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Welcome everyone. Thank you for being here today. We'll start promptly at one o'clock, but I wanted to go ahead and let you know that you are in the right place.

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If what you are here for is the webinar entitled Winter is here, but summer is coming. Preparing for July 1, 2024 licensure compliance.

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I'm Jenny Parks and I, oh yeah, sorry. Not at one o'clock, 11 o'clock. My apologies.

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Anyway, I'm Jenny Parks. I'm the VP of Policy and Research at the Midwestern Higher Education Compact.

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And we are joined today by higher education licensing pros. They are going to give us some more great information about staying in compliance with all of the pieces that are necessary to have an effective practice in professional licensure disclosures and and other sorts of compliance.

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As a reminder, this is a recorded presentation and it will be posted to the MHEC website in the coming days.

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All the resources from the webinar will be available on the MHEC website as well. During the webinar, if you would like to submit any questions, please use the QA section at the bottom of your screen, not the chat.

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We will be monitoring those and that's also where we pull those in the end and make sure we've answered all of them.

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So please use that feature rather than the chat. And then at the end of the webinar you will also receive a survey.

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To see how we did. So we will start very shortly. Thank you. For being here.

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Hello everyone. My name is Jenny Parks. I am the VP of Policy and Research at the

Midwestern Higher Education.

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Compact. Welcome to our webinar today. Our webinar is entitled Winter is Here, but summer is coming, preparing for July 1, 2024.

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Licenser compliance. I will draw your attention to the chat. We have a number of the resources from today's presentation available for you there in links.

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So please take a look at those if you'd like. I'll remind you that this is a recorded presentation that will appear on the MHEC website in the days to come.

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As will all of the resources from today's presentation. If during a webinar or during the Q&A session, you do have a question, please submit it in writing in the Q&A section, not in the chat, please.

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And I will repeat that because, sometimes people don't remember that. Please submit questions via the QA section, not the chat section of the Zoom Platform.

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It's in the bottom of your screen. And finally at the end of the webinar, we will have a survey.

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We will ask you to complete that so that we know how we did and how, how we can improve.

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And once again, if you would like access to the presentation and other resources, they are also linked in in the chat for you.

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So thank you for being here. I am going to go ahead and introduce our guest speakers. We are joined today by higher education licensing pros.

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Nan Kalke and Kris Maul. And if you've been at any of our webinars with them before, you know that they're fantastic.

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They provide a an amazing service to help us all navigate very choppy waters of professional licensure, disclosures and other compliance matters and.

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In fact, the last webinar we had with them was so highly attended and there were so many lingering questions that we said, hey, let's just do another one pretty

quickly.

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There's definitely an appetite for this information. So thank you for being here. You're doing yourself, your students and your institution a service.

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By listening to what these fine folks have to say. So I am now going to turn it over to Chris.

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Great. Thank you so much, Jenny. I appreciate you having us here today and thanks you all that are attending for for taking time out of your day to hear more about licensure.

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You can see a little bit about myself up here on the slide as well as my colleague Nan. We co-founded higher education licensure pros just over three years ago.

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Really in reaction to the current requirements around licensure. Compliance and disclosures that went into effect July first of 2,020.

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So here we are. Now, right, almost 4 years later, and we've got a new set of regulations.

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Related to professional occupational licensure to deal with. So that's what we're going to be focused on here today.

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I just wanted to note right off the bat that this is a follow-up to a December webinar as Jenny mentioned.

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You can find a recording of that webinar along with the presentation deck and a written Q&A document on MHEC convening webpage.

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So if you haven't already viewed that, you may want to do that after today's session at some point.

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So some of the information I'll be covering today is very similar to what we might know over in December.

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But because this is kind of an evolving target here, since it is a newly published regulation, and you know, we're still getting information trickling out from

Department of Education on exactly what it means.

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There are some differences in today's webinar versus that December session. So here's what I'm planning to cover in the next hour.

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I'll do a review of what those July one requirements are. Related to professional and occupational licensure.

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I'll do some examples. So how are how should an institution be applying the new regulations to your programs and the work that you're doing.

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And then I have some kind of tips on how to prepare for July one because while it is winter, at least for most of us, summer is going to be here in a blink of an eye.

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So I know you're all probably anxiously or busily preparing for this along with many other things that are going to affect July first this year.

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But I do want to let you know there will be time for questions at the end. So as Jenny mentioned, please put your questions in the Q&A and we'll try to cover as many of those as we can live today.

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And then I will be doing a written Q&A document afterwards as well that will eventually be made available through.

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MEX website. Alright, so important kind of disclaimer here at the start as I mentioned this is an evolving target these final regulations were published back in October of 2,023 and as most of you probably know, you know, regulation language is important, but it doesn't really give a complete picture, you know, of what you should be doing as an institution.

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So there has been a little bit of additional information trickling out from the department through their staff mostly through an email communication.

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You'll note on the presentation today that I've and when I have information that I've received from the Department of Education staff person.

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I've highlighted that in red font on my slides. Just to distinguish that from information that's coming directly from the regulation or from the published

commentary that the Department of Education released back in October.

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So I'll explain that as we go, but just wanted to make note of that that again some of this is you know really just information that's being emailed to folks when they inquire.

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Or ask questions to staff.

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Alright, I did forget to note my other important disclaimer. This is not legal advice.

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A lot of this information will involve, you know, different risks to your institution and to your students. And so it's important that you take all this information in, but then that you're ultimately making decisions about how to apply that with your own legal counsel.

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Alright, let's jump in to title for regulations. Before I do, definitions or key terms, these are going to be really important as we walk through what these July one requirements are going to be really important as we walk through what these July one requirements are.

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So when I say licensure or when the Department of Education says licensure talks about licensure, really what that means is any sort of state or territory government issued credential to practice or work in a particular profession or occupation.

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So that can be called other things. Depending on the professional occupation and depending on the state or territory it may be called the certification or registration, authorization, etc.

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You get the idea. But really we're talking about again those state or territory government issued types of credentials, not the private organization ones.

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There are a lot of those out there certifications or again certificates, authorizations, whatever. We're not talking about those.

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Those are not included in these regulations. Distance education is a critical term. I've got some information up here on the slide and I'll talk more.

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Through that, but essentially department staff is indicating that the May, 2023 dear colleague letter applies here to these particular new requirements related to licensure certification and disclosures.

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And then initial enrollments, another important turn. We're going to see that come up in a couple of different contexts with these new July one requirements.

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And we do have a definition from regulations, which I put up here on the side. We also know through the prior version of rules, again, that went into effect July one of 2020 that the department gave some guidance in their commentary there about what that means that initial enrollment piece so prior to an enrollment agreement or a financial commitment.

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So again, just setting the stage here, all of those are gonna be really important terms. As we dig in.

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On this slide I have a summary. Really, you know, breathe, brief snapshot, a high-level snapshot here of what these new requirements are but I'm going to just start here for a moment because I think most of you on the line are probably familiar with the existing requirements again that went into effect.

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July 1, of 2020. Those specifically require public disclosures and individual direct disclosures to be sent in certain instances and at certain times to different audiences.

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So those are still around. Those are not going away under the new July one requirements. And you'll see here on the summary there have been some changes and I'll talk a bit about those in a moment.

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But there is a new requirement and this is the most impactful for all institutions and that's the PPA certification requirement.

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So again you can see here on the summary slide a brief overview of what that is and I'll get into details here.

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But the high-level takeaway is an institution cannot enroll a student located in does not meet or not determined state or territory starting July one.

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So this absolutely could impact enrollments at your institution depending on you know, what type of program you're offering and where your students are located.

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And again, I'll get into all these details here, but wanted to start out with that high-level summary.

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So let's talk about this new PPA certification responsibility because again it is the most impactful to institutions within this new regulation package.

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So I have the language from the regulation here on the slide itself. You can read that as at your leisure.

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You can again download this side deck yourself if you'd like. There were links provided in the chat.

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So feel free to do that. But I'm gonna skip in and, you know, dig into what the language is actually telling us here.

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So program participation agreement, I wasn't that familiar with this until these new regulations came out in October.

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Some of you made me more familiar with it depending on your work in financial aid or your role within the your institution.

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So the program participation agreement is essentially. Aid or your role within the your institution. So the program participation agreement is essentially a master contract or agreement between the institution and the US Department of Education Agreement is essentially a master contract or agreement between the institution and the US Department of Education.

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It allows your college or university to participate in a master contract or agreement between the institution and the US Department of Education.

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It allows your college or university to participate in the Title 4 program, which is a federal financial aid program.

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It allows your college or university to participate in the Title 4 program, which is the federal financial aid program, student loans, for your students to access.

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So, this PPA must be assigned and agreed to, some kind of, cadence, some kind of

cycle of renewal.

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That's gonna differ by institution and it could be for a period of up to 6 years.

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Now with that said, every institution needs to be ready by July first of this year to be able to comply with the new requirements.

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The PPA itself has been around for a very long time and it's been added. And changed to over the years.

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This topic that I'm talking about today is not the only new addition to the PPA. There are a couple of other very important things that were included in this October release of the final regulation that goes into effect July first and that's related to accreditation as well as some consumer protection related pieces.

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So if you don't know much about those yet, I encourage you to seek out resources. I'll give a shout out to WCET SAN state authorization network.

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They have a lot of information on their site about those additional areas. The PPA certification that will be effective July one.

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So back to the focus for today. License sure. What does it mean with this new PPA certification responsibility?

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So every institution has to affirmatively certify that your licensure programs meet the educational requirements where your institution is located.

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And where your distance education students are located. Then there is this little kind of exception or carve out where a distance education student could go through an attestation process if they live somewhere where your program doesn't meet and I'll get into those details later but you know the basics are where the institution is located and where distance education students are located.

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What does this education mean? Well, as I mentioned before, Department of Education staff have indicated that the May 2023 dear colleague letter applies to this particular new regulation.

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And what that dear colleague letter indicates is that any student who is taking at least one course through distance education is considered enrolled in distance



education.

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The department's further clarified again through staff communication that what they really mean is if they're taking one or more course.

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Online or through to distance education in the first semester or term of the licensure program. So if you have prospective students who will or could be taking one or more courses online during that first term.

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Then again, department staff is indicating they would be considered distance education student. I know that is different from many other definitions that exist out there, including other definitions of the Department of Education uses.

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But this is the information we have as of today. And that's important because again going back to my previous slide.

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Right you have to be able to certify affirmatively yes this relationship program meets the education requirements where the distance education students are located.

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Alright, so let's talk a little bit more about location here. Student location is still critical.

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That's something that I, you know, you've been using at your institution for those direct disclosures between July 1 of 2020 and now and it's going to be even more critical under this new PPA certification requirement.

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So each of institution gets to set your own student location policy. There's not a specific policy or process that the Department of Education dictates.

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However, you do have a requirement to have an official student location policy in place for this purpose, that you're going to be using to help that you identify where your perspective students and students are located and then apply that to this new PPA certification requirement as well as to disclosures.

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For the PPA certification, really what we're looking at is the time of initial enrollment into that licensure program.

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That's the point in time where you're going to be setting that perspective students location. And the department has clarified that this is going to cover new program

enrollments or new program entrants on or after July first.

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So for some of you, you know, you could have people that are starting classes at a much different timeframe with than that, but the key that we're going to look for is when do you consider them to be enrolling in that license your program.

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If it's on or after July, the first then this new PPA certification requirement would apply.

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Okay, and a couple other points here related to the new PPA certification responsibility. There's some language within the commentary and that's the lengthy lengthy comments that the Department of Education includes when they release lengthy comments that the Department of Education includes when they release a final regulation.

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So if you read to that commentary, it includes when they release a final regulation. So if you read through that commentary, there's a few things that I thought were very notable that institution.

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So if you read through that commentary, there's a few things that I thought were very notable that institutions should be aware of as you're considering this new regulation.

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So the department says within their commentary that any prospective student who's going to be relocating or attending a license for program face-to-face on your campus could be considered located on campus at the time of initial enrollment.

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So practically what this would mean is, you know, if you have a student who lives in Kentucky, but they're going to be relocating to your campus in Missouri to do the program.

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You could consider that person who lives in Kentucky at the time they're applying to be located in Missouri as long as they're doing all of their courses, you know, on your campus and face-to-face is the language that Department of Education uses in this regulation.

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So important note here again from Department of Education staff. If that student could be taking one or more courses online during their first term then they would be considered or should be considered a distance education student.

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So again, important. Point in time and I'll be opportunity to take an online course.

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Those are going to be factors of where you should be determining that students location. Okay. Again, for PPA certification, we're talking about that time of initial enrollment of the student.

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And to the program. So you're going to be certifying. Yes, we meet the educational requirements for this perspective student at the time they're enrolling.

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So practically what that means is if that student later relocates. To a state or territory where your program does not meet the educational requirements, they could continue in your program.

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They could stay involved. They would be eligible for Title IV. Your program would still remain eligible for Title IV.

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Essentially the department says in their commentary we don't want to penalize students, you know, if they're changing their location in the middle of the program.

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If something changes though with a state's requirements or your program itself and now you're in a scenario where you do not meet a particular state or territories location.

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Then you would as an institution need to stop taking new enrollments into that program. And you'd have to not take enrollments until you could meet those requirements.

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So again, whether it's a state has changed the education requirements or something's changed about your program.

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In those instances, stop enrollments right away.

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Alright, couple other things to note here about this new PPA certification responsibility. The department gives an example specific to teacher preparation and licensing around using a licensure compact or reciprocity agreement.

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To help determine if you meet the educational requirements in another state. So I

think that it's great that the department has pointed this out and recognize, you know, that there are different kind of pathways to achieve licensure, which is absolutely true.

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I will say word of caution though on using this. I don't think the department has opened the floodgates for institutions to just be able to rely on the fact that a compact exists for that profession or that you know some kind of reciprocity agreement exists.

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It's still going to be important that you as an institution understand exactly what that compact allows your graduates to do and that they could use that compact or reciprocity agreement.

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As a recent graduate of a program. So meet the educational requirements in another state or territory. So you'll see some language here.

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Basically department staff is cautioning like you know, be careful with this one, but it is something new that we haven't seen in that July first 2020 regulations related to disclosures.

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Then the final point about PPA certification is related to this attestation. So as I mentioned before, Institutions must be able to certify you meet the educational requirements where your distance education students are located or where that student attests that they will be seeking licensure and employment after graduation.

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So this is kind of again a mechanism, an exception where you could continue to enroll students or prospective students I should say that are located and it does not need state or territory.

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So again, some. In red font, you'll see some information that I received from the Department of Education contact.

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This really is about a student having one specific state. One specific state. Where your program meets the requirements.

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And they have to attest in writing that they plan to seek licensure and employment in that one specific state where you need after graduating.

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So unfortunately, you know, this is not going to help all perspectives students if

they're not able to identify one specific state and able to put that in writing, then you really shouldn't be enrolling them in the program anymore if they're located in it does not meet location.

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Okay, I'm gonna shift gears now to disclosures and as I mentioned before we still have the public disclosures as well as the individual direct disclosures that remained in effect after July one of this year.

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So here's the actual regulation language the new July 1, 2024 language related to disclosures and I'm just gonna break down a couple of things about that.

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So first wanted to note the biggest change here is that Department of Education's removed the no determination made or that not determined category.

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So you may recall today under the July 1, 2020 regulations institutions should be disclosing publicly if their program meets or does not meet or if you've not determined yet if you meet the educational requirements and all 59 states and territories.

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I know through our work with institutions and talking to, to other folks, you know, a lot of institutions have no determination made lists that are pretty lengthy still.

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And again, that is in compliance with the July 1, 2000, and 20, the current in effect regulations related to public disclosures.

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But the departments removed that for July one of 2024. So. What is that going to mean practically?

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Well, I think a couple of things. So again, the department saying you must publicly disclose where you've made a determination if the program meets or does not meet requirements.

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There could be some scenarios where your institution hasn't made a determination and you could choose to still include that in a listing on your website.

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There's nothing within the federal regulatory federal regulation that would prevent you from doing that after July 1, 2000, and, 24.

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You shouldn't be advertising or enrolling students located in those no determination made states. Or that does not meet states.

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So again, department contact is basically saying If you're going to be advertising to prospective students. In any state then you should know if the program meets or not.

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And then make that information available accordingly. My note up here is sometimes confusing, so I hope it's not confusing, but basically I'm thinking through different scenarios, right?

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And if you truly have face-to-face on-campus program where there's absolutely no option for an online or distance education course during that first term of enrollment, then there could be a scenario where that program only has a disclosure for the state where you're campus is located and maybe you know a couple other states regionally or something.

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So your disclosure lists could become much shorter. Again, depending on a particular scenario for the program and your students ability to take on line or distance courses or not.

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Direct disclosures, again, these are still here. Department has not really made many or any substantive changes really to the direct disclosure language, which in some ways isn't fortunate because we do have a bit of a disconnect between the direct disclosure language and the public disclosure language now and how those interplay with the new PPA certification requirement.

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So just as a reminder, again, this is under today's regulation that went into effect in 2020 you do need to send a direct disclosure to a prospective student if they're located and it does not meet or not determined or haven't made a determination state or territory.

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And this needs to be sent prior to that. So the challenge I think with this is under the new July 1, 2,024 regulation, right?

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We all know now that you should not and cannot enroll students if they're located and it does not meet or not made a determination state or territory.

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So I think the most likely scenario is your students who get this particular direct disclosure, these prospective students, would need to go through that written attestation process in order to enroll in your program.

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So this group of students is going to be get receiving, you know, more communication from your program and institution prior to enrollment and we'll have to go through that written attestation process in order to enroll.

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And I do apologize. My language here kind of fell off the slide. So I will try to fix that and get that updated.

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But basically the department staff had said this does not just apply to distance education students. They've made it clear that this is going to still apply to all students.

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However, most likely we'd be talking about distance education students. Who would need or, be required to receive these.

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Okay, so a little bit more here on individual direct disclosures. Current students again under the existing that went into effect in 2,020 regulation must receive a written disclosure within 14 calendar days.

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If something changes and they are located and it does not meet. State or territory, this could be because the student changes locations or again something might change with the state's requirements or with your program.

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Either way, if that student is now and it does not meet scenario, the institution needs to send direct disclosure within 14 calendar days.

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That still exists under these new July 1, 2024 regulations and as I mentioned before you know if the students changing location they're not going to lose access to title 4 they can continue being enrolled in your program.

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If it's the other scenario where the states changed or your programs changed, again, as I mentioned, you'd have to stop new enrollments, but that would not impact your current students.

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So the department also has said again through, email contact with their staff that this probably would apply to distance education students, but not exclusively.

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So there could be scenarios where you would need to send this to a student who's not a distance education student.

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Okay, so I know this is very hard to read on the slide, but this is a quick snapshot document that we created, that really tries to again at a pretty high level walk through what the new steps are under the July 1, 2024 requirements.

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So this walks through that PPA certification piece. As well as communicating with disclosures. So this will be this has been made available in the chat.

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There's a link to this. If this is helpful for you, feel free to download it, use it, share it at your institution or elsewhere.

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But again, just a high level snapshot of what you need to download it, use it, share it at your institution or elsewhere.

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But again, just high level snapshot of what you need to download it, use it, share it at your institution or elsewhere.

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But again, just high level snapshot of what you need to do in order to be able to comply with these July one requirements.

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And now I wanted to shift gears and do just a few examples quick of particular programs and how you would apply in the steps that are required.

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You know, be able to understand. What's going on with those programs? So on this slide you'll see a flowchart that we created.

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There is a link to this flowchart separately as well that's in the chat that you can download and use as you see fit.

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If that's helpful. But I'm just gonna walk through the programs here on the left. Kind of walking through the flowchart and how that would shake out for that particular program.

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So the first example that I was going to go wanted to go through today is a bachelor of science and information technology with a focus on cybersecurity.

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So when we're kind of starting this analysis of, you know, how does this program fit in?



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We start here. Is it a licensure program? Right? So first we have to identify if it's a license for program or not.

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And the kind of key metrics we use for this is has the program been designed to lead to a professional or occupational license or is it advertised as leading to a lifestyle or advertised as resulting in, you know, employment opportunities that would require a license.

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So, in this case, for information technology, cybersecurity, there is no state issued license or again certification, authorization, whatever the term may be, there's no state issued license at this point for that type of profession.

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So there are lots of private certifications that someone can achieve. In cybersecurity or other aspects within information technology.

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But because there's no state or territory issued license, then we're in the no. This is not a licensure program.

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So this one's real easy. You don't need to worry about it. The new PPA certification doesn't apply.

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No disclosures are required. Alright, let's move on to the more challenging ones. BS in nursing is the next example I thought of.

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So is it a licensure program? Yes, this program, a bachelor of science in nursing, it's specifically designed to help prepare people for a registered nurse license and it's advertised very clearly to do that.

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So we're in a yes scenario. Okay, public disclosures are going to be required for all states and territories where the institution has made a meets or does not need determination.

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Right? So you may need to update your current public disclosures, especially if you have a lot of states as the not determined, you'll have to decide if you're going to move those into one of those meets or does not need category or continue disclosing not determined.

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For direct disclosures, first we think about the prospective student individually.

Are they going to be taking one or more courses through distance education during their first term of enrollment?

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If the answer is no. Then you go to your student location policy. Does your student location policy put that perspective student as located on your campus?

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And if the answer is yes to that. Then because they're located on campus and I'm assuming that your RN program would meet your home states your campus states license requirements then no direct disclosure would be required right so that one is again pretty straightforward assuming that your student location policy specifically says we're going to be treating prospective students attending our, you know, face-to-face on-campus program as located in

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our state. That would get you to this yes. If your student location policy doesn't treat this perspective student that way, so they're not taking any online courses, but your policy maybe uses, you know, mailing address or current home address at the time of application and then you could be in this no situation so in that case a direct disclosure would need to be sent prior to enrollment.

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Again, if they're in a does not meet or not determine state or territory. Right. So, I'm gonna think flip over to The next one here.

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Marriage and family therapy. So in my head I was thinking let's say this is a partially online program, right?

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So students take, let's say, more than 50% of the courses on line and then they have to do some kind of face-to-face experience.

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At some point in the program. So first question again, is it a licensure program? Yes, this is designed to lead to marriage and family therapy and it's clearly advertises that so we have to keep going down the flowchart.

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Public disclosures would need to be on the website for all those states and territories where the institution has made and meets or does not need determination.

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And then for direct disclosures, we look first for perspective students. Will they be taking one or more course to distance education during their first term?

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Yes, in this scenario. And these students will take one or more course online

during their first term. So yes, a direct disclosure is required and it must be sent prior to enrollment if they're in it does not meet or not determine state or territory.

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Let's just say we have a student that's in it does not meet state, but they want to enroll in your program.

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Well, for this, then you would need to go to that written attestation, right? So if they're located and it does not meet, they can still enroll in your marriage.

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And family therapy program as long as you have a written attestation where they clearly indicate I want to seek licensure and employment in this one particular meets state after I graduate from your program.

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And I think in the interest of time, I'm gonna skip my last example here, but you all get the idea.

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So hopefully, this visual is helpful as you're thinking through your own programs. And what these requirements will mean to you after July one.

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Okay, so how can you prepare for July one? Again, we all know summer is going to be here real soon.

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So I think the first order business is confirming your institutions list of license related programs. And remember the key here is going to be as it's designed to lead to a license or is it advertised as lean to a license or even some sort of profession or occupation or job opportunity that requires a license.

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I think that last one is the most tricky to suss out and identify, but I do think it's really important, especially in light of the new PPA certification.

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You don't want to have any programs that seem like they should be on your licensure list. If they're not really a license, that seem like they should be on your licensure list if they're not really a licensure program.

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So it's worthwhile to go through and kind of do that audit and review of your own institutions, so it's worthwhile to go through and kind of do that audit and review of your own institutions programs and how they're being advertised.

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I'd say the next most important thing is figuring out where your current students and your perspective students are coming from, right?

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So again, the new requirements are all connected to student location and that's very important. Again because you must be able to certify, yes, we meet the education requirements where that perspective student is located.

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So if you at least know where your current student are located as well as any prospective students who may be in that admission process or that inquiry process in some fashion.

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That's going to give you a good picture. Of which states and territories you need to be able to make a meets determination for.

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So that's, second most highest or maybe first, highest priority is know where your students are.

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Okay, excuse me, I'm gonna take a quick step here.

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So after you have your list solidified and you know where your students and prospective students are at.

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Then the next step is to complete the research. You know, what are those educational requirements across all the states and territories where our students are located?

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And then compare your specific licenser program to each state and territories. And I'm not gonna sugarcoat this.

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This work takes a tremendous amount of time. This work takes a tremendous amount of time. So for any of you on the webinar.

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And so for any of you on the webinar today who have been doing this or have been coordinating it today who have been doing this or have been coordinating it for your institution, who have been doing this or have been coordinating it for your institution, you know that it can take, you know, or have been coordinating it for your institution, you know that it can take, you know, hundreds and hundreds of hours to

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do the research and then to compare the curriculum for all states and then to compare the curriculum for all states and territories.

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Again, you do have to make a meets determination, though, in order to continue enrolling students located.

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So there's no way around this work. It is something that you need to do and be able to have that meets determination made prior to July one.

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Alright, couple other points here. How to get ready, how to prepare. It's Really critical again to know that you have a student location policy that's going to work for your institution under this new July one requirement.

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So you may have a student location policy in place already that you created after or before July one of 2,020 related to the current disclosure requirements.

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Be a good idea to review that, right? And assess it and see if anything may need to be changed in light of the new PPA certification requirement and that distance education definition that the department is using at this point.

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And I just a couple notes here, again, that face-to-face on-campus prospective student.

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If you'd like to be able to treat them as located in the state where your campus is, I would encourage and to specifically include that.

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In your student location policy. So then it's very clear to anyone who's looking at that policy.

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So then it's very clear to anyone who's looking at that policy. So then it's very clear to anyone who's looking at that policy, how you are treating those perspectives students.

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Calendar is gonna be important for this work too. So I think you all know this, but licensing requirements can change over time.

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So this unfortunately is not going to be a one and done scenario when you're doing that research and making those comparisons.

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It's something that will need to be revisited on a regular basis. Kind of when we work with institutions, you know, we say an annual review would be a great place because there are other things on an annual review or annual renewal cycle with Department of Education.

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And want to at least be able to say we've looked at this, you know, at least once within the past year.

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So make your own calendar or update your calendar with those annual review dates. Because it will be something important.

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On an ongoing basis as you recertify each time through that PPA agreement that you meet the educational requirements.

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And then finally, documentation. Like most. Compliance related things. Documentation is going to be critical, especially should you ever be audited.

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Even if you're not audited though, you know, documentation could be helpful if you're renewing for other purposes such as your own state's approval or authorization of your program or if you participate in Sara, the state authorization reciprocity agreement, there's some considerations.

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Related to licensure within current SARA policy, which may be updated in the future to reflect these new July 1 2024 requirements.

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So having your documentation in order is really important. I'd especially recommend that you retain copies of whatever it is.

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A spreadsheet, a word document, whatever, where your curriculum is being compared to the state and territory specific requirements where that meets or does not meet conclusion comes into play.

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Retain copies of that and then of course any kind of direct disclosure that's sent to a specific student, you'd want to be able to pull that back up at any point in time.

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Should you be asked to produce it? So make sure that the disclosures as well as that written attestation piece that that is tied to that specific perspective student or students record and that you're able to reproduce that or bring that up.

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Should you ever need to do that in the future?

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Alright, I'll just have a couple more thoughts and we're gonna switch over to questions. So location policy, I mentioned it a few times here today, but again, it's even more important.

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And then ever because of this new PPA certification requirement. So as you're reviewing your location policy, here are some things you can think about.

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That we have up on the slide here. Again, really important for new PPA certification as well as the direct.

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Disclosure piece.

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And finally, who's going to help you with this work? Right? Because I'm sure a lot of you on the line today, you're kind of a one-person team, maybe you have a few colleagues, but you know, you're working towards compliance and so many issues and this is just a sliver of your responsibilities, but unfortunately, you know, it's a really important sliver.

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That needs to get done. So who's going to help with this work? Definitely connect with your financial aid team.

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So because this new program participation agreement certification requirement is being added July first of this year. There's someone on your financial aid team that certifies that PPA every time it comes up.

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For renewal. So make sure they know about this new licensure requirement and that that's going to be on PPA moving forward and that they understand kind of what's happening behind the scenes in order for you all to make that affirmative certification.

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As part of the PPA. Your academic leaders absolutely need to know about this work and what's required and allow the people that need the time.

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To take the time to do it. Again, I know this is really hard because everyone is stretched so thin with so many responsibilities, but there's just not a shortcut around it that research needs to be done to know what the education requirements

are and then your specific program needs to be compared to it.

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In order to make a meets determination. And that means that you will have to involve your subject matter experts, which usually are the faculty.

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Again, I know they're extremely busy. They're already stretched to thin, but you need someone who knows the details of the curriculum.

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Itself to be making that comparison in order to be able to say you meet the educational requirements. And then your IT department.

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So for a lot of these things, they're probably going to need to be system changes or flags, you know, added to certain steps in the process.

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In admission, or even connecting to the direct notifications, you know, it may need to have some IT work.

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So. Connect with them as soon as possible. I know most institutions it takes a while to get an IT project rolling so you'll want to do that straight away if you haven't already.

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And then finally, just wanted to point out a couple things about us. So higher education licensure pros.

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We do work with colleges and universities around the country to help with this work that's needed. We offer an online database called the bookmark of educational requirements across all 59 states and territories and we've got actually closer to 70 license types now that are available.

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So if you'd like more information about the bookmark or the services that we can provide institutions, feel free to check out our website.

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And now I'm ready to shift to question. So as we're getting Jenny back on here to help with that.

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I mentioned, you know, the education. Department staff person. I've been connecting, connecting with her names Vanessa Gomez.

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I've included her telephone and email. You can reach out yourself. To Ms. Gomez with questions and I believe that she's been pretty responsive.

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I know she has been to my questions and I think she has to others as well. So I encourage you to reach out directly to her with any questions about this as well.

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Thank you. Chris, as always, it's highly informative. Unfortunately, it raises as many questions as it answers though.

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Okay. Right.

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So I think we have a record of 64 questions. In our QA section. So we're gonna try to tackle them as best we can.

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I'm hoping that we'll begin to see that some overlap. I did see that in the chat someone had put a question there.

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Can you go ahead please cut and paste it into the Q&A section because that's going to be a lot easier for us to keep up with answering those questions there.

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So. If we are ready, I'm gonna go to, question number one here, from anonymous attendee.

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The new regulations pertain to initial enrollment. Are there any remnants of existing regulations that would require us to provide individual direct disclosures throughout the course of the student's time with the institution.

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Or can we shift our individual disclosure processes to focus on initial enrollment only?

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Yeah, that's a great question. So unfortunately, there hasn't been a change with direct disclosures.

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So if you have a student who's changing location while they're enrolled in the program, you would need to send that direct disclosure within 14 calendar days or if you have a scenario where a state changes their law or their requirements or something changes with your program, maybe you hold a specialized accreditation and then something happens and you no longer do, then you would need to send a direct disclosure within 14 calendar days.

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So short answer is you have to keep doing that. You cannot just tie it to initial enrollment.

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Great. Thank you. Here's another one. Initial enrollment gives me heartburn.

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I can with 100% certainty determined that a student will be located in my state at the time that classes start.

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At time of quote initial enrollment they may be located in a state where our program doesn't meet the requirements but they will be moving to my state to take classes.

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Can we enroll this student?

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Yeah, so, I'd say again, kind of thinking through the flowchart. First question for you would be will that student be taking online or distance education courses during their first term of enrollment.

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So kind of not even factoring in where that student is physically located. They're going to be taking a distance education or online course.

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During the first term of enrollment. You would need to be able to say, yes, we meet the requirements where that student is located.

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If they're not taking an online course, then it becomes a little easier because you can consider them under your student location policy if you add that language you can consider them to be located where your campus is.

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And so in that instance, Again, I'm assuming that all of you would be able to say, yes, our program meets the educational requirements where our campus is located.

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So I hope that answers it, but basically I understand your heartburn and so I would encourage you to think about your own institutions.

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Understanding of initial enrollment and it might be helpful to get something in writing and possibly even an official policy around that or include it within your student location policy.

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But what the department has said is, you know, initial enrollment is some time period before financial commitment to the institution.

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Is made. So I hope that's a little bit helpful.

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Thank you. Alright, third question. For distance education, is it only courses related to the licensure program or are we to also consider general education courses the student might be taking?

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So unfortunately, the Department of Education contact has said it's any course. Any course. So including Jen Ed courses.

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Now I will say kind of one thought around that though. This applies at the time of initial enrollment to the licensure.

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Program. So if you have, you know, undergraduate students coming in that are not declared as a major yet.

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They probably wouldn't fit in under any of this, right? It's only at the point in time when someone is being enrolled into the licensure program itself.

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That these requirements would come into play.

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Thank you. Does it matter in the quote distance education unquote designation for a student if the course there taking online is not a program course, but again, okay, same, but a general ed.

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You just answered that great. Alright, sorry. I didn't realize that would be, the same question.

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All right, next one. So if the student is on campus in Michigan where the college is located for all classes, but unable to take an English class due to the time conflict, they are now considered an online student, even if they never take another online class, for example, nursing.

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And where do we find the educational requirements since most governments say quote, meet the requirements of the board of whatever.

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Yes, that's a good two-part question. So I'd say first part of the question, you have a student who is relocating to your campus in Michigan.

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They may end up meeting to take an online course because there's no in person sections available. What do we do?

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Is that person a distance education student? I would say under the, again, the information being received from Department of Education staff at this point in time. Yes.

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That student would be considered a distance education student. So then what that means is wherever they are located. Per your institution's student location policy.

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At the time of initial enrollment. You would need to be able to say that it meets the educational requirements that your program needs to educational requirements.

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Your student location policy may be set up in a way where that student would still be considered located in Michigan.

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You know, that seems like a much easier scenario or your student location policy may treat that perspective student as located where they're currently residing.

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Or where their permanent address is at the time. So you really do have to think through those things and how your institutions student location policy is going to play out in these different scenarios.

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The second part of the question around how do we even find the education requirements in other states? So it can be very frustrating.

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Many times the state or territory boards or agencies website itself doesn't have clear complete information. So what our process, higher education license, pros and what we recommend to institutions is you really need to start with the law.

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So it's looking at state statutes and regulations and roles, typically between that, somewhere within the law, you're going to find specific educational requirements.

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If they are required. In some instances, you know, professions rely on specialized accreditation of programs or some other external approval like from a state nursing board for example that information should also be pretty clear in the law and that would give you the direction you would need to know it.

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Are there specific courses? You know, and internship experiences or whatever that we need to compare to? Or is the state rely more on specialized accreditation?

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Like for example CCNE for a nursing program. That's going to be the information you need to know about each state so that you can make that meets determination.

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Got it. Thank you. What if a student is concurrently enrolled in face-to-face and online courses?

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So again, under information received from the Department of Ed staff, if it's at least one course that they are enrolled in online during that initial first term of enrollment.

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They're considered a distance that student.

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Alright, I think this is a redundant question, but let's make sure. Even if the student is in Missouri and attending classes face to face on a campus there, if they're also taking one online class, They are distance considered a distance education student and the institution has to ensure alignment with requirements in another state say Kentucky.

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Is that correct?

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Right. So again, it would this would depend on that institution's student location policy. And exactly what that policy says and how it's applied to the student who sounds like would be moving from Kentucky to Missouri.

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But yes, as I mentioned, it is possible that a student who's going to be taking mostly all of their courses online at your campus could be considered a distance education student.

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Based on the information we received from Department of Ed, but the meeting the other states requirements is only going to come into play again depending on your own institution, student location policy and how you're treating those students.

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Got it. So here's another scenario. We are in Michigan. Our accounting program doesn't accept students from Louisiana.

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A student from Louisiana attends the program. In person on our campus, but they take a general education class online.

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It sounds like we would be in violation. Or we can't accept accounting majors at all from states we don't accept.

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Because they may take an online course in their first semester. Is that right?

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Yeah, so I think I understand the question here, but essentially can I'm gonna sound like a broken record, but this is going to depend on your institution's student location policy and how you have that established.

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I will just make a side note here about accounting. Accounting produces its own new set of issues and problems.

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I didn't give an accounting example this time I did back in December, but essentially my understanding of accounting is no bachelor's programs and accounting or very very few are going to meet the requirements for CPA certified public accountant because every state requires 150 semester credits to be a license CPA.

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Again, majority virtually all bachelor's programs are less than a hundred 50 semester credit hours.

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So. For accounting, you may need to rethink how your classifying this program. Does it actually belong on your list of license your programs as long as you're clear about what it's designed to do and you're advertising that in a way that's very clear.

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So for example, our program is 120 semester credits. It takes 150 to be licensed as a CPA.

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This program may help you earn the credits, but it will not allow you to become a CPA.

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Something along those lines. If you're very clear about it, then I think that you

can remove a bachelors and accounting from your list of licensure programs.

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Again, because it's not designed by itself. To meet the requirements for CPA and as long as you're not advertising it as meeting the requirements, you would be clear for that.

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Great. And thank you. Yes, I know all of these are very new. So that's why I'm reading them anyway.

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So, thank you. I understand the new rule that I understand from the new rule that even if they are residing on campus enrolled in a licensure program and take one or more online courses in the first semester or term, then we need to count them as a distance education student.

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What if they wait and take an online course in their second semester or term? Does this rule count them as distance education students.

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Ms. Gomes has said no. Second term in beyond does not matter. It's really connected to that first term.

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If it's online during the first term. That's when it counts.

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Got it. Thank you. I'm just checking our time here. Okay, if a state or territory changes requirements and we know longer meet requirements, it states we must change their program to meet new licensure requirements.

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Does that mean we would need to change requirements for that catalog year in previous catalog years or would it just be the new catalog year going forward?

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If it would be going forward, would we need to update the students currently in the program to the new catalog year to be in compliance for the new requirements.

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Right, that's a great question. I'm thinking through how this practically would play out at your institution in the scenario.

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So thanks for that. Yeah, so it would technically what it would happen if a state changes their requirements and you no longer meet.

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You would need to stop enrolling new students into that program. You could continue to have students who were already enrolled finished the program.

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And they would remain eligible for Title 4, your program would remain eligible for Title 4. So I think short Instagram question is you would not have to change your existing current students into a new catalog.

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In order for them to remain in the program. But if you want to and wall more students that are located in that does not meet state or territory, you would need to change your program.

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To meet the that state's requirements. Before you could start enrolling again. So you would have a scenario here maybe where you've got a group of students doing an older version of a program that doesn't meet.

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Again, recall direct disclosure requirements. If it changes to does not meet, you're gonna have to notify all current students within 14 calendar days.

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So you would have had to tell them, hey, the state changed the requirements, we do not meet.

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You probably a lot of those students want to be licensed in that state, so they may want to change to the new catalog that will meet the state's requirements if that makes sense.

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So you would have some shifting and adjusting to do there. But for Title 4, eligibility for those students that are already enrolled, they could stay involved in the older version of the program.

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And remain eligible.

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Okay. Alright, I think we have time for one more question. How do we handle students that change programs?

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A student lives in another state and in a program that does not require licensure. The next year they change programs to a program that does require licensure and we do not meet the requirements in that state.

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The student has some credit. But is again going to a new program.



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Yeah, so again, this is connected to point of initial enrollment in a licensure program.

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So you would not be able to enroll this student in that license your program unless they can provide you a written attestation that says they intend to seek licensure and employment in a particular meets state.

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Got it. Well, thank you so much. We have many other, questions here, but Chris has agreed again very graciously, very generously, to answer these in writing and we will send out the questions in the answers in the coming weeks as those documents become available.

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So stay tuned. On the, into the MHEC website. We're going to be doing some updates to some of our, resources and reaching out probably this spring to ask you some more questions about how MHEC can support you in your professional license your practice.

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Kris, Nan, thank you so much. I appreciate all of your generosity and hard work and you know, thank you for making it a little less painful to do this work.

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Thank you. Again, for having, having us and look forward to continuing answering your questions. So thanks everyone for participating today.

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Bye everybodyTake care