



Q&A from Professional Licensure: Moving Beyond Minimal Compliance February 28, 2023

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Question 1

Is there a distinction made between licensure and certification? My field is board-certified; only certain states also require licensure. Does this distinction matter for these guidelines?

Answer 1

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

Question 2

Are schools relying on "no determination" because the CIP Code -> SOC crosswalk that allows for the licenses search State is unreliable? <https://www.onetonline.org/crosswalk/CIP/>

Answer 2

That is an interesting question we have heard institutions ask before. Where do you fit CIP codes into all of this? In general, as most of you probably know better than I do, CIP codes are not perfect. They are not aligned perfectly with various professions, with your program, and it is often hard to find that exact match right within CIP codes. And the reality is that CIP codes don't play a part in this federal regulation itself. So, I think it can be a useful tool when you are going through the list of programs that your institution offers, to use CIP codes as one kind of mechanism to evaluate, you know, is this a licensure program or not? But, the CIP codes, any of them themselves are not the be all end all here. It is important to know, how have we designed this particular degree or certificate program? What are the learning outcomes associated with it? Are we aligned to any kind of external standards, such as specialized



accreditation, other factors that come into play? Also, how are we advertising it? So, if there is language out there, on your website, or in your catalog, or other marketing materials, where there are claims being made about particular types of jobs that are available by completing this program, you have to look really closely at that. Are those jobs or positions ones that do require a professional or occupational license? And if the answer is yes, then that fits in with the category of a licensure program, even though the CIP codes themselves may not be perfectly aligned to a profession that typically requires a license.

Question 3

VA disclosure done at what level, prospects or enrolled students?

Answer 3

Under the new VA licensure regulation (effective 2/17/23), institutions must “publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation.” One thing I would encourage all of you to reach out to your SAA with questions like this, because there's not a lot of detail in the implementation of it. It really is just focused on, you know, here are these new additional requirements, without details of format or implementation. Hopefully, things will become much more clear in the near future on these things, so that all of you can implement these at your institution. But I do encourage you to reach out to your SAA, and I also just wanted to mention - I know many of you may be members of the SAN Network, the State Authorization Network through WCET and WICHE. If you are, I know that Cheryl Dowd has been communicating with folks at the Department of Veterans Affairs to try to get more clarity on this, and I think she's going to be hosting a Q&A session in the next couple of weeks. So stay tuned for that as well.

Question 4

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

Answer 4

That's a great question, and I'll say, I don't feel like I have a broad enough sample to generalize how many other institutions may be taking this approach. But what I will say for this question is that I'm not sure that is in line with the current public disclosure requirement that's out there under Federal regulation. So again, you know, it's kind of two separate things we have going on. We have the student location, which is connected to the direct disclosures, and separately we have the public disclosures which have no connection to the student location. And again, the regulation for public disclosure says you must understand and communicate if your program meets or does not meet, the educational requirements for all 59 U.S. States and Territories. So I know that logically that may not make sense for your institution if you only have students coming from these four particular States, but nonetheless, that is the current Federal requirement and which SARA Policy reinforces the Federal requirement there, too.



Question 5

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

Answer 5

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

Question 6

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

Answer 6

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

Question 7

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

Answer 7

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



purposes of Title IV compliance, so if it's a student who would not be accessing Title IV funds, then it really doesn't fit within these regulations, anyway.

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

Question 8

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

Answer 8

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

Question 9

Doesn't NC-SARA have a list of professional licensure?

Answer 9

Yes, they have a list of licensure boards for states/territories. They're specifically focused in about four or five areas. The areas are counseling, psychology, nursing, teacher education, and social work. You can find that on their website under the professional licensure tab at the top.

Question 10

Do we need to send a direct notification if the program meets the requirements or only for those that do not meet the requirements?

Answer 10

Under current Title IV and SARA policy, direct disclosures do not need to be made if a program meets requirements, only if they do not meet requirements, or have not made that determination.



Question 11

Some of the questions have to do with requirements that are outside of a program such as postgrad experience.

Answer 11

A program does not have to meet requirements outside of a degree/certificate program, for example post grad experience, in order to say it meets educational requirements. Programs do have to meet the educational requirements that are in-program, in order to indicate “meets”.

Question 12

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

Answer 12

I am guessing that means for providing contact information for the Board, if it's a not determined state under the SARA policy. If you're providing a link directly to the homepage of the Board or Agency, and there's clearly an email address and that phone number available there, I think that seems reasonable, but obviously more helpful if you can provide a direct email and phone number right on your disclosure as well. So some of this is all a judgment call, because we don't have prescriptive templates or clear definitions on some of this.

Only providing the licensing agency name and contact information does not fulfill the public or direct disclosure requirements under Title IV regulation or SARA policy. A statement of “meets”, “does not meet”, or “no determination made” is required.

Additional question 1

Has there been any centralized work done by national professional organizations yet, or do you know if any are planning such work, to assist institutions in making these disclosures?

Additional answer 1

There are several professional organizations who have expanded information about licensure requirements on their websites and/or through member-only areas since July 2020 when the Title IV disclosures went into effect. These include: [NCSBN](#), [ASWB](#), [NASBA](#), [NASDTEC](#). However, none of these organizations are providing complete information covering all of the educational requirements for licensure (detailed coursework, specific number of credits, practicum/internship hours or activities etc.) in all 59 U.S. states and territories. HELP is not aware of any plans by these organizations to provide additional assistance or direction to institutions for this work.



Additional question 2

place of residence... this is confusing. If the student is military often times for security reasons they are showing home address? furthermore, if a student resides in say Ohio but is stationed for 6 weeks in New York, how are we to know this?

Additional answer 2

Under the Title IV disclosure regulation, institutions must create their own policy for student location for purposes of direct individual disclosures. This policy must be applied equally to all students. Under the new VA licensure regulation (effective 2/17/23), institutions must “publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation.” Institutions should contact their State Approving Agency (SAA) for guidance on accounting for military affiliated students and location considerations per Title IV regulations.

Additional question 3

It seems that the work necessary by each institution in this country individually seems very counter productive and putting a strain on small universities already understaffed. Is there any group doing research that will become available to all institutions for the most popular programs. I.E. education, nursing, etc.

Additional answer 3

The research and comparison work required to determine if programs meet educational requirements for licensure in all 59 U.S. states and territories absolutely strains institutions of all sizes. Research takes hundreds (or even thousands) of hours for each license type. [Higher Education Licensure Pros LLC \(HELP\) offers an online database of educational requirements for over 50 license types in all 59 U.S. states/territories.](#) Memberships are available at different levels, including an Enterprise membership for groups of smaller institutions.

Additional question 4

This slide deck is a great start for someone beginning to understand this project. Are there other resources available?

Additional answer 4

MHEC, with assistance from Higher Education Licensure Pros LLC, provides a directory of licensing Boards/Agencies for the most common license types in each state/territory. [It is available on the Convening page.](#) MHEC and HELP plan to provide additional webinars and convening opportunities in 2023 to support institutions with this work. Institutions can [join Higher Education Licensure Pros LLC email list](#) to get notifications of upcoming webinars.



Additional question 5

Does NCSARA have a summary spreadsheet of licensure requirements or programs from each state? We are struggling with the manpower components to confirm license requirements for various (24+) programs in multiple states.

Additional answer 5

NC-SARA does not offer specific licensure requirements or licensure-related programs for each state/territory. [NC-SARA does offer information about licensing boards/agencies for 5 different license types](#). [Higher Education Licensure Pros LLC \(HELP\) offers an online database of educational requirements for over 50 license types in all 59 U.S. states/territories](#). Information available in the database provides institutions with all educational requirements for each license type, allowing comparison to their unique programs and determination if the program meets requirements. Memberships are available at different levels, including an Enterprise membership for groups of smaller institutions.

Additional question 6

If we go to the statutes and regulations and it says must graduate from an ABET accredited college or equivalent and pass the exam... is this meeting the requirements as some say 4 years experience, which would come after graduation and we have no involvement or control over.

Additional answer 6

Under current federal Title IV regulation and SARA policy, the disclosures are connected to the educational requirements for the license. In other words, components or requirements that must be completed as part of the degree or certificate program. Work experience or post-graduate supervision is not part of the program, therefore, does not factor into a "meets" or "does not meet" determination. Note that under the new VA licensure regulation (effective 2/17/23), institutions must "publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation." This likely includes work experience or other post-graduate experience that happens outside of the program. Institutions should contact their State Approving Agency (SAA) for guidance.

Additional question 7

What about non-credit offerings? continuing education

Additional answer 7

The current federal Department of Education regulations only apply to Title IV participating programs. If students are not able to utilize Title IV funds, the disclosure requirements would not apply. Note that current NC-SARA policy extends the disclosure requirements to institutions that do not participate in Title IV. Also note that under the new VA licensure regulation (effective 2/17/23), institutions must "publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of



education is designed to provide preparation.” Institutions should contact their State Approving Agency (SAA) for guidance.