

Licensure Level-Set: Why Institutional Leaders Should Prioritize this Work

August 17, 2022



This presentation is being recorded.



Resources available on the MHEC website post-event.



Submit questions in the Q&A.



Please complete our survey.

Midwestern Higher Education Compact



Jenny Parks
Vice President
jennyp@mhec.org



Emily Jacobson
Director of M-SARA
msara@mhec.org

Introductions



Nan Kalke, PhD

- Specialized accreditation
- Program and curriculum content alignment to external standards
- Ensure program operations meet quality assurance standards



Kris Maul, JD

- Over a decade specializing in licensure
- Research, analysis and curriculum
- Compliance processes and systems
- Board communication and advocacy
- Student and graduate support



We will cover:

- **Review** of federal and SARA requirements
- **What** work is required, **How** to do it and **Who** should do it
- **Examples** of public and direct disclosures
- **Challenges and opportunities** of engaging in this work
- **Resources and support** available through MHEC/M-SARA
- **Why** prioritize this work



Requirements



Institution Responsibility

Current Federal Regulations ([34 CFR 668.43](#)) and NC-SARA policy ([v. 22.1 § 5.2](#)) require:

- Understand
- Communicate



Institution Responsibility: Understand

Understand how licensure programs meet educational requirements for licensure in each state and U.S. territory.

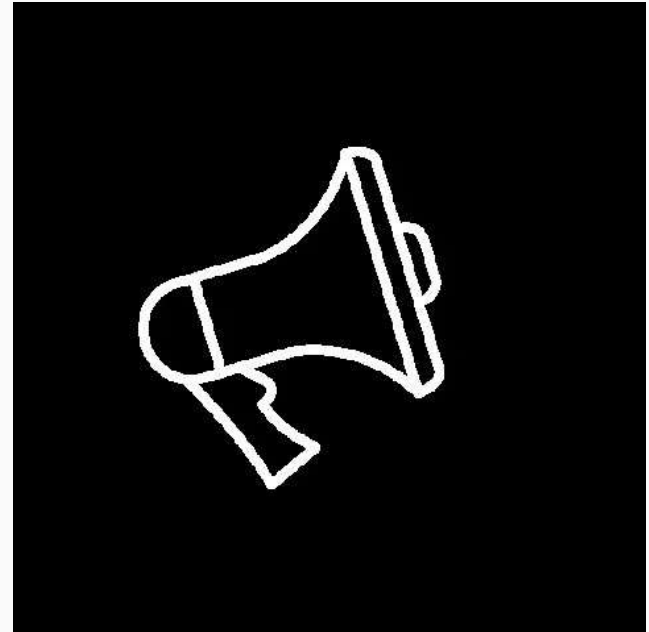
- Applies to *all modes of delivery*
 - Physical campus, distance/virtual and hybrid
- Difference between Federal Regulations and SARA Policy
 - “All reasonable efforts”
 - Provide board contact information and advise the student or applicant to determine if meets where located



Institution Responsibility: Communicate

Communicate licensure information to prospective and current students:

- *Public disclosures (website)*
 - All U.S. states/territories (59)
- *Individual direct disclosures (email)*
 - Student location is key
 - Prior to enrollment
 - 14 calendar days if changes to “does not meet”



Policy Considerations

- Once all programs leading to licensure have a determination on a public site (e.g., website, catalog):
 - **How often will these be reviewed/updated?** Annually or at other intervals? Specify the month, if possible.
 - The month specified will impact when individual disclosures need to be sent out to current students if there is a change in determination to “does not meet” based on the 14-day requirement.
 - *Build in time for your subject matter experts* to compare curricula to any changes to state/territory educational requirements.
- **Define student location**
 - Must be applied consistently to all students!
 - Address change in student location
- Specify when individual disclosures will go out to prospective students.
 - When does financial commitment occur?
 - Do you already define enrollment?



Location Policy Examples

For the purposes of professional licensure disclosure compliance, [Saint Mary's](#) 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 Saint Mary’s 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.

[UW-Madison](#) 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.**”



What, How, and Who



What work is required

In order to understand and communicate, institutions must:

- **Research educational requirements**
 - Statutes/regulations
 - Board/agency websites
 - Application materials
 - Reliable third-party sources
- **Compare to their program**
 - Detailed course comparison, at times
- **Conclude if “meets” or “does not meet”**



How to do this work

Legal research, curriculum comparison and communication with state boards are all required to understand and communicate.

- *1-3+ hours per state, per license type, for the research needed*
- *2-4+ hours per state, per license type, for curriculum comparison*
- *1-2 hours per state, per license type, for communication with boards*



How to do this work - Research

Educational Requirements vary across states/territories!

Research includes finding and evaluating statutes/regulations/rules, Board websites (including application materials), and reliable third-party sources.

- Is specialized accreditation required or accepted?
- Internship/fieldwork experience (hours, face-to-face)
- Residency
- Total number of credits required (e.g., 48 or 60)
- Must all credits be within the degree program?
- Can course title indicate similar course content?
- Training required for initial licensure (CE or course)



Who should do this work

- Compliance Director
- Program Director
- Curriculum SMEs
- Provost/Registrar
- Systems Analyst/IT and Website Support
- Legal
- Enrollment and Admissions Leads
- Marketing
- External Expert, like HELP



Disclosure Examples



Examples from Institutions - Public Disclosures

The [University of Kentucky](#) Master of Architecture program meets the educational requirements for licensure as an architect in Minnesota. Additional requirements such as experience, examinations, background checks, etc. may apply. Students who are interested in working in Minnesota should contact the state board before enrolling in the program.

North Dakota: [Saint Mary's University of Minnesota](#) has determined that its B.S. in Nursing, Pre-Licensure program meets educational requirements for R.N. licensure in North Dakota. Students are advised that the North Dakota Board of Nursing requires a transcript review at the time of application to issue a final determination of whether the candidate's BSN program meets requirements, including coursework and clinicals.

[Morningside University](#)

Florida	BSN-meets state RN requirements	Department of Health Board of Nursing Ph (850) 488-0595, Fax (850) 617-6460 website: floridasnursing.gov/ email:
	Online RN-BSN, MSN, DNP and Certificate programs approved to operate under SARA and fulfills APRN license requirements	



Examples from Institutions - Public Disclosures

The [University of Kentucky](#) Counseling Psychology Master of Science degree program does not meet the requirements for licensure in Arizona, as there is no masters-level psychology license in Arizona.

New Jersey: [Saint Mary's](#) has determined that its MSW program meets educational requirements for Licensed Master Social Worker (LMSW) and Licensed Clinical Social Worker (LCSW) licensure in New Jersey. Applicants for Licensed Clinical Social Worker (LCSW) licensure may need to demonstrate completion of specific coursework* to meet requirements.

**Required coursework may be met by MSW program electives.*

[Morningside University](#)

Louisiana	BSN-meets state RN requirements	Louisiana State Board of Nursing Ph (225) 755-7500, Fax (225) 755-7584 website: lsbn.state.la.us email: lsbn@lsbn.state.la.us
	Online RN-BSN, MSN, DNP and Certificate programs not approved to operate. Undetermined to fulfill APRN license requirements.	



Examples from Institutions - Public Disclosures

Disclosure

The University of Kentucky BS in Accounting program alone does not meet the educational requirements for Certified Public Accountant licensure in Alabama. Additional coursework is required, but applicants may have the option to sit for the NASBA CPA examination with a baccalaureate degree (120 credit hours), while completing the additional 30 hours of coursework. The board will evaluate each application in its entirety to make a final decision regarding certification and will compare the applicant's coursework against board standards. Additional non-educational requirements such as fingerprinting, additional examinations, work experience, etc. may apply. Students who are interested in working in Alabama should contact the state board before enrolling in this program.



Examples from Institutions - Public Disclosures

District of Columbia (D.C.) - Saint Mary's has determined that its MSW program meets educational requirements for Licensed Graduate Social Worker (LGSW) and Licensed Independent Social Worker (LISW) licensure in the District of Columbia. Applicants for Licensed Independent Clinical Social Worker (LICSW) may need to demonstrate completion of specific coursework* to meet requirements for licensure.

**Required coursework may be met by MSW program electives.*



Examples - Direct Disclosures

Dear Student,

You have indicated an interest in the **INSTITUTION NAME's** Master of Social Work (MSW) program and you have indicated you live in **STATE NAME**.

Our MSW program meets the educational requirements for licensure in **STATE NAME**.

Potential changes in requirements: Licensure information is reviewed and updated on this site in **MONTH** of each year. 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 student's program has met requirements. These boards and agencies make that determination after someone graduates or completes the program and applies for licensure. **INSTITUTION NAME** cannot guarantee the ability to earn any professional license, in any field, in any jurisdiction.

Additional requirements: Completing a program is typically only one part of the professional licensure requirements. Many 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 may include background checks, years of work experience, fingerprinting requirements, etc.

Thank you for your interest in our program.

NAME



Examples - Direct Disclosures (Part 1 of 3)

Dear Student,

You have indicated an interest in the MSW program, and you have indicated you live in the State of **Maine**.

Our MSW program meets the educational requirements for licensure in Maine

Levels of Licensure

Maine has five levels of licensure. They are:

Licensed Social Worker-Conditional

Licensed Social Worker (LSW)

Licensed Master Social Workers (LMSW)

LMSW-Conditional Clinical

Licensed Clinical Social Worker (LCSW)

Note: You must apply for LMSW Conditional Clinical licensure in order to begin your clinical consultation towards LCSW licensure.

Know what is Required

You are responsible for reviewing the state regulations yourself to make sure there have been no changes and to ensure you are up-to-date on all the requirements. The link is provided here for your convenience:

<https://www.maine.gov/pfr/professionallicensing/professions/state-board-social-worker-licensure>

License Fee

You will be assessed a fee for your license. Check the Board of Social Work's website for information on the amount as it might have changed.



Examples - Direct Disclosures (Part 2 of 3)

Current Requirements

Current requirements for the first level of license upon graduating with an MSW degree.

- Application and fee.
- Payment of a non-refundable Criminal History Check fee.
- Official transcripts of an earned MSW degree from a CSWE accredited program.
- Request for ASWB Examination (Masters) or Official documentation of successful passage of the required examination (Masters).
- Agreement to Provide Consultation Form (included in the Application Form).
- Completed Clinical Concentration Worksheet (included in the Application Form).
 - Graduate course on Personality Theory focused on normal growth and development.
 - Graduate course on Personality Theory focused on adult psychopathology.
 - Option A or B
 - Option A: Four (4) graduate clinical methods courses in practice with individuals, couples, families, and groups.
 - Option B: Three (3) graduate clinical methods courses and one (1) additional course in personality.



Examples - Direct Disclosures (Part 3 of 3)

Additional Current Requirements

Additional Training or Coursework Required for Licensure:

- Twelve (12) hours of coursework in family or intimate partner violence. Including coursework in spousal or partner abuse that addresses screening, referral and intervention strategies, including knowledge of community resources, cultural factors, evidence-based risk assessment, and same-gender abuse dynamics.

The following MSW elective courses may apply to the additional training or coursework required for licensure:

- Clinical Concentration Coursework:
 - MSW661 Clinical Practice with Addictions (Whole course)
 - MSW662 Clinical Practice with Trauma (Whole course)
- Family or Intimate Partner Violence Coursework:
 - MSW650 Clinical Methods I with Individuals (Week 3 reading)
 - MSW662 Clinical Practice with Trauma (Whole course)



Challenges and Opportunities



Challenges



- **Differences across states/territories for each license type**
 - Even for professions aligned to model acts and/or specialized accreditation!
- **Cannot rely on reciprocity or compacts for eligibility under current ED or SARA requirements.**
 - Must evaluate if program satisfies all educational requirements for initial license in each state/territory.
- **Unclear regulations and licensure disclosure requirements**
 - Can “not determined” be used perpetually?
 - What is “all reasonable efforts” for SARA?
 - What does “ensure” actually mean under ED proposal?



Challenges

- **Frequent changes** to license requirements and program curriculum
- **Limited time** and people power
 - 70-400+ hours for each program.
 - Most institutions offer more than 10, some over 30 different programs related to distinct licenses!
 - Expertise - Statutes/regulations difficult to interpret, contradictory information published, Board practice may not align with published requirements.
- **Cost**
 - Some institutions estimated \$22,000 for initial research for 1 program! \$11,000 for each research update/review!



Opportunities

Knowing how all programs meet (or do not meet) educational requirements for licensure in each state/territory can:

- **Create new possibilities for enrollments**
 - Border states/online programs
- **Better prepare your graduates**
 - Smoother pathway to license and employment in field
 - Some specialized accreditors are asking and reporting this info
- **Minimize risk to students**
- **Reduce risks to the institution**
 - ED Title IV eligibility
 - Continued SARA participation



Resources and Support



MHEC Resources and Support - Pilot Webinar

Webinar on Unraveling Licensure Disclosures (5/17/2022)

- Presented new Guide to Licensure Disclosure Implementation
- For institutions in Iowa, Missouri, and North Dakota
- 60 registrants

Feedback

100% of survey respondents rated webinar as very useful or extremely useful

- “Clear, concise information and answers to questions.”
- “The example disclosures are very useful resources to institutions.”
- “This is a topic of great interest. The examples they provided were very helpful. How to tackle the disclosures was helpful as well.”
- “Matter-of-fact presentation that demystified what needs to be done to make licensure programs work.”

Survey respondents want more on:

- “Negotiated rulemaking as more information is released or updated.”
- “Best practices. Examples of disclosures, websites, etc. Subtopics can include such things as what happens if a student is already enrolled in a program in a state where we have not made a determination; is there a grace period.”



MHEC Resources and Support - Ask the Expert

Ask the Expert

MHEC has retained HELP to answer questions related to licensure from institutions. Reach out directly to Kris with your questions or to ask for support:

kris@higheredlicensurepros.com or (612) 242-9293

Support could include:

- Interpretation of licensure statutes/regulations
- Reviewing confusing licensure board website language
- Contacting licensure board for clarification or confirmation of requirements
- Recommendations for public disclosure language
- Review of location policy and process for direct disclosures
- Additional ways to communicate licensure information to students



Additional MHEC Resources and Support



Additional MHEC Resources and Support - Webinars

Additional webinars, including expansion of pilot, possible throughout rest of 2022 and into 2023.

- **Expansion of pilot - Unraveling Licensure Disclosures - planned for this fall. More details coming soon!**
 - Comprehensive overview of Federal and NC-SARA disclosure requirements, steps institutions must take to comply, plus best practices and resources available to institutions to engage in the work necessary to create disclosures.
- Licensure research- “How to” workshop
 - Session to walk through examples of how to conduct licensure research for different license types, including templates and best practices.
- Curriculum comparison- “How to” workshop
 - Session to walk through examples of how to complete detailed curriculum comparison, which is required to understand if some programs meet educational requirements, for different license types.

What licensure topics or information would be most helpful for your institutions?



Additional MHEC Resources and Support - Guide



**MIDWESTERN
HIGHER EDUCATION
COMPACT**

YOUR GUIDE TO LICENSURE DISCLOSURE IMPLEMENTATION

You are ready to dig into licensure and ensure your institution is providing this critical information to students, while complying with Title IV regulations and SARA policy.

But what, exactly are the requirements and how to best tackle this time-consuming, complicated work?

This guide will help you and your team create and implement effective licensure disclosures.



STEP 1: UNDERSTAND

Determine which programs

- Designed or advertised for licensure
- Applies to all learning modalities

Research educational requirements in all U.S. jurisdictions

- Find board/agency website
 - Review statutes/regulations/rules, application forms, any FAQs
- Use reputable third-parties, such as professional associations, to confirm/clarify
- Some licensing boards/agencies may be willing and able to answer specific questions
- You may discover program approval is required by a board/agency, especially if clinical experiences are offered in their jurisdiction

Compare your program to jurisdiction requirements

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

Conclude if "meets" or "does not meet" all educational requirements

- Under SARA policy, disclosure can indicate "not determined" after "all reasonable efforts" are made to determine if "meets"



Create a process to review and update on a regular basis (annual aligns with other Title IV disclosure timing)

STEP 2: COMMUNICATE

PUBLIC DISCLOSURE

Create a specific webpage for public disclosures

- Indicate "meets," "does not meet" or "not determined" for each jurisdiction
- Includes contact information for board/agency if "not determined" and instruct prospective student to contact the board/agency

INDIVIDUAL DIRECT DISCLOSURE

Student location policy

- Documented policy defining location
- Each institution determines own policy
- Consider:
 - How/when do students notify you if their location changes
 - How/when do you confirm location of students

Create email or other written communication process for prospective & current students

- Send to each prospective student based on location
- When to send:
 - Prior to enrollment (defined as completed registration reqs except for payment of tuition & fees) if "does not meet" or "not determined"
 - Within 14 calendar days for current student if changes to "does not meet"
- Helpful but not required:
 - Send to all prospective students, even if "meets"
 - Collect receipt acknowledgment through application or enrollment agreement



Additional MHEC Resources and Support - Guide

OVERVIEW



All SARA participating institutions must understand how their programs meet educational requirements for licensure in all 59 U.S. jurisdictions, and communicate that information to various audiences at specific times as outlined in Title IV regulation. SARA extends the Title IV requirements to all SARA participating institutions. State regulations and Federal Misrepresentation regulations can also impact licensure disclosures.

The Department of Education has proposed changes to the Title IV requirements as part of Negotiated Rulemaking. Proposed changes would expand an institution's responsibilities, requiring Program Participation Agreement certification that each program meets licensure requirements in every jurisdiction where the students are located, in addition to disclosures. It would also take away the option of indicating "not determined" in the disclosures. If adopted, these changes will likely be effective 7-1-2023.



BEST PRACTICES

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

- In addition to email or written communication, think about the most effective way to communicate to your students. Is it a conversation with admission or advising staff? Faculty advisors? Program orientation?
- Integrate licensure topics into assignments in all licensure programs. At a minimum, students should be required to visit their licensing board/agency website, review application process and all requirements for licensure. There are many beyond educational requirements—exams, background check/fingerprinting, training, etc.



GET THE RIGHT TEAM IN PLACE

A good team is essential to complete each step in this guide. Since securing support and resources for this work can be a challenge, be sure that leadership understands the importance of compliance with all Title IV regulations and SARA policies. The institution's ability to offer the program and provide federal financial aid is directly impacted by these disclosures!

Most teams will include: Provost/Registrar, IT Support, Admissions/Enrollment Leadership, Program Directors/Faculty Chairs, Curriculum experts, Legal, Marketing



REFERENCES & RESOURCES

Federal regulation and law

- 34 CFR 668.42(a)(5)(v) - Institutional information (public disclosures)
- 34 CFR 668.43(c) - Institutional information (individual direct disclosures)
- 34 CFR 668.71 - Misrepresentation - Scope and specific definitions
- 34 CFR 668.72 - Misrepresentation - Nature of educational program
- Public Law 116-315, Section 1018 - Additional licensure disclosure requirements for students utilizing GI Bill or other VA funding

Other resources

- NC-SARA Manual v. 21.1 § 5.2, and other NC-SARA Resources
- Department of Education [Negotiated Rulemaking](#)

The information should not be considered legal advice. Legal questions should be directed to counsel.

Created 4-29-2022
by [Higher Education
Licensure Pros LLC](#)
for MHEC
v. 1



Additional MHEC Resources and Support - Board Directory

Jurisdiction (State)	Licensing Board/Agency Name	Professions	Website	General Email	Phone Number
Arkansas	Arkansas State Board of Public Accountancy	Accounting	https://www.asbpa.ark	ASBPA@arkansas.gov	(501) 682-1520
Arkansas	Arkansas State Board of Acupuncture and Related Techniques	Acupuncturists	https://www.healthy.ark	ASBART@arkansas.gov	501-671-1569
Arkansas	Arkansas State Board of Architects, Landscape Architects and Interior Designers	Architecture, Interior Design	https://www.asbalaid.ark	asbalaid@arkansas.gov	(501) 682-3171
Arkansas	Arkansas State Board of Athletic Training	Athletic Training	https://www.aratb.org/	aratb@arkansas.gov	(501) 683-4076
	Arkansas State Board of Athletic Training	Athletic Training	https://www.aratb.org	aratb@arkansas.gov	(501) 683-4076
Arkansas	Arkansas State Board of Barber Examiners	Barbering	https://www.labor.ark	asklabor@arkansas.gov	(501) 682-4035
Arkansas	Arkansas State Board of Chiropractic Examiners	Chiropractic	https://www.healthy.ark	ASBCE@arkansas.gov	(501) 682-9015
Arkansas	Contractors Licensing Board	Construction Trades	https://www.aclb.arkan	contractors.licensing.bo	(501) 372-4661
Arkansas	Board of Electrical Engineers	Construction Trades	https://www.labor.arkansas.gov/labor/code-enf		501-682-4500
Arkansas	Home Inspector Registration Board	Construction Trades	http://www.ahirb.org/	ahib@arkansas.gov	(501) 683-3710
Arkansas	Arkansas Department of Health	Cosmetology	https://www.healthy.ark	cosmo@arkansas.gov	501-682-2168
Arkansas	Arkansas Board of Examiners in Counseling and Marriage & Family Therapy	Counseling, Marital and Family Therapy	https://abec.statesoluti	https://abec.statesoluti	501.683.5800
Arkansas	Arkansas State Board of Dental Examiners	Dentistry	https://www.healthy.ark	asbde@arkansas.gov	501-682-2085
Arkansas	Arkansas Dietetics Licensing Board	Dietetics	https://www.healthy.ark	ARDiet@arkansas.gov	501-661-2530
Arkansas	Arkansas Department of Health	EMS/Paramedic	https://www.healthy.ark	adhems@arkansas.gov	1-800-462-0599
Arkansas	Arkansas State Board of Licensure for Professional Engineers and Professional Land Surveyors	Engineers and Land Surveyors	https://www.pels.arkan	https://www.pels.arkan	501 682-2824
Arkansas	Arkansas Board of Registration for Foresters	Foresters	https://www.agriculture.ark	cara.tharp@agriculture.ark	(501) 224-2836
Arkansas	Arkansas State Board of Embalmers and Funeral Directors	Funeral Services	https://insurance.arkansas.gov	insurance.license@arkansas.gov	
Arkansas	Board of Registration for Professional Geologists	Geologists	https://www.arpgboard.org	pgboard@arkansas.gov	501-683-0150
Arkansas	None	Homeopathic Physician			
Arkansas	Bar Association	Law	https://www.arkbar.com	https://www.arkbar.com	501-375-4606
Arkansas	Arkansas Department of Health	Massage Therapy	https://www.healthy.ark	adh.message@arkansas.gov	501-683-1448
Arkansas	Arkansas State Medical Board	Medical Doctor, Osteopathic Physician	https://www.armedicalboard.org	office@armedicalboard.org	(501) 296-1802
Arkansas	Arkansas Department of Health	Midwifery	https://www.healthy.ark	adh.whgen@arkansas.gov	501-661-2480



Board contact information for over 40 licensed professions/occupations for all 59 U.S. states/territories

Why prioritize this work?



Questions



www.HigherEdLicensurePros.com

Nan Kalke

Kris Maul



/in/nankalke/

in/kris-maul



(612) 385-4231

(612) 242-9293



nan@
higheredlicensurepros.com

kris@
higheredlicensurepros.com



References

- *Federal regulation and law*
 - [34 CFR 668.43\(a\)\(5\)\(v\)](#) - Institutional Information (public notifications for programs leading to professional licensure or certification for all modalities)
 - [34 CFR 668.43\(c\)](#) - Institutional Information (individualized notifications for programs leading to professional licensure or certification for all modalities)
 - [34 CFR 668.71](#) - Misrepresentation - Scope and specific definitions
 - [34 CFR 668.72](#) - Misrepresentation - Nature of educational program
 - [Public Law 116-315, Section 1018](#) - Additional licensure disclosure requirements for students utilizing GI Bill or other VA funding.
- *SARA Policy*
 - [NC-SARA Manual v. 22.1 § 5.2](#)

Resources

- [Negotiated Rulemaking](#)
- [NC-SARA Resources](#)



References and Resources