we were able to get them on short notice to talk us through this.

Kelvin: One last plug, as always, there are "Read more about it," links in the show notes on the website for TOPcast for this episode, just like there is for anything else. This one you probably want to go to because there's a lot more detail. Some of the government websites that are referred to and the blog postings, Tom, that you've already mentioned, and other resources, they'll be there. So, you can go dig in on the details. If you have a hard time at all, following any of this, listen to it three or four times, and go read the other stuff.

Tom: Yeah, and definitely check out the WCET blog.

Kelvin: Yeah. Well, Tom, I guess that's good as a prelude. And now through the modern miracle that is technology podcast time travel, here's your interview with Russ and Cheryl.

(Musical transition)

Tom: So, Cheryl and Russ, thank you for coming back on TOPcast to talk about some of the shenanigans that are going on in our nation's capital with this latest round of negotiated rule making. It can get a little dense at times, I know, for people who don't like, every day, follow policy, but the implications are enormous. So, maybe for those who haven't been following along in their hymnals at home, Russ, I wonder if you can just give us a quick little overview of what negotiated rule making is. You have served on these bodies in the past and have participated in negotiated rule making. So, who better to explain it to the layman?

Russ Poulin: Yes, and I find it hard to believe that people don't follow this every day. [Laughter] But the negotiated rule making is something that the US Department of Education and other federal departments use in terms of setting down, well, exactly what the regulations are that might be used, or interpretations for regulations, or items that have come from Congress, so that people know what to do to comply. Typically, what they do is that they will set out, "Here are the issues that we're going to talk about." They will gather around affected parties, so people who would be affected by them or could provide knowledgeable input on whatever the issues are, and that they go through a process where they have a small committee that talks about them, that they negotiate and share proposals. The Department of Education is one of the folks that is on that committee. So, they work these through, and then later on there's a process where they... Well, they try to come to what's called consensus, where they all agree on everything. That doesn't happen very often. Then once that is done, it goes out, whatever the results are, go out for a public comment. Based upon the public comment, then the department can issue a final role.

Tom: Okay. So, we've been going through that process. Now, there are a number of things that have been brought up as part of this latest round. Some of it has to do with the 90/10 rule, and gainful employment, and other kinds of things. But then there's some things that are very specific to distance learning, which our listeners are going to want to know about. I wonder if, Cheryl, if you can maybe summarize some of the key areas that we should pay most close attention to.

Cheryl Dowd: Sure. So, what we found is, as you were mentioning and as Russ was explaining, they pick issues that will be part of the rule making. In this particular one, as you mentioned, the 90/10 rule. But something that didn't get a lot of press, a lot of ink, was issue number six. It was called certification procedures. Within that were a lot of sub issues, and some that we were surprised about. The two that we're really going to address today have to do with professional licensure notifications, and I'll talk a little bit about that. Russ is going to talk a little bit about reciprocity and how that was affected. But specifically, what this certification procedure is, so if anybody wants to go look it up, it was issue paper number six, and it was a subsection number 32. Section 32 required that an institution ensure that its curriculum meets state educational requirements in a state, where they are offering a program that leads to professional licensure, where they intend to provide Title IV. So, that was a higher bar than what we've been seeing previously. Previously, we knew there were notifications in 2019 when we got to talk to you, Tom. We were talking about the different types of notifications that institutions would be providing. This took it up a notch and said, you're only going to provide it, and provide Title IV if you can ensure that the curriculum meets the state educational requirements. So, that was something that we want all of our

listeners here to be able to be understanding that that is a higher bar. Now, these regulations did not reach consensus, but we know from the department that it is their intention to write the rules that will be provided as proposed regulations in the near future. Russell will probably talk a little bit about that structure, and what are the next steps.

Tom: Can I ask a question about that?

Cheryl: Sure.

Tom: It's so funny. Literally the meeting I had right before this was talking about this with some of our folks who handle this kind of compliance stuff. One of the questions I have is, so in the past, in 2019, when we last spoke about this, institutions could state, “Yes, we meet the requirements,” “No, we don't meet the requirements,” or “We don't know,” and that was okay. Have those three choices changed going forward?

Cheryl: Well, it's interesting that you bring that up because what we were talking about within the certification procedures section, it has to do with something called the PPA, the Program Participation Agreement. That's a little too dense for us to get into right now, but it's basically the contract that the institution makes to be able to participate in Title IV. So, the notification section is in another part of the code of federal regulations, and they were trying to tweak that with the public notifications as you mentioned, Tom, the “Yes,” “No,” “Maybe.” What the department was indicating, they didn't really talk about it a lot, but they talk about removing the “I don't know,” piece. So, that the notifications were still there, and it was proposed that they either… you indicate that your institution does or does not meet state educational requirements in all the states and territories and removed that third option. They did not address the individual notifications that were already a part. We had conversations with the negotiators to say, "Hey, that section still exists, please don't forget about it," because it needs to harmonize, right, with all of these other regulations. Well, of course these are only proposed. So, as you know, for your institution, they need to keep providing the notifications as we know them until there's something that has changed, and that won't happen until at least July 1 of 2023.

Russ: Yeah. So, the problem for institutions here is this ensure word that they have in there. Is that really, at this point, remember she said the Program Participation Agreement was what you agreed to do in order to be able to offer federal financial aid. So, really what you're doing is, that you're saying, you are sure you are ensuring that you meet whatever the educational requirements are in that state where you're giving aid to a student. The problem with that is that in a lot of places, you can do that,

that there is an approval process or something you could do. But, in other places that they're either silent about what those requirements are, or they won't... If you have a difference and you're trying to figure out, is that good enough that they won't tell you? So, it's really hard for you as an institution for you to say, "Yes, I'm 100% sure that I meet that standard." Then now you're basing your federal financial aid on this standard where you're supposed to be sure, but there's no way for you to be 100% positive.

Tom: Yeah, an interesting question I asked our team was, "So, what about the National Consortium, like the Nursing Compact?" We know that if you're licensed in one state in the compact, the others will recognize that license. But it was pointed out to me that yes, but so, we're in Florida, and if you get licensed in Florida, it doesn't necessarily mean you meet the requirements of another state in the compact. It just means that state, once you have your Florida license, will accept that. So, even then we can't say if you're part of a compact like that you meet the requirements for some other state, it does mean that your license is a little more portable, but it doesn't mean you meet the requirements for the purposes of disclosure.

Cheryl: You explained that so well, Tom, we're going to hire you to go out and tell people this. [Laughter] Because the conflict is that, what you just described, is a post licensure opportunity. So, we're talking about pre-licensure, and we're talking about portability of the education, not the license. So, those are two different things. And so, you explain very well that it is... And that's another thing. When you talk about teaching, there are different pathways to certification. So, you see that the students would get their education, and they would go to another state, and states vary in terms of what they'll require in order to be able to be certified in their state, and they have different ways to do it. So, Russ will tell you too, that we made a public comment in the first week of rulemaking that we said, "Please confer with professions and state boards to learn how they are providing it because we know that states and professions vary." So, having a one size fits all rule is very challenging.

Russ: Yeah, Cheryl did a good job of talking with the teaching profession that there's all sorts of alternative pathways in terms of getting into teaching. One of the things is, is that you know almost every state that they have, has a history of Kansas, or whatever the history of the local state, that they have it there. Typically, what they'll do is that you are certified in the state, but provisionally certified until you take that history of Kansas course, right? So, how does that fit with this new regulation? You're not fully meeting the requirements, but Kansas doesn't care. [Laughter] So, how do we fit that in?

Tom: Yeah, the history of Kansas doesn't have a ton of relevance here in Florida. Yeah. That's interesting. Yeah. Not that it's not interesting, right? It's a great state.

Russ: Right, but you probably have people who are in the military, and they're serving in one of your military stations, and they're going to go back to Wichita, right?

Tom: Right, yeah. Wow. So, Russ, what are the implications for reciprocity because the whole SARA compact seems to be affected by all of this negotiated rulemaking as well.

Russ: Yeah, so, this is a separate part of this same rule, Section 32, that was mentioned by Cheryl that there was a requirement put in there on... requirement on institutions. So, it's not they can't do a requirement on SARA or in states because any roles have to be around the money that the federal government gives out. So, it's a requirement on institutions that they are not eligible to grant aid in another state, if they're part of a reciprocity agreement that doesn't allow the states to enforce, is the word that they're using, to enforce state regulations that are institutions specific. So, I'll have to go into a geeky thing here where there's two different types of rules. There are these generally applicable types of laws. So, that's things like fraud or misrepresentation that could be not only for institutions, but for your barber shop or your used car dealer, or anybody that's in the state. Then there are rules that are specific to institutions in the state, and what happened in the reciprocity agreement, so what is now SARA, but now it's put together, that there were some of those things that were institution specific ones that the states agreed, and that they voluntarily joined into this, that they said, “Okay, we have a tuition refund requirement in this state.” But if you're part of SARA, that you don't have to use that, and there's a whole list of those sorts of things. What this would do, if the language goes forth, as it is right now, is that it would say that really the only thing that can be part of reciprocity is the actual act of applying for state authorization in the state and many fees that you have. So, the result would be back to the pre-2014, pre-SARA days, where if there's a tuition refund requirement in a state, or you have to do bonding, or you have to do extra data analysis out of provisions in a state. There's in a whole host of other things that could come back into play if this provision goes forward. And I do have to say that there's some... It all depends on how people act and how the states respond, and how SARA responds as to what the full impact will be. But we can certainly see where it could have a pretty significant impact on SARA, students, and institutions.

Tom: Yeah, I could see that. I think back to the pre-SARA days, and when we were looking at individual states to become compliant in those states, there

were some that did have tuition refund policies that were actually in violation of Florida law. By law, we have certain rules about how we're allowed to refund tuitions, and what some states required, like partial refunds, depending upon the date when you withdraw or whatever. That we're in direct conflict with what the state of Florida says were allowed to do, we were like, “Thank goodness for SARA,” because it neutralized all of that kind of stuff. But now it seems like, I guess for genuine consumer protection reasons, they're looking at putting all this back in place, but it seems to just completely mitigate a lot of the benefits of a national reciprocity compact like SARA.

Russ: Yeah, that's exactly what the proponents of this are saying is that it provides increased student protections, and that is for them because there's a lot of these things that now come into play on out of state institutions. They thought it was unfair that distance students in a state had what they were calling two tiers worth of protections. One, if there's SARA institutions and, one, if the students are in a non-SARA institution. But we keep pointing out that these states voluntarily get into this. Also, that there's probably the proponents of this tend to be from a few states that had very strict rules, and that they want their rules enforced, but aren't looking at that, "Oh, wait, there is quite a few states that really had little or no rules in several states where SARA actually brought up the consumer protection.” That part of it is lost on it as well, and what will happen with that?

Tom: So, Cheryl, as we look at, say the certification requirements or the disclosures, if we think this is going to happen, right? If we think the department is going to write this, and then they just take effect at some point, right, because they couldn't come to consensus? Then at what point do institutions need to stop admitting students from certain states where they can't guarantee certification when they graduate?

Cheryl: Right. It was really interesting to listen to the committee discuss that because they were talking about a way to grandfather people in, if you will, because they were talking about certain application period, admittance, and then being able to have the institution be able to ensure and satisfy. So, they were talking about that that would start into play after the... Whatever the effective date, which is always a July 1, because it has to do with financial aid. So, it's a July 1, and so, it would mean the next admitting class is what this would... the institution would have to ensure that it satisfies the state educational requirements.

Tom: And that's 2023, July 1, 2023.

Cheryl: If the regulations are able to be in final form by November 1 of 2022. They have a very strict calendar. So, what we're looking for right now is

for the department to have to write this rule. They have to write the certification procedures issue. So, it'll include this Section 32, and so, it's the whole package. So, they'd have to prepare that package and have it available as a proposed regulation subject to public comment. And then the public has the opportunity to comment, and the department has to have time to review the comments and be able to respond to them, to be able to provide that with the final regulations by November 1, in order for them to be effective by July 1 of 2023.

Tom: Okay.

Cheryl: That's a lot to do.

Russ: Tom, the confusing thing about this is that they now have 16 issues, and some of them are massive issues like gainful employment, and these that they have out there that they need to write up to send out for the public comment. So, we're thinking some will get on the track to make this November 1st 2022 deadline, and some probably will be after that. So, they'll make the November 1st, 2023 deadline, making the effective date of those being in 2024. We've been talking to different people, and we're taking bets about which issue will be early and which will be late. We have different ideas, so everybody will have to watch to see which ones come out when. The thing for sure is that it'll come out prior to a holiday because they love doing that, and ruining Cheryl's and my weekend. So, it's.. [Laughter]

Cheryl: That's right. That is exactly what happens.

Tom: I'm sure it's wholly intentional.

Russ: So, we're not going anywhere for July 4th weekend.

Cheryl: That's right, that's right. They have been July 4th.

Tom: Maybe the last question I'll throw out is, what can institutions do? What should they be aware of? I know I sent a public comment, I wrote a nice letter that Bob Reed wrote for me, and I put my name on, and tweaked it, and sent it off. Then I got a nice note back from the department saying, “Thanks, but we don't care, we're not taking any of these, right now.” So, what can institutions do to have some influence, or to plan for what may come down the pike?

Russ: Well, I think some of the things that you should be doing right now is just educating yourself about all this. We'll be covering more about this on our wcetfrontiers.org or blog website. So, be watching for that, that's the first thing. The second is probably doing early warning all around you at the

institution, about letting people know that this is in the works. So, talking to your provost, president's office, government relations office, for sure, because I think government relations may want to start talking to senators, congressmen and such, especially if you have people who are on either the Senate Help Committee, which deals with education or the House Education and Workforce Committees that you may want to get that. So, there's some ways there. But you're right, the Department of Education is not taking comment right now until they put out the rule. Cheryl, what else would you recommend?

Cheryl: Well, we've talked a lot about being able to make sure that the institution is tracking where their students are, what are their priorities, because business decisions may need to be made. So, with reciprocity, some folks thought, "Oh, carte blanche, we can now provide our programs anywhere for institutional approval." Of course, professional licensure you have to be a little more cautious, but now even more so, making sure the tracking is in good shape, and making business decisions about where you are providing your programs. So, that way you're prepared should these rules come down.

Tom: Cool. Well, thank you both for taking the time on short notice to jump into the podcast and give us an update on all these really important issues that are swirling all around us. It looks like this train keeps moving, will impact everybody in this distance learning space, and we're going to have to learn how to adjust accordingly. So, thank you for all of your hard work, all your advocacy on all of our behalf, and for coming on TOPcast and sharing all this information.

Russ: Great. Thank you, Tom and Kelvin.

Cheryl: Thanks for having us.

Kelvin: Well, Tom, that was your interview with Russ and Cheryl. That's a lot.

Tom: It's a lot. It's a fire hose of information, but it's important. And it's important for us to track, especially because depending upon what happens, the date will either be July 2023 or July 2024, but those dates are going to come no matter... We can't stop them. So, they're going to come one way or the other. So, if there is an opportunity to write a letter and express your concern, or express your opinion, I did. I encourage people to do it. I think this is democracy in action. If there is a comment period, let's take advantage of it.

Kelvin: Yeah. So again, go to our show notes page, you'll find links to how to do all of that stuff, if you don't know already how to do so. Shall I try to wrap this up and get us out the door?

Tom: Sounds good.

Kelvin: Perhaps we'll say by way of wrap up that government regulation gives bounds to and focus to our work of online higher education. Staying informed and involved, as you just mentioned, is the best way to influence the process and ensure that our work is aligned with regulations and is not unduly hindered by them. How's that?

Tom: Amen, brother.

Kelvin: All right. Until next time for TOPcast, I'm Kelvin.

Tom: And I'm Tom.

Kelvin: See ya.