Global Compliance Handbook

A Roadmap for Managing Global Compliance

STATE AUTHORIZATION NETWORK
a network of WCET

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Acknowledgements

The authors would like to thank Ryan Faulkner for providing valuable feedback on the preliminary draft of this handbook.

Citation and Copyright

Kerensky, K. and Poulin, R. (September 2026). Global Compliance Handbook: A Roadmap for Managing Global Compliance. State Authorization Network (SAN), a network of the WICHE Cooperative for Educational Technologies (WCET).

Additional Resources

For related resources, see https://wcetsan.wiche.edu/resources/getting-started. For inquiries or more information contact san-info@wiche.edu.

AI Use Acknowledgements

ChatGPT, Claude, and Copilot were used to suggest edits throughout the Handbook for grammar, clarity, and flow. The outputs were reviewed, edited for accuracy, and integrated into this final handbook.

Legal Disclaimer

Nothing in this document constitutes or should be construed as legal advice. This material is provided solely for general informational purposes. Legal interpretations of the matters addressed herein may vary based on your organization's specific circumstances, applicable jurisdiction, and other factors. Consult your organization's legal counsel for advice specific to your situation.

Dedication

This Handbook is dedicated to a leader who has safely navigated through the shoals of the interstate regulations for postsecondary education. As her interests grow internationally, we appreciate Cheryl Dowd's vision in inspiring this work.

Executive Summary: Preparing for the Road Ahead

Global compliance often begins with the question: *Can we enroll this student?* But any cross-border activity can create obligations under another country's laws, including requirements related to issues such as institutional approval, professional licensure, consumer protection, taxation, and data protection. Because requirements vary, **global compliance is less about finding one answer and more about building a process** to identify, research, evaluate, and manage obligations.

This Handbook provides a practical framework for organizing that work and building a sustainable approach. It moves from building awareness and understanding your global footprint through prioritizing countries, considering U.S. restrictions and country-specific requirements, making informed decisions, and implementing compliance responsibilities. Later steps focus on sustaining the program through ownership, documentation, communication, monitoring, and change management.

The [Global Compliance Program Self-Assessment and Maturity Overview] complement the Handbook. The Self-Assessment helps institutions reflect on the practices they currently have in place. Each Handbook step includes a **checkpoint** identifying key elements to have in place, along with corresponding Self-Assessment questions. **Core questions** reflect the foundational practices described in the step, while **Going Deeper questions** address practices that can further strengthen or mature a program. The Maturity Overview provides context for how those practices can evolve over time.

You do not need to address everything at once — or start with Step 1. Institutions will begin from different places depending on their existing activity, resources, and priorities. Use the Self-Assessment to identify strengths and opportunities, then use the Handbook to determine where to begin or what to strengthen next. The goal is **steady, sustainable progress**: understanding your activity, documenting what you learn, involving the right people, making informed decisions, and building processes that can adapt as activities and regulations change.

The Handbook provides the roadmap; the Self-Assessment helps you gauge your progress; the Maturity Overview helps you consider how your program can evolve. Your institution sets the pace, resources, and expertise needed for the journey.

Your Global Compliance Journey

A Roadmap for Success

Thirteen practical steps to help your institution understand, evaluate, and manage compliance responsibilities in countries around the world.

START

1 BUILD AWARENESS AND SUPPORT
Establish leadership support, identify stakeholders, and create a basic coordination structure.

2 CONDUCT INTERNAL REVIEW AND BUILD ACTIVITY INVENTORY
Identify current and planned international activity and establish a process to keep the inventory current.

3 PRIORITIZE COUNTRIES AND BUILD A REVIEW ROADMAP
Establish criteria, set priority tiers, and create a roadmap for country-specific reviews.

4 CONSIDER U.S. RESTRICTIONS AND REQUIREMENTS
Understand U.S. laws, policies, and institutional requirements that may affect international activity.

5 RESEARCH COUNTRY REQUIREMENTS
Gather authoritative information on authorization, recognition, regulatory, legal, and operational requirements.

6 EVALUATE REQUIREMENTS AND INSTITUTIONAL CAPACITY
Analyze findings, assess risks and feasibility, and identify information gaps.

7 MAKE INFORMED DECISIONS
Determine whether and how to proceed in each country and document the decision and rationale.

8 DEVELOP THE COUNTRY COMPLIANCE PLAN
Define required actions, conditions, resources, timelines, and responsibilities.

9 IMPLEMENT AND LAUNCH
Complete required approvals, implement operational changes, and transfer ongoing responsibilities into compliance processes.

10 OWN AND MANAGE COMPLIANCE
Assign ownership, monitor obligations, track deadlines, and maintain compliance in each country.

11 MONITOR, REVIEW, AND ADAPT
Continuously monitor changes, review compliance, and update plans as requirements or activities evolve.

12 COMMUNICATE COMPLIANCE INFORMATION
Share clear, current compliance information with stakeholders and provide a way to raise new or changing activity for review.

13 PROVIDE STUDENT-FACING INFORMATION AND DISCLOSURES
Provide accurate, timely disclosures and ensure students receive important information at the right time and in the right place.

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Glossary[1]

- **Activities:** Actions in a country that may require an institution to seek authorization or approval, such as direct recruiting, advertising, enrolling students in in-person or online courses, offering short courses, or placing students in experiential learning.
- **Authorization:** A government's approval for an institution to operate. Terms may include approval, registration, or licensure, and may apply to the institution as a whole or to individual programs.
- **Enrolled student:** A person who was admitted to an institution and registered for at least one course.
- **Experiential learning placements:** Practical learning experiences arranged or approved by an institution (ex. internships, practicums, clinical rotations, student teaching, service learning, or fieldwork).
- **Location:** The place where the student primarily takes a course or where institutional activity occurs.
- In compliance: An institution has met all the legal, regulatory, application, and fiscal conditions required to conduct activities in a country.
- **Military-connected student:** "...students with a parent on active duty or on full-time or part-time National Guard or Reserve duty in the armed forces (Air Force, Army, Navy, Marine Corps, Space Force, Coast Guard)[2]."
- **Military installation:** "...a base, camp, post, station, yard, center, or other activity under the jurisdiction of the Secretary of a military department or, in the case of an activity in a foreign country, under the operational control of the Secretary of a military department or the Secretary of Defense, without regard to the duration of operational control[3]."
- **Military student:** "...active-duty service members, veterans, reservists, National Guard members, and their eligible family members who are seeking to enhance their knowledge, skills, and abilities through education and training[4]."

1 There are terms that are commonly used and some that we have created to better convey a concept.
2 Military Child Education Coalition website. "Frequently Asked Questions."
3 Cornell Law School. Legal Information Institute.
4 American Council on Education website. "Today's Military Learners."

- **Ministry:** The agency responsible for authorization and oversight of postsecondary education in a country. May also be called a "Government oversight agency."
- **Operating:** When an institution's activities in a country trigger compliance requirements. The legal term may vary by jurisdiction.
- **Planned activities in a country:** The institution plans to achieve compliance before pursuing activities in a country.
- **Prospective student:** "…any individual who has contacted an eligible institution requesting information concerning admission to that institution[5]."
- **Registered agent:** "A registered agent is a designated person or entity authorized to receive legal and official documents on behalf of a company…[6]"
- **Risk:** Adverse consequences from non-compliance. Stanford University's "Definition of Risk" webpage and North Carolina State University offer additional institutional risk resources.
- **Study abroad:** "Study abroad is when a student pursues their academic goals in a foreign country." Institutions may create or contract for short- or long-term educational experiences in other countries.

5 Cornell Law School. Legal Information Institute. "20 U.S. Code § 1092 - Institutional and financial assistance information for students."
6 Wikipedia. "Registered agent." Accessed April 17, 2026. https://en.wikipedia.org/wiki/Registered_agent

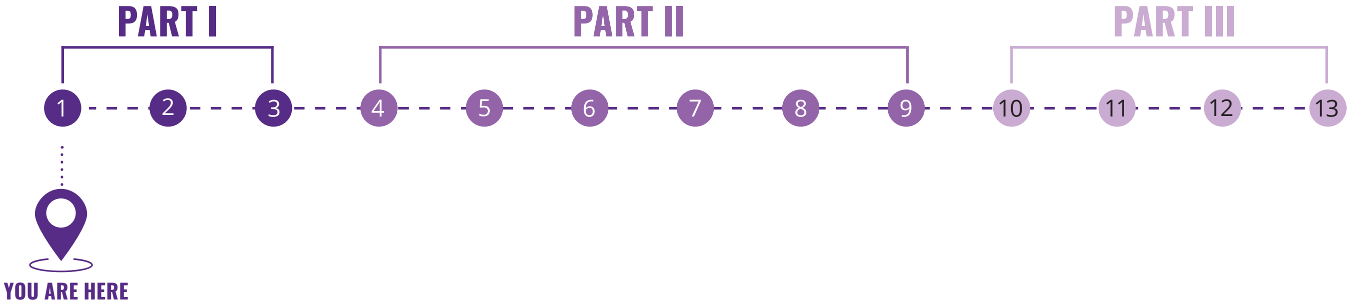
THE HANDBOOK: PART I

Charting the Route

BUILDING INSTITUTIONAL INFRASTRUCTURE

Global compliance is not only a legal, research, or online learning function. **Global compliance is an institutional process that requires coordination across academic leadership, enrollment management, legal counsel, finance, technology, and student services.** Without clear structure, even well-intentioned compliance efforts can become fragmented, duplicative, or inconsistent.

The Handbook is intended to give you practical step-by-step advice on how to proceed. Part I focuses on how institutions organize themselves to manage global compliance effectively. This includes establishing leadership authority, understanding current and planned international activity, creating a framework for prioritizing compliance work, establishing governance structures, and creating processes for decision-making, documentation, and communication.



STEP 1:

Build Awareness and Support for Sustained Global Compliance Management

Global compliance is not the responsibility of one office. Cross-border activity may involve academic, administrative, operational, and compliance areas across the institution. Online education, recruitment, student mobility, placements, partnerships, remote work, and other activities can create obligations in countries outside the United States.

Before an institution can effectively manage global compliance, it needs enough awareness, leadership support, and coordination to understand what activity is occurring and begin evaluating the requirements that may apply. Step 1 establishes that foundation. More detailed inventory, research, decision-making, implementation, communication, and ongoing management processes are developed in later steps.

1.1 Build Awareness of Global Compliance Responsibilities

Begin by helping institutional leaders and key stakeholders understand why global compliance requires attention and shared responsibility. At this stage, the institution does not need a complete inventory, detailed risk assessment, or fully developed compliance program. **The goal is to recognize that international activity may create obligations, identify where information may be incomplete, and establish a reason to look more systematically at the institution's global activities.**

Explain why global compliance matters. Countries regulate educational and other institutional activity within their borders, and requirements may relate to education, consumer protection, taxation, data privacy, employment, or other areas of law. Obligations may arise from online or distance education, recruitment or marketing, student travel, placements or experiential learning, faculty or staff activity abroad, partnerships, third-party arrangements, remote work, or other cross-border activity, even when the institution does not have a physical location in another country.

This work is also tied to the institution's responsibility to students and its duty to operate lawfully and transparently wherever its activities reach. Students should not face risks to their educational experience, credential, placement, or professional pathway because applicable country requirements were missed or not addressed.

Identify potential risks of noncompliance. Noncompliance can affect both the institution and its students. Depending on the country and activity involved, consequences may include restrictions on recruitment, enrollment, or educational activity; fines, penalties, taxes, refunds, or other financial obligations; challenges to the recognition of educational activities or credentials; disruption if an activity must be paused, changed, or discontinued; reputational harm with regulators, partners, students, or the public; and legal or regulatory exposure for the institution.

Identify known international activity and visibility gaps. Use existing information, such as reports, program information, meeting discussions, or known examples, to identify what international activity is already occurring and where information may be incomplete. Consider where activities are taking place, which offices are involved, whether the institution knows when new international activity is being planned, and whether activities are reviewed before they begin. The purpose is to identify enough potential exposure and visibility gaps to show why a more structured review is needed; a more detailed inventory is developed in Step 2.

Identify the stakeholders who need to be involved. Create a preliminary list of offices and stakeholders that may need to participate in global compliance. At this stage, the purpose is not to assign final responsibilities, but to show that relevant information, expertise, and decision-making authority are distributed across the institution. Depending on the institution, stakeholders may include Academic Affairs, Enrollment Management, Global Engagement or International Programs, International Student Services, State Authorization or Regulatory Compliance, Legal Counsel, Institutional Research, Information Technology, Human Resources, Professional Licensure Compliance, Finance, or other offices connected to international activity.

1.2 Secure Leadership Support and Establish the Initial Compliance Workgroup

Use the information gathered in Section 1.1 to help leadership understand the institution's potential international exposure, visibility gaps, and need for a coordinated review. At this stage, the institution does not need a fully developed global compliance program, final governance structure, or complete risk framework. The goal is to secure enough leadership support, authority, and participation to begin the work in a practical way, while recognizing that more formal documentation, monitoring, escalation, and decision-making processes will develop as the program matures. SAN's resource, Stakeholder Buy-In and Engagement, may be helpful for additional ideas for securing institutional support.

Present the case for a coordinated review. Use the initial information about known international activity, possible exposure, visibility gaps, and stakeholders to explain what is known, what remains unclear, and why a structured review is needed. This discussion should **help leadership understand where international activity may create obligations, which offices may need to participate, and what support is needed to begin.** It should also address assumptions that may create risk. For example, an institution should not assume that online education, military-connected activity, remote work, or other cross-border activity is outside another country's requirements simply because the institution is in the United States. If the person raising the issue does not work directly with senior leadership, the issue should be raised through the appropriate supervisory or administrative channel so it reaches the right decision-makers.

Discuss resources and the institution's preliminary approach to risk. If leadership agrees that further review is needed, discuss the resources and support required to begin, including staff time, participation from relevant offices, legal or regulatory research, documentation tools, and outside expertise when appropriate. Leadership should also provide general direction on how the institution will handle questions or incomplete information, including when issues should be elevated for additional review. This does not require final answers at the outset; more detailed risk assessment, research, monitoring, and escalation processes can be developed in later steps as the institution's compliance program matures.

Obtain authorization to begin the work. Authorization does not need to be lengthy or overly formal, but it should clearly show that the institution supports a structured global compliance review and recognizes that the work requires cooperation across offices. The authorization should identify a lead office, coordinator, or other structure with enough authority to engage stakeholders, request and review information, coordinate the initial assessment, and bring significant issues forward for institutional consideration.

Confirm the workgroup and lead. Using the preliminary stakeholder list from Section 1.1, confirm which offices or individuals should participate in the compliance workgroup and who will coordinate the effort. The lead may sit within State Authorization or Regulatory Compliance, Global Engagement or International Programs, the Provost's Office, Legal or Risk Management, or another area with enough institutional visibility and authority to coordinate across offices. The structure may vary by institution, but there should be a clear point of coordination and **participating offices should understand why they are involved and how they will contribute.**

Clarify initial roles, communication, and ways of working. Establish basic expectations for how the work will be coordinated, who will provide information or subject-matter expertise, where questions should be directed, which issues require additional review, and when leadership, legal counsel, or other experts should be consulted. The group should also set practical goals and milestones for the initial review, decide how information and open questions will be tracked, and determine how progress will be communicated. Simple tools such as meeting notes, a shared action or issue tracker, and a preliminary list of international activities may provide enough structure to begin. More formal documentation, country-specific files, monitoring processes, and governance structures can be developed over time.

Begin communication and awareness. Begin communicating with relevant faculty and staff about the global compliance effort and why their participation matters. Early communication should help stakeholders understand that international activity may create compliance responsibilities and that new or changing activity should be raised for review. As the compliance program develops, communication and education can expand to include more detailed guidance, procedures, and training.

STEP 1 CHECKPOINT: AWARENESS TO ACTION

You should now have: Leadership support + designated lead + initial stakeholders + basic coordination structure + an understanding of known international activity and information gaps.

Self-Assessment (Core): Questions 1–4. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 5, 6, 40, and 41. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 2:

Conduct a Structured Internal Review and Build the Institutional Activity Inventory

Once leadership awareness, initial coordination, and review responsibilities are in place, the institution needs a practical picture of its global footprint: where activity is happening, where new activity may be developing, and where information is incomplete. Before prioritizing countries in Step 3 or conducting country-specific analysis, it needs a working baseline of the countries, activities, people, offices, partners, and operational arrangements involved. **Perfection is not the goal; the goal is to make a good-faith effort to map the institution's global footprint well enough to support prioritization and review.**

2.1 Review Existing Information and Identify Visibility Gaps

Begin with information the institution already has. The purpose of this first review is to identify what information is available, where it is maintained, and where additional collection or validation may be needed before the institution moves into more detailed review. Consider questions such as:

- Where is student location information stored, and how is it updated?
- Can the institution identify when students relocate after admission or enrollment?
- Which systems or offices capture information about international partnerships, recruitment, marketing, experiential learning, faculty or staff activity, or other activity abroad?
- Are any units maintaining information locally that is not visible through central systems?
- Where are the most significant gaps or inconsistencies?

PAY PARTICULAR ATTENTION TO STUDENT LOCATION!

Student location should be part of this initial review because many compliance requirements depend on where students are physically located. Existing student location practices used for state authorization, distance education, placements, or other activities may provide a useful starting point. Institutions that need to develop or strengthen these foundational practices can look to SANsational Award winners for practical institutional examples of developing reliable student location policies and processes for state, federal, and global compliance needs.

Useful sources may include the student information system, learning management system, admissions or CRM tools, study abroad and partnership records, HR systems, contract or procurement records, and information maintained by academic or administrative units. As part of this review, the institution should consider whether it can capture and update student location information, access that information when needed for compliance review, and identify other data needed to understand international activity.

The review should also look beyond student records to activity that may be less visible in central systems, including faculty or staff presence abroad, partnerships, third-party arrangements, recruitment, placements, and activity managed by individual academic or administrative units. The goal is to identify what the institution knows, where that information comes from, and what may be missing; more detailed collection and validation will follow.

2.2 Develop a Practical Approach for Gathering Missing Information

After reviewing existing information, determine how to gather what is missing or not centrally available. Global activity may be recorded in different systems or known only to individual offices or programs, so the information-gathering approach should be simple enough for participating units to complete while broad enough to identify activity that may not appear in central systems. Common approaches include system reports; short questionnaires or surveys; conversations with program and office leaders; reviews of partnership, contract, or vendor records; and targeted follow-up with offices such as Global Engagement, International Student Services, Study Abroad, Enrollment, Human Resources, Procurement, Marketing, Finance, and Information Technology. The right approach will depend on the institution's size, structure, and existing data practices. **Privacy and data protection should be considered early because some countries may limit how information is collected, stored, accessed, or shared across borders.**

Focus information gathering on activities that may create obligations in another country, including students located outside the United States, recruitment or marketing directed to individuals in other countries, academic partnerships and third-party arrangements, other learning activities outside the United States, or faculty or staff working from another country. **Institutions may adapt the sample questions in Exhibit 1 as a survey or conversation guide** and, if possible, test them with a small group before broader distribution to identify unclear questions and reduce follow-up.

2.3 Collect and Validate the Information

As information is gathered, organize it into one working inventory that creates a usable picture of international activity. One person or office should coordinate the process, record information consistently, and follow up when responses are unclear, incomplete, duplicated, or inconsistent with other institutional records. Follow-up may be needed to determine whether two offices are reporting the same activity, which country an activity involves, or whether the activity is current or planned. Validation at this stage does not require a formal audit; the purpose is to make the information complete, clear, and reliable enough to support the next step and to catch obvious gaps, duplicate entries, or conflicting answers before they make country review harder.

2.4 Organize the Inventory by Country and Activity

Once the information has been collected and reviewed, organize it in a format that allows the institution to see where international activity is occurring and what still needs attention. A spreadsheet, table, dashboard, or shared tracker may be sufficient if it identifies the country, activity, office or program involved, approximate number of students or participants when known, whether the activity is current or planned, the institutional contact, and any important gaps or uncertainties.

Institutions may add fields as needed, and the inventory does not need to be perfect or comprehensive before moving forward. The goal is to establish a practical baseline for Step 3 and identify basic patterns, such as countries with multiple programs or activities, growing student enrollment, experiential learning, partnerships, or other forms of institutional presence. Where possible, separate confirmed activity from activity that is planned, potential, or uncertain so the institution can understand its current footprint while also identifying activity that may require attention before it begins.

2.5 Establish a Process for Keeping the Inventory Current

Before moving to Step 3, **identify how the inventory will be maintained as global activity changes.** At a minimum, the institution should assign responsibility for maintaining the inventory, identify which offices should provide updates, define what changes should be reported, and give stakeholders a clear way to share new or changing activities. Reportable changes may include a new country, partnership, experiential learning activity, enrollment growth, faculty or staff presence abroad, new recruitment activity, a change in delivery model, or planned expansion. The process does not need to be a fully developed monitoring system at this stage because later steps will address ongoing monitoring and change management in greater detail. **For now, make sure stakeholders know how to raise new or changing activity for review.**

Exhibit 1: Sample Questions for Gathering Institutional Data on Global Activity

The questions below can help institutions identify current and planned global activity. They may be adapted as a survey or used to guide conversations with relevant offices. You do not need to determine country-specific compliance requirements during this initial inventory.

Current International Activity

Does your program currently conduct activities in another country, such as enrolling students in person or online, marketing or recruiting students, conducting internships or similar professional experiences, partnering with institutions or organizations, employing individuals who live or work there, or engaging in other activity that may create institutional obligations? If so, which countries are involved, and approximately how many students or participants are included?

Planned or Potential International Activity

Does your program plan to conduct activity in another country, such as enrolling students in person or online, marketing or recruiting students, conducting internships or similar professional experiences, employing individuals who live or work there, launching a new program, partnership, delivery model, recruitment effort, or other expansion, or pursuing another developing opportunity? If so, which countries are being considered, when is the activity expected to begin, and approximately how many students or participants are expected to be involved?

STEP 2 CHECKPOINT: KNOW YOUR GLOBAL FOOTPRINT

You should now have: A practical inventory of current and planned global activity + identified information gaps + a process for gathering missing information + a basic process for keeping the inventory current.

Self-Assessment (Core): Questions 7–9. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 10 and 43. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 3:

Prioritize Countries and Build a Country Review Roadmap

After mapping institutional activity, the next step is to decide which countries to review first. **Few institutions have the capacity to research every country at once, and Step 2 may reveal more current, planned, or emerging activity than initially expected.** Step 3 turns the activity inventory into a practical roadmap by identifying priority countries, sequencing the work, and recognizing that priorities may change once country-specific research begins. This prioritization is preliminary because the institution usually knows more about its own activities, plans, and capacity than it knows about each country's legal requirements. Use institutional activity, strategic importance, potential exposure, student impact, and capacity to set the initial order; later country research may change those priorities.

3.1 Establish Simple Country Prioritization Criteria

Before deciding which countries to review first, establish simple criteria so decisions are intentional, explainable, and consistent. Do not try to determine legal requirements or compliance status at this stage, though known or suspected complexity may signal that a country should be reviewed earlier. Invite academic leaders and program stakeholders to share information about student demand, planned growth, partnerships, and operational needs, while keeping prioritization coordinated at the institutional level.

Consider factors such as:

- **Current or planned activities:** the number and type of students, programs, placements, partnerships, recruitment activities, faculty or staff presence, or other activity in the country.
- **Strategic importance:** institutional priorities, student demand, academic programs, partnerships, workforce needs, or planned growth.
- **Potential exposure:** activity that has not yet been reviewed, regulated or higher-impact programs, in-country activity, third-party arrangements, or other circumstances that may warrant closer attention.
- **Student impact:** the number of students or participants affected and the potential effect of a compliance decision on their educational experience.
- **Operational capacity:** available staff, expertise, budget, and institutional ability to support activity or conduct the necessary review.
- **Known or apparent complexity:** information already available to the institution suggesting that a country's requirements may be complex, uncertain, or particularly important to investigate.

3.2 Group Countries into Preliminary Priority Tiers

Rather than ranking every country individually, group countries into broad priority tiers that show where review resources should go first. Three tiers are usually enough, and countries can move between tiers as activity changes or new information becomes available:

- **High priority:** Countries that warrant early review because of significant or time-sensitive activity, student impact, strategic importance, or other factors indicating that review should begin soon.
- **Medium priority:** Countries with meaningful current or planned activity that should be reviewed after higher-priority countries.
- **Low priority or monitor:** Countries with no current activity, early or speculative interest, or lower immediate institutional priority. These countries can be monitored or deferred until capacity is available.

3.3 Establish an Interim Approach for Countries Awaiting Review

Some institutions will have activity in countries before country-specific research is complete. To manage that uncertainty, establish interim expectations based on the activity inventory and the institution's risk tolerance. These are interim decisions, not determinations of whether the activity is legally permitted. At a high level, determine whether activity in an unreviewed country:

- may continue under existing institutional processes;
- requires additional internal review before new activity begins;
- should be limited while the review is underway; or
- requires escalation because of significant uncertainty or potential exposure.

Significant uncertainty should be escalated to the appropriate institutional authority, legal counsel, or subject-matter experts. Communicate any interim expectations to offices that initiate or support international activity so current commitments are managed and new activity does not proceed without review.

3.4 Build the Country Review Roadmap

After assigning preliminary priority tiers, create a practical roadmap for country reviews. Organize reviews in phases or waves based on capacity so the institution can start with countries that need the most immediate attention instead of trying to research everything at once.

The roadmap should identify:

- which countries will be reviewed first and the sequence or general timing for each review;
- who will coordinate each review;
- which stakeholders will need to participate; and
- any interim expectations that apply while a country is awaiting review.

Share the roadmap with relevant stakeholders so they know which countries are being reviewed, which are awaiting review, and how new or changing activity should be overseen. Treat the roadmap as a working plan that can be updated as country research clarifies authorization requirements, regulatory complexity, operational feasibility, and other considerations.

STEP 3 CHECKPOINT: ESTABLISH A REVIEW ROADMAP

You should now have: Agreed-upon prioritization criteria + preliminary country or activity priority tiers + an interim approach for activity awaiting review + a practical roadmap for country-specific research.

Self-Assessment (Core): Questions 18 and 19. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Question 42. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider this question, which addresses more developed program practices.

THE HANDBOOK: PART II

Exploring New Terrain

CONDUCTING COUNTRY RESEARCH AND ANALYSIS

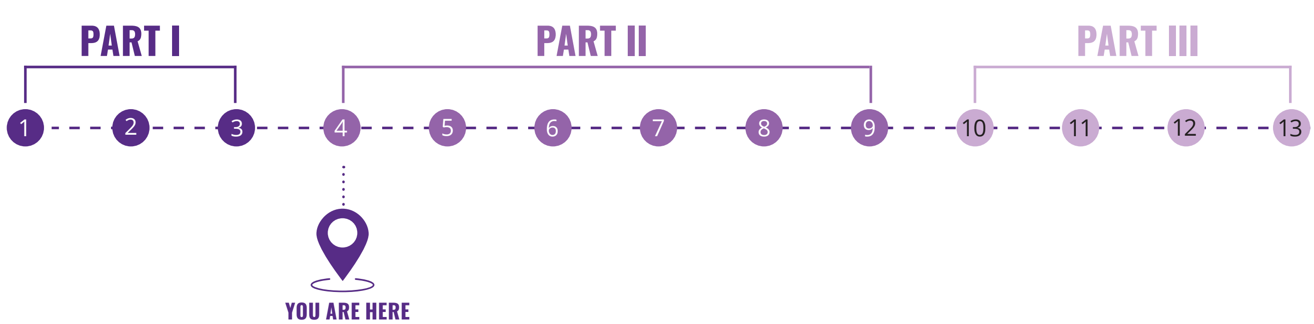
Part I focused on internal discovery and reflection to build the infrastructure necessary to support global compliance work. It emphasized the importance of leadership, governance, institutional coordination, and the development of a clear process for identifying and prioritizing countries for review.

At this point in the process, institutions have established two critical foundations:

- They understand where institutional activity is occurring or planned.
- They have identified which countries require initial attention.

Part II is where institutions begin engaging directly with the regulatory landscape of individual countries. The goal is to understand what laws, requirements, restrictions, or obligations apply when an institution delivers education or related services to individuals located in those countries.

Global compliance does not follow a single structure or predictable framework. Each country may regulate foreign educational activity differently, and obligations may arise from multiple agencies. For this reason, country research must be approached as a structured investigative process. It requires interpretation, documentation, persistence, and an understanding that compliance obligations often extend beyond institutional approval alone.



STEP 4:

Review U.S. Restrictions and Related Institutional Requirements

Before investing substantial time in country research, institutions should first determine whether U.S. restrictions, accreditation obligations, or institutional requirements could limit, delay, or change the proposed activity in the priority country under review. This step assumes the institution has already identified a country for research and is beginning that country-specific review by checking for threshold issues that may shape the scope, timing, or participants in the research process.

Step 4 is intended as an educational and awareness-building step, not a detailed analysis of every U.S. or institutional requirement. The person completing this step may not have the expertise to resolve each issue. The goal is to recognize threshold concerns early enough to involve the right subject-matter experts and shape the institution's decision-making, country research, timeline, and next steps.

4.1 Understand the Institution's Dual Compliance Obligations

U.S. institutions operating internationally generally need to consider two overlapping sets of requirements:

- **Foreign-country requirements,** including laws, regulations, approvals, and authorization processes in the country where students are located or activity occurs; and
- **U.S. requirements,** including sanctions, export controls, financial restrictions, accreditation expectations, state or system requirements, and other institutional obligations that may affect international activity.

These requirements may apply at the same time in the country under review. A country may permit an institution to provide online education, for example, while U.S. restrictions, accreditation requirements, institutional policies, or other U.S.-based obligations limit the activity. This means that completing a country-level review does not necessarily establish that an institution may proceed. **U.S. requirements should be considered alongside foreign-country requirements from the beginning of the country review.**

At a foundational level, institutions should ask whether the proposed country, activity, or parties involved could affect educational services, online instruction, controlled content or technology, student or institutional data, payments, partnerships, research collaborations, new locations or programs, or required internal or external approvals.

4.2 Identify U.S. Requirements That May Affect the Activity

Institutions do not need the person completing this step to become an expert in every area of U.S. international compliance. Instead, the reviewer should recognize the major areas that may require attention, note when a question may be outside their expertise, and involve the appropriate institutional experts for additional guidance. Potential areas include:

Sanctions and Restricted Parties. The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) administers economic and trade sanctions that may restrict activity involving certain countries, regions, organizations, or individuals. **Depending on the applicable sanctions program, restrictions may affect educational services, payments, contracts, partnerships, or other institutional activities.** Institutions should determine whether the country, individuals, organizations, or activities involved require sanctions or restricted-party review.

Export Controls and Controlled Content. U.S. export-control requirements may apply when international activity involves certain technology, software, technical data, research, equipment, or other controlled information. **These requirements may be particularly relevant to programs, research, or activities involving areas such as engineering, cybersecurity, aerospace, defense, or other sensitive technologies.** Institutions should determine whether the proposed activity raises an export-control question and, when appropriate, involve the office or individual responsible for export-control or research-compliance review.

Accreditation, state, system, and institutional requirements. Accreditation, state, system, and institutional requirements may also affect the timing or conditions under which an institution can proceed in the country under review. **Review may be needed for a new location, site, instructional arrangement, program, significant expansion, substantive change, material delivery-mode change, or other activity requiring institutional or external approval.** These approvals may follow different timelines from foreign-country authorization, so institutions should identify them early and incorporate them into the country review plan.

Other U.S. and Institutional Requirements. Other requirements may also affect international activity, including federal financial aid obligations, financial or banking restrictions, institutional policies, risk-management expectations, and internal approvals for international partnerships, research, technology, or other activities.

PAY ATTENTION TO U.S. RESTRICTIONS

For economic, political, health, security, or other reasons, the U.S. government may place restrictions on U.S. entities (including colleges and universities) from providing any services in a sanctioned country. These restrictions could extend even if you are serving students solely at a distance.

4.3 Check for Threshold Issues Before Detailed Country Research

Before beginning detailed country research, institutions should make an initial awareness check of the country, parties, and proposed activity. This check helps identify whether another office or subject-matter expert should review a potential issue before the country's research continues. The level of review should be proportionate to the proposed activity. A simple online enrollment scenario may require a lighter awareness check than an arrangement involving research, controlled technology, local personnel, financial transactions, or extensive in-country activity.

At a minimum, institutions should consider whether the country, region, parties, content, technology, financial transactions, approvals, or other institutional requirements raise questions that should be flagged for review before country research continues. If the awareness check identifies a potential restriction, significant uncertainty, or an issue outside the reviewer's expertise, the institution should pause, modify the proposed activity as appropriate, or route the matter to the relevant institutional expert before relying on an assumption that the activity may proceed.

4.4 Route Potential Issues to the Right Institutional Experts

When the initial check identifies a potential issue, institutions should determine which office or subject-matter expert needs to review it and what must be resolved before the country review can continue or the activity can proceed. Depending on the issue, this may involve export control or research compliance staff, legal counsel, finance or treasury, tax, accreditation, state authorization, academic affairs, information security, privacy or data governance, risk management, or another institutional office.

4.5 Document Findings and Reuse Institution-Wide Guidance

The threshold review should be documented in the country file or centralized compliance system. The record should identify the country, activity, relevant parties, date and method of screening, potential restrictions or requirements identified, offices or experts consulted, required approvals or follow-up actions, any conditions placed on the activity, and the resulting status, such as proceed to country research, proceed with conditions, pause pending review, or do not

GOVERNMENT AND COMPLIANCE RESOURCES

Association of University Export Control Officers (AUECO)
AUECO Government Resources
U.S. Department of Commerce (EAR)
EAR Country Chart
U.S. Department of State (ITAR)
U.S. Department of Treasury (OFAC Regulations)
OFAC Sanctions Programs

proceed. If the review identifies a requirement that applies institution-wide or across multiple countries, the institution should document it in a shared location so it can be reused in future country reviews.

Threshold findings should inform the country review roadmap, readiness assessment, and ongoing monitoring process. Issues identified here may affect the scope of country research, the experts who participate, the timeline for review, the conditions for proceeding, or the need for future reassessment.

Institutions may use authoritative government, accreditor, state, system, governing board, and institutional resources to support the initial awareness check.

STEP 4 CHECKPOINT: ESTABLISH THE U.S. COMPLIANCE STARTING POINT

You should now have: An understanding of applicable U.S. restrictions and institutional requirements that may affect international activity + a process for considering those requirements alongside country-specific obligations.

Self-Assessment (Core): Question 14. This question most directly reflects the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 15, 16, 25, and 42. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 5:

Map the Country Compliance Landscape

Once an institution has identified where it currently serves students, or where it intends to expand, the next step is to understand what types of compliance requirements may apply in those countries. Global activities can trigger requirements in multiple areas depending on what the institution is doing, where the activity occurs, how education is delivered, who is involved, and whether the institution uses local partners, personnel, vendors, or technology.

The purpose of this step is to create a research map. Institutions are not expected to determine the specific legal requirements that apply at this stage. Instead, they should **use the activities identified in earlier steps to identify which compliance areas require further review so that Step 6 can focus on researching those areas and developing findings.**

5.1 Begin with Institutional Activities and Targeted Compliance Questions

Country compliance research should begin with a clear understanding of the activities the institution is conducting or planning in the country under review. Those activities should come from the global activity inventory and should guide which compliance domains need closer attention in later sections by identifying the compliance questions most likely to be relevant. The institution's activity inventory should help focus the review and prevent the research from becoming unnecessarily broad.

The activity inventory should be specific enough to show what the institution is doing, where it is doing it, who is involved, and whether students, personnel, partners, vendors, technology, data, revenue, or professional programs are part of the activity. The goal is to connect what the institution is doing with what may need to be researched.

KEEP IN MIND: EXAMPLES ARE ILLUSTRATIVE

Throughout this step, laws and regulations are provided as illustrative examples of the types of requirements that may exist in different countries. They are not intended to suggest that every law applies to every institution or activity. Applicability depends on the specific activities, individuals, and other connections the institution has within the country.

5.2 Identify the Compliance Areas That May Apply

Country compliance involves more than determining whether an institution is authorized to provide education. Depending on the institution's activities, requirements may arise from education regulators, professional licensing bodies, tax authorities, privacy regulators, labor agencies, consumer protection authorities, accessibility bodies, business registration entities, and other organizations with authority over particular activities.

The sections below introduce the major compliance domains that institutions may need to consider. Each domain includes a brief description of the type of requirements it may encompass, why the domain matters to cross-border activities, a key question to guide the institution's research, and a See It in Practice example illustrating how the domain may be addressed in another jurisdiction. **Not every compliance area will apply in every country. The purpose of this step is to consider the major areas that could apply, determine which ones need further research, and document why other areas were excluded.** The Global Compliance Research Task Checklist (Appendix 1) can help institutions work through these areas and identify specific questions for research in more detail.

Most of the examples provided are based on national laws or regulatory frameworks. However, compliance requirements may also exist at the state, provincial, territorial, regional, or local level, depending on the country and the activity. In some jurisdictions, local requirements may supplement national requirements; in others, they may be the primary source of regulation. Institutions should therefore consider the appropriate level of government or regulatory authority when conducting their research. SAN's in-depth resources for Canada (A Guide to Higher Education Regulation in Canada and Canada Approval Quick Chart) and Mexico (A Guide to Higher Education Regulation in Mexico and Mexico Approval Quick Chart) highlight how national and local government requirements play into global compliance responsibilities.

Institutional Authorization and Academic Requirements

Institutions should determine whether a country regulates foreign institutions providing education to students in the country and whether approval, registration, recognition, reporting, renewal, or other obligations may apply. Requirements may apply based on the institution, program, credential, delivery method, student location, local activity, or use of partners. Research may need to determine what obligations apply and whether conditions are attached to offering programs, recruiting students, or using particular terminology. More information can be found in SAN's International Ministries of Education and Data Privacy Laws chart.

- **Why it matters:** An institution may need approval, registration, recognition, or notification before enrolling students, advertising programs, or delivering education in a country. Requirements may also include student protection, disclosure, complaint, reporting, or credential-recognition obligations.
- **Key Questions:** Can foreign institutions provide education? Are approvals, registrations, recognition, or program approvals required?

- **See It in Practice:** Singapore's Private Education Act 2009 regulates certain private education provided electronically, while Germany's Distance Learning Protection Act establishes requirements for certain forms of distance education.

Professional Licensure and Regulated Professions

Programs leading to professional practice may require review beyond general institutional authorization. Professional regulators may determine whether a credential, curriculum, clinical or experiential education, supervised practice, or other program components are recognized for licensure or employment, especially in fields such as healthcare, education, psychology, engineering, accounting, social work, law, and other regulated professions.

- **Why it matters:** A program may be permitted to operate in a country without the resulting credential qualifying a graduate for professional practice there. Conversely, countries may restrict who may provide, advertise, or offer education leading to a regulated professional qualification, or may impose recognition/approval requirements on foreign qualifications. Institutions need to understand these distinctions so they can appropriately plan programs and communicate limitations to students.
- **Key Question:** Does the profession require local recognition, approval, clinical requirements, or disclosures?
- **See It in Practice:** Professional regulation can take quite different forms across countries. Some countries may divide responsibility between federal and state governments for different professions; some may use federal and regional professional councils; some may rely primarily on national professional councils and boards; and some may combine national professional councils with state-level registration authorities. SAN's in-depth resources for Canada (A Guide to Higher Education Regulation in Canada and Canada Approval Quick Chart) and Mexico (A Guide to Higher Education Regulation in Mexico and Mexico Approval Quick Chart) showcase how national and local government requirements play into global compliance responsibilities, including professional licensure programs.

Marketing, Advertising, Recruitment, and Consumer Protection

Marketing and recruitment activities may create obligations even when education-specific authorization is not required. Countries may regulate advertising claims, accreditation or recognition statements, recruitment agents, pricing, refunds, contracts, outcome claims, and information provided to prospective students.

- **Why it matters:** Institutions may need to adjust marketing practices, websites, recruitment materials, contracts, or student disclosures to meet local requirements and avoid misleading statements.
- **Key Question:** Are marketing and recruitment practices, contractual terms, pricing, refunds, or outcomes claims regulated?

- **See It in Practice:** India has requirements addressing misleading advertisements, while Australia's Spam Act 2003 establishes requirements for marketing messages and emails.

Data Protection, Privacy, Cybersecurity, and Technology

Educational activity involves collecting, using, storing, and transferring student and employee information across borders. Data protection and technology requirements may apply to applications, academic records, learning platforms, remote proctoring, artificial intelligence tools, analytics systems, vendors, and other technology-enabled services. More information can be found in SAN's Data Privacy 101 and SAN's International Ministries of Education and Data Privacy Laws chart.

- **Why it matters:** Privacy and technology requirements may apply even when education-specific authorization is not required. Institutions may need to evaluate data transfers, vendor agreements, security practices, notices, consent processes, retention requirements, and technology use before serving students.
- **Key Question:** Are privacy, cybersecurity, artificial intelligence, vendor, or data-transfer requirements relevant?
- **See It in Practice:** India's Digital Personal Data Protection Act, South Korea's Personal Information Protection Act and Brazil's General Personal Data Protection Act (LGPD) establish requirements for the handling of personal information.

Employment, Labor, Immigration, and Staffing

Personnel activity can create obligations separate from student enrollment. Requirements may arise when faculty, staff, recruiters, contractors, or other representatives work from or regularly perform activities in another country. More information can be found in SAN's Labor & Employment Compliance Overview.

- **Why it matters:** Remote work arrangements, local representatives, and contracted services may trigger employment protections, worker classification rules, immigration requirements, payroll obligations, social contributions, tax considerations, or business registration requirements.
- **Key Question:** Could personnel activities trigger employment, immigration, tax, or registration obligations?
- **See It in Practice:** In Canada, there are different federal and provincial laws that could be applicable depending on the areas in which companies operate. At the national level is the Canada Labour Code. Additional laws in the provinces and territories set out the rights and obligations of employers and employees, such as the Employment Standards Code in Alberta.

Taxation, Business Registration, and Financial Compliance

Financial obligations may arise from tuition payments, revenue collection, local personnel, partnerships, vendors, recruitment activities, or other economic activity in a country. These requirements are often managed by agencies outside the education sector. More information can be found in SAN's Tax Considerations 101.

- **Why it matters:** Institutional authorization does not necessarily address tax or business obligations. Institutions may need to evaluate registration requirements, indirect taxes, invoicing rules, payment restrictions, currency issues, withholding obligations, or potential taxable presence.
- **Key Question:** Are taxes, invoicing, registration, payment, or permanent-establishment issues potentially triggered?
- **See It in Practice:** Distance learning is a digital service that may be subject to Mexico's Value Added Tax (VAT) law. Singapore's Goods and Services Tax (GST) may require overseas providers of remote services to register and collect GST when thresholds are met.

Accessibility, Equity, Language, and Student Communications

Countries may have requirements or expectations related to accessibility, nondiscrimination, language, and how educational information and services are provided. More information can be found in SAN's Digital Accessibility Overview and the WCET Accessibility Issue Page.

- **Why it matters:** Institutions may need to adapt instructional materials, technology tools, accommodation processes, websites, disclosures, or other student communications to meet applicable requirements and ensure students can access educational services appropriately.
- **Key Question:** Are accessibility standards, nondiscrimination rules, or language requirements applicable?
- **See It in Practice:** The European Accessibility Act mandates uniform accessibility requirements across all European Union (EU) member states and can apply to U.S.-based institutions with websites or applications reaching individuals in the EU.

5.3 Connect Activities to Compliance Questions and Plan Research

After reviewing the major compliance domains, institutions should return to the activity inventory and translate each country-specific activity into targeted research questions. The table below provides a high-level starting point. The Global Compliance Research Task Checklist (Appendix 1) can be used when institutions need more detail. It provides more specific questions by compliance domain and can help teams document why certain areas were prioritized or excluded.

Institutional Activity	Questions to Consider
Serving students in the country	Is authorization required? Are there student protection, disclosure, or credential-recognition requirements? Are student services accessible?
Marketing or recruiting	Are advertising, recruitment, pricing, refunds, or other consumer protection requirements triggered?
Offering a regulated professional program	Is the credential recognized? Are there professional licensing, clinical, experiential, or disclosure requirements?
Having personnel work in the country	Are employment, immigration, tax, or business registration requirements triggered?
Using technology or transferring data	Are privacy, cybersecurity, data transfer, artificial intelligence, or vendor requirements triggered?
Collaborating with local partners or vendors	Does the arrangement create additional authorization, contractual, tax, privacy, or operational requirements?

Step 5 is about mapping the questions, not resolving them. The result should be a practical outline of high-priority research areas, areas that appear outside the scope of the institution's planned activities, and questions that require input from legal, tax, privacy, professional licensure, employment, or other institutional experts, helping institutions focus research resources where they are most needed. By connecting institutional activities to potential compliance domains, institutions create a focus for Step 6, where they identify authoritative sources, conduct country research, and document preliminary findings.

STEP 5 CHECKPOINT: MAP OF THE COUNTRY COMPLIANCE LANDSCAPE

You should now have: A clear connection between the institution's activities and potential compliance areas + identified compliance areas requiring further research + specific research questions for those areas + documented reasons for areas determined not to apply.

Self-Assessment (Core): Questions 11–14. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 15, 16, and 25. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 6:

Conduct Country Compliance Research and Develop Findings

Step 5 identified the compliance areas and questions that require further research based on the institution's activities in a country. Step 6 focuses on answering those questions through reliable, documented country research. The goal is to develop a supportable understanding of the requirements that appear to apply to the institution's activities, identify what remains uncertain, and document the basis for the institution's preliminary findings.

Country compliance research will not look the same in every jurisdiction. Some countries provide accessible statutes, regulations, and government guidance, while others have fragmented information, limited English-language materials, or requirements that depend on regulator interpretation or administrative practice. Institutions should use a consistent overall approach while adapting their research methods to the country and questions being evaluated.

6.1 Define the Research Approach

Research should begin with the compliance areas, activities, and questions identified in Step 5. Before beginning a review of sources, institutions should clarify what they need to learn, which activities are being evaluated, what questions need to be answered, what level of confidence is needed, and who may need to review or confirm the findings. This planning step helps keep the research focused and prevents institutions from collecting information that does not answer the actual compliance question. As questions are answered, new issues may emerge that require additional research or clarification. Institutions should revisit the research approach as needed, then move into source review to identify the authorities and information needed to answer the remaining questions.

Country research may involve materials that are not available in English or that use unfamiliar legal or regulatory terminology. **Machine translation can help develop an initial understanding, but institutions should use qualified translation, interpretation, or subject-matter expertise when accuracy is important, such as for significant legal conclusions, regulatory submissions, contractual commitments, or student-facing communications.**

6.2 Identify Authorities and Evaluate Sources

Once the research approach is defined, institutions should identify the authorities and sources that can answer the research questions. The appropriate authority will depend on the compliance issue and the institution's activities, so institutions should not assume that the education regulator is the only relevant source of requirements. Education questions may involve a ministry or education regulator, while other issues may involve authorities responsible for professional licensing, tax, privacy, employment, business registration, consumer protection, accessibility, or other areas.

Primary or official sources should form the foundation whenever reasonably possible, while secondary sources can help explain the regulatory system, identify relevant authorities, or point researchers toward the underlying requirements. Secondary sources can be especially useful during early research because they may explain unfamiliar regulatory systems, identify relevant agencies, summarize legal developments, provide translations or summaries, or highlight practical implementation issues. These sources should generally be used to locate, interpret, and contextualize requirements rather than replace the institution's review of primary authority. Institutions should assess how much confidence they can place in the information and whether further confirmation is needed.

Useful starting points include official government ministry websites, national quality assurance directories, accreditation listings, professional licensing boards, international education organizations, U.S. embassy or commercial resources, professional associations, peer institutions, SAN resources, and internal experts with relevant country or subject-matter experience. These sources can help identify responsible agencies, provide context, surface practical approval pathways, and point researchers toward requirements that may not be obvious from official websites alone.

When reviewing information, institutions should ask who issued it, whether it is current, whether it applies to the institution's country, activity, delivery model, institution type, or student population, and whether it actually answers the question being researched. For primary sources, researchers should review relevant definitions and provisions in full, identify exceptions or limitations, distinguish mandates from recommendations, connect the language to the institution's activities, and document the citations that support each conclusion.

6.3 Clarify Unresolved Questions

Published information will not always provide a clear answer. Requirements may be unclear, incomplete, outdated, difficult to interpret, or silent about a particular activity. When an important question remains unresolved, institutions should identify the uncertainty and seek clarification rather than assuming that the absence of information means the activity is permitted. **More significant or higher-risk questions should be reviewed by legal counsel, institutional leadership, or an appropriate subject-matter expert before the institution relies on the finding to launch an activity, enter an agreement, make a financial commitment, or provide student-facing information.**

Regulator outreach can be particularly useful when published information does not address the institution's specific circumstances. Useful responses usually start with clear questions and should **provide enough context for the regulator to understand the activity, such as the institution's location, delivery model, student location, program type, partners, and planned in-country activity.** For example, rather than asking whether online education is permitted, the institution might explain that it is a U.S.-based institution offering a particular program to students residing in the country and ask whether authorization, registration, notification, or another requirement applies. Institutions should preserve significant regulator communications and other guidance as part of the country research record, including what was asked, what information was provided, what response was received, who provided it, and whether any follow-up remains necessary.

Other knowledgeable sources can help strengthen the analysis by showing how requirements are interpreted or managed in practice, identifying common approaches or emerging issues, and flagging questions that may not appear in published guidance. Institutions should be clear about what each source supports because some information may describe a legal requirement while other information may reflect common practice, risk-management advice, or an unresolved question.

6.4 Synthesize Findings and Identify Next Steps

After reviewing the available information, institutions should bring the findings together into a practical understanding of what appears to apply to their activities. For each significant compliance area, the institution should identify the activity evaluated, the requirement or issue considered, the sources reviewed, and the preliminary findings.

Sources may not always appear to agree. Differences may result from changes in law, different activities or institution types, different regulatory authorities, translation issues, terminology, or differences between legal requirements and common practice. When this occurs, institutions should document the difference and determine whether additional clarification or expert review is needed. **Peer benchmarking and expert input can help when questions remain after written sources have been reviewed, especially by explaining how similar requirements are interpreted or managed in practice** and by identifying practical constraints, emerging risks, or operational dependencies that are not obvious from published guidance.

6.5 Preserve the Research Record

Documenting research is an important part of the compliance process. Country requirements change, institutional activities evolve, and staff responsibilities shift over time. **A well-maintained research record preserves institutional knowledge and helps another reviewer understand what was researched, what was found, and why the institution reached its preliminary conclusions.**

At a minimum, the research record should identify the country and activities reviewed, the compliance areas and questions considered, key sources and dates reviewed, relevant regulator or expert communications, findings and important assumptions, unresolved questions or limitations, follow-up actions and responsible offices, required expert or legal review, and circumstances that should trigger future review. The research record should be updated when requirements change, activities expand, new information becomes available, or unresolved questions are clarified. Significant updates should be dated so the institution can see what information supported the decision at a particular point in time.

Research records should be maintained in a consistent location and format so the people responsible for compliance, implementation, decision-making, and monitoring can access them when needed. The Global Compliance Research Task Checklist (Appendix 1) can help organize research questions, identify sources, record findings, track open questions, document follow-up, and preserve institutional knowledge.

STEP 6 CHECKPOINT: DOCUMENTED COUNTRY COMPLIANCE FINDINGS

You should now have: Documented country-specific research + identified applicable requirements and uncertainties + an initial interpretation of how those requirements apply to the institution's planned or current activities + identified issues requiring additional review.

Self-Assessment (Core): Questions 13–16 and 21. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 25, 28–33, and 42. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 7:

Review Agreements, Partnerships, and Special Circumstances

After completing the country research in Steps 4-6, institutions should consider whether any agreements, partnerships, or special circumstances affect the planned activity, including country entry, local partnership requirements, approvals, or the division of compliance responsibilities. **Institutions should determine what role the arrangement actually plays in the institution's compliance strategy and whether additional approvals or responsibilities remain.**

7.1 Determine How Agreements or Partnerships Affect Compliance

Institutions operating across U.S. state lines may be accustomed to the efficiencies created by the State Authorization Reciprocity Agreement (SARA). International activity requires a different analysis because **there is no comparable framework that authorizes U.S. institutions to operate across countries.** Each country establishes its own framework for foreign educational providers. As a result, **an institution should not assume that an agreement between governments, institutions, organizations, or local partners automatically authorizes recruitment, instruction, degree activity, field experiences, supervised practice, or other educational operations.**

Institutions should determine who the parties are, what authority each party holds, whether the arrangement is operational or regulatory, whether it changes the approval or authorization pathway, how compliance responsibilities are divided, and whether additional review is needed before relying on it. A partnership should be viewed as part of the compliance landscape. **Unless the applicable legal or regulatory framework confirms otherwise, an agreement does not authorize the institution to operate, replace government or regulatory approval, eliminate other obligations, or transfer the institution's overall compliance responsibility to another organization.** If a partner or agreement is described as changing the institution's legal obligations, the institution should verify that understanding through appropriate country research, regulatory guidance, or expert review before relying on it.

Agreements and partnerships may include treaties, government or ministry arrangements, government-sponsored initiatives, memoranda of understanding, exchange or articulation agreements, research collaborations, joint or dual programs, service arrangements, local institutional partnerships, or other arrangements supporting international activity. In some jurisdictions, a local partnership may be encouraged or required as part of the regulatory pathway for foreign providers.

7.2 Identify Special Circumstances That May Require Review

Some activities involve circumstances that may affect how country requirements apply or how an activity is implemented. Military-affiliated activity is one example; other government, local, professional, or operational arrangements may raise similar questions. **The foundational question is whether the arrangement or circumstance changes the compliance analysis enough to require additional review.** If the answer is unclear, institutions should consult the appropriate subject-matter expert, authority, or legal resource rather than assuming the special circumstance changes the requirements.

Military-Related Arrangements. Institutions serving military-affiliated students outside the United States should determine whether a Status of Forces Agreement (SOFA) or another military-related arrangement may affect the planned activity. SOFAs and other military arrangements vary by country and may affect issues such as the treatment of personnel, access to military installations, or local procedures. However, **the existence of a SOFA does not automatically authorize educational activity.** Institutions should also remember that military-affiliated students may live off base.

Other Circumstances That May Affect the Analysis. Other special circumstances may also require review, including activity connected to government-sponsored educational programs, diplomatic or international agreements, unusual local partnership arrangements, emergency or humanitarian activity, or other circumstances outside the institution's usual operating model.

7.3 Document the Review and Any Follow-Up Responsibilities

Institutions should document the agreements, partnerships, military arrangements, or other special circumstances considered during the country analysis and explain whether they affect compliance obligations, implementation, or follow-up actions. This preserves institutional knowledge and makes it easier to reassess the issue if the agreement, partnership, activity, or regulatory environment changes. **If an agreement or partnership creates continuing responsibilities, those responsibilities should be incorporated into implementation and ongoing compliance processes.**

STEP 7 CHECKPOINT: ACCOUNT FOR AGREEMENTS AND SPECIAL CIRCUMSTANCES

You should now have: Identified agreements, partnerships, military-related arrangements, and other special circumstances that may affect the country compliance analysis + documented conclusions about whether they change the institution's obligations or implementation approach.

Self-Assessment (Core): Question 24, along with applicable elements of Questions 11–16. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 25 and 42. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 8:

Decide Whether to Proceed in the Country

By this point, the institution should understand the main requirements that may apply to the planned activity in a specific country. Step 8 uses those country findings to decide whether the institution should proceed, modify the activity, delay it, or stop. The focus is still on the country's investigation: what would be required in this country, what specific tasks would need to be completed, who would need to help complete them, and whether the institution is prepared to take those steps. Later steps address broader global compliance management processes, such as standing roles, ongoing tracking systems, and institution-wide workflows. SAN's resource, Resources for Effective Compliance Management, may be helpful in thinking through resource allocation decisions.

8.1 Review of Country Readiness and Required Actions

Start by reviewing the country's research findings and identifying what compliance would require for this activity. Consider the required country-specific actions, who needs to help complete them, timing, whether each requirement is one-time or ongoing, any documentation, monitoring, reporting, or renewal obligations, and whether the requirement applies institution-wide or only to a specific program, activity, or circumstance.

Once the major country requirements are clear, use them to assess the institution's readiness in the areas most likely to affect the decision to proceed. The following categories help organize that review and connect the country research to the specific actions, resources, and conditions that may be needed before the activity can move forward. A full list of Country Readiness Questions is at the end of this section for teams that want a more structured discussion guide.

- **Legal and regulatory readiness:** Determine whether the institution can meet the applicable requirements, approval conditions, documentation, reporting, renewals, and responses to regulatory requests. If requirements remain unclear, identify the legal or subject-matter expertise needed before proceeding.
- **Operational readiness:** Consider whether academic, administrative, student support, technology, communication, and other processes can support the requirements. Identify processes that must change or be created before activity begins.
- **Financial readiness:** Identify the upfront and ongoing costs, such as applications, registrations, taxes, legal or consulting support, translation, staffing, technology updates, renewals, and reporting. Determine whether the needed resources are available and sustainable.

- **Staffing and expertise:** Determine whether the institution has the people and expertise needed for the country-specific compliance work, including which offices or individuals would need to help complete particular actions. This is different from assigning long-term global compliance roles; it is identifying the support needed to achieve compliance for this country's activity.
- **Strategic fit and institutional risk:** Consider whether the activity supports institutional goals and whether the risks and resource demands are acceptable. This may include student demand, strategic value, compliance costs, operational complexity, unresolved questions, and potential financial, reputational, or student impacts.

This review should clarify what is known, what remains uncertain, what compliance will require, and whether the institution is prepared to manage it. It should also identify the country-specific actions, resources, dependencies, and timelines needed before the activity begins and to maintain compliance over time. For example, institutional authorization may be required before enrollment begins, tax registration may depend on approvals, accreditation review may need to occur before certain foreign activities launch, or vendor agreements may need revision before services begin. Understanding what needs to be in place helps institutions develop realistic timelines and avoid committing to activities before foundational requirements are addressed.

8.2 Decide and Document the Path Forward

Bring findings together in a concise country decision summary or country compliance plan. This should explain the proposed activity, key country requirements, unresolved questions, specific tasks or conditions that must be addressed, needed resources or operational changes, significant risks or limits, and the recommended path forward. Providing leadership with concise, well-supported recommendations allows decisions to be made within the broader context of institutional priorities and risk tolerance. **The appropriate decision-makers should then use the summary to decide whether, and under what conditions, the institution will proceed in that country.**

POSSIBLE COUNTRY DECISION OUTCOMES

- **Proceed**: The requirements are understood and the institution is prepared to meet them.
- **Proceed with Modifications**: The institution can move forward if specified changes or conditions are addressed.
- **Defer**: The institution remains interested but needs additional information, resources, capacity, or other conditions before proceeding.
- **Do Not Proceed**: The institution determines that the activity is not suitable to pursue currently.

Document the decision and the rationale so there is a clear institutional record that can be revisited if the activity changes, expands, or is reviewed again. If the decision is to proceed, the country plan can guide the immediate implementation work for that country, including completing required actions, and identifying the ongoing country-specific processes needed to maintain compliance. Later steps can then address how those responsibilities fit into broader global compliance management practices.

STEP 8 CHECKPOINT: READY TO DECIDE AND ACT

You should now have: A documented country compliance assessment + identified requirements, risks, uncertainties, and implementation considerations + a clear institutional determination about whether to proceed, modify, defer, or discontinue the activity.

Self-Assessment (Core): Questions 12, 15, 16, 18, 19, 20, 21, and 24–25. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Question 42. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider this question, which addresses more developed program practices.

Country Readiness Questions

Use these questions to guide the readiness discussion. They are intended to support institutional decision-making, not replace legal or subject-matter review.

Legal and Regulatory Readiness

- Can the institution meet the applicable requirements identified through country research?
- What approvals, registrations, reporting, disclosures, renewals, or other actions must be completed?
- Are any significant legal or regulatory questions still unresolved?

Operational Readiness

- Can current academic, administrative, technology, and student support processes support the planned activity?
- What processes or systems need to change before the activity begins?
- Can the institution maintain the required documentation, reporting, communications, and other ongoing processes?

Financial Readiness

- Are the upfront and ongoing costs understood?
- Are sufficient resources available to implement and maintain compliance?
- Are there significant financial requirements that could affect the decision to proceed?

Staffing and Expertise

- Are appropriate individuals or offices identified to conduct and maintain the required responsibilities?
- Is additional legal, regulatory, local, technical, or other expertise needed?
- Are the necessary resources and responsibilities ready to be assigned?

Strategic Fit and Institutional Risk

- Does the activity support institutional priorities or provide sufficient value to justify the resources required?
- Are the identified legal, regulatory, financial, operational, reputational, or student-related risks within the institution's tolerance?
- Are any unresolved issues significant enough to require the activity to be modified, delayed, or discontinued?

STEP 9:

Implement Country Compliance Requirements and Operational Processes

By the end of Step 8, the institution should have decided whether to move forward in a country. Step 9 explains how to put that decision into action. This means completing required approvals, updating internal processes, collaborating with vendors, preparing staff, and making sure the right offices know what they need to do.

Implementation will not look the same in every country. The institution should use what it learned in earlier steps to decide what must be done before launch and what must be managed after launch. The [Country Compliance Implementation Tracker (Appendix 2)] can help track tasks, deadlines, records, and follow-up items.

9.1 Translate the Country Compliance Plan into an Implementation Roadmap

Start by turning the country's compliance plan into a simple roadmap. The roadmap should list the work that needs to happen, who will do it, and when it should be finished. For example, if approval is required before enrolling students, the roadmap should include the steps to prepare the application, submit it, answer questions, save the approval, and tell the right offices when enrollment can begin.

The roadmap should separate:

- Pre-launch requirements that must be completed before activity can begin;
- Implementation tasks needed to establish compliant operations; and
- Continuing obligations that will transfer to routine compliance management after launch.

The roadmap should also show what records need to be kept and which tasks must happen before other tasks can move forward. This helps the institution set a realistic timeline and avoid missing important steps.

9.2 Establish Implementation Ownership and Accountability

Implementation needs clear ownership. For each major task, the institution should identify who is responsible, who needs to help, and when the task should be completed. Responsibility should usually go to the office that already manages the related work. The compliance workgroup can help coordinate, answer questions, and track progress, but each office should understand what it needs to do.

9.3 Implement Required Operational Changes

Some countries' requirements may require changes to regular institutional practices. The institution should use earlier research to decide what needs to change. Depending on the country and activity, changes may include:

- revising marketing or recruitment practices;

- updating professional licensure disclosures or program webpages;
- modifying admissions, enrollment, refund, or complaint processes;
- implementing privacy notices or data-handling practices;
- updating accessibility or language-specific communications;
- revising vendor or partnership agreements;
- changing technology configurations;
- establishing reporting or recordkeeping procedures; or
- creating new internal review or approval steps.

Operational changes should be broken into practical tasks that the affected offices can complete. For example, updating a disclosure may require drafting new language, obtaining legal or compliance review, updating a webpage, notifying enrollment staff, and saving a copy of the final approved version. The institution should record what changed, who approved it, and when it took effect.

9.4 Establish Financial and Administrative Processes

Implementation may also involve costs or administrative steps. These may include fees, translations, local experts, technology updates, vendor costs, taxes, or renewals. The institution should identify these items early so they do not delay the launch. Institutions should identify the steps needed to:

- pay application, registration, or renewal fees;
- process invoices and other required payments;
- obtain internal financial approvals;
- submit required financial reports;
- manage taxes or withholding obligations;
- retain receipts, confirmations, and supporting documentation; and
- calendar recurring financial deadlines.

9.5 Implement Data, Technology, and Vendor Requirements

If country requirements affect technology, data, or vendors, the institution should involve the right offices before the activity begins. At a basic level, the institution should understand what information will be collected, how it will be protected, and whether any vendor or system changes are needed. If a vendor will support the activity, the institution should confirm the vendor's role, responsibilities, and any required review steps before the vendor is used. The goal is to make sure the institution's systems and vendors can support the planned activity. This may include reviewing privacy, security, purchasing, and contract needs before launch.

9.6 Implement Staffing, Employment, and Local Presence Requirements

If the institution has employees, contractors, or another type of local presence in the country, it should identify the basic setup steps and complete the processes necessary to support compliant staffing arrangements. These steps should be coordinated with the offices that normally oversee staffing, legal, finance, and compliance matters. The roadmap should show who is responsible, what approvals or outside support may be needed, and what records should be kept.

9.7 Implement Student-Facing Compliance Requirements

Some country requirements affect information shared with students or applicants. The institution should make sure key student-facing information is accurate, easy to find, and consistent across offices.

Related tasks may include drafting or updating language, getting reviews, publishing the information, and keeping the last version. Offices should coordinate so students and applicants receive clear and consistent information. Step 13 provides more detail on disclosures and transparency.

9.8 Complete Regulatory Approvals, Registrations, and Notifications

The institution should complete any required approvals, registrations, notifications, or other regulatory steps before beginning activities that depend on them. This may include preparing materials, submitting required information, responding to questions, paying required fees, and saving proof that the step was completed. Before submitting materials, the institution should confirm that they match the planned activity and are submitted by the right person. Regulatory approval begins an ongoing compliance relationship. As such, approval conditions, renewal dates, reporting deadlines, and other follow-up items should be saved and tracked.

9.9 Confirm Implementation Completion and Prepare for Ongoing Compliance

Before implementation is complete, the institution should take time to confirm that the main work is finished and ready to move into ongoing compliance management. Institutions should establish review schedules and identify triggers for renewed country analysis, such as legal or regulatory changes, new programs or credentials, new technology platforms, vendor or partnership changes, staffing changes, or significant changes to institutional activity in the country. This helps the institution know what has been completed, what still needs attention, and who is responsible after launch.

The closeout should confirm that:

- required approvals or setup steps are complete;
- key operational changes are in place;
- important records have been saved;
- ongoing responsibilities have been assigned; and
- future deadlines or follow-up items are being tracked.

STEP 9 CHECKPOINT: COUNTRY COMPLIANCE READY FOR OPERATION

You should now have: Completed required approvals and implementation actions + assigned ongoing responsibilities + documented completion and compliance conditions + processes in place for continuing compliance.

Self-Assessment (Core): Questions 17, 20–21 and 26. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 10, 25, 31, 32, and 43. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

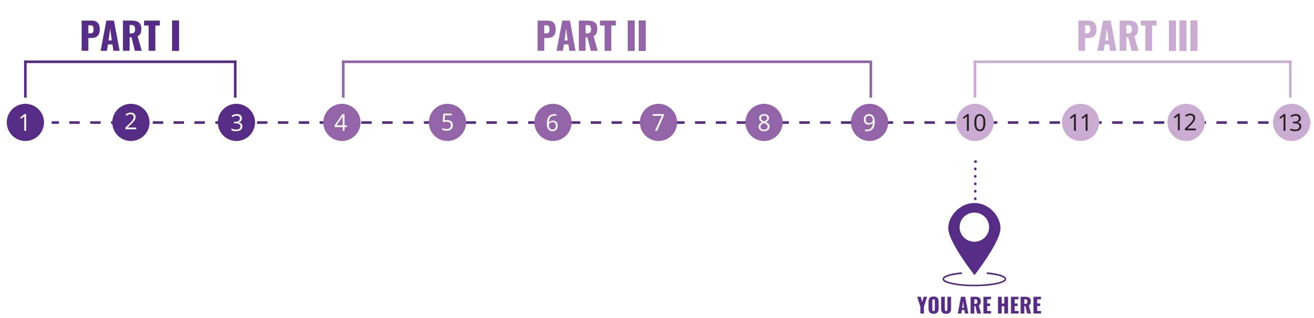
THE HANDBOOK: PART III

Reaching the Destination

OPERATIONALIZING COMPLIANCE

Part II focused on country-level research and analysis. At that stage, institutions identified applicable laws and regulations, reviewed potential U.S. restrictions, examined international agreements, and developed a clearer understanding of the regulatory environment in each priority country. **By the end of that work, institutions should understand what the institution is doing, or plans to do, in each country, and which legal, regulatory, and operational requirements may apply in those jurisdictions.**

Part III focuses on translating research findings into decisions, processes, and sustained institutional practices. This step does not provide a full compliance program framework; instead, it highlights key operational practices for maintaining global compliance within broader compliance management processes. For more detailed guidance on general compliance management practices, institutions may consult SAN resources such as Creating a Compliance Program, Documentation Tips & Tools, Organization Tips & Tools, Continuity Planning Development, Onboarding and Training Plan Development, and Project Planning Tips & Strategies.



STEP 10:

Incorporate Global Compliance into Ongoing Operations and Monitoring

After initial country determinations, approvals, and implementation, global compliance should become part of day-to-day operations. Step 10 explains how to keep requirements current by building compliance into shared systems, assigned responsibilities, and routine workflows that support later work on governance, documentation, communication, training, and continuity.

10.1 Maintain a Centralized System for Ongoing Compliance

Maintain one centralized place to track international compliance obligations and related actions, such as a spreadsheet, shared database, project management tool, or compliance calendar. **Keep it current, accessible to the people responsible for the work,** and updated when requirements, owners, deadlines, documentation, or institutional activities change. Institutions may also consult SAN's Project Management 101 for the Compliance Professional and Project Planning Tips & Strategies resources for more detailed information on project management skills that may benefit their compliance work.

At a minimum, track:

- country-specific requirements and obligations;
- approvals, registrations, or other authorizations;
- reporting, renewal, filing, or payment deadlines;
- responsible offices or individuals;
- required actions and their status; and
- supporting documentation or records.

10.2 Monitor Changes and Reassess Institutional Activity

A tracking system is most useful when the institution monitors changes, reviews compliance issues, and acts on what it learns. Build a process to identify external regulatory changes, internal activity changes, and lessons from compliance incidents, audits, or prior reviews. Use reliable sources, such as government agencies, legal counsel, consultants, professional associations, peer networks, or other trusted resources, and decide who will review developments, assess their impact, and coordinate any needed response. The institution should use a consistent process to determine when a change, audit finding, or concern affects an existing determination or requires additional review. When one of these changes occurs, decide whether additional research, a revised determination, new approvals, updated procedures, or another response is needed.

New international activity will continue to arise after the initial country reviews are complete, so institutions need a practical way for faculty, staff, and offices to raise new or changing activity for review before commitments are made or work begins. Build review points into planning so the institution can spot activity changes that may affect compliance, such as entering a new country, expanding activity in an existing country, changing delivery methods, partnerships, vendors, personnel abroad, or changing recruitment or marketing. This intake process can often be built into an existing approval or planning process. At a minimum, the process should help the institution identify the country or countries involved, the proposed activity, the sponsoring office or program, and any other information needed to decide whether compliance review is required. It should also explain where requests are submitted, who reviews them, how decisions are communicated, and where records are kept.

The institution should also have a clear response process when global activity does not follow approved procedures, including unauthorized recruitment, enrollment in restricted locations, activity that exceeds an authorization, or failure to follow country-specific conditions. The process should identify who reviews the concern, how it is documented, and how corrective action will be coordinated. **Staff, faculty, and partners should know how to raise questions or report concerns when international activity may create compliance risk.** The reporting path can be simple, such as a shared mailbox, intake form, designated compliance contact, or escalation route. The key is to make the mechanism easy to find, explain when it should be used, and ensure concerns reach the appropriate people.

10.3 Assign Ownership and Maintain Continuity

Assign clear ownership for each ongoing compliance obligation so someone is responsible for monitoring the requirement, coordinating with other offices, and confirming that required actions are completed. Other offices may provide information, complete tasks, obtain approvals, or address specific requirements, but responsibility should be clear enough that an obligation does not fall between offices. To support continuity, avoid relying on one person's memory, inbox, or undocumented process; use shared records, calendars, procedures, templates, and backup personnel to preserve institutional knowledge when staff change or are unavailable. Institutions may also consult SAN's Continuity Planning Development and Onboarding and Training Plan Development resources for more detailed information and considerations for continuity and succession planning for compliance roles.

10.4 Embed Global Compliance into Institutional Workflows

Make global compliance part of routine decision-making so requirements are identified before commitments are made or activities begin, change, or expand. To encourage engagement, institutions should make global compliance review easy to identify and difficult to bypass. Look for existing planning or review processes where international activity can be screened early. After those review points are identified, use simple screening questions or checklists to help units recognize when additional review is needed. **Embedding these tools into routine workflows makes compliance easier to follow, helps identify requirements earlier, reduces avoidable delays, and protects students.** Institutions may also consult SAN's Policy Development 101 resource for more detailed information and considerations for turning important institutional compliance practices into policy.

STEP 10 CHECKPOINT: FROM REVIEW TO ONGOING MANAGEMENT

You should now have: A system for tracking ongoing obligations + a process for monitoring changes + assigned ownership for ongoing responsibilities + global compliance review incorporated into relevant institutional workflows.

Self-Assessment (Core): Questions 20, 22, 23, 27, 31. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 26, 33, 34, 36–37, and 40–44. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 11:

Build Compliance Documentation and Governance Infrastructure

As global compliance becomes part of ongoing institutional operations, institutions need a reliable way to document decisions, maintain important records, clarify responsibilities, and manage questions that require additional review. Step 10 established the basic operational processes for tracking obligations, monitoring changes, assigning ownership, and incorporating compliance into institutional workflows. Step 11 builds the documentation and governance infrastructure that supports those processes over time.

The goal at this stage is not a perfect or highly sophisticated compliance infrastructure. **At this point, you want to make sure that essential information and decisions are documented, responsibilities are clear, and the institution can continue the work even when activities, requirements, or personnel change.** Institutions can begin with practical tools and processes and strengthen them as the volume and complexity of international activity grows.

11.1 Establish and Maintain Consistent Documentation Practices

Institutions should have a consistent way to document important global compliance information and decisions. The documentation should make clear what was reviewed, what requirements or sources were considered, what decision was made, why the decision was made, who was responsible, and what actions or deadlines remain. It should also identify any unresolved questions or follow-up needs.

A centralized repository or other shared system can give the institution one reliable place to keep country research, compliance determinations, approvals, regulator communications, and related records. The system does not need to be complex. A shared folder, database, compliance platform, or other appropriate tool may be enough if the information can be found, maintained, and accessed by the people who need it. Records should be clear enough that someone reviewing the matter later does not have to recreate the original work. Institutions may also consult SAN's [Documentation Tips & Tools] and [Organization Tips & Tools] resources for more detailed information and considerations for effective documentation and organization strategies.

Document Recurring Processes. Institutions should also document important recurring compliance processes so that they do not depend on one person's knowledge or memory. Policies and procedures can establish institutional expectations, while shorter process guides can explain how recurring tasks are completed. These materials may explain how the institution communicates requirements, trains staff, tracks where students or activities are located, and reviews marketing or public-facing materials. People responsible for recurring compliance tasks should also maintain practical desk guides. These guides translate policies into daily steps. The level of documentation should match the complexity of the work. A simple process may only need a checklist or short guide. More complex processes may require a formal procedure, workflow, or additional supporting documentation.

Keep Compliance Information Current. Once compliance information and recurring processes are documented, institutions should keep them current as requirements, activities, decisions, and responsibilities change. A routine review schedule helps keep records from becoming outdated or inconsistent. During these reviews, institutions should check whether documentation still matches current practice, whether open issues need follow-up, and whether older records should be archived. Updates may be needed when new research or legal guidance changes an existing determination, an approval or registration is completed or renewed, institutional activity expands, a partner or delivery model changes, responsibilities shift, or an existing process no longer reflects how the institution operates. Institutions do not need to review every record on the same schedule. Instead, they should have a practical way to identify information that may be outdated, needs to be updated, or should be archived so important records remain useful over time.

11.2 Clarify Compliance Ownership, Decision Authority, and Escalation Pathways

Global compliance often involves several offices, so institutions should be clear about who leads the work, who owns recurring tasks, who provides needed information or expertise, and who can approve major actions or changes. The structure may look different at each institution, but the responsibilities should be clear enough that questions do not get lost between offices or stay unresolved because no one knows who should act. Ownership should also be written down so it can be updated when teams, roles, or staffing change.

Clear ownership also helps the institution know when to escalate an issue. Not every compliance question needs senior leadership or legal review, but some issues require more expertise, judgment, or approval. Escalation may be needed when requirements are unclear or conflict with each other, the issue could have significant legal, financial, operational, or student impacts, offices disagree, proposed activity falls outside an existing approval or process, or a change may create new compliance obligations. The institution should also explain where escalated issues go, who makes or approves the decision, and how the decision and any follow-up actions will be recorded. A predictable escalation process helps complex issues receive appropriate review without slowing routine compliance work.

STEP 11 CHECKPOINT: COMPLIANCE INFRASTRUCTURE ESTABLISHED

You should now have: A consistent approach to documenting compliance information and decisions + a process for keeping essential information current + clear ownership and decision authority + an escalation pathway for issues requiring additional review + an intake process for new or changing international activity.

Self-Assessment (Core): Questions 21 and 28–30. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 10, 25, 32, and 33. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 12:

Communicate Compliance Status, Expectations, and Changes Across the Institution

Global compliance processes are only effective when the people making and supporting international activity understand what has been decided and what those decisions mean for their work, such as knowing where activity is permitted, what conditions apply, or when a change requires additional review. **This step is intended to make global compliance information visible, understandable, and actionable across the institution by helping stakeholders know where to find current information, what they are expected to do, and how to raise new activity, changes, or concerns.** Institutions seeking more detailed guidance on communication planning, stakeholder engagement, compliance training and onboarding may wish to consult related SAN resources, including Stakeholder Buy-In and Engagement, Creating a Compliance Program, Onboarding and Training Plan Development, and Compliance Training Programs and Initiatives.

12.1 Identify Stakeholders with Defined Responsibilities

Begin by identifying the offices, leaders, and other parties that need global compliance information to make decisions or fulfill their responsibilities. The appropriate audience will vary by institution and activity, but may include academic departments and program leaders, admissions and enrollment, marketing and recruitment, finance and tax, legal and compliance, information technology and data privacy, executive leadership, and relevant partners or vendors.

12.2 Define What Stakeholders Need to Know

Because not every stakeholder needs the same information or level of detail, institutions should determine who needs to know what, when they need to know it, and how the information will reach them. The level of detail should be appropriate to the audience. A useful principle is "no surprises." The objective is to provide enough current and reliable information for stakeholders to make appropriate decisions and to receive information early enough to adjust plans, meet deadlines, avoid unauthorized activity, and raise questions before problems occur.

Depending on the activity and audience, this may include:

- **Country and activity status.** Stakeholders should be able to determine whether activity in a country is approved, under review, restricted, paused, or prohibited, and whether the status applies institution-wide, to a particular program, or only to certain activities.

- **Conditions and limitations.** Communications should identify material conditions affecting how activity may occur. These might include limits on recruitment, admissions, enrollment, instructional modality, experiential learning, local partnerships, staffing, marketing, or student support.
- **Required actions.** Stakeholders should understand what they must do before initiating, changing, or continuing international activity. This may include obtaining approval, using required disclosures, completing a review, consulting a designated office, or pausing activity until a question is resolved.
- **Changes affecting ongoing activity.** When regulatory developments, institutional decisions, or changes in the institution's own activities affect an existing country's determination, affected stakeholders should be informed about what changed and what action, if any, is required.

12.3 Tailor Communication to the Audience

Different stakeholders interact with international activity in a variety of ways. The specific offices and functions will vary by institution. What matters is that the institution has identified the people who need compliance information and has established a practical way to provide it. Communication should therefore emphasize the decisions and actions most relevant to each group.

- **Academic leaders and faculty** may need to know whether a program or instructional activity may occur in a country, whether restrictions apply to modality or experiential components, and when proposed changes require additional review.
- **Admissions, enrollment, and student support teams** may need clear information about where students may be admitted or enrolled, what restrictions or disclosures apply, and when changes in student location or program participation should be escalated.
- **Marketing and recruitment staff** may need to know where recruitment is permitted or restricted, what disclosures or limitations apply, and when activities require review.
- **Finance, tax, technology, procurement, human resources, data privacy, and other operational functions** may need information about obligations affecting payments, taxes, data, staffing, contracts, vendors, or systems.
- **Leadership and governance bodies** generally need a more concise view of country status, institutional exposure, significant risks, resource implications, and matters requiring institutional decisions.

The objective is not to give every stakeholder a full country file. It is to provide enough current, validated information for each audience to make appropriate decisions and avoid actions that conflict with institutional requirements.

12.4 Establish Practical Communication Channels and a Predictable Cadence

Institutions should establish practical ways for stakeholders to access current global compliance information. Depending on institutional size and capacity, this may include a centralized country-status tracker, dashboard, shared compliance resource, periodic report updates, targeted notice, or direct communication to affected offices. The goal is to make it easy for stakeholders to find reliable information without having to guess where decisions are stored or whom to ask.

The institution should also define when information will be communicated. Some updates will be event-driven, such as when a country is approved, restricted, or paused; when a regulatory requirement changes; or when an important deadline or disclosure requirement is identified. Other updates may follow a routine schedule, such as periodic updates to affected offices or regular reporting to leadership. **The specific format and frequency can vary, but stakeholders should know where to find current information, who communicates significant changes, and when to expect routine updates.**

12.5 Reinforce the Process for New and Changing Activity

Communication should reinforce that new activity or a material change may need review before the institution makes commitments or takes action. Communication should also make clear where questions or requests should be submitted, what information should be provided, and when activity should pause pending review. This does not mean every international question needs a lengthy formal process; the goal is to help stakeholders recognize when a change could affect compliance and know how to obtain the right review before moving forward.

12.6 Keep Communication Current

Communication materials should be treated as part of the institution's compliance infrastructure. When country determinations, requirements, approvals, restrictions, procedures, or institutional activities change, related stakeholder communications should be reviewed and updated so people are working from current information.

Institutions should also periodically check whether stakeholders can actually use the information provided. Repeated questions, inconsistent practices, outdated references, or activity occurring outside established processes may show that communication needs to be clearer or that additional training or workflow changes are needed. The goal is not simply to distribute information, but to make sure current compliance decisions are reflected in day-to-day institutional practice.

STEP 12 CHECKPOINT: COMPLIANCE INFORMATION IS VISIBLE AND ACTIONABLE

You should now have: Identified communication responsibilities + a practical way to access current country and activity information + routine and change-driven communication processes.

Self-Assessment (Core): Questions 2–4 and 30. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 35, 38, and 39. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

STEP 13:

Implement Student-Facing Disclosures and Transparency Requirements

Student-facing disclosures are where an institution's compliance decisions and operational limitations become visible to students. Students may need information about whether an institution or program may operate in their location, whether a program meets professional or other requirements, what costs or refund conditions apply, how their information will be handled, or what limitations may affect their participation. Because these requirements may arise from education, consumer protection, professional licensure, privacy, or other regulatory frameworks, institutions should determine what information students need, when it must be provided, where it should appear, and who is responsible for keeping it current.

The purpose of this step is to help institutions translate the requirements and decisions identified through earlier steps into clear, accurate, and timely student-facing information. Disclosures may be legally required, but they also support informed decision-making and help ensure that institutional commitments match what students can reasonably expect to receive. When connected to research, documentation, governance, operational controls, and ongoing monitoring, transparency becomes part of the compliance process rather than a separate final task.

13.1 Identify Required and Recommended Disclosures

Earlier steps should have identified many requirements that may need to be communicated to students. Institutions should now bring those findings together, determine which disclosures are required and which are recommended to support transparency, and decide who is responsible for translating regulatory requirements and institutional decisions into clear student-facing language. Because requirements often identify what must be communicated without specifying how to explain it, compliance, academic, student services, finance, privacy, technology, legal, or other offices may need to contribute depending on the subject matter.

Common disclosure areas may include:

- institutional authorization or ability to operate in a student's location;
- program availability or eligibility based on jurisdiction;
- professional licensure, certification, or credential recognition limitations;
- student rights, protections, complaint processes, and grievance procedures;
- tuition, fees, refunds, and other consumer protection information;
- technology or participation requirements that may affect access;

- data privacy practices, including collection, storage, or cross-border transfer practices; and
- language, accessibility, or other participation requirements.

Institutions should distinguish between required disclosures — information specifically required by law, regulation, accreditation standards, professional licensing bodies, or other applicable authorities — and recommended disclosures, which provide additional information to improve transparency, manage expectations, or help students make informed decisions.

Requirements often explain the general information that must be included, but they do not always provide exact wording. In those cases, someone needs to translate the requirement into language students can understand, while making sure the content remains accurate and complete. The goal is to produce information that is accurate, understandable, and useful to students.

13.2 Align Disclosures with Institutional Operations

Before disclosures are published, institutions should confirm that they accurately reflect what the institution can and will provide. This review should consider whether statements about program delivery, student support, tuition and refunds, technology, professional licensure, data practices, or other student-facing matters match current institutional processes and capacity. Disclosures should not promise services, eligibility, protections, or outcomes the institution cannot provide, and operational practices should not contradict published information. This alignment is especially important when disclosure language is developed by multiple offices or appears in multiple locations. If a disclosure identifies a limitation or condition, the relevant operational offices should understand how it will be implemented. **Institutions should use a consistent source of approved language or another method for maintaining current versions so students do not receive conflicting information.**

13.3 Determine When and Where Students Need the Information

Institutions should determine when students need each disclosure based on the decision or activity the information may affect. **Vital information should be provided early enough for students to consider it before making decisions that may be difficult to reverse, and the timing may vary depending on the disclosure.**

This may be before or during:

- recruitment or application;
- admission or enrollment;
- course or program registration;
- participation in a placement, internship, clinical, or other experiential activity;
- travel or other in-country activity; or
- a change in student location or other circumstances that affects eligibility or participation.

Institutions should also decide whether the information should be broadly available or provided directly to students based on their country, program, activity, or other circumstances. Some disclosures may belong in public program information, while others may be better delivered through admissions, enrollment, advising, student portals, or direct communications. In some cases, students may also need to acknowledge that they received the disclosure before moving forward. **The objective is to provide information early enough and in a place where students are likely to see and use it.**

13.4 Integrate Disclosures into Existing Institutional Processes

Once disclosure requirements, content, timing, and audiences are established, institutions should incorporate them into the processes students and staff already use. Connecting disclosures to existing workflows helps ensure required information is provided consistently and does not depend on individual staff members remembering when it is needed. To keep disclosure information consistent across these operational touchpoints, institutions should use shared tools (such as standardized templates) and review practices.

Depending on the disclosure, this may include:

- marketing and program webpages;
- recruitment communications;
- admissions and enrollment processes;
- enrollment agreements or registration systems;
- learning management systems or student portals;
- academic advising and student support communications; and
- processes triggered by changes in student location, program participation, or other relevant circumstances.

13.5 Establish Ownership and Maintenance Processes

Student-facing information must remain current as regulations, institutional activities, programs, and operating practices change. Each significant disclosure category should therefore have a clear owner and a defined process for review and updating. Ownership may be shared. For example, one office may monitor the underlying regulatory requirement, another may maintain the student-facing webpage or communication, and another may confirm that the operational practice matches the disclosure. What matters is that responsibility for monitoring, updating, reviewing, and approving the information is clear.

Updates should be triggered by changes that could affect what students have been told, including:

- changes in country requirements or institutional authorization;
- new or changed programs or delivery models;
- changes affecting professional licensure or credential recognition;
- changes in student support, technology, privacy, or data practices;
- changes in tuition, refunds, or other consumer-facing requirements; or
- changes in the population or locations to which the disclosure applies.

Institutions should also establish a reasonable review cycle for student-facing information and maintain enough documentation to show when significant disclosures were reviewed or changed. These practices should align with the documentation, governance, monitoring, and communication structures established in earlier steps.

STEP 13 CHECKPOINT: TRANSPARENCY AS AN INSTITUTIONAL PRACTICE

You should now have: Identified student-facing disclosure requirements + a process for developing and delivering accurate information + assigned ownership and review processes.

Self-Assessment (Core): Question 17, along with applicable elements of Questions 3, 4, 11, and 20. These questions most directly reflect the foundational practices described in this step.

Self-Assessment (Going Deeper): Questions 25, 26, and 33. Institutions seeking a more comprehensive assessment of their global compliance program may also wish to consider these questions, which address more developed program practices.

Conclusion: The Journey Continues

As you have deduced, maintaining compliance for activities in other countries can involve a lot of work. But there can be great benefits on the other side of those efforts, including opportunities to extend your programs and serve students in new places. To help make that work manageable and sustainable, we return to a few of the key messages in this Handbook:

- **Identify a leader** (person or office) to coordinate global compliance.
- **Obtain explicit support from institutional leadership** and the resources needed to do the work.
- **Assess the costs, benefits, and compliance considerations** before moving forward with activity in a new country.
- **Maintain thorough records** of research, communications, interpretations, decisions, applications, payments, and changes over time.
- **Communicate regularly** with the people and offices involved so they understand where you are in the process and what comes next.
- **Take it one step at a time.** You do not have to solve every global compliance question at once; focus on the next step that makes sense for your institution.

Finally, we return to the travel metaphor we have used throughout this Handbook. **Compliance is a journey more than a destination.** You are always somewhere along the route, and you need as clear a map as possible for where you are headed next. Even when you reach a compliance "destination," the journey is not over. Regulatory changes and new activities may send you down a new path.

Our best advice? **Settle in, know where you are headed, and enjoy the ride.**

Kathryn Kerensky
Russ Poulin

Appendix 1: Global Compliance Research Task Checklist

Use this checklist as a starting point when reviewing a country's compliance landscape. For each area, confirm what has been researched, note what is not applicable, document sources, and flag unresolved issues. Not every item will apply in every country or activity, but each area should be considered briefly.

Institutional Approval and Academic Requirements

- Does the country regulate foreign educational providers, online education, recruitment, advertising, or enrollment of residents?
- Are institutional, program, credential, modality, clinical, internship, or partner approvals required?
- What application materials, fees, timelines, translations, financial documents, curriculum or faculty information, policies, or student protection plans are required?
- What approval conditions or ongoing obligations apply, such as advertising limits, reporting, renewals, disclosures, complaints, refunds, records, or material change notices?

Professional Licensure and Regulated Professions

- Does the country regulate the profession connected to the program, credential, clinical experience, field placement, or supervised practice?
- Which regulator, licensing board, ministry, or council oversees the profession?
- Does program completion support local licensure, certification, registration, employment, or professional recognition?
- Are program approval, curriculum review, supervised practice approval, site approval, partner agreements, documentation, exams, or student eligibility requirements needed?
- What student disclosures are needed about licensure eligibility, recognition limits, exams, supervised experience, residency, or individual credential review?

Marketing, Advertising, Recruitment, and Consumer Protection

- Are there restrictions on advertising, digital marketing, country webpages, recruitment fairs, scripts, brochures, or other materials directed to residents?
- Are agents, third-party marketers, commission-based recruitment, local representatives, or partner recruitment activities regulated?
- Do advertisements, websites, scripts, brochures, or other student-facing materials require prior approval?
- Are terms such as “university,” “college,” “recognized,” “approved,” or “accredited” restricted or subject to proof?
- Do consumer protection rules affect pricing, fee disclosures, refunds, cancellation rights, complaints, outcomes, recognition limits, or other student disclosures?

Data Protection, Privacy, Cybersecurity, and Technology

- Do privacy laws apply to the institution's collection, use, storage, retention, processing, or deletion of student, applicant, employee, or other personal information?
- Do cross-border transfer rules, consent requirements, contractual safeguards, localization, regulator notices, or data processing agreements apply?
- Do cloud hosting, cybersecurity, vendors, LMS tools, remote proctoring, biometrics, AI tools, analytics, automated decisions, or monitoring create added obligations?
- What privacy notices, consent processes, data rights, breach notices, incident response steps, records, or security controls are required?

Employment, Labor, Immigration, and Staffing

- Are faculty, staff, recruiters, representatives, contractors, consultants, or other personnel located in or working from the country?
- Do local employment laws apply to hiring, contracts, benefits, leave, termination, wages, working time, protections, or workplace obligations?
- Do classification rules affect whether someone is an employee, contractor, agent, local representative, or third-party provider employee?
- Do personnel activities trigger payroll, social security, benefits, employment registration, immigration, tax, permanent establishment, business presence, or local registration obligations?

Taxation, Business Registration, and Financial Compliance

- Do VAT, GST, sales tax, digital services tax, withholding tax, or similar taxes apply to tuition, fees, online education, digital materials, software access, or other charges?
- Is tax or business registration required before collecting revenue, invoicing, hiring, contracting locally, using agents, or conducting sustained activity?
- Are educational, nonprofit, charitable, public institution, foreign provider, or other exemptions available, and are they automatic or application-based?
- What thresholds, filing triggers, payment deadlines, invoicing rules, recordkeeping, renewals, financial reports, or currency controls apply?
- Do personnel, partners, offices, agents, vendors, or recurring activities create permanent establishment, taxable presence, branch registration, foreign investment, or "doing business" concerns?

Accessibility, Equity, Language, and Student Communications

- Do accessibility requirements apply to websites, LMS tools, mobile apps, course tools, portals, instructional materials, or student communications?

- Are captioning, transcription, audio description, alternative formats, accessible documents, or accommodation processes required?
- Do equity or nondiscrimination rules affect admissions, enrollment, services, complaints, program access, or participation?
- Must contracts, disclosures, consent forms, enrollment materials, refund information, complaint procedures, websites, or other student communications be provided in a specific language?
- Are there limits on English-only services or requirements to provide information in an official or required language?

Appendix 2: Country Compliance Implementation Tracker

Use this tracker after country research is complete to assign owners, monitor progress, record dependencies, and document compliance evidence. Before using it, identify a lead office, confirm responsible offices, and capture key decision points and escalation paths in the notes column. Institutions may adapt the tracker in Word, Excel, Microsoft Lists, a shared workbook, a database, or another project management tool that supports ownership, reminders, dashboards, and documentation.

Suggested Status Options

Status	Meaning
Not started	Work has not yet begun.
In progress	Implementation is underway.
Pending External Action	Waiting for regulator, vendor, partner, or other outside action.
Complete	Implementation has been completed and documented.
Ongoing	Activity continues as part of routine compliance operations.

Country Compliance Implementation Tracker

Tasks listed are examples. Add country-specific tasks, deadlines, owners, evidence, and follow-up steps based on your research findings.

Institutional Authorization and Academic Operations

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Submit required applications, registrations, or notices; track approval dependencies.				
Collect required attachments, signatures, translations, fees, and internal approvals needed for the submission				
Implement required academic or operational changes (such as updating program pages, refund procedures, etc.)				
Document approval conditions and ongoing obligations				

Professional Licensure and Regulated Programs

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Implement required curriculum or program changes				
Submit required approvals for programs, clinicals, or faculty.				
Implement approval, clinical, internship, or placement processes				
Update professional licensure disclosures				

Marketing, Recruitment, and Student Communications

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Review marketing and recruitment materials for country compliance.				
Update websites and promotional materials				
Revise required student disclosures				
Review enrollment agreements and consumer information				

Data Protection, Privacy, and Technology

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Review applicable systems and processes for privacy compliance.				
Implement required privacy notices and consent processes				
Configure systems for country requirements.				
Review vendors and platforms for compliance requirements.				
Update vendor agreements, as needed				

Employment, Staffing, and Local Operations

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Complete employment or contractor compliance steps.				
Complete required registration, payroll, benefits, tax, or immigration steps.				
Update internal staffing procedures				

Taxation and Business Operations

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Complete required tax or business registrations				
Implement invoicing and reporting procedures.				
Establish recurring filing processes				
Document financial compliance responsibilities				

Vendors and Third-Party Relationships

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Complete compliance review of vendors and partners.				
Update vendor or partner agreements				
Verify vendor compliance responsibilities				
Implement vendor monitoring procedures				

Accessibility, Language, and Student Support

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Update accessibility features or accommodations				
Revise student-facing materials to meet language requirements				

Documentation and Ongoing Monitoring

Implementation Task	Owner	Target Date	Status	Evidence/Notes
Maintain a centralized country compliance file.				
Establish renewal calendar with owners, dependencies, reminders, and due dates.				
Schedule periodic country compliance reviews				

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STATE AUTHORIZATION NETWORK
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