



MIDWESTERN HIGHER EDUCATION — COMPACT —

Q&A from *Clarity on SARA Policy §5.2:* *Essential Updates for Licensure Compliance and Enrollments*

The following questions were asked during the [4/29/2026 MHEC Event Clarity on SARA Policy §5.2: Essential Updates for Licensure Compliance and Enrollments](#) presented by Kris Maul, JD of [Higher Education Licensure Pros](#). We ran out of time to answer these during the event, but want to provide additional information and resources. These questions and answers are organized into five topic areas.

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

What is a licensure program?

Q: If we are not advertising as licensure we do not have to determine it as licensure correct?

Even if not being advertised for licensure, a program may still be a licensure program if it is designed for licensure.

Under SARA Policy 5.2, which reinforces and expands the federal U.S. Department of Education Title IV regulations to non-Title IV institutions and programs, institutions must decide which programs are licensure programs. Neither NC-SARA nor the U.S. Department of Education has provided a comprehensive list.

The Title IV regulations ([CFR § 668.43\(a\)\(5\)\(v\)](#)) state that disclosures are required for an academic program “if an educational program is designed to meet educational requirements for a specific

professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.”

Some factors to consider when deciding if a program is designed for licensure:

- Professional/curricular standards, including programmatic accreditors aligned to licensure
- Licensing exam data reported
- Expectation that most graduates will seek licensure

Q: Would the reporting requirements ever depend on an individual student’s situation? for example, if a student is taking additional training while on a provisional (not full) credential while earning hours or waiting to take an exam (or retake an exam the student failed). It seems like there might be some tricky situations.

Both the Title IV regulations and SARA Policy 5.2 are connected to programs, not individual students. If the program or course is designed or advertised as preparing students for licensure, then it is a licensure program. Even if individual students may not pursue a license or already partially qualify for the related license, it does not impact the responsibility to provide disclosures or limit enrollment to only those States where the program “meets” educational requirements.

A somewhat related answer in the [U.S. Department of Education Certification Procedures Q&A](#) illuminates that the requirements are connected to the program—not individual students:

***LDR-Q13:** What if distance education students are eligible for Title IV aid but choose not to receive it? In those situations, can our institution enroll them in a program where licensure requirements are not met or not determined?*

***LDR-A13:** The disclosure requirements in 34 CFR 668.43 apply to all Title IV eligible programs leading to licensure or certification, regardless of whether the student enrolled in the program receives Title IV funds. If the student is enrolled via distance education or correspondence courses, the requirements in 34 CFR 668.14(b)(32) also apply regardless of whether a student is a Title IV recipient. That said, a school cannot circumvent these regulations by setting up an ineligible Title IV program.*

Q: How does this apply to a program located very close to a border and students may reside in one state but take ALL courses in the state where the university is situated. Can the students be considered 'local'?

SARA Policy 5.2 would not apply to programs or courses offered on your campus to students located on your campus.

If these are Title IV eligible programs, then the institution does need to provide public disclosures (“meets” or “does not meet” in every State where a determination has been made) and individual direct disclosures to any prospective student located in a “does not meet” or undetermined location at the time of initial enrollment. Where prospective students are located is dictated by the institution’s student location policy. Many institutions have created student location policies that treat all students who will be completing coursework on campus as located on campus at the time of initial enrollment.

Q: Can you reanswer this question? Can you talk about fully on ground programs and the licensure requirements? If a student has to be on ground to enroll, will take all courses on ground, and the licensure program meets requirements in the home state, do we still need to include licensure disclosures for all states? Does all of that change if/when the student takes one online course within the program?

SARA Policy 5.2 would not apply to programs or courses offered on your campus to students located on your campus.

If these are Title IV eligible programs, then the institution does need to provide public disclosures (“meets” or “does not meet” in every State where a determination has been made) and individual direct disclosures to any prospective student located in a “does not meet” or undetermined location at the time of initial enrollment. Where prospective students are located is dictated by the institution’s student location policy.

There are several questions and answers from the [U.S. Department of Education Certification Procedures Q&A](#) that can be helpful in understanding how taking an online course during the first term of enrollment impacts disclosure responsibilities:

***LDR-Q2:** We understand that if a school designs a program to meet educational requirements for a specific professional license or certification, or advertises that the program meets such requirements, we are required to publicly disclose all the States where the institution has determined that its program does and does not meet such requirements. But we have a question about what our responsibilities are regarding prospective students.*

Are institutions required to make this determination for every State/territory for all licensure-related programs? Or are they only required to make these determinations for States/territories where prospective distance education students are located? If the latter, could an institution wait and make a determination when they have a prospective student interested in the program?

***LDR-A2:** The requirements differ for on-campus and distance education or correspondence programs.*

Before a school enrolls a student from a particular State into an on-campus program, the school must ensure that the program meets all licensure requirements in the State(s) in which the institution is located. The school must also disclose to that student whether it has made a determination regarding whether the program meets licensure/certification requirements in the State where the student is located at the time of initial enrollment in the program. For a student attending a face-to-face program, the institution must disclose a list of all States where the institution has determined that the program does and does not meet such requirements.

*However, as mentioned in the October 31 final regulations, the Department is concerned that institutions enrolling out-of-State students into online programs may not be ensuring their programs have the necessary approvals for licensure or certification the way a school with a physical location would. Therefore, for a program offered through distance education or correspondence courses to a student in a State different than where the institution is located, the institution must determine that the program meets the licensure/certification requirements in the State where each student is located at the time of initial enrollment in the program. If such determination is not made or if the institution has determined the program does not meet such requirements, it cannot enroll students located in that State into the program and it should not be advertising the program. If an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation only in certain States, it would be a best practice to highlight those States when advertising the program. Please see the flowchart in **LDR-A1** for a visual outline of the disclosure and licensure requirements.*

LDR-Q3: *For purposes of compliance with 34 CFR 668.14(b)(32), how do we determine whether a prospective student is enrolled in “distance education”? If a student who enrolls in a program leading to licensure or certification takes an online general education course at the time of initial enrollment in the program but takes the certification courses all in-person, would that student be considered a distance education student?*

LDR-A3: *For any programs that offer any coursework via distance education, institutions should be aware that if there is any period of time during the first payment period when the student initially enrolls in the program where the student will be living in another State via distance education for any portion of the program, the student would be considered a distance education student for purposes of this requirement. As such, the program would need to meet the licensure requirements of the State in which the student completed any coursework via distance education. For purposes of applying the requirements in 34 CFR 668.14(b)(32), we would consider the first payment period to be the first semester in which the student is enrolled in a licensure program and takes at least one class that is required for that program.*

However, if the student will be located either on-campus or living in the same State as the institution while completing the required coursework, the program would only need to meet the licensure requirements in the State where the institution is located regardless of whether the student was enrolled in any online coursework. For example, if a student enrolls in a licensure program and takes at least one

online class (including a general education class) that counts toward the student's Title IV eligibility during their first semester (payment period), and attends that online class while living in another State, the requirements in 34 CFR 668.14(b)(32) would apply and the student would be considered a distance education student. On the other hand, if a student takes no courses through distance education in that first payment period or is living on-campus or in the same State as the institution while completing the distance education coursework, they would not be considered enrolled in distance education for purposes of these requirements.

*As a reminder, if the student is considered a distance education student, the institution is required to make a determination of the State in which the student is located at the time of initial enrollment in accordance with 34 CFR 600.9(c)(2). The institution must determine that the program meets the licensure/certification requirements in the State where each student is located at the time of initial enrollment in the program. If such determination is not made or if the institution has determined the program does not meet such requirements, then the student would not be permitted to enroll. However, as stated in the preamble to the October 31 final regulations and explained further in **LDR-A6**, 34 CFR 668.14(b)(32) allows an institution to offer a program leading to licensure or certification to a student who currently lives in a State where the program does not meet requirements for licensure or certification if the school obtains an attestation from the student about the specific State to which they intend to move, so long as the program satisfies the educational requirements for licensure in that State.*

Specific program questions

Q: What about a college credit Welding Certificate?

This depends on the State where the institution is located, where the students are located, and what specifically the certificate is designed (and advertised) to prepare students for.

Welding typically requires industry-specific certification (like from the American Welding Society) rather than a State-issued "license" to work. However, some states (e.g., Wisconsin) and specific roles in structural, pipe, or aerospace welding do require a State-issued "license" for employment.

Q: Would a Commercial Drivers License (CDL) school count in this? A CDL is a certification on a driver's license.

Yes, if the CDL school participates in the Title IV federal financial aid program and/or SARA.

Remember that "licensure" is an umbrella term. "Licensure" is anything State-issued that is required for employment. It could be called something other than a license – certification, certificate, endorsement, authorization, registration, etc.

Different CDLs (Class A, Class B, etc.), along with various endorsements and restrictions, are issued by each State department of motor vehicles. This seems to clearly fit the definition of a “licensure” program.

Q: The key is how the program is advertised, correct? If an online institution is planning to offer a BS in Construction Management, provided they do not say the program was designed for licensure, then they would not need to check requirements, correct?

Even if not being advertised for licensure, a program may still be a licensure program if it is designed for licensure.

Under SARA Policy 5.2, which reinforces and expands the federal U.S. Department of Education Title IV regulations to non-Title IV institutions and programs, institutions must decide which programs are licensure programs. Neither NC-SARA nor the U.S. Department of Education has provided a comprehensive list.

The Title IV regulations ([CFR § 668.43\(a\)\(5\)\(v\)](#)) state that disclosures are required for an academic program “if an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.”

Some factors to consider when deciding if a program is designed for licensure:

- Professional/curricular standards, including programmatic accreditors aligned to licensure
- Licensing exam data reported
- Expectation that most graduates will seek licensure

Q: What about an endorsement someone can get that stacks on their existing license. For example a licensed teacher that completes coursework required for a special-education endorsement?

Remember that “licensure” is an umbrella term. “Licensure” is anything State-issued that is required for employment in that occupation or profession. It could be called something other than a license – certification, certificate, endorsement, authorization, registration, etc.

In this case, a teacher who is completing a program to qualify for a special education endorsement – allowing them to teach special education students and/or in a special education setting, which they otherwise could not do without the endorsement – is in a “licensure” program.

Q: Would you consider the "Certified Mental Performance Consultant® (CMPC)" to be a licensure program? It is not state issued, but is marketed as desirable to work in this field (a highly trained professional who specializes in the mental performance aspects of sport and performance.)

At this time, Higher Education Licensure Pros is not aware of any State-issued license or certification for Mental Health Performance. Note that States can decide to license and regulate any profession or occupation at any time.

Keep in mind that “licensure” is an umbrella term for anything that is issued by a State entity that is required for employment in that profession or occupation. SARA Policy 5.2 does not apply to private organization-issued certifications or other credentials that are preferred for employment. In order to understand if certifications are issued by a State and required for employment, research must be completed into State law, board/agency websites, and other relevant third-party sources of information for licensed professions and occupations.

Q: This is a little bit tangential, but are there certifications that are advertised as part of degree programs that would be considered licensure programs? For example, my institution has programs that advertise preparing students for the Certified Mental Performance Consultant (for a kinesiology program) and Society for Human Resource Management certification.

It depends. If these certifications are designed or advertised to satisfy the educational requirements for licensure, then they are “licensure programs” and SARA Policy 5.2 applies. Keep in mind that “licensure” is an umbrella term for anything that is issued by a State entity that is required for employment in that profession or occupation. SARA Policy 5.2 does not apply to private organization-issued certifications or other credentials that are preferred for employment. In order to understand if certifications are issued by a State and required for employment, research must be completed into State law, board/agency websites, and other relevant third-party sources of information for licensed professions and occupations.

At this time, Higher Education Licensure Pros is not aware of any State-issued license or certification for Mental Health Performance or Human Resource Management. Note that States can decide to license and regulate any profession or occupation at any time.

Q: We have a few certificate programs, (noncredit) that are being used as pre-requisites to gain access to a graduate program. We have another that a certificate program if passed can be transferred to an MBA program. Do we need full "meet" and "does not meet" disclosures?

If these certificates are designed or advertised to satisfy the educational requirements for licensure, then they are “licensure programs” and SARA Policy 5.2 applies. Keep in mind that “licensure” is an umbrella term for anything that is issued by a State entity that is required for employment in that profession or occupation. SARA Policy 5.2 does not apply to private organization-issued certifications or other

credentials that are preferred for employment. In order to understand if certifications are issued by a State and required for employment, research must be completed into State law, board/agency websites, and other relevant third-party sources of information for licensed professions and occupations.

Q: In our state, sitting for a CPA exam requires 120-credits while CPA licensure requires 150-credits comprising of specific accounting and business coursework, plus a bachelor's degree. Our students would need to complete both our undergraduate and graduate programs to fully meet licensure in our state. Separately neither of our undergraduate or graduate programs technically meet the licensure requirements. Would our accounting bachelor's degree program or our 30-credit graduate accounting program fall under federal requirements or SARA 5.2 requirements?

This depends on how the programs are designed and advertised.

Under SARA Policy 5.2, which reinforces and expands the federal U.S. Department of Education Title IV regulations to non-Title IV institutions and programs, institutions must decide which programs are licensure programs. Neither NC-SARA nor the U.S. Department of Education has provided a comprehensive list.

The Title IV regulations ([CFR § 668.43\(a\)\(5\)\(v\)](#)) state that disclosures are required for an academic program “if an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.”

Some factors to consider when deciding if a program is designed for licensure:

- Professional/curricular standards, including programmatic accreditors aligned to licensure
- Licensing exam data reported
- Expectation that most graduates will seek licensure
- Ability to work in the related profession or occupation without a license

Additionally, many states have recently adopted new pathways for CPA licensure that reduce total credits required for licensure. As more states adopt these standards, many institutions are re-evaluating their accounting programs.

Process considerations

Q: Will SARA be looking at this for the upcoming renewals?

Institutions should understand the specific expectations of their State Portal Entity (SPE).

On the current [Application and Approval Form for Institution Participation in SARA](#), it indicates “(w)hen the State Portal Entity enters “yes” on this form, the State affirms that the applicant institution has followed proper procedures and provided necessary documents to operate under SARA.” SPEs must confirm that the institution has met all requirements on the form in order for SARA approval to be extended.

Section 12 of the form indicates “The institution agrees to provide notifications to students related to professional licensure. Any institution approved to participate in SARA that offers courses or programs designed to lead to professional licensure or certification or advertised as leading to licensure must satisfy all federal requirements for disclosures regarding such professional licensure programs. For SARA purposes, these requirements will also apply to non-Title IV institutions and programs.” This language aligns with the current language of SARA Policy 5.2.

Q: Since review and updating determinations are not dictated by USDOE or SARA, do you have a recommendation on frequency of review?

Because licensure requirements do change frequently, and because other federal and SARA reporting requirements occur on an annual basis, Higher Education Licensure Pros recommends at a minimum a once a year process for review of State licensure requirements, comparison to current curriculum of programs, and updating of all disclosures.

Q: What if a student is working for a company remotely (say, in an internship), with out of state offices? Does this policy apply?

From the [SARA Policy manual definitions](#):

33. “Out-of-state learning placement” means: experiential learning placements such as, but not limited to, clinical rotations, internships, or student teaching offered by SARA-participating institutions in locations outside their home state. For greater detail, see data reporting handbooks annually provided by NC-SARA and available at www.nc-sara.org.

Q: What if there is an affiliation agreement between a 2-year community college and a 4-year university (student transfers associate's degree into bachelor's degree program)? Is the final granting university responsible?

The 4 year out-of-state university would be responsible for PPA Certification/written attestation and disclosures at the time of initial enrollment to the licensure program. In these scenarios, institutions may want to provide information about licensure at the time of enrolling in to the Community College, so that students are not later surprised by enrollment limitation and/or written attestation requirements.

Keep in mind that the goal of these regulations is to protect students from enrolling in a licensure program that will not help them meet career goals and employment after completion.

Q: Kris. If we meet the state requirements for a third party provider course/program, how do we think about out of state placements they may arrange without our knowledge?

While many functions can be delegated to third parties, compliance cannot. Institutions must work with the third party provider to be sure they understand compliance requirements and limitations. By enrolling students in out of state placements for a non-Title IV or non-credit “licensure program”, it could trigger the need to satisfy SARA Policy 5.2 requirements. Third party providers sometimes need education on how SARA facilitates their ability to enroll students located in other states or completing placements in other states, on behalf of the institution. With enough institutions speaking up, most third party providers will likely devote more resources and staff to these compliance areas.

Q: Please clarify: if we offer a program that we are unable to determine if the program meets the educational requirements in a specific state, we must restrict enrollment, but can provide a written attestation for the students. For this, it doesn't matter if the program is for credit or is non-credit?

NC-SARA counsel and staff have indicated that the requirements of Policy 5.2 include licensure disclosures ([34 CFR § 668.43\(a\)\(5\)\(v\)](#) and [34 CFR § 668.43\(c\)](#)) and through reference, the PPA certification/enrollment restrictions/written attestations ([34 CFR § 668.14\(b\)\(32\)](#)).

As a result, students (including non-Title IV programs and non-credit courses) should be located in a jurisdiction where offering “meets” educational requirements for licensure, at time of initial enrollment. This includes non-Title IV programs and non-credit courses, if they are a “licensure program” and being offered in other jurisdictions through SARA authorization.

If a student is not located in a “meets” jurisdiction, they may still enroll if they plan to seek licensure and employment in a “meets” jurisdiction. The student must provide a written attestation, naming the one “meets” jurisdiction where they plan to seek licensure and employment, prior to enrollment.

Licensure compacts and reciprocity agreements

Q: Can you talk about compacts like the Nurse Licensure Compact and other reciprocity agreements? If your program meets requirements through reciprocity, does that suffice for a "Meets" determination?

Institutions may be able to utilize a licensure compact or reciprocity agreement in making “meets” determinations, however, no two compacts or reciprocity agreements are alike.

Some points to consider:

- Who is covered? Recent program graduates or only experienced professionals?

Compact/agreement must cover recent program graduates in order to be relevant.

- Will they be issued a license by receiving state or does it only cover practicing across state borders? Compacts/agreements covering practice across state lines (such as the Nurse Licensure Compact) are likely less relevant to making a “meets” determination.
- What additional requirements (if any) will graduates of your program need to satisfy to utilize this pathway to licensure in another state? If anything prevents immediate licensure (temporary is ok) and employment, this would be a barrier to relying on the compact/reciprocity agreement.

From [U.S. Department of Education Certification Procedures Q&A](#):

***LDR-Q8:** In responding to a few comments in the preamble to the October 31 final regulations, the Department noted that reciprocity and licensure compacts are a pathway to licensure for some people. Does this mean that institutions can rely on licensure compacts or reciprocity agreements to indicate that their program “meets” educational requirements in another State or territory? If this is a possibility, can it be any mechanism that facilitates licensure in other States, or does it need to be specific for recent graduates (those without any licensed work experience)? Some compacts and reciprocity agreements require that the professional have one or more years working as a licensed professional before qualifying to utilize that pathway to licensure or practice across State lines.*

***LDR-A8:** These regulations mandate that the program satisfy the applicable educational requirements for professional licensure or certification requirements in the State in which a student is located or in the State where the student seeks employment after completing the program. The requirement would be met if completion of a program qualifies the student to take any licensure or certification exam that is needed to practice or find employment in an occupation that the program prepares the student to enter. Nothing prohibits an institution from demonstrating that the program meets this requirement through a reciprocity agreement.*

*In order for reciprocity to meet the requirement for a program to satisfy the applicable educational requirements for licensure, the completion of the program must qualify the student to sit for a required licensure or certification exam or find employment in an occupation **immediately** upon completion of the program. For example, an acceptable situation is a student completing a teacher certification program in State A and State B granting the student a conditional certification that allows the student to begin teaching in State B immediately, and in order for the student to become fully certified, the student will need to complete a State specific course while they teach successfully in State B for three years. An example that **would not** satisfy the requirements in 34 CFR 668.14(32)(ii) is a student completing a teacher certification program in State A who would be required to take additional coursework after completing their program in order to begin teaching or take a licensure exam required to obtain employment in State B. Additionally, a situation where reciprocity is conditioned upon a graduate having worked in the profession for a certain number of years before being permitted to sit for the required*

licensure and/or certification in the other State would mean that the program **does not** satisfy the requirements in 34 CFR 668.14(32)(ii).

The intent of this provision is for students to be certain that a program preparing them for licensure or certification in a profession for which such credentials are necessary actually meets those requirements in the State where they are located or one to which they intend to move.

Q: Can you discuss reciprocity agreements, particularly teacher education programs? If another state would offer graduating student employment (provisional licensure) once the student received licensure in the institution's home state, but full licensure in the other state might require additional coursework or other requirement while they work in the field, does the institution meet the federal and SARA licensure requirements.

Institutions may be able to utilize a licensure compact or reciprocity agreement in making "meets" determinations, however, no two compacts or reciprocity agreements are alike.

Some points to consider:

- Who is covered? Recent program graduates or only experienced professionals? Compact/agreement must cover recent program graduates in order to be relevant.
- Will they be issued a license by receiving state or does it only cover practicing across state borders? Compacts/agreements covering practice across state lines (such as the Nurse Licensure Compact) are likely less relevant to making a "meets" determination.
- What additional requirements (if any) will graduates of your program need to satisfy to utilize this pathway to licensure in another state? If anything prevents immediate licensure (temporary is ok) and employment, this would be a barrier to relying on the compact/reciprocity agreement.

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LDR-A8: *These regulations mandate that the program satisfy the applicable educational requirements for professional licensure or certification requirements in the State in which a student is located or in the State where the student seeks employment after completing the program. The requirement would be met if completion of a program qualifies the student to take any licensure or certification exam that is needed to practice or find employment in an occupation that the program prepares the student to enter. Nothing prohibits an institution from demonstrating that the program meets this requirement through a reciprocity agreement.*

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The intent of this provision is for students to be certain that a program preparing them for licensure or certification in a profession for which such credentials are necessary actually meets those requirements in the State where they are located or one to which they intend to move.

Examples of disclosures

Q: Are there Institutions working with HELP who have displayed this information on their website well, and in line with newer ADA guidelines? If so, are you able to share who those are?

While any webpage can be made compliant with WCAG 2.1 (AA) standards, in general displaying public disclosures directly on the webpage is more easily made accessible than providing links to spreadsheet or PDF downloads. Similarly, while interactive maps are more visually appealing, these can also present significant accessibility challenges.

Here is an example of a clear public disclosure webpage that could more easily be compliant with WCAG 2.1 (AA) standards than some alternative formats: <https://www.stmary.edu/professional-licensure>
Note, that HELP has not confirmed this webpage's compliance with the standards.

Q: Are there any samples of notifications for individuals and what should be on your website? If no samples, is there a list of schools that excel at this?

Higher Education Licensure Pros created [these examples](#) for institutions to consider when developing public disclosures, individual direct disclosures, and the written attestation exception.