

# Professional and Occupational Licensure Disclosures *Best Practices Guide*

Created for NASASPS 2023  
by [Higher Education Licensure Pros LLC](#)

**Important note:**

This information is provided by Higher Education Licensure Pros LLC based on our experience working with licensure issues. We are not a law firm. The information provided does not, and is not intended to, constitute legal advice; instead, all information, content, and materials provided are for informational purposes only. Risks to the university/college and students should be considered and evaluated with legal counsel prior to creating policies and communicating licensure information to prospective students/students.

# LICENSURE DISCLOSURES: SNAPSHOT SUMMARY



Federal [Department of Education](#) regulations and [State Authorization Reciprocity Agreement \(SARA\)](#) policy require institutions to understand if their programs meet educational requirements for professional or occupational licensure and communicate that understanding to specific audiences at specific times. [Department of Veterans Affairs](#) rules require additional disclosures.

This compliance snapshot outlines these requirements at a high level and may be a useful tool when explaining requirements and working with institutional partners.

## STEP 1: UNDERSTAND

### Determine which programs are licensure

- Designed or advertised
- All modalities

### Research educational requirements in all U.S. jurisdictions

- Find board/agency website
- Review Statutes/regulations/rules, application forms, any FAQs and other info
- Use reputable third-parties to confirm/clarify (ASWB, NASDTEC, etc)
- Some licensing boards/agencies may be willing and able to answer specific questions
- You may discover program approval is required by a state board/agency, especially if clinical experiences are offered in their state/territory

### Compare your program to state/territory requirements.

- For some license types, you will need to complete an in-depth curriculum comparison to courses-possibly to the assignment level and field experience/internships.
- Although rare, some licensing boards will evaluate your out-of-state program, for a small fee. Take advantage of these opportunities.

### Conclude if “meets” or “does not meet”.

- Current federal regulation allows for “not determined.”
- Under SARA policy, can use “no determination made” after “all reasonable efforts” to determine if meets.

### Create a process to review research and update comparisons on a regular basis.

- Annual aligns with other Title IV disclosure timing

## STEP 2: COMMUNICATE

### PUBLIC DISCLOSURES

#### Create specific webpage for public disclosures

- “Meets”, “Does not meet” or “no determination made”
- SARA policy - must include contact information for board/agency if “no determination made”

**Veterans Affairs** requires “any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation.”

### INDIVIDUAL DIRECT DISCLOSURES

#### Location policy

#### Each institution establishes own policy

- Direct disclosure based on prospective student/student location
- How/when do students notify you of change in location? I.e. relocation
- How/when do you confirm location of students?

#### Create processes for prospective and current students.

- Typically through email
- Prior to enrollment (completed registration requirements except for payment of tuition and fees) - if “does not meet” or “no determination made”
- Within 14 calendar days for current student - if changes to “does not meet”
- Best practice - send to all prospective students, even if “meets”. Collect acknowledgment of receipt through application or enrollment agreement.
- Try to insert into existing communication processes (i.e. prior to enrollment, with an address change, etc)

Note: This information should not be considered legal advice. Legal questions should be directed to your counsel.

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# Table of Contents

<b>Table of Contents</b>	<b>3</b>
<b>Current Requirements: An Overview</b>	<b>5</b>
Understand	5
Communicate	5
Public Disclosures	5
Direct Disclosures	6
<b>Proposed Changes</b>	<b>7</b>
<b>How to Identify Licensure Programs</b>	<b>7</b>
<b>Who Should do this Work</b>	<b>8</b>
<b>Professional Licensure Disclosures: What work is required</b>	<b>9</b>
Research Educational Requirements	9
Statutes and regulations	10
Licensing board or agency websites	12
Reliable third-party sources	13
Communication with licensing board or agency	13
Compare to program and curriculum	13
Degree level, field, and total credits	14
Reliance on an external authority to meet educational requirements	16
Required course content areas	17
<b>Licensure Disclosure Requirements and Examples</b>	<b>25</b>
Public Disclosures for Title IV and SARA	25
Minimum Compliance	25
Better Practice	26
Sample Introductory Information	27
Public Disclosures for Veterans Affairs	27
Minimum Compliance	28
Location Policy	29
Examples from Institutions	29
Prospective student location	30
Enrolled student location	30
Change of location	30
Individual Direct Disclosures	31
Prospective Students: Minimum Compliance	31



Prospective Students: Better Practice	33
Current Students	35
Current Students: Minimum Compliance	35
Current Students: Better Practice	36
Other Considerations	38
<b>Higher Education Licensure Pros LLC Services</b>	<b>39</b>
Who we serve	39
Why you need our help	39
Our Services	39
Research	39
Analysis	39
Communication	40
Compliance	40
<b>Frequently Asked Questions and Answers (FAQ)</b>	<b>41</b>
General questions on professional licensure	41
Questions on student location policy	44
Questions on public and direct disclosures	45
Questions on SARA policy	51
Department of Veterans Affairs rule	52



## Current Requirements: An Overview

Since July 1, 2020, Federal Department of Education (ED) Title IV Regulations ([34 CFR 668.43](#)) and State Authorization Reciprocity Agreement (SARA) policy ([v. 22.1 § 5.2](#)) require institutions to **understand** how programs meet educational requirements for licensure in each state and U.S. territory, and **communicate** that understanding to specific audiences at specific times.

In addition, since February 17, 2023, Department of Veterans Affairs (VA) has required institutions to “publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation” for institutions participating in the GI Bill or other VA education benefits programs. VA has not provided implementation guidance, creating questions on the scope of required disclosures.

A brief note on terminology. Licensure is used throughout this Guide to refer to any license, certification, certificate, endorsement, or credential that is issued and required by a state or territory government to practice in a profession or work in an occupation. Terminology varies considerably across states/territories and professions/occupations.

### Understand

Institutions must know how programs related to licensure meet educational requirements in all U.S. states and territories – there are 59 U.S jurisdictions specified in regulation. Educational requirements are those that must be satisfied through an institution of higher education as part of the required degree or certificate program. The federal regulation applies to all modes of delivery, whether on a physical campus, distance/virtual, or hybrid.

To satisfy the VA requirements, institutions also need to know any conditions or additional requirements for licensure, including training, experience, or examinations, at least in the state or territory where State Approving Agencies (SAA) approval is held. This may extend to all U.S. states and territories, depending on anticipated forthcoming implementation guidance.

### Communicate

#### *Public Disclosures*

Institutions must publicly disclose if licensure programs “meet,” “do not meet,” or “no



determination made,” for all U.S. states and territories (59 specified in regulation).

Current SARA policy ([SARA Policy Manual v. 22.1 § 5.2](#)) allows for institutions to indicate “no determination made” after making “all reasonable efforts” to determine if the program meets requirements.

Under [§ 5.2](#), if an institution has not made a determination, then they must provide licensing Board/Agency contact information for that state or territory. They also must direct people to contact the Board/Agency themselves to try to determine whether the program meets requirements.

To satisfy the VA requirements institutions must publicly disclose, in a prominent manner, the additional requirements (e.g., training, work experience, exams) that are required for licensure that are not part of the academic program. This applies to the state or territory where State Approving Agencies (SAA) approval is held, and may extend to all U.S. states and territories, depending on anticipated forthcoming implementation guidance.

### ***Direct Disclosures***

In addition to public disclosures, institutions must send an individual direct disclosure to prospective students prior to their enrollment in the licensure program if they are located in a “does not meet” or “no determination made” state or territory. These direct disclosures must also be sent to any currently enrolled student within 14 calendar days of a change that puts them in a “does not meet” location. A change in determination could be due to the student changing locations and notifying the institution, the state/territory changing educational requirements for the license, or the program changing its curriculum.

Student location is not defined or provided in regulation. Rather, [CFR § 668.43\(c\)\(3\)\(ii\)\(a\)](#) indicates each institution must have a student location policy that is applied consistently to all students. Note that [ED indicated in their response to comments](#) with release of the final regulation that “Institutions may, however, develop procedures for determining student location that are best suited to their organization and the student population they serve. For instance, institutions may make different determinations for different groups of students, such as undergraduate versus graduate students.”



## Proposed Changes

It is anticipated that the Department of Education will be releasing final draft regulations related to licensure in April 2023 for public comment. Based on [negotiated-rulemaking sessions in 2022](#), the draft will likely include impactful changes to licensure responsibilities; specifically, requiring institutions to “ensure” that programs meet all educational requirements for licensure in states/territories where students are located, and removing the option to list “no determination made” for public disclosures.

Ensuring that a program offered through an institution located in another state/territory meets educational requirements for licensure will be a challenge. Most state licensing boards and agencies do not currently have a process in place for reviewing out-of-state programs. Rather, an individual graduate’s education is assessed at the time the individual applies for a license. To attempt to meet this threshold, it will be even more critical for institutions to know the licensure requirements for all U.S. states and territories and compare their programs to the specific academic and curriculum requirements.

## How to Identify Licensure Programs

The federal Title IV regulation([CFR § 668.43\(a\)\(5\)\(v\)](#)) states that disclosures are required for an academic program “if an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.” Institutions will need to create a list of all programs that are designed or advertised as leading to a license. Many licensed professions are commonly known, for example, nursing, teaching, social work, and accounting. Other professions or occupations are only licensed in a few states. Some examples of lesser known license types include music therapist, applied behavior analyst, and paralegal.

Resources to help identify the licenses related to academic programs:

- [Career One Stop](#) provides a list of occupations, some of which require a license.
- [O\\*Net](#) provides some information about licensure.
- The [Department of Education](#) provides links to various associations of professions and occupations.
- [Midwestern Higher Education Compact](#) and [State Authorization Network](#) each provide a directory of licensing boards/agencies



When reviewing websites and marketing materials – including anything through an Online Program Management (OPM) partner – to determine if programs are being advertised as leading to a career in a licensed profession, institutions may need to revise marketing claims. For example, a webpage for a human services bachelors degree program mentions social work as a possible job outcome. If the program does not hold Council on Social Work Education (CSWE) accreditation, it will not meet licensure requirements in almost all states/territories. The program is likely not designed for licensure. Rather than create “does not meet” disclosures for this program, it may make more sense to change the way it is being advertised—remove the reference to social work as a job outcome.

If the program is a combined program or dual degree, or a student can gain a certificate while completing a degree program, separate disclosures will likely be needed for each. For example, a CSWE accredited master of social work program that includes completion of a certificate in addiction counseling. Social workers and addiction counselors are two distinct licensed professions. If the program is specifically designed to allow graduates to earn both types of licenses, then disclosures should be created for each one.

## Who Should do this Work

It takes a team effort to complete the research of educational and additional requirements for licensure, compile the information, compare the academic programs and curriculum, create the disclosures, develop policies, track and update student location, update the website, and implement a direct disclosure email process.

Many institutions will find it beneficial to include the following departments and roles on this team:

- Compliance Director
- Program Director
- Curriculum Subject Matter Experts (SMEs)
- Provost/Registrar
- Systems Analyst/IT and Website Support
- Legal
- Enrollment and Admissions Leads
- Marketing
- External Expert, like Higher Education Licensure Pros





Based on our experience, institutions should designate a single person or team that is responsible for licensure disclosures, in order to have consistency across the institution. This person or team would serve as a project manager and reach out to the various departments, roles, and central resource teams that need to be included. This project manager should also ensure that documentation of research, curriculum comparisons, direct disclosures, policies, and procedures are maintained.

## **Professional Licensure Disclosures: What work is required**

The following section outlines what work is required to meet the current federal Title IV regulations and State Authorization Reciprocity Agreement (SARA) policy that was reviewed in the prior section. In general, to meet professional licensure disclosure requirements, higher education institutions need to first, understand, and then communicate, educational requirements for each program they offer that is advertised as leading to a certificate or license.

To understand and communicate, institutions must:

- Research educational requirements through a review of the following:
  - Statutes and regulations
  - Licensing board or agency websites
  - Reliable third-party sources
  - Communication with licensing board or agency
- Compare the educational requirements found to program and curriculum
  - A detailed course comparison may be needed
- Conclude if “meets” or “does not meet”

## **Research Educational Requirements**

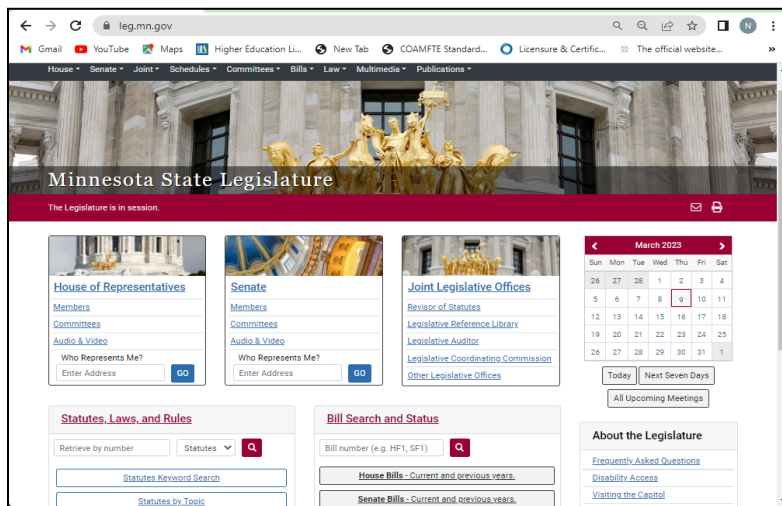
To understand and communicate, institutions will need to research educational requirements with a close review of the relevant statutes and regulations and information the licensing board or agency has made publicly available. Use reliable third-party sources to verify the information you have found in your research and communicate directly with the licensing board or agency when you find unclear or contradictory information. Examples are used in the following section to describe the process for researching educational requirements outlined in the bullet points.



## Statutes and regulations

The first step in this process is a close review of the relevant statutes and administrative regulations that provide definition and procedure for creation of the State board or agency that issues the license or certificate and sets qualifications the applicant must meet. You can find statutes and regulations (laws, rules, codes) by searching the internet for the state legislative webpage or often on the licensing board's website as well.

**HELP TIP:** *If you reference legislation from a board's website make sure to check the date when the legislation was enacted or amended. It may not be the most current.*



You can find statutes, laws, and rules (codes, regulations) for each U.S. state by searching the internet for the state legislature page. The screenshot shows where Minnesota statute, laws, and rules can be found.



Finding statutes and regulations for U.S. territories can be more difficult. An internet search for the licensed profession or certification in each territory has been useful.



Your review of the legislation for each license or certification will include definitions, requirements the board must follow in the licensing process, applicant qualifications, alternative licensing pathways including internship, trainee, and reciprocity, any out-of-state rules, and if board or other approval is required. Each of the applicant qualifications listed below will be described in detail in the program and curriculum comparison section.

Applicant qualifications may include:

- University requirements
  - Regional or national accreditation
- Program requirements
  - Specialized accreditation
  - Residency
- Applicant requirements within the program
  - Degree
    - Level (high school, undergraduate, graduate, doctoral)
    - Field
  - Required coursework
  - Supervised experience within the program (e.g., practicum, clinical lab)

The applicant qualifications listed above are those the program must compare to the program and curriculum to make a determination whether the program “meets” or “does not meet” educational requirements for every state and territory that issues the license-type being researched. In addition, the following applicant qualifications, if relevant, will be helpful to provide to students:

- Additional applicant requirements outside of program
  - Minimum age
  - Criminal background check
  - References
  - Post-graduation experience
  - Passage of state or national exams
  - Current certification

**HELP TIP:** *Make a note of the specific statute or regulation where you found relevant information so you can cite it and find it again if needed.*



## ***Licensing board or agency websites***

Second, a review of the publicly available information on the state or territory board/agency's website will provide clarification on how the board/agency implements the procedures outlined in statute and regulation. Using an internet search engine will typically work to find each state and territory licensing board or agency website. The following agencies also provide links to licensing boards/agencies:

- [Midwestern Higher Education Compact \(MHEC\) Licensure Board/Agency Directory](#)
- [NC-SARA Professional Licensure Directory](#)
- [State Authorization Network \(SAN\) National Associations for State Licensure Research](#)



Example of official state logo on licensing board website

**HELP TIP:** *Check to make sure you have the correct licensing board website by finding the official state logo on the page.*

When you have identified the state or territory licensing board or agency website, you will review all the information offered for the license type you are researching. The most common points of information found on the board/agency website are:

- Application forms
- Application instructions
- An FAQ
- Practice and Legislation News
- Resources
  - A link to, or a copy of, relevant statute and regulation
  - A link to the professional association
  - Contact information

### **Reliable third-party sources**

Third, double-check information you have gathered in the first two steps with a reliable third-party source, such as the association or council of licensing boards for that profession. Examples include; National Council of State Boards of Nursing (NCSBN), the Association of Social Work Boards (ASWB), National Association of State Boards of Accountancy (NASBA), and National Association of State Directors of Teacher Education and Certification (NASDTEC).

**HELP TIP:** *Be careful not to trust commercially sponsored sites designed to market and advertise programs.*

### **Communication with licensing board or agency**

Lastly, communicate directly with the licensing board/agency to clarify any unclear or contradictory information you have found in your research. Copy and paste the information you are asking about along with the context of your question if you are communicating via email message.

**HELP TIP:** *Ask only one specific question with reference to the relevant statute, regulation, or website. It may avoid having to decide to which question a “yes” or “no” response should be applied.*

### **Compare to program and curriculum**

Now that the research has been completed, in order to understand if a program and curriculum meets educational requirements for licensure, some license types require a detailed comparison of program components and courses to state or territory required content areas.

Not all license types will need an in-depth program and course comparison. Generally, it will be clear from your review of statute, regulation, and application materials whether, and to what extent, a comparison is required. A program and course comparison may be required for some states/territories even if specialized program accreditation is required or accepted by the board/agency. There are several areas the program may need to evaluate, depending on the level of detail the state/territory requires. Each of the program and course areas for comparison listed below will be described in the next section.

Program and course areas for comparison:

- Degree level, field, and total credits



- Reliance on external authority to meet educational requirements
- Course content areas
- In-program supervised experience
- Residency

Compare the educational requirements listed above to the program and curriculum. Descriptions and examples for each of these are provided in the next section.

### ***Degree level, field, and total credits***

State or territory educational requirements for licensure or certification may include a specific degree in a primary field or a list of optional fields the degree program must address.

Regarding degree level, some professions are licensed in a progressive manner where the first level of license requires a set of educational requirements that allow the licensed professional to practice under a level of supervision and, after a set period of time or number of hours (or both), they may choose to apply for a more independent level or type (e.g., clinical versus administrative) of licensed practice.

#### **Example 1.** Level of degree required based on level and type of practice in social work

An applicant will need at least a master’s level degree to qualify for a clinical or independent level social work license in all states and territories that issue a social work license. Some states/territories also offer a social work license for an applicant that holds a bachelor level degree. The degree must be in a social work field and the program must hold specialized accreditation from the Council of Social Work Education (CSWE)

#### **Example 2.** Level of degree based on external national standards in dietitian practice

Several U.S. states and territories have either a bachelor or master’s degree requirement included in statute or administrative regulations an applicant must hold to be eligible for licensure as a dietitian. Most of the U.S. states and territories that issue a dietitian license also require the applicant to pass the registration examination for dietitians administered by the Commission on Dietetic Registration (CDR). Only graduates of ACEND-accredited programs are eligible to take the exam to become a registered dietitian and effective January 1, 2024, the minimum degree requirement will be a graduate degree (see <https://www.eatrightpro.org/acend/accredited-programs/about-accredited-programs>). Based on the eligibility requirements to take the CDR exam required by most states/territories, any




state or territory requirement that includes less than a graduate degree (e.g., a bachelor’s degree) must be considered with the exam requirements.

**Example 3.** Field options for a professional counselor license

To meet eligibility requirements for a licensed professional counselor (LPC), an applicant must graduate from a master’s program that, in most cases, either is accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) or has completed a degree in counseling or related mental health field that includes a list of specific course content areas (e.g., Connecticut). In the District of Columbia (D.C.), the fields of study (outside of a counseling degree program) that are acceptable to the Board include social science, psychology, social work, human service, etc. with the expectation the program addresses very specific course content areas.

**Example 4.** Total credits in specific fields

When curriculum comparisons are necessary	
<p><i>Alabama Certified Public Accountant (Ala. Admin. Code 30-X-4-06)</i></p> <p>(3) For candidates who first sit for the examination on or after January 1, 2016, once the candidate passes all test sections of the examination, the candidate will have 36 months from the time all test sections are passed to obtain a total of 150 semester hours or 225 quarter hours of post secondary education that must include</p> <p>(a) a total of 33 semester hours or equivalent quarter hours in accounting (excluding introductory courses) at the upper division undergraduate and/or graduate level, and</p> <p>(b) <b>a total of 27 semester hours</b> or equivalent quarter hours in business courses (other than accounting courses) at the undergraduate or graduate level <b>from among the following subject areas: economics; legal and social environment of business; business law; marketing; finance; organization, group, and individual behavior; quantitative applications in business; communication skills, and business ethics.</b></p> 	<p>The slide is an example of a total number of credit hours that include a specific number of hours in specific fields and subject areas a candidate for a CPA license will be required to demonstrate.</p>

In example 4, a program will need to compare the list of required courses with their curriculum to determine whether the program “meets” or “does not meet” educational requirements for Alabama.

## Reliance on an external authority to meet educational requirements

Many states and territories have specific content requirements listed in statute, administrative regulations, and application materials. These will differ by license type and jurisdiction. Listed below are examples where a U.S. jurisdiction does not include specified course content areas but rather relies on an external authority, such as a specialized accreditor, a private certification board or agency, or another state approval.

### Examples:

- Out-of-state approved teacher preparation program graduates who hold a teacher license or certificate from the state or territory where the program is approved to meet educational requirements (e.g., Alabama professional educator certificate, middle-level mathematics).
- A valid current registration with the Commission on Dietetic Registration (CDR) is required for a dietitian license in New Mexico.
- Graduation from an accredited educational program as verified by the Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association (AOTA) is accepted by the Virginia Advisory Board of Occupational Therapy to meet the educational requirements. The applicant must also be certified as an Occupational Therapist by the National Board for Certification in Occupational Therapy (NBCOT).

**HELP TIP:** *Even if the applicant has graduated from a program that holds specialized accreditation, the state or territory may have additional educational requirements.*

### Professional Counselor Example: Florida continued

#### 4. GRADUATE OF A CACREP MENTAL HEALTH COUNSELING PROGRAM

If you graduated from a **mental health counseling program** accredited by CACREP, your overall degree program must be a minimum of 60 semester hours or 80 quarter hours, including a course in human sexuality and a course in substance abuse.

Indicate below the graduate level course you completed that satisfies the two specific content areas. You must have a minimum of three semester hours or four quarter hours in each content area.

Content Area	School Name	Course Number	Course Title	Credit Hours
Human Sexuality				
Substance Abuse				

Submit worksheet with your application.

DH-MQA 1174, Revised 8/2020, Rule 64B4-3.001, F.A.C.

Page 18 of 20



The Florida Board requires an applicant who has graduated from a CACREP-accredited mental health counseling program to have completed courses in human sexuality and substance abuse.





## Required course content areas

Many U.S. jurisdictions include program components and specific course content areas an applicant must meet to be eligible for a license. Examples in this section will illustrate:

- When curriculum comparisons are necessary
- Worksheets provided by the licensing board a program may use to align their curriculum
- Key points to consider in your curriculum analysis
- Whether a graduate of your program will need to demonstrate they meet educational requirements with a transcript only or will need to provide course descriptions (typically from the course catalog the year they matriculated), or course syllabi that shows assignments or activities
- Understanding statute and regulations together
- Are the credits required within the degree program or may a portion of them be taken outside of the degree program?
- When your program does not meet course requirements
- In-program supervised experience
- Program approval required for out-of-state program or clinical experience
- Residency requirements
- Does your program assist students in meeting state/territory training requirements that are not required to be provided in the program?

**Example 1.** A comparison of total hours with required content by credit hour is needed

### When curriculum comparisons are necessary

*Arkansas Licensed Associate or Professional Counselor (Ark. Admin. Code 007.33.6-3.6)*

(a) The applicant must have received a graduate degree from a regionally accredited institution of higher education that is primarily professional counseling or therapy in content and document completion of a minimum of **60 graduate semester hours** in course work, counseling/therapy in content, that meet the academic and training standards established by the Board. The counseling programs, from which the degree/courses are earned, within the institution, shall meet the standards for the preparation of counselors by the specific national professional associations related to each license.

(b) The adopted standards for LAC and LPC are the current Council for Accreditation of Counseling and Related Educational Programs (CACREP) standards and must meet Arkansas core curriculum standards.

(e) **Core Curriculum for LAC or LPC includes:**

- 1. Professional Identity and Ethics, (3 Graduate Credit Hour Minimum)**
- 2. Social and Cultural Diversity, (3 Graduate Credit Hour Minimum)**
- 3. Human Growth and Development, (3 Graduate Credit Hour Minimum)...**



*Note additional content areas not reflected here.*

The example demonstrates a requirement of total hours in content that must include (in part) at least 3 graduate credit hours in specific “core curriculum” content.

## Example - Curriculum Comparison is Needed

2.03(3) Out-of-state applicants. An initial license may be issued to an applicant from another state or country whose qualifications meet or exceed the requirements of the State Board of Education and who has met the following requirements:

- 2.03(3)(a) has completed the appropriate degree, experiences, and educational level for the license and endorsement(s) requested as specified in these rules;
- 2.03(3)(b) has successfully completed an educator preparation program approved or authorized by a state other than Colorado, including a program at an accepted institution of higher education in the endorsement area sought or another educator preparation program, including an alternative teacher preparation program;
- 2.03(3)(c) has successfully completed field-based experience that meets or exceeds Colorado's field-based experience requirement as provided by section 23-1-121(2)(d), C.R.S.;
- 2.03(3)(d) holds a standard license issued by the state education agency of another state or country, is eligible to hold a standard license issued by the state education agency of the preparing state, or meets the official requirements of the legally designated licensing agency of the preparing state; and
- 2.03(3)(e) has provided evidence of satisfactory completion of the approved content tests appropriate to the license and endorsement requested.



1 Colo. Code Regs. § 301-37:2.00

**Example 2.** A program will need to compare their field experience with the state requirements.

In addition to state approval or authorization, the program will need to know the state's field-based experience requirements.

## Example 3. Required worksheet provided by the Board (partially shown)

The Wisconsin Accounting Examining Board provides the applicant with a worksheet they will complete by listing at least one course (introductory courses can not be used) that addresses each subject listed in items a through e. The applicant will also include any additional courses (introductory courses can be used) needed to meet the minimum 24 undergraduate or 15 graduate semester hours. The applicant worksheet can be used by the program to determine if their curriculum meets the state's educational requirements. The program should not rely on the worksheet alone but use the information they have gathered from researching information in state statute and regulations and from other information provided on the Board's website.

## Accounting Example: Wisconsin

**Wisconsin Department of Safety and Professional Services**  
 Mail To: P.O. Box 8935 Madison, WI 53708-8935  
 FAX #: (608) 251-3836 Phone #: (608) 266-2112  
 Office Location: 4822 Madison Yards Way Madison, WI 53705  
 E-Mail: [dsp@wisconsin.gov](mailto:dsp@wisconsin.gov) Website: <http://dsp.wis.gov>

**ACCOUNTING EXAMINING BOARD**  
**REQUIRED COURSE WORK IN ACCOUNTING AND BUSINESS SUBJECTS**

**Instructions:** Submit the accounting and business course work information below that corresponds with the education requirements in Wis. Admin. Code §§ Acry 2.303, 2.202(2) and 2.202(3). Complete this form (Form #3176) for the institution(s) that conferred the qualifying degree(s). More than one form may be completed for multiple institutions.

**APPLICANT INFORMATION**

Last Name	First Name	MI	Institution Name
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**ACCOUNTING COURSE WORK** – Wis. Admin. Code §§ Acry 2.303, 2.202(2), and 2.202(3). At least one (1) course must be provided in each of items (a) through (e). Additional courses may be listed in order to reach the minimum 24 undergraduate or 15 graduate semester hours. Items (a) through (d) are generally expected to be courses beyond the introductory level. Introductory courses can be listed under item (f) if needed in order to demonstrate sufficient semester hours. Transcripts, course catalog descriptions, and/or syllabi may be requested in support of this form.

Subject	Course Title(s)	Course Number	Semester/Year	Grad Credits	Under-Grad Credits	Total Sem Hours
<i>Example:</i>	<i>Tax for Business and Corporations</i>	<i>Acct 1023</i>	<i>Fall 2013-2014</i>		3	
A. Financial Accounting						
B. Cost or Managerial Accounting						
C. Taxation						



The applicant worksheet can be used by the program to determine if their curriculum meets the state's educational requirements.



When a state or territory includes specific courses, in general there will be language either in statute, administrative regulation, or on the board’s website that will provide information on what a graduate will need to demonstrate when applying for licensure. Whether, for example, a transcript with course titles that align will suffice, course descriptions from a syllabus or catalog are needed, or whether submission of a full syllabus with descriptions at the assignment or activity level is required to show alignment with course requirements. Examples of each of these are provided in the next section.

**Some points to consider in your curriculum analysis:**

- Generally, a course can only be used to meet the requirements in one area unless a Board specifically indicates it can be used in more than one area.
- Generally, a course can be considered to align to a content area if at least 50% of that course addresses the content area.
- Check for language, typically in statute or administrative regulations, as to whether courses or credits need to be within the degree program or not.

**Example 4.** When a transcript showing course titles that align with state or territory educational course requirements is sufficient.

In the spreadsheet graphic shown below, the educational program has listed their courses that align with the state requirement of 30 semester hours in accounting that include managerial accounting, financial accounting, taxation and audit and 24 semester hours in business that include 2 semester hours in business communication and 3 semester hours in business ethics.


State Content Area	Definition (if provided)	Credits/Hours Required	Course Name/Number	Week/Activity	Course Credits/Hours	Not	
Accounting	30 semester credit hours in accounting that include <b>Managerial Accounting</b> , Financial Accounting, Taxation and Audit.	30 semester	AC222 Accounting Concepts			3	
			AC223 Financial Accounting Principles			3	
			AC320 Federal Tax			3	
			AC321 Intermediate Accounting I			3	
			AC322 Intermediate Accounting II			3	
			AC324 Cost Accounting			3	
			AC325 Accounting Information Systems			3	
			AC426 Auditing			3	
			AC428 Advanced Accounting			3	
			AC427 Governmental and Not-For-Profit Accounting (CPA track)			3	
			BU385 International Business Environment			3	
			BU312 Business Law I			3	
			Other Business	24 semester credit hours in business that include 2 semester credit hours in <b>Business Communication</b> and 3 semester credit hours in <b>Business Ethics</b> .	24 semester	BU452 Strategic Management	
FN341 Corporate Finance						3	
MG219 Principles of Management						3	
MK217 Principles of Marketing						3	
PH362 Business Ethics						3	
BU413 Business Law II (CPA track)						3	
E328 Professional Communication						3	

This spreadsheet can be used to file as verification that the program meets the requirements for this state or territory and to communicate to students what courses they need to take (should there be an elective choice).



**Example 5.** The Minnesota Board of Behavioral Health provided a required course guide for applicants recommending submitting a copy of the course description from the course catalog, a copy of the course syllabus, or a letter from the course instructor indicating that a particular course falls within a required content area.

Professional Counselor Example: Minnesota




Applicant's Name: \_\_\_\_\_  
(Please print)

**REQUIRED COURSEWORK GUIDE**

**PLEASE NOTE: THESE DESCRIPTIONS OF REQUIRED COURSE WORK ARE GUIDELINES ONLY TO ASSIST APPLICANTS IN DETERMINING WHICH COURSES MAY FALL WITHIN A REQUIRED CONTENT AREA. THEY ARE NOT INTENDED TO BE A DEFINITIVE LIST OF THE SUBJECTS WHICH MAY BE USED TO MEET A PARTICULAR CONTENT AREA. HOWEVER, APPLICANTS MUST BE ABLE TO SUPPORT LISTING A PARTICULAR COURSE AS MEETING A REQUIRED CONTENT AREA. YOU MAY DO SO BY SUBMITTING A COPY OF THE COURSE DESCRIPTION FROM THE COURSE CATALOG, SUBMITTING A COPY OF THE COURSE SYLLABUS, OR HAVING THE COURSE INSTRUCTOR SEND A LETTER DIRECTLY TO THE BOARD OFFICE INDICATING THAT A PARTICULAR COURSE FALLS WITHIN A REQUIRED CONTENT AREA.**

**1. The Helping Relationship, Including Counseling Theory and Practice.** Includes studies that provide an understanding of counseling and consultation processes, including both individual and systems perspectives. This includes basic interviewing, assessment, and counseling skills; characteristics and behaviors that influence helping processes, including verbal, nonverbal, and personal client or consultee; and ethical considerations.

**2. Human Growth and Development.** Includes studies that provide an understanding of the nature and needs of individuals at all developmental levels. This includes, but is not limited to, theories of individual and family development across the lifespan, theories of learning and personality development; understanding of developmental crises, disability, addictive behavior, psychopathology, and environmental factors as they affect normal and abnormal behaviors; and ethical considerations.




Required coursework guide provided by the Minnesota Board of Behavioral Health and Therapy

**Example 6.** Understanding statute and regulations together

The code requires nine credits in Marriage and family studies that, in the description, include theoretical foundations, family systems theories, and preventative approaches. The regulations further clarify how the nine credits should be divided between those three areas. Total credits across all areas = 39 out of 60.

MFT Example: District of Columbia

<p>D.C. Code</p> <p><b>Marriage and family studies (9)</b>          (i) <b>Theoretical foundations</b>, history, philosophy, etiology and contemporary conceptual directions of marriage and family therapy or marriage and family counseling;          (ii) <b>Family systems theories</b> and other relevant theories and their application in working with a wide variety of family structures, including families in transition, nontraditional families and blended families, and a diverse range of presenting issues; and          (iii) <b>Preventative approaches</b>, including premarital counseling, parent skill training and relationship enhancement, for working with couples, families, individuals, subsystems and other systems;</p> <p><b>Marriage and family therapy (9)</b></p> <p><b>Human development (9)</b></p> <p><b>Psychological and mental health competency (6)</b></p> <p><b>Professional ethics and identity (3)</b></p> <p><b>Research (3)</b></p> 	<p>D.C. Municipal Regulations</p> <p><b>Family systems theories (3) and marriage and family studies</b>          (a) A minimum of three (3) semester hours in <b>family systems theories</b> and their application in working with a wide variety of family structures, which shall include:          (1) Studies of families in transition, nontraditional families and blended families; and          (2) A diverse range of marriage and family issues presented in a clinical setting;          (b) A minimum of six (6) semester hours of marriage and family studies, which shall include:          (1) <b>Theoretical foundations</b>, history, philosophy, etiology and contemporary conceptual directions of marriage and family therapy or marriage and family counseling; and          (2) <b>Preventative approaches</b>, including premarital counseling, parent skill training and relationship enhancement, for working with couples, families, individuals, subsystems and other systems;</p>
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Regulations provide additional clarification on the code.



As you research educational requirements, look specifically to see if the state or territory allows an applicant to take required course credits outside of the degree program.

**Example 7.** The Illinois Marriage and Family Therapy Licensing and Disciplinary Board instructs the applicant to submit a syllabus for each course, proof of acceptable completion of the course, and all documentation necessary to demonstrate that the post-degree institution and the specific course meet all requirements.

State/Territory	Specific Number of Coursework Credits (hours)?	Credits required within the degree program?	Practicum/Internship Hours (if needed) IN PROGRAM	Clinical Supervision Hours (for licensure)? AFTER GRADUATING	Exam(s) Required (could include state)	Other Requirements for Licensing (background, training, etc.)	Board Approval of Program Required?	Board Approval of Clinical Placements	
Illinois	48 semester hours or	No							
Illinois	48 semester hours or	From the Board's website instructions AC-MFT form - This form is completed by the applicant. Applicants completing core area coursework at more than one college or university may submit a separate AC-MFT form for each college or university through which marriage and family therapy coursework was completed.							
Indiana	twenty-seven (27) semester hours or	e) Courses taken at a post-degree institution may count as equivalent for an education requirement of subsection (b) if the institution's training program is accredited by the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) or meets the following requirements: 1) The institution's program is established to achieve coherent mission and training objectives and the program has as its primary objective the training of marriage and family therapists.							
Indiana	twenty-seven (27) semester hours or	2) The specific course submitted as equivalent to those defined in subsection (b) is taught by faculty who hold graduate degrees and are trained and credentialed in the field in which they teach.							
Iowa	60 semester hours (or 80 quarter hours or	3) Courses must be offered by an established, identifiable facility or agency.							
Iowa	60 semester hours (or 80 quarter hours or	4) Courses must be ongoing and additive (offered at the same place over a specific period of time and available on an ongoing basis) or offered off site by an acceptable post degree institution with an established, identifiable home-base facility or agency.							
Kansas	COAMFTE	5) Courses must include outlines, clear description of content, appropriate bibliography, and other indications or meet generally acceptable criteria for academic offerings.							
Kansas	COAMFTE	6) Correspondence courses are not acceptable.							
Kansas	COAMFTE	f) Credit for courses taken pursuant to subsection (e) will be given on a semester-hour equivalency basis which is 15 classroom hours per semester credit. Evaluation of course work is on a case-by-case basis for each applicant. To receive credit, an applicant must submit a syllabus for each course, proof of acceptable completion of the course, and all documentation necessary to demonstrate that the post-degree institution and the specific course meet all the requirements of subsection (e).							
Kansas	COAMFTE	Ill. Admin. Code tit. 68, § 1283.30							

Information on the Board's website clarifies the applicant may complete core area coursework at more than one college or university. The Illinois Admin. Code requires the institution to meet requirements of the subsection.

**Example 8.** When your program does not meet course requirements

**HELP Example: WI Counselor Curriculum Comparison (continued)**

State	State Curriculum Requirements	Course	Notes	Course description (if provided)
	Research and Evaluation (3 credits)	Statistical Techniques and Research Methods (3 cr) Evaluation Methodologies (2 cr)	Elective course	'Research and evaluation.' Studies that provide a bro
	Professional Counseling Orientation (3 credits)	Ethics and Professional Issues (3 cr)		'Professional counseling orientation.' Studies that pro
	Foundations of Clinical Mental Health Counseling or Clinical Rehabilitation Counseling (3 credits)	Foundations of Clinical Mental Health Counseling (3 cr)		At least 3 semester hours or 4 quarter hours in one of the following: 1. 'Foundations of clinical mental health counseling.' If the academic program has an emphasis in mental
	Clinical Mental Health Counseling Diagnosis and Treatment Planning or Rehabilitation Counseling Diagnosis and Treatment Planning (3 credits)	Psychopathology (3 cr)		At least 3 semester hours or 4 quarter hours in one of the following: 1. 'Clinical mental health counseling diagnosis and
	Crisis and Trauma Counseling (3 credits)	Living with Experiences of Trauma (2 cr)	Need one additional credit May be missing content	'Crisis and trauma counseling.' Studies that include counseling approaches that effectively address crises and trauma, the impact of trauma and crisis
	Abnormal Behavior and Psychology (3 credits)	Advanced Psychopathology (2 cr)	Need one additional credit	'Abnormal behavior and psychopathology.' Studies that include concepts of psychopathology and
	Addictions Counseling (3 credits)	Chemical Dependency	Need one additional	'Addictions counseling.' Studies that provide an

The program does not meet course requirements and the admin. code requires all coursework must be taken within the program

(Wis. Admin. Code MPSW § 14.01 (2))



In addition to required courses, that state or territory may require supervised experience that is required to be included in the degree program.

The Indiana Behavioral Health and Human Services Licensing Board requires an applicant for a marriage and family therapist associate license to have completed at least one supervised clinical practicum, internship, or field experience, in a marriage and family counseling setting that must meet the requirements listed in both statute and administrative code.

A screenshot from the Board’s website, shown below, provides the reader with the level of detail needed to understand the primary requirements for an in-program supervised experience. If a Board does not provide this level of information, a review of the relevant statute and administrative regulations will be necessary.

**HELP TIP:** *A review of the relevant state or territory statute and administrative regulations is important to ensure the information available on the Board’s website reflects the current requirement.*

### Example 9. In-program supervised experience

The screenshot shows the Indiana Professional Licensing Agency (PLA) website. The header includes a menu icon, the PLA logo, and the text "Indiana Professional Licensing Agency". A search bar on the right contains the text "Search PLA". Below the header, there is a section titled "License Update option." followed by a list of requirements:

- **Form III- Verification of Graduate Coursework:** Applicants for a marriage and family associate license must have received a master's or doctor's degree in an area of marriage and family therapy, **or in a related area as determined by the board**, from an eligible postsecondary educational institution that meets the requirements of the board. All education criteria must be met by postsecondary educational courses. **Certifications cannot be used to meet educational requirements.**
- **Form P- Verification of Practicum:** Applicants must complete at least one (1) supervised practicum, internship, or field experience in a marriage and family counseling setting, which must include a minimum of five hundred (500) hours. The five hundred (500) hours of marriage and family therapy services must be broken down into the following:
  - Four hundred (400) must be client contact hours,
  - Two hundred (200) hours must be relational hours under the supervision of a licensed marriage and family therapist who has at least five (5) years of experience or a qualified supervisor approved by the board.
  - One Hundred (100) hours of supervision from an LMFT who has at least five (5) years of experience. This supervision may be group, individual, or some combination thereof.
- **Official Transcripts:** Applicants must upload an official transcript from each school listed on Form C. The transcripts from which you obtained your degree must show that all requirements for graduation have been met and the date the degree was conferred.

A state or territory may require board approval of an out-of-state program or clinical experience. The spreadsheet example below shows the categories of research a program will need to understand whether their program meets requirements of the state or territory for board approval of program or clinical/field placement, faculty and clinical (including preceptor) qualifications, and other state or territory requirements related to program delivery or clinical experiences.

**Example 10.** Board approval of out-of-state program or clinical experience

Please review "Key" tab for important information for understanding and using this spreadsheet.										
State/Jurisdiction	Board/Agency Name	Board Website	Board Approval of Clinical/Field Placements for Out-of-State Programs?	Which Programs Require Approval?	Link to Approval Requirements	Faculty License Requirements-Didactic?	Faculty License Requirements - Clinical (including preceptors)?	Which Programs Require Faculty/Preceptor or Licensing?	Other State Requirements Related to Program Delivery or Clinicals for	Citations to State Statute Regulations, Rules
Alabama	Alabama Board of Nursing (ABN)	<a href="https://www.abn.alabama.gov/">https://www.abn.alabama.gov/</a>	Yes. 610-X-3-.09. Out Of State Programs Conducting Clinical Experience In	APRN and Post-Licensure	<a href="https://www.abn.alabama.gov/wp-content/uploads/2021/03/">https://www.abn.alabama.gov/wp-content/uploads/2021/03/</a>	610-X-3-.01 (14) Nursing Faculty: Registered	610-X-3-.01 (9) Clinical Supervisor, Clinical	APRN and Post-Licensure	None Found	AL ST § 34-21 AL ADC 610-3
Alaska	Alaska Board of Nursing	<a href="https://www.abn.alaska.gov/">Board of Nursing, Professional Licensing.</a>	No, but registration of individual student required. 12 AAC 44.460.	APRN	<a href="https://www.commerce.alaska.gov/web/portals/5/pub/nur42">https://www.commerce.alaska.gov/web/portals/5/pub/nur42</a>	None Found	12 AAC 44.460. Preceptorships. (f) A preceptor must	APRN	None Found	AK ST § 08.68 12 AK ADC 44
Arizona	Arizona State Board of Nursing	<a href="https://www.azbn.gov/">https://www.azbn.gov/</a>	No. EXEMPTION FOR CERTAIN OUT-OF-STATE	N/A	N/A	From NCSBN website: Didactic faculty	From NCSBN website: Clinical faculty	APRN	None Found	AZ ST § 32 AZ ADC R4-15

**HELP TIP:** *It can be difficult to understand if board approval is necessary. Check the definition sections in statute and administrative regulations to identify if the board has defined the type of institution, program, or clinical experience that meets their approval.*

Another area you will want to specifically look for is whether the Board has residency requirements. The two examples provided below show a state’s residency requirement of one academic year of full-time academic graduate study in marriage and family therapy and a state’s requirement that half of all skill-based coursework be in residency.

**Example 11.** Residency requirement of full-time academic graduate study

**MFT Example: NH - Residency Requirement**

(d) A minimum of one academic year of full-time academic graduate study in marriage and family therapy shall be completed **in residence at the institution granting the degree.**

(e) Whether graduate study was completed in residence shall be **determined based on criteria which include the following:**

- (1) Predominant modality shall be face-to-face instruction;
- (2) Advising and evaluation shall be done face-to-face;
- (3) Students shall have face-to-face access to a core of marriage and family counseling faculty whose primary time and employment responsibilities are to the institution; and
- (4) Students shall have face-to-face access to other students matriculated in the program.


N.H. Code Admin. R. § 01

**Example 12.** Residency requirement for half of all skill-based coursework

**Example: Kansas - Residency requirement - LCAC**

(g) Each applicant for licensure as a clinical addiction counselor shall have satisfactorily completed formal academic coursework that contributes to the development of a broad conceptual framework for addiction counseling theory and practice. This formal academic coursework shall be distributed across the substantive content areas specified in this subsection. For applicants who graduate on or after July 1, 2013, half of all skill-based coursework shall be **completed while the student is in residence**, as defined in this regulation. A maximum of three graduate semester hours, or the academic equivalent, may be completed in independent study.

(a) (2) "In residence," when used to describe a student, means that the student is present at the physical location of the institution or at any other location approved by the board for the purpose of completing coursework, during which the student and one or more core faculty members, adjunct faculty members, or agency internship supervisors are in face-to-face contact.



**Example 13.** Training requirements outside of program


In addition to your determination as to whether your program “meets” or “does not meet” educational requirements, does your program assist students in meeting state/territory training requirements that are not required to be provided in the program?

**Social Work Example: California**

University curriculum subject matter experts will need to populate the course name/number in each corresponding state-required course content area. Generally, state boards will only if the course addresses the content area. Typically, state boards consider 1 semester credit to be equivalent to 15 clock hours.

Note, that for all of these course content areas, graduates from out-of-state programs may have the ability to complete additional courses or training after graduating from the degree program. Column D indicates if courses must be part of program or can be completed after graduating (through another institution or continuing education provider).

State Name (License Title)	State Content Area	Definition (if provided)	Must be taken as part of degree program?	Credit/Hours Required	University Course Name/Number	Week/Activity	University Course Credits/Hours
<b>Coursework/training hours required for first level license required by state after graduating from MSW</b>							
California (ASW)	California Law and Ethics	Advertising, scope of practice, scope of competence, treatment of minors, confidentiality, dangerous patients,	No	12 clock hours			
	Suicide risk assessment and intervention	N/A	No	6 clock hours			
	Child abuse assessment and reporting in California	N/A	No	7 clock hours			
	Human Sexuality	N/A	No	10 clock hours			
	Alcoholism and Chemical substance abuse and dependency	N/A	No	15 clock hours			
	Ageing, long term care and	N/A	No	10 clock hours			





## Licensure Disclosure Requirements and Examples

This section outlines requirements and provides examples to comply with current federal regulations and State Authorization Reciprocity Agreement (SARA) Policy. Note that proposed changes to ED Title IV regulations and SARA policy could significantly change these examples. Also, at the time of creation of this guide, VA and State Approving Agencies (SAA) have not provided any guidance on recently created requirements.

### Public Disclosures for Title IV and SARA

[34 CFR 668.43\(a\)\(5\)\(v\)](#) requires public disclosures for any program designed or advertised as leading to a professional license (or certification) required for employment in a U.S. state or territory. Statement if program “meets”, “does not meet”, or “no determination made” for each licensure program for all U.S. states and territories (59).

[SARA Policy Manual v. 22.1 § 5.2](#) indicates institutions must make “all reasonable efforts” to determine if a program will meet requirements. If unable to determine, must include current contact information for licensing board/agency and advise the student or applicant to determine whether the program meets requirements for licensure in the state where the student is located.

### Minimum Compliance

Each state/territory should be listed as “meets”, “does not meet” or “not determined” for each licensure program. To comply with SARA policy, the contact information for the state/territory licensing board or agency must be included if “not determined”.

The **<NAME OF PROGRAM>** program **meets** state/territory educational requirements for professional licensure in the following states/territories:

The **<NAME OF PROGRAM>** program **does not meet** state/territory educational requirements for professional licensure in the following states/territories:

We **have not made a determination** if the **<NAME OF PROGRAM>** program meets state/territory educational requirements for professional licensure in the following states/territories:



*For each state/territory that is on this list, must include the following, per SARA policy:*

Contact information for the **<STATE/TERRITORY>** licensing board or agency for **<TYPE OF PROFESSION>** can be found on the **<NAME OF BOARD/AGENCY>** website. **<LINK TO WEBSITE>**

You should contact **<NAME OF BOARD/AGENCY>** to try to determine whether the program meets requirements for licensure.

### **Better Practice**

The **<NAME OF PROGRAM>** program **meets** state/territory educational requirements for professional licensure in the following states/territories:

The **<NAME OF PROGRAM>** program **does not meet** state/territory educational requirements for professional licensure in the following states/territories:

The following states/territories do not issue a **<NAME OF LICENSE>** license:

We **have not made a determination** if the **<NAME OF PROGRAM>** program meets state/territory educational requirements for professional licensure in the following states/territories:

*For each state/territory that is on this list, must include the following, per SARA policy:*

Contact information for the **<STATE/TERRITORY>** licensing board or agency for **<TYPE OF PROFESSION>** can be found on the **<NAME OF BOARD/AGENCY>** website. **<LINK TO WEBSITE>**

You should contact **<NAME OF BOARD/AGENCY>** to try to determine whether the program meets requirements for licensure.

### **HELP Tips**

*Title of webpage or section of webpage where disclosures are provided should be clear, for example, "Professional Licensure Disclosures" or "State Licensure Disclosures". Webpage should take 3 clicks or less to find from the institution's homepage.*



*Include introductory information that educational requirements can change and additional requirements, such as exams, supervised experience, background checks, etc. may be required.*

### **Sample Introductory Information**

Below is a list of programs that are designed for professional licensure along with information to comply with [34 S.C.F.R. 668.43](#) and [NC-SARA Policy Manual v. 22.1 § 5.2](#)

**Licensure is individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. **<INSTITUTION NAME>** cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

**Additional requirements.** Completing a program is typically only one part of the professional licensure requirements. Most states require that individuals meet additional requirements in order to qualify for licensure, including but not limited to additional coursework and training, supervised clinical experiences, and successful passage of state or national exams. Other licensure requirements typically include, but are not limited to, fees, background checks, years of work experience, references, fingerprinting requirements, etc.

**Potential changes in requirements.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at any time. While a program may originally meet the educational requirements for licensure, changes in requirements could impact the program's ability to meet new educational requirements. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

### **Public Disclosures for Veterans Affairs**

The Department of Veterans Affairs announced a final rule, modifying [38 CFR 21](#), on January 18, 2023, effective on February 17, 2023. At the time this guide was created, no guidance has been released from Veterans Affairs or State Approval Agencies. It is unclear if the new licensure and disclosure requirements apply only to the state/territory where the institution holds SAA



approval or all states/territories where students are located.

- Program must meet all instructional curriculum licensure requirements
- Plus Additional Disclosures
  - *Publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation.*
    - Training could include things like CPR, mandated reporter, state-specific history or ethics courses. Any type of continuing education, board-sponsored learning, or hands-on experiences that are in addition to the academic program requirements, required for the first or initial license for that profession/occupation.
    - Experience could include supervised clinical experience after graduation (Licensed Professional Counselor), work experience earned prior to or simultaneously with the academic program (Alcohol and Drug Counselor), specific amount of time worked in the field (P-12 Principal).
    - Examinations could include any state-specific or national exams.
    - Most licenses also require criminal background check and/or fingerprinting, along with U.S. citizenship and/or authorization to work.
    - Many licenses also have a minimum age and residency requirements.
    - Some licenses require applicants to earn a non-governmental organization issued certification first. (e.g. Nurse Anesthetists)

### ***Minimum Compliance***

In addition to the educational requirements for **<NAME OF LICENSE>** licensure in **<STATE OR TERRITORY>**, the following additional requirements must be met:

**<INSERT POST-GRADUATION SUPERVISED EXPERIENCE OR OTHER WORK EXPERIENCE>**

**<INSERT EXAMINATIONS>**

**<INSERT ANY TRAINING OR CONTINUING EDUCATION REQUIRED FOR INITIAL/FIRST LICENSE OUTSIDE OF PROGRAM>**



Students should also be aware that criminal background, citizenship status, residency, age, and other factors may be a condition for licensure in **<STATE OR TERRITORY>**. Students are advised to review all available information on the **<STATE OR TERRITORY>** licensing board website **<INSERT LINK TO BOARD WEBSITE>**.

## Location Policy

[34 CFR 668.43\(c\)\(3\)\(ii\)](#) requires institutions to have a written policy and documented process for establishing location of prospective students and students that must be applied equally across all students/programs. Policy and process should have regular, frequent review and updates as needed. This location policy will be used to determine prospective student/student location for purposes of individual direct disclosures.

Consider the following when creating your policy and process:

- How/when do students notify you of change in location? I.e. relocation
- How/when do you confirm location of students?
- State Authorization Reciprocity Agreement (SARA) Policy considerations
- Consider asking prospective students where they intend to work after graduating and send disclosure for that location (in addition to current location)
- Include General Counsel in crafting policy, to assess risks of different approaches

### *Examples from Institutions*

**Example 1.** For the purposes of professional licensure disclosure compliance, this institution determines student location and time of enrollment in the following ways:

- “Student location” is defined as the permanent mailing address, or “Home” address, provided to the university by the student and stored in the student’s record. This definition applies to all students.
- “Time of Enrollment” is defined as the point at which students have been admitted to a program or major, but have not yet registered for courses in that program or major.

**Example 2.** Institutions will determine the location of a student for purposes of providing accurate professional licensure disclosures in the following way. The “Local Address” field within the university’s Student Information System (SIS) will be recorded as each student’s location.



The university defines the Local Address as, “A physical address where a student currently or will live and/or frequently stay during the time they will be taking classes for the upcoming term. It is a place of residence where someone would be most likely to find the student; where the student puts their head down at night.”

### **Example 3. Student location**

For the purpose of this policy, institutions must determine student location (i.e., state) in order to disclose state-specific professional licensure information:

1. At the time of the student’s initial enrollment in an educational program, and
2. Upon formal notification by the student of a change in the student’s location

All other College and system policies that determine residency for the purpose of tuition assessment are not superseded by this policy.

### ***Prospective student location***

For the purpose of this policy, a prospective student’s location is the state of the prospective student’s residency at the time the student has applied for admission, intends to enroll and is then entered into the student record system. For students whose permanent address does not include a U.S. state or territory (e.g., students living outside the United States), their location will be considered the state of Minnesota.

### ***Enrolled student location***

The student location for enrolled students is the state where the enrolled student resides and is based on the permanent home address entered into the student record system. For students whose permanent address does not include a U.S. state or territory (e.g., students living outside the United States), their location will be considered the state of Minnesota.

### ***Change of location***

Student location designations will remain in effect unless and until a student officially notifies the College that their permanent address has changed. Once a student notifies the College, the date of entry will be used as the effective date of a student’s revised location for the purposes of this policy. If a student does not notify the College of a change of address and their permanent address has been end dated in the student record system because mail was returned as undeliverable, their location will be considered the state of Minnesota.



## Individual Direct Disclosures

[34 CFR 668.43\(c\)](#) requires notification to prospective students located in a “does not meet” or “no determination made” state or territory in writing, which may include through email or other electronic communication, prior to enrollment. Enrollment is understood as completed registration requirements, except for payment of tuition and fees. In other words, enrollment is prior to financial commitment to the institution. Current students must be notified in writing within 14 calendar days of making the determination that the program “does not meet” educational requirements.

[NC-SARA Policy Manual v. 22.1 § 5.2](#) indicates institutions must make “all reasonable efforts” to determine if a program will meet requirements. SARA does not define “all reasonable efforts.” If unable to determine, must include current contact information for licensing board/agency and advise the student or applicant to determine whether the program meets requirements for licensure in the state where the student is located.

**HELP TIP:** *Try to insert individual licensure disclosures into existing communication processes (i.e. admission forms, with an address change, etc). Collect acknowledgment of receipt through application, enrollment agreement, or other means.*

### **Prospective Students: Minimum Compliance**

Dear <PROSPECTIVE STUDENT>,

You have indicated an interest in the <**INSTITUTION NAME**>'s <**NAME OF PROGRAM**> and you have indicated you are located in <**STATE/TERRITORY NAME**>.

Our program does not meet the educational requirements for licensure in <**STATE/TERRITORY NAME**>.

We encourage you to review licensure information for any state or territory where you may work after completing the program <**PUBLIC DISCLOSURE PAGE LINK**>

**Potential changes in requirements.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at



any time. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

**Licensure is individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. **<INSTITUTION NAME>** cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

**Additional requirements.** Completing a program is typically only one part of the professional licensure requirements. Most states require that individuals meet additional requirements in order to qualify for licensure, including but not limited to additional coursework and training, supervised clinical experiences, and successful passage of state or national exams. Other licensure requirements typically include, but are not limited to, fees, background checks, years of work experience, references, fingerprinting requirements, etc.

Thank you for your interest in our program,

**<DEAN or PROGRAM DIRECTOR NAME>**

Dear **<PROSPECTIVE STUDENT>**,

You have indicated an interest in the **<INSTITUTION NAME>**'s **<NAME OF PROGRAM>** and you have indicated you are located in **<STATE/TERRITORY NAME>**.

We have not determined if our **<NAME OF PROGRAM>** program meets the educational requirements for licensure in **<STATE/TERRITORY NAME>**.

**You should contact the <STATE LICENSING BOARD NAME> at <WEBSITE> and <PHONE NUMBER> to determine if this program will meet educational requirements for licensure.**

We encourage you to review licensure information for any state or territory where you may work after completing the program **<PUBLIC DISCLOSURE PAGE LINK>**





**Potential changes in requirements.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at any time. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

**Licensure is individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. <INSTITUTION NAME> cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

**Additional requirements.** Completing a program is typically only one part of the professional licensure requirements. Most states require that individuals meet additional requirements in order to qualify for licensure, including but not limited to additional coursework and training, supervised clinical experiences, and successful passage of state or national exams. Other licensure requirements typically include, but are not limited to, fees, background checks, years of work experience, references, fingerprinting requirements, etc.

Thank you for your interest in our program.

<DEAN or PROGRAM DIRECTOR NAME>

### ***Prospective Students: Better Practice***

Send email to **all prospective students** with some details about requirements for licensure in the state/territory where they are located.

Dear <PROSPECTIVE STUDENT>,

You have indicated an interest in the <INSTITUTION NAME's> <NAME OF PROGRAM> and you have indicated you are located in <STATE/TERRITORY NAME>.



Our program does not meet the educational requirements for licensure in  
<STATE/TERRITORY NAME> OR

Our program meets the educational requirements for licensure in  
<STATE/TERRITORY NAME>

OR

We have not determined if our <NAME OF PROGRAM> program meets the  
educational requirements for licensure in <STATE/TERRITORY NAME>

OR

<STATE/TERRITORY NAME> does not issue a <NAME OF LICENSE> license.

**Know What is Required.** You are responsible for reviewing and understanding  
licensure requirements, as a future licensed professional.

#### **Educational Requirements.**

<INCLUDE INFORMATION ABOUT SPECIALIZED ACCREDITATION BEING  
REQUIRED OR ACCEPTED, SPECIFIC COURSES, AND/OR SPECIFIC  
IN-PROGRAM SUPERVISED EXPERIENCE (PRACTICUM/INTERNSHIP) AND  
HOW THE PROGRAM MEETS OR DOES NOT MEET THOSE REQUIREMENTS>

We encourage you to review licensure information for any state or territory  
where you may work after completing the program <PUBLIC DISCLOSURE  
PAGE LINK>

**Additional Requirements.** Completing a program is typically only one part of  
the professional licensure requirements. Most states and territories require  
that individuals meet additional requirements in order to qualify for licensure,  
including but not limited to additional coursework and training, supervised  
clinical experiences, and successful passage of state or national exams. Other  
licensure requirements typically include, but are not limited to, fees,  
background checks, years of work experience, references, fingerprinting  
requirements, etc.

#### **Exam Requirements.**

<INCLUDE INFORMATION ABOUT ANY EXAMS>

#### **Additional Training Requirements.**

<INCLUDE INFORMATION ABOUT TRAINING/CONTINUING EDUCATION  
REQUIRED FOR INITIAL LICENSURE>

#### **Experience Requirements.**



**<INCLUDE INFORMATION ABOUT SUPERVISED OR WORK EXPERIENCE  
REQUIRED OUTSIDE OF THE PROGRAM AND/OR AFTER GRADUATING>**

**Potential Changes.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at any time. While a program may originally meet the educational requirements for licensure, changes in requirements could impact the program's ability to meet new educational requirements. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

**Licensure is Individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. **<INSTITUTION NAME>** cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

**Thank you for your interest in our program.**

**<DEAN or PROGRAM DIRECTOR NAME>**

## **Current Students**

Must send individual direct disclosure (email) within 14 calendar days of changing from “not determined” or “meets” to a “does not meet” location. This could be due to the student changing locations, the state changing the educational requirements for the license, or the program making curriculum changes.

### ***Current Students: Minimum Compliance***

Dear Student,

You are enrolled in **<NAME OF PROGRAM>** and you have indicated you are located in **<STATE/TERRITORY NAME>**.



Our program does not meet the educational requirements for licensure in <STATE/TERRITORY NAME>

We encourage you to review licensure information for any state or territory where you may work after completing the program <PUBLIC DISCLOSURE PAGE LINK>.

**Potential changes in requirements.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at any time. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

**Licensure is individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. <INSTITUTION NAME> cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

**Additional requirements.** Completing a program is typically only one part of the professional licensure requirements. Most states require that individuals meet additional requirements in order to qualify for licensure, including but not limited to additional coursework and training, supervised clinical experiences, and successful passage of state or national exams. Other licensure requirements typically include, but are not limited to, fees, background checks, years of work experience, references, fingerprinting requirements, etc.

Thank you for being part of our program.

<DEAN or PROGRAM DIRECTOR NAME>

### **Current Students: Better Practice**

**HELP TIP:** Prior to sending this email, have academic or faculty advisor try to reach the student by phone to let them know about the email. At a minimum provide a phone number for the student to reach an academic or faculty advisor who can talk to them about the changes in licensure.



Dear Prospective Student,

You are enrolled in **<NAME OF PROGRAM>** and you have indicated you are located in **<STATE/TERRITORY NAME>**.

Our program does not meet the educational requirements for licensure in **<STATE/TERRITORY NAME>**. We know that you may have questions about this. Please contact **<NAME>** at **<PHONE NUMBER>**.

**Educational Requirements.**

**<INCLUDE INFORMATION ABOUT SPECIALIZED ACCREDITATION BEING REQUIRED OR ACCEPTED, SPECIFIC COURSES, AND/OR SPECIFIC IN-PROGRAM SUPERVISED EXPERIENCE (PRACTICUM/INTERNSHIP) AND HOW THE PROGRAM DOES NOT MEET THOSE REQUIREMENTS>**

We encourage you to review licensure information for any state or territory where you may work after completing the program **<PUBLIC DISCLOSURE PAGE LINK>**

**Potential Changes.** Licensure information is reviewed and updated on an annual basis. Licensure requirements are subject to changes at any time. Students should periodically check with the state licensure board or agency in the state(s) they intend to work in to confirm licensure requirements.

**Additional Requirements.** Completing a program is typically only one part of the professional licensure requirements. Most states require that individuals meet additional requirements in order to qualify for licensure, including but not limited to additional coursework and training, supervised clinical experiences, and successful passage of state or national exams. Other licensure requirements typically include, but are not limited to, fees, background checks, years of work experience, references, fingerprinting requirements, etc.

**Exam Requirements.**

**<INCLUDE INFORMATION ABOUT ANY EXAMS>**

**Additional Training Requirements.**

**<INCLUDE INFORMATION ABOUT TRAINING/CONTINUING EDUCATION REQUIRED FOR INITIAL LICENSURE>**



### **Experience Requirements.**

**<INCLUDE INFORMATION ABOUT SUPERVISED OR WORK EXPERIENCE REQUIRED OUTSIDE OF THE PROGRAM AND/OR AFTER GRADUATING>**

**Licensure is Individual.** Only licensure boards or agencies can determine whether a program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for a license. After all reasonable efforts, we have provided our best assessment of how our program matches up to educational requirements for the license. **<INSTITUTION NAME>** cannot guarantee the ability to earn any professional license, in any field, in any state or territory.

Thank you for being part of our program.

**<DEAN or PROGRAM DIRECTOR NAME>**

### **Other Considerations**

The idea behind licensure disclosures is to ensure that students understand where/how their program will meet licensure requirements and, most importantly, where it will not.

- Think about the most effective way to communicate to your students, this may not be email. Is it through admission or advising staff? Faculty advisors? Program orientation? Written disclosures are required to satisfy the federal regulations and SARA policy, but also including a verbal notification of the information in the email may reach more students.
- Integrate licensure topics into assignments in all licensure programs. At a minimum, students should be required to visit their licensing board/agency website, review the application process and all requirements for licensure. There are many requirements beyond educational requirements—exams, background check/fingerprinting, specific training, references, fees etc. Additionally, because students will need to apply for the license after graduating, they should be familiar with the Board and the application process.
- Creating an automated direct disclosure process poses challenges (system constraints, lack of IT support, customized development) but can be worth the additional effort and cost. Keep in mind that student locations will change, licensure requirements will change over time, and program curriculum can change, which all trigger the need for direct disclosures.



## Higher Education Licensure Pros LLC Services

We help higher education institutions fully comply with all professional licensure related laws, regulations, and policies. We help unravel complex and dynamic professional licensure requirements so that students are prepared to apply in any state they plan to work.

### Who we serve

We serve higher education institutions of all types and sizes with programs that lead to a professional license or certification.

### Why you need our help

Professional licensure is complicated! We have over a decade of experience making sense of it. If you don't understand how your programs meet educational requirements for licensure in all states and territories, the time to act is now!

Many colleges and universities struggle to understand and keep up-to-date with licensure requirements across states and professions, due to the time and expertise it takes to complete research. Additionally, changes are made with some regularity and not in unison, across all states and professional fields.

### Our Services

[HELP works with colleges and universities in the following areas:](#)

#### *Research*

Thorough legal research process to identify professional licensure requirements for all U.S. states and territories. We offer [The Bookmark, our one-of-a-kind online knowledgebase of requirements for close to 60 license types for all U.S. states and territories](#). Annual memberships start at \$5000.

#### *Analysis*

Curriculum comparisons in order to understand if academic programs meet the licensure requirements of all states and territories (could include detailed syllabi review).



## ***Communication***

Develop processes to ensure prospective students and students know whether a degree program meets the requirements for their state and profession.

## ***Compliance***

Create systems for meeting public and direct disclosure requirements, along with continued updates for regulatory changes .

We would love the opportunity to see how we can help your institution solve your licensure compliance challenges! [Contact us through our website](#) or call (612) 385-4231.





## Frequently Asked Questions and Answers (FAQ)

These questions from recent webinar attendees and our answers are provided as a resource. The answers are provided by Higher Education Licensure Pros LLC based on our experience. The information provided does not, and is not intended to, constitute legal advice; instead, all information, content, and materials provided are for informational purposes only. Risks to the university/college and students should be considered and evaluated with legal counsel prior to creating policies and communicating licensure information to prospective students and students.

Some of the questions were answered live during the webinars and others were provided to attendees after the webinar due to time constraints. The questions are categorized by general questions on professional licensure; student location policy; public and direct disclosures; SARA policy; miscellaneous; and, Department of Veteran Affairs final rule.

### General questions on professional licensure

**Question 1.** Is there a distinction between licensure and certification? Does this distinction matter for these guidelines?

**Answer 1.** *Yes, that distinction does matter. One challenge when talking about these requirements is that the language used is inconsistent. Federal regulation and SARA policy use both licensure and certification when referring to a state/territory issued credential and authority to practice. Teaching is a common area where you will see certification used by states/territories, rather than license. The bottom line is that any endorsement, certificate, or certification, whatever the issued credential is called, if it is issued by the state or territory, by the Government itself, that is what we are talking about for these disclosures. If it is a private board, agency or nonprofit organization that is issuing some kind of professional certification, those do not fit within this framework. Those are not part of the federal regulation or SARA policy. Only the Government issued credential, whatever that is, that provides someone with the authority to practice in that profession or occupation in that state or territory is included in the federal and SARA disclosure requirements.*



**Question 2.** Are schools relying on "no determination" because the CIP Code -> SOC crosswalk that allows for the licenses search State is unreliable?

**Answer 2.** *In general, as most of you probably know better than we do, CIP codes are not perfect. They are not aligned perfectly with various professions, or with your program, and it is often hard to find that exact match right within CIP codes. And the reality is that CIP codes do not play a part in this federal regulation itself. Using CIP codes can be a useful tool when you are going through the list of programs that your institution offers to use CIP codes as one kind of mechanism to evaluate whether a program is a licensure program or not. But, the CIP codes themselves are not the be all end all here because it is important to know how a particular degree or certificate program has been designed. What are the learning outcomes associated with it? Is the program aligned to any kind of external standards, such as specialized accreditation, or other factors that come into play? Also, how is the program being advertised? If there is language on your website, or in your catalog, or other marketing materials, where there are claims being made about particular types of jobs that are available by completing this program, you have to look really closely at that. Are those jobs or positions ones that do require a professional or occupational license? And if the answer is yes, then that fits in with the category of a licensure program, even though the CIP codes themselves may not be perfectly aligned to a profession that typically requires a license.*

**Question 3.** Do these regulations apply only to for-credit programs?

**Answer 3.** *These apply to any program your students are utilizing Title IV funds for. It does not matter what type of program it is. If it is a program that students are using Title IV funds to enroll in, then the regulations apply.*

**Question 4.** I most often get push back on campus for needing to verify "authorization" or "approval" requirements set by Boards that are not covered by SARA and are not directly related to disclosures about curriculum and licensure. I am thinking about faculty state licensure requirements, clinical placement approval processes, board applications, etc., that would have to be met before we can offer the program in that state. I found lots of resources talking about disclosures that I can share but I have struggled to find items that speak directly to the need to sometimes get Board approval. Do you have any recommendations for addressing this part of the approval process with skeptical stakeholders?



**Answer 4.** *We have not found anything that is comprehensive across professions that outlines requirements for when a program would need to seek some sort of approval or authorization from a state licensing board in order to essentially have your students doing clinical work there or having your program offered in that state, whatever the case may be. There is information that is profession-specific. For example, the National Council of State Boards of Nursing (NCSBN) has very good information on their website on what those particulars are, so the states that do require faculty licensing for didactic courses to be taught in their state or authorization to offer clinical experiences in their state, for example, are provided. They will not have anything that will convince your nursing program on why it is important or how to get “on-board” or anything like that. It is important, because your faculty can get in hot water if they are not licensed in the state and they need to be, or their students can, if they are doing clinicals in the state and they are not supposed to be because they do not have the proper authorization from the licensing entity.*

**Question 5.** Are programs that lead to national industry certifications covered programs?

**Answer 5.** *No, unless a state or territory requires all professionals in that field to hold such industry certification in order to practice the profession/occupation. Sometimes state or territory licensure is directly connected to holding a national industry certification. Current federal regulations and SARA policy only address programs designed or advertised for a state/territory-issued license, certificate, or credential. The language from the regulation 34 CFR 668.43(a)(5)(v), which SARA policy points to, indicates, in part, “(i)f an educational program is designed to meet educational requirements for a specific professional licensure or certification that is required for employment in an occupation, or is advertised as meeting such requirements, information regarding whether completion of that program would be sufficient to meet licensure requirements in a State for that occupation.”*

**Question 6.** How do you know when the state changes its requirements?

**Answer 6.** *There are some state board websites where you can sign up to get alerts when there are any changes but there are not many of those. In most cases, you have to go back to the state legislature website. Look at the posted date of when the license requirement has been updated. Sometimes on the Board website they will post information about upcoming legislative changes*



*or when updates have been enacted. There are also tools available for purchase where you can access state statutes and regulations with proprietary software.*

## **Questions on student location policy**

**Question 7.** Please share with us an example of a student location policy?

**Answer 7.** *Two examples provided. One example demonstrates the institution connecting student location to the permanent address of the student. Practically, that could mean they have those students located all over the country even if most of them are coming to the campus for the program, because they are using the permanent address of the student. The other example shows an institution that is using the student’s temporary mailing address, where that student is going to be “laying their head at night,” when they are taking classes. So, in that instance, if it is a traditional kind of undergraduate program, most are going to be located on the campus or somewhere nearby. Both are valid policies and both are acceptable under current Title IV federal regulation.*

*Crafting a student location policy for licensure disclosures is a complicated undertaking. There are many factors that an institution should consider, including but not limited to, students commuting across state lines, the number of fully online/distance students, the mobility of graduates, and student information system capabilities and limitations. In addition to Title IV regulation, SARA Policy 5.12 should be reviewed to inform a SARA participating institution’s student location policy for licensure disclosures. Keep in mind the spirit of licensure disclosures is to provide students with helpful information that will support their career plans. The student location policy is used to determine which direct disclosures a prospective student and current student receives. To best support the student, institutions may want to consider including a link to public disclosure information in all direct disclosures, with a note to encourage students to review licensure information for any state or territory where they may want to work.*

**Question 8.** I have been under the impression that location determinations had to be based on where the student was physically taking the classes or program. However, some examples showed were on permanent address?



**Answer 8.** For licensure disclosure purposes, Title IV regulations allow institutions to determine their own student location policy. SARA Policy 5.2 for licensure directly references Title IV regulation and indicates that all institutions must follow Title IV regulation for licensure disclosures. SARA Policy 5.12 links a student’s location to where the student is physically located at the time the student is in contact with the educational provider. For licensure disclosures, individual direct disclosures (based on that prospective student’s location as determined by the institution’s location policy) must be provided prior to enrollment in the licensure program for any “not determined” or “does not meet” state or territory, and within 14 days of a change to “does not meet” for current students.

The right student location policy for each institution depends on a number of factors, unique to the institution. There are many factors that an institution should consider including, but not limited to, students commuting across state lines, number of fully online/distance students, mobility of graduates, and student information system capabilities and limitations. It is also important to keep in mind that each institution may define or categorize addresses differently. For some institutions, the permanent address may be the best option to ensure students are receiving meaningful licensure information.

The key to creating a student location policy and direct disclosure process that complies with Title IV regulations and SARA policy is to:

1. Have a written, defensible policy for determining student location (and relocation).
2. Have a process to regularly query (and update) student location (at least the state or territory, if not the full address).
3. Include a link to public disclosures in all direct disclosures and encourage prospective students and current students to check on information for any state or territory that could be relevant to their career plans.

## Questions on public and direct disclosures

**Question 9.** Can public disclosures be made in the University Catalog or do they have to be on a specific webpage on the institution’s website?

**Answer 9.** Yes, they can be included in the University Catalog, as long as it is readily available to prospective and enrolled students. Many institutions choose to include them on their website



*with other required disclosure information. 34 CFR 668.43(a)(5)(v) requires that a listing of all U.S. states and territories (59) is provided with your determination of “meets,” “does not meet,” or “not determined.”*

**Question 10.** What offices on campuses are usually responsible for doing this?

**Answer 10.** *Typically the office that is responsible for state authorization, accreditation and/or other external approvals, is responsible for ensuring that public and direct licensure disclosures are made. The individual/team will need to work closely with the program director/faculty chair for each licensure program to complete research and curriculum comparisons, IT and website staff for creating and updating disclosures, Legal to ensure policies and choices about disclosure conform with institution’s approach to risk, and admissions and enrollment leaders to ensure that direct disclosures are reaching prospective students prior to enrollment.*

**Question 11.** Is there a specific office that you recommend for sending the individual direct disclosure notification for record keeping purposes (Registrar or academic affairs or licensure program)?

**Answer 11.** *Great consideration, you know, really thinking about how you are going to implement this. I would say the actual office itself, or who is sending the email, doesn't matter as much as keeping some kind of record that it was sent. So you may have some kind of enrollment or admission process in place where it makes sense for something to come from the registrar, or it might make more sense to come from the Dean of the school because they're already sending other information about the program and you can integrate the licensure disclosure into that. So not necessarily who's sending it, but just that it is important to keep a record attached to that individual prospective student or current students record that it was sent. And ideally, if you can implement some sort of notification of receipt by the prospective student or student. So maybe you can integrate that into some sort of enrollment agreement that's signed by that applicant - something where it would be an acknowledgment that, Yes, I did receive the license information - a fantastic step in a process if you're able to implement that.*



**Question 12.** Just to be clear, the student loan policy is required per federal regulations?

**Answer 12.** *The disclosure requirements apply to any institution that participates in any student financial assistance program authorized by Title IV of the Higher Education Act of 1965, as amended. The disclosures are required under the section of regulations that outline various institutional information that must be provided to enrolled and prospective students. The specific sections of regulation related to public and direct disclosures are provided here:*

*34 CFR 668.43(a)(5)(v)*

*If an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements, information regarding whether completion of that program would be sufficient to meet licensure requirements in a State for that occupation, including -*

- (A) A list of all States for which the institution has determined that its curriculum meets the State educational requirements for licensure or certification;*
- (B) A list of all States for which the institution has determined that its curriculum does not meet the State educational requirements for licensure or certification; and*
- (C) A list of all States for which the institution has not made a determination that its curriculum meets the State educational requirements for licensure or certification.*

*34 CFR 668.43(c)*

- (1) If the institution has made a determination under paragraph (a)(5)(v) of this section that the program's curriculum does not meet the State educational requirements for licensure or certification in the State in which a prospective student is located, or if the institution has not made a determination regarding whether the program's curriculum meets the State educational requirements for licensure or certification, the institution must provide notice to that effect to the student prior to the student's enrollment in the program.*
- (2) If the institution makes a determination under paragraph (a)(5)(v)(B) of this section that a program's curriculum does not meet the State educational requirements for licensure or certification in a State in which a student who is currently enrolled in such program is located, the institution must provide notice to that effect to the student within 14 calendar days of making such determination.*



(3)

*(i) Disclosures under paragraphs (c)(1) and (2) of this section must be made directly to the student in writing, which may include through email or other electronic communication.*

*(ii)*

*(A) For purposes of this paragraph (c), an institution must make a determination regarding the State in which a student is located in accordance with the institution's policies or procedures, which must be applied consistently to all students.*

*(B) The institution must, upon request, provide the Secretary with written documentation of its determination of a student's location under paragraph (c)(3)(ii)(A) of this section, including the basis for such determination.*

*(C) An institution must make a determination regarding the State in which a student is located at the time of the student's initial enrollment in an educational program and, if applicable, upon formal receipt of information from the student, in accordance with the institution's procedures under paragraph (c)(3)(ii)(A) of this section that the student's location has changed to another State.*

**Question 13.** For programs where licensure is optional and we do not use any marketing language about preparing students for specific licensure, does that mean disclosures are optional? I was thinking of Engineering, where our students can work in their discipline without being a professional engineer, for example.

**Answer 13.** *If there is no state- or territory-required license or credential to work in that occupation of profession in any state or territory, then the disclosure is not required. Note, that even if a small number of states or territories require a license, then it should be included as a licensure program and disclosures provided. Often institutions need to engage in research to have a clear understanding if a program should be included on their list of licensure programs. For example, there are many newer, or less established, licenses that only a fraction of states have adopted (e.g., Behavior Analyst and Music Therapist). Students and graduates will always benefit from having information about licensure, even if the disclosures are not required under federal regulation.*





**Question 14.** At my institution, 95% of our students are from a four-state region. We have completed a review of all licensed professions for which we offer programs in this four-state region. My institution has chosen to only review requirements in states outside of that four-state region once we have a prospective student in that location. Is this what many other institutions are also doing?

**Answer 14.** *That's a great question, and I'll say, I don't feel like I have a broad enough sample to generalize how many other institutions may be taking this approach. From my perspective, this approach is not in line with the current public disclosure requirements under federal regulation and SARA policy. There are two separate things going on-direct disclosures and public disclosures. Student location, which is connected to the direct disclosures, may limit which states/territories direct disclosures are required for. The public disclosures have no connection to student location. The "meets", "does not meet", or "no determination made" statement must be disclosed for all U.S. states and territories (59). Logically that may not make sense for your institution if you only have students coming from four particular States, but nonetheless, that is the current Federal requirement, which SARA Policy reinforces.*

**Question 15.** We will never have students enrolled from some states. Is it safe to just say doesn't meet?

**Answer 15.** *Probably not. The language used in current federal public licensure disclosure requirements includes, "...for which the institution has determined that its curriculum does not meet the State educational requirements for licensure or certification." The presumption is that each institution is making a determination about their curriculum and including in a list of states and territories where it meets, does not meet, or has not determined. Also note that SARA policy requires institutions to make "all reasonable efforts" to determine if a program meets licensure requirements. Simply listing "does not meet" without engaging in any research or comparison may not be a reasonable effort. Additionally, note that there are other federal regulations that could impact the licensure information you provide about your programs, including Misrepresentation ((34 CFR 668.72). Listing states and territories as "does not meet" without engaging in any program comparison may be considered Misrepresentation.*

**Question 16.** Regarding giving direct disclosure information, what happens if a veteran is stationed at a foreign base, or their location is not known?



**Answer 16.** *There's no clear guidance in current Federal regulation around this. I would say If you can incorporate some of this into your student location policy that's going to be good for you and for the prospective students - just to be clear on how you're going to handle this scenario. But ideally, you would attach them to some U.S. state or territory. So maybe they do have a last known U.S. address, or maybe they can give you an address of a family member or something, so that they fit within your student location policy. If there truly is no U.S. address, so if it's a scenario where you're enrolling even folks from outside of the U.S., then obviously, you can't send them a disclosure related to a non-U.S. state or related to another country. You're not going to have that information. And again, just a reminder that this is for purposes of Title IV compliance, so if it's a student who would not be accessing Title IV funds, then it really doesn't fit within these regulations, anyway.*

*Just as a reminder for folks who are working with military connected students and veterans. Sara Appel, MHEC: If you have a question. Please reach out to your school certifying official. They know a lot of the background and a lot of the details for these kinds of questions. So please, you know, make friends with them and, you know, just kind of start a relationship with them because they can really help you out with some of these quite quickly. Kris Maul: Yeah, thanks, Sara. And that'll be even more important. Right? Looking ahead to these new VA licensure related regulations, having that good working relationship with others at your institution that are supporting your military affiliated learners will be very important.*

**Question 17.** If you've searched and looked but cannot make a determination for a specific location, say, Guam, is it acceptable to put unknown at this time with the direct link?

**Answer 17.** *The Territories are definitely a challenge, and Nan and I have experienced this. We've researched over 50 different license types over the past couple of years. There are many instances where you just cannot find the information for the territory. So that's what we do in those instances, we provide whatever we can find. If there is a link to a board that would regulate this profession, provide the link and just the information with "we've not been able to determine" if there's a license available in this jurisdiction. So provide as much as you can and that way you are truly making all reasonable efforts. You know you've gone out and done the research, and you're providing what you can, and sometimes that means you can't provide an answer if it meets or does not meet.*



## Questions on SARA policy

**Question 18.** I have seen some institutions listing the licensing agency name and contact information for programs for each state and territory. Does that meet the requirement of disclosure for professional licensure?

**Answer 18.** *Only listing the contact information by itself does not meet the requirement under Federal regulation or SARA policy. It is important to include that information if it's a "not determined" state under SARA policy, you should be including a link to that Board or Agency website and their contact information and directing prospective students and students to contact the Board. Only providing the link does not satisfy the current requirements under Federal title IV regulation or SARA policy.*

**Question 19.** Is there a comprehensive list of all licenses in the U.S. states and territories as a starting point?

**Answer 19.** *No. There is a directory of licensure boards/agencies the [Midwestern Higher Education Compact \(MHEC\)](#) provides as a resource. This resource is not 100% comprehensive but it is more comprehensive than any other resource we have found. The U.S. Department of Education International Affairs Office provides hyperlinks to 33 state professional association boards on the following webpage: [licensure information by profession](#). Licensure information is also connected to many occupations and professions in [O\\*Net Online](#).*

**Question 20.** Doesn't NC-SARA have a list of professional licensure?

**Answer 20.** *Yes, they do. They're specifically focused in about four or five areas. The areas are counseling, psychology, nursing, teacher education, and social work. You can find that on their website under the professional licensure tab at the top.*

**Question 21.** The Department of Education regulations about disclosures is for all programs we have regardless of modality that allows us to state "don't know" for many states which is good because we don't have students coming to us from all those states and territories for our nursing or educator prep programs. The SARA requirement goes further, requiring that we make



an effort to find out for all areas. Is that SARA rule for online programs only, or for all programs we offer that lead to state licensure?

**Answer 21.** *Our understanding is that SARA policy applies to SARA, if that makes sense. So, if it is a program that does not utilize SARA (remember SARA does not just address online programs, it also covers clinical or field experiences across state lines), then SARA policy would not apply - that is our understanding. We encourage you to confirm that directly with your SARA portal entity.*

## **Department of Veterans Affairs rule**

**Question 23.** Does the VA disclosure requirement apply to prospective or enrolled students?

**Answer 23.** *The answer is not entirely clear from the regulation itself. We encourage you to reach out to your SAA with questions like this, because there's not a lot of detail in the implementation of it. It is focused on meeting all curriculum license requirements, including any additional disclosures related to licensure. If you are a member of the SAN Network, the State Authorization Network through WCET and WICHE, Cheryl Dowd has been communicating with folks at Department of Veterans Affairs to try to get more clarity on this.*

