



MIDWESTERN
HIGHER EDUCATION
— **COMPACT** —

Behind the Work: Uncovering the True Scope of Licensure Compliance Challenges in Higher Education

May 28, 2026



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McNicholes



Any resources
available will be
posted on the
MHEC website.



Engage with
colleagues in the
chat. Questions in
the Q&A, please!



Please
complete
our survey.



- **Sarah Cheverton**, James Madison University
- **Kathryn Kerensky**, State Authorization Network (SAN)
- **Kris Maul**, Higher Education Licensure Pros (HELP)

Agenda

- The Impact
- The Responsibilities
- The Research
- Insights from Licensing Boards
- From Findings to Action
- Implementation & Process
- Considerations
- Questions



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.

The Impact

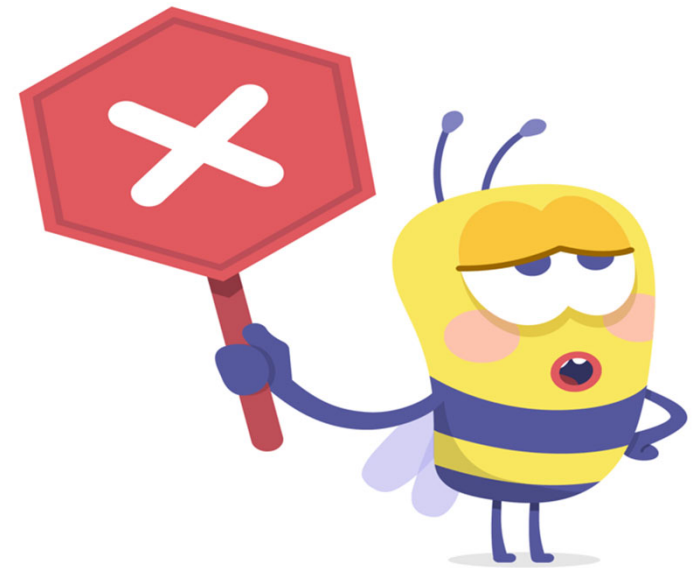


A Shift That Fundamentally Changed Enrollment Decisions

Did You Know?

Institutions generally may not enroll students in licensure programs unless they have determined the program meets educational requirements in the student's state.

If they cannot make that determination → they generally cannot enroll the student.



From Disclosure to Determination: How Federal Requirements Evolved

Disclosure Framework (Initial)

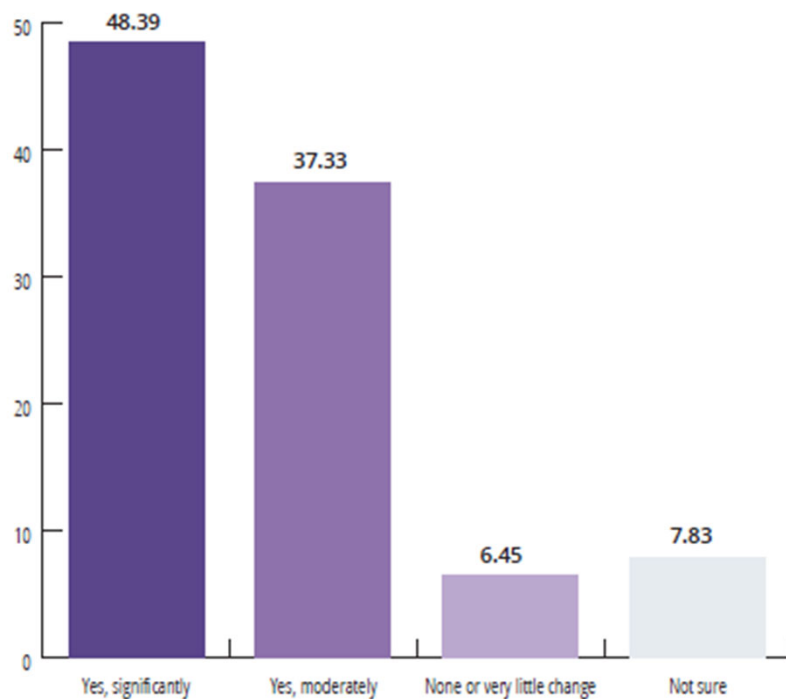
- + Required disclosures regarding whether program meets or does not meet state educational requirements
- + Public disclosures (meets /does not meet by state)
- + Direct notifications to students
- + Students could still enroll

Certification Framework (Current)

- + Disclosures still required
- + Institutions must determine if programs meet requirements
- + Enrollment restricted if determination cannot be made
- + Increased institutional responsibility and risk

Workload and Capacity Pressures Are Widespread and Growing

Overall Perceived Increased in Workload

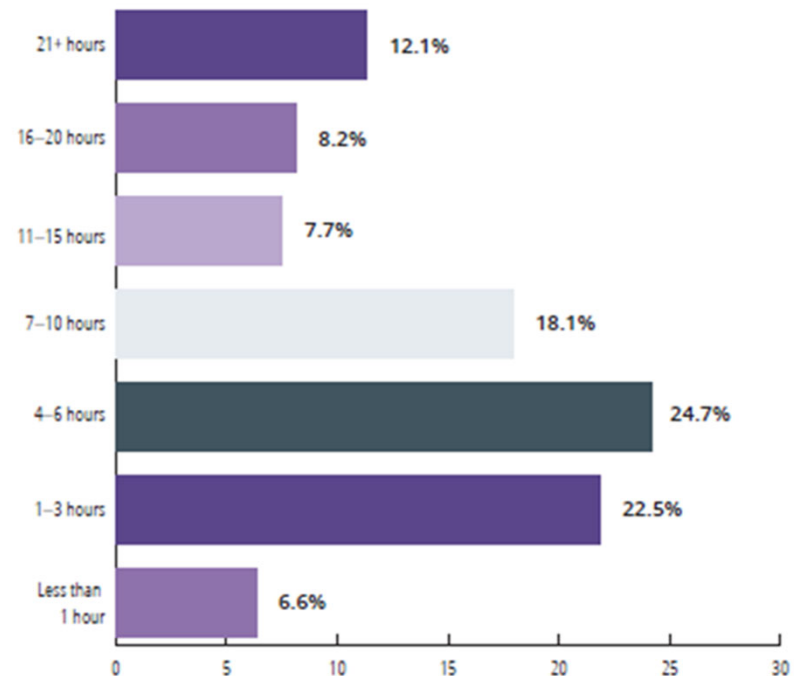


- 86% report a moderate or significant increase in workload
- Many institutions report no corresponding increase in staffing
- Small incremental increases compound across programs and states, amplifying overall burden

"Undue Burden"

- “It has been an undue burden. 4–6 hours doesn’t sound like a lot, but 50 states, plus territories and multiple programs, it’s a lot for one person. All these requirements are burdensome. No public institution wants to harm students. There has to be a better way.”

Increase in Average Weekly Workload



AUDIENCE POLL #1

How would you describe the workload for professional licensure compliance at your institution?

- Significant (high, ongoing demand; dedicated time/resources needed)
- Moderate (regular but manageable; shared across roles)
- Little workload (minimal, occasional tasks only)
- Not currently applicable (no professional licensure responsibilities)



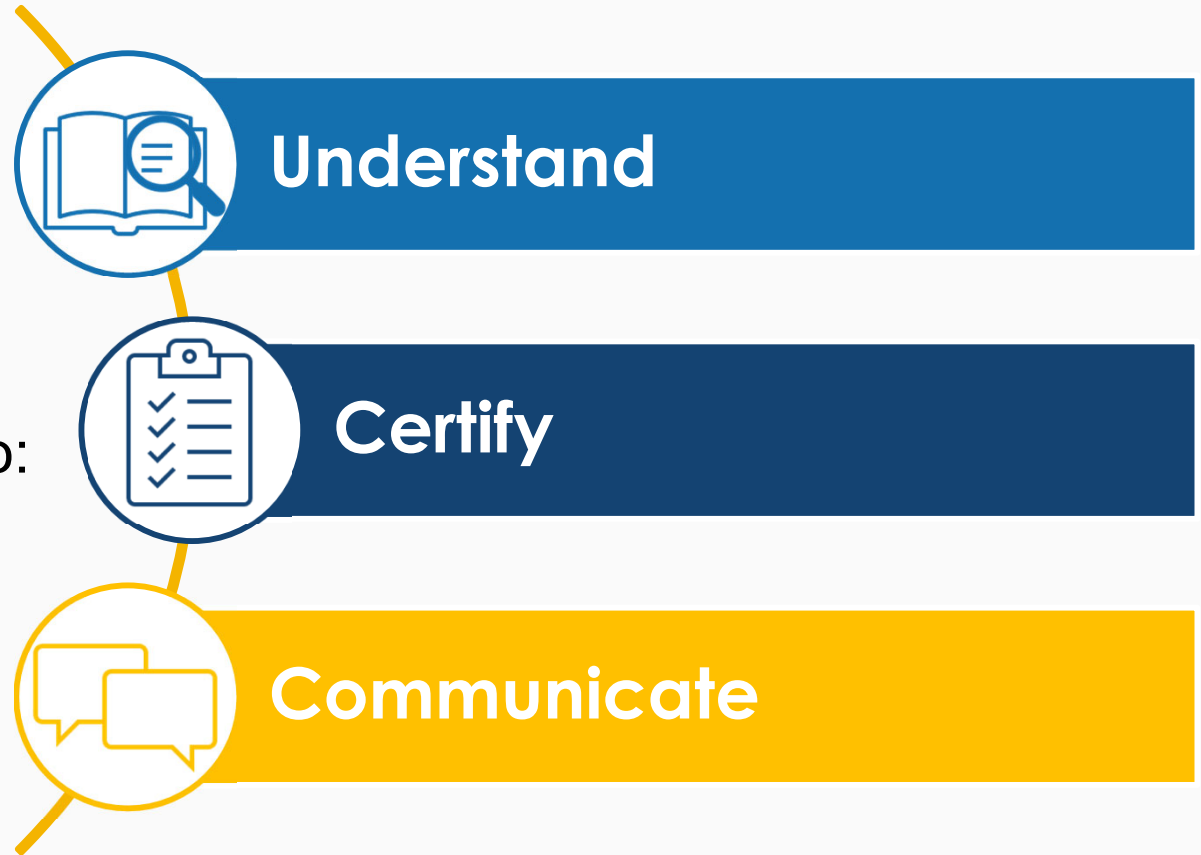


The Responsibilities

Why licensure compliance is so complex

Responsibilities

Federal regulations and SARA Policy 5.2 require institutions to:



Understand

Institutions must **understand** if **licensure programs** meet educational requirements for licensure in each state and U.S. territory where **recruiting, advertising, and enrolling**. To understand, institutions must research in all states and territories:

- **Every Licensure Program Type**
- **Accreditation Requirements**
- **Curriculum & Supervised Experience Specifications**
- **Unique In-Program Standards**



Understand (cont.)

- +59 jurisdictions with different requirements (approvals, reporting, licensure, etc.)
- +Licensing boards operate differently across jurisdictions
- +Most boards cannot provide binding determinations
- +Requirements are not always centralized or clearly published
- +Institutions must often independently interpret regulations



Certify



Institutions must **certify** if **licensure programs** meet educational requirements for licensure where the institution is located and where *distance education* students are located at the time of enrollment, through Program Participation Agreement (PPA) Certification under **Federal Title IV Regulations** ([34 CFR § 668.43](#) and [34 CFR § 668.14](#))

Communicate

Institutions must **communicate** licensure information to prospective & current students. These licensure disclosures should be communicated publicly and individually.

Public Disclosures (Website)

- Must state “Meets” or “Does not Meet”
- “Not Determined” limited
- Applies in all states & territories where students are located
OR the program is advertised/recruited

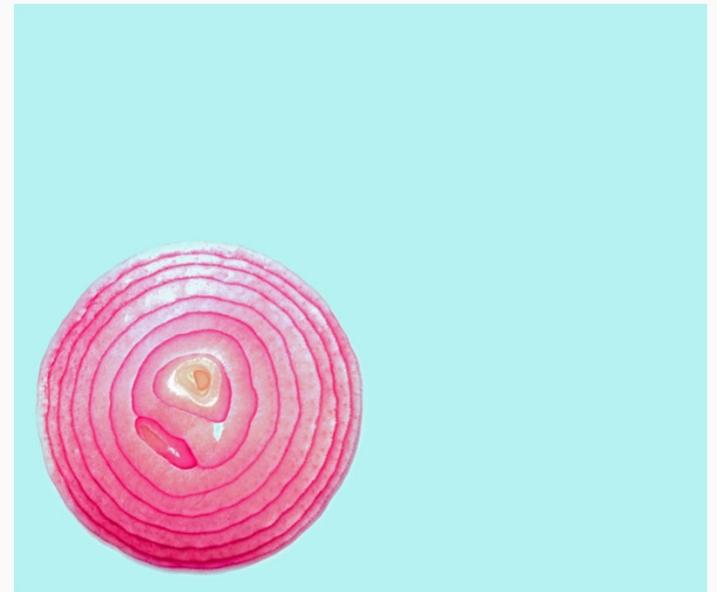
Individual Disclosures (Direct)

- Student location is key
- Required before initial enrollment if in a “does not meet” state – written attestation also required
- Must notify within 14 calendar days of learning a program shifts to “does not meet”

Multiple Overlapping Obligations

Institutions managing licensure programs may already be responsible for:

- + State authorization and SARA-related obligations
- + Licensing board approvals (including clinical, faculty, and experiential learning requirements)
- + Consumer protection and misrepresentation compliance
- + Additional federal requirements such as:
 - o Gainful Employment / Financial Value Transparency
 - o Veterans benefits compliance
 - o Workforce Pell and emerging initiatives



Certify Responsibility Increased Institutional Work

- + Institutions trying to avoid restricting enrollments
- + Deeper state-by-state analysis required
- + Increased interactions with licensing boards
- + More collaboration with academic programs
- + Increased documentation expectations





AUDIENCE POLL #2

For you, where has most of the work in professional licensure compliance come from? (Select all that apply)

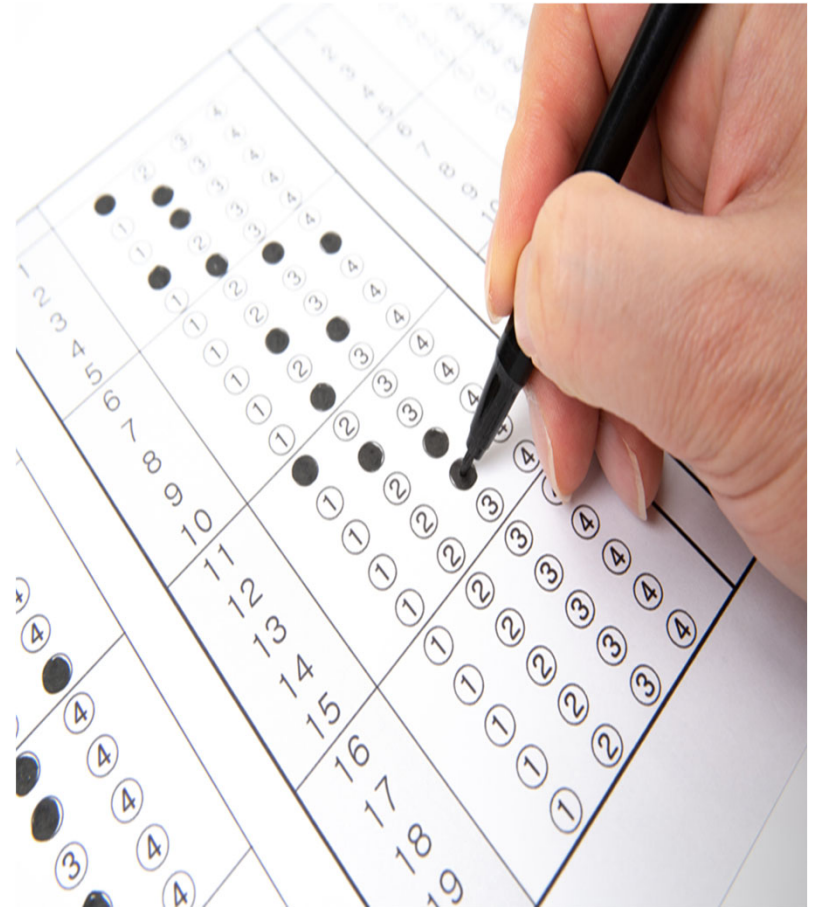
- State research and determination of requirements
- Disclosures
- Internal coordination & training (e.g., working with academic units, advising staff, faculty education)
- Ongoing monitoring (e.g., tracking regulatory changes)
- Data reporting
- Other (please share in the chat)

The Research



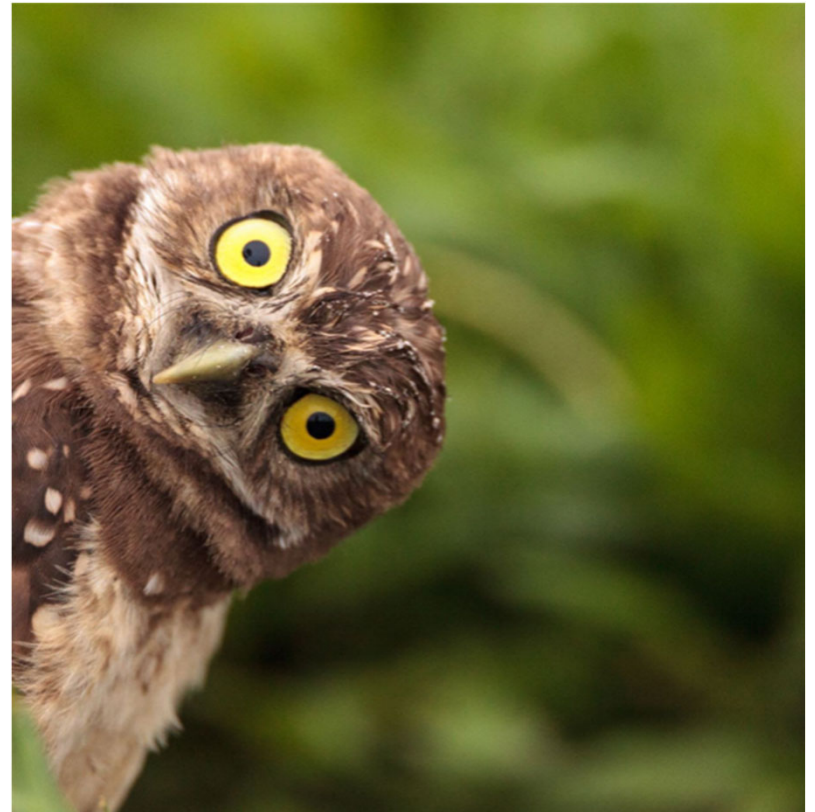
About the Survey – Survey Details

- 228 institutional responses
- In-depth interviews conducted
- Multiple sectors, sizes, and program types represented



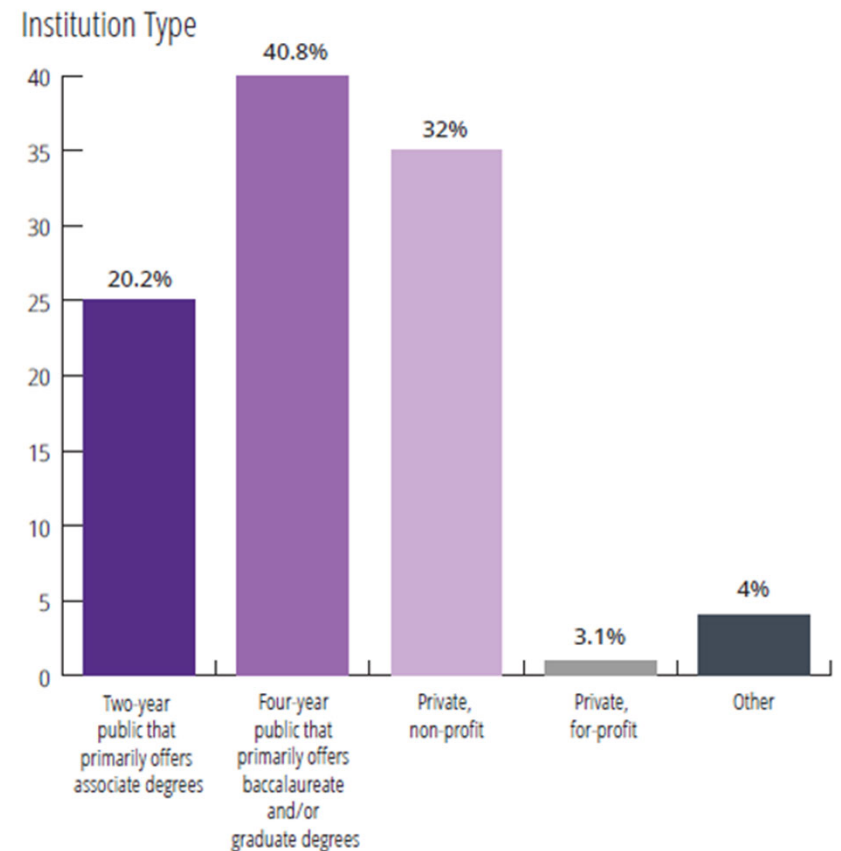
About the Survey – What We Wanted to Understand

- Where is the workload coming from?
- How are institutions managing workload?
- What decisions/impacts resulted?



Findings Reflect Broader System-Level Trends

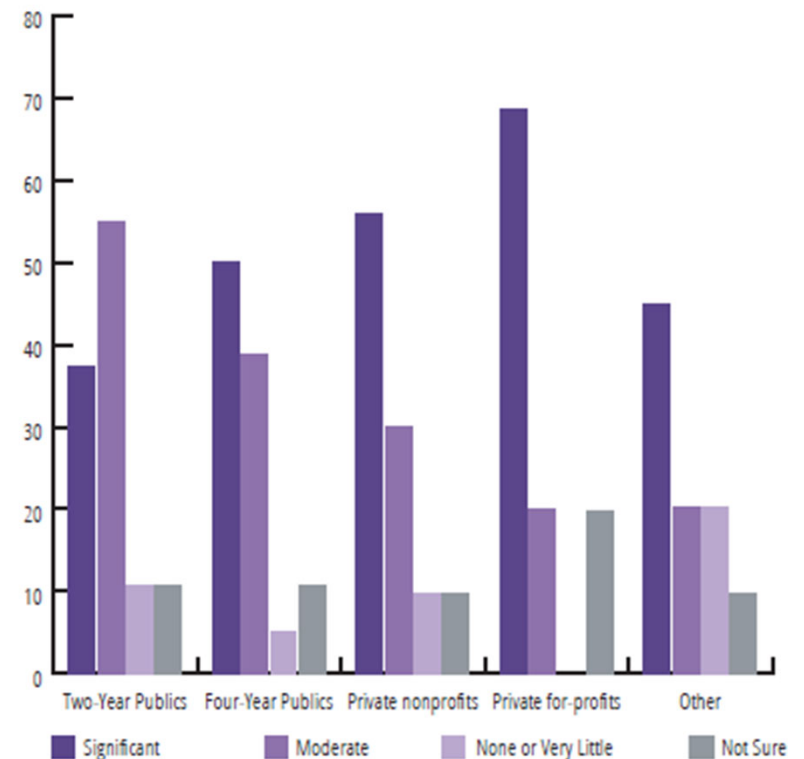
- **Public institutions:** Two-year (20.2%) and four-year (40.8%) colleges and universities.
- **Private institutions:** Non-profit (32%) and for-profit (3.1%) schools.
- A small number of respondents (4%) represented unique institutional types, such as system offices overseeing multiple campuses, career schools, graduate-only or law/professional schools, vocational and technical programs, and specialized health-focused institutions.



Workload Is Shared Across Institutions—But Experienced Differently

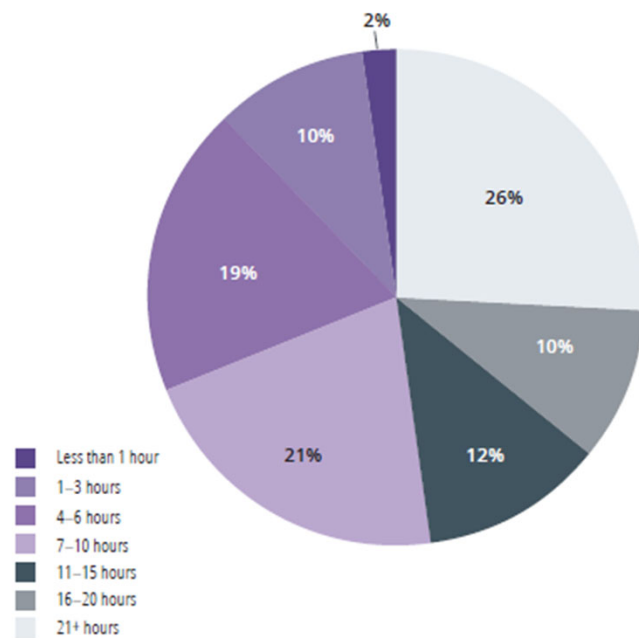
- All types of institutions experienced increases, though to varying degrees. Private for-profits were most likely to describe a significant increase (68%), albeit with a small sampling size, while two-year publics most often reported moderate increases (54%)
- A slight majority of all institution sizes reported a significant increase in workload compared to moderate or minimal change (with the exception of institutions with 1,000-2,999 students)

Perceived Workload Increase by Institution Type

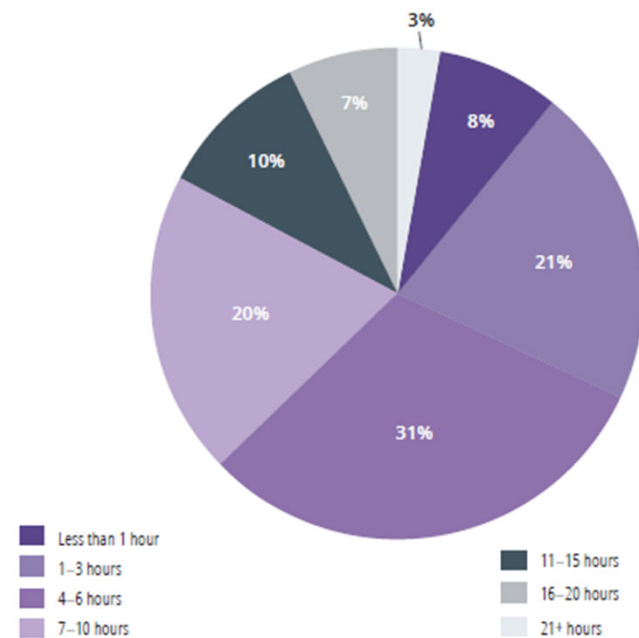


Workload Isn't Just About Volume—It's About Capacity

Hourly Reports by Institutions Reporting Significant Increases



Hourly Reports by Institutions Reporting Moderate Increases

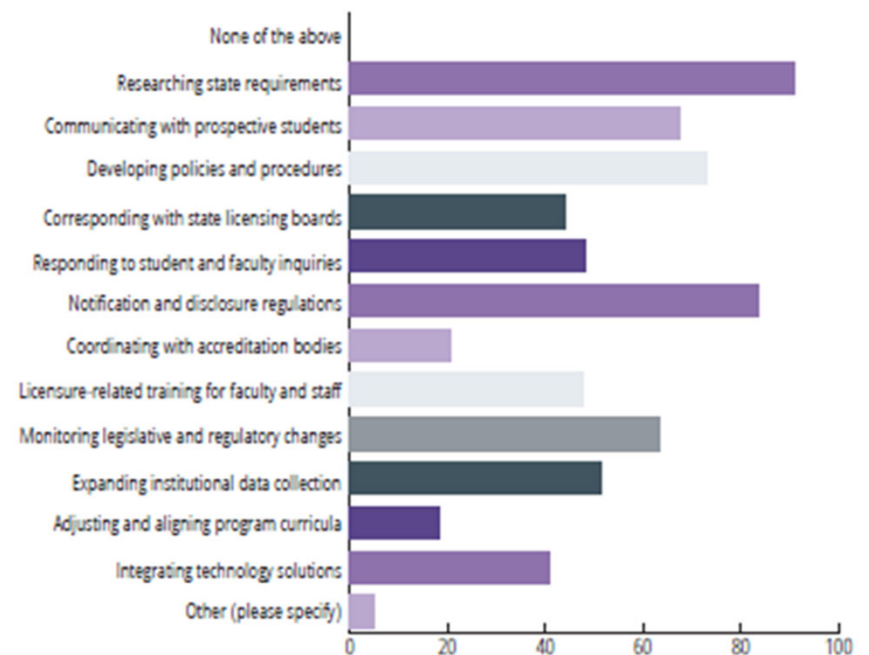


Far More Than Paperwork – This Is Complex, Interpretative Work

Top workload areas:

- state research (90%),
- disclosures (85%),
- internal coordination & training (79%),
- ongoing monitoring (63%),
- data reporting (51%).

Compliance Workload Increase



The chart shows areas where compliance workload has increased the most.

Behind the Disclosure: The Systems, People, and Processes Required

- +93% report having a public disclosure process
- +77% report having a direct disclosure process
- +Direct disclosure processes often involve:
 - oCRM systems
 - oStudent Information Systems
 - oInstitutional and program applications
 - oPublic disclosure websites
- +Most frequently involved units:
 - oAdmissions (77%)
 - oAcademic Programs (65%)
 - oCompliance Offices (53%)
 - oRegistrar (42%)

Presence of Direct Disclosure Process by Type of Institution

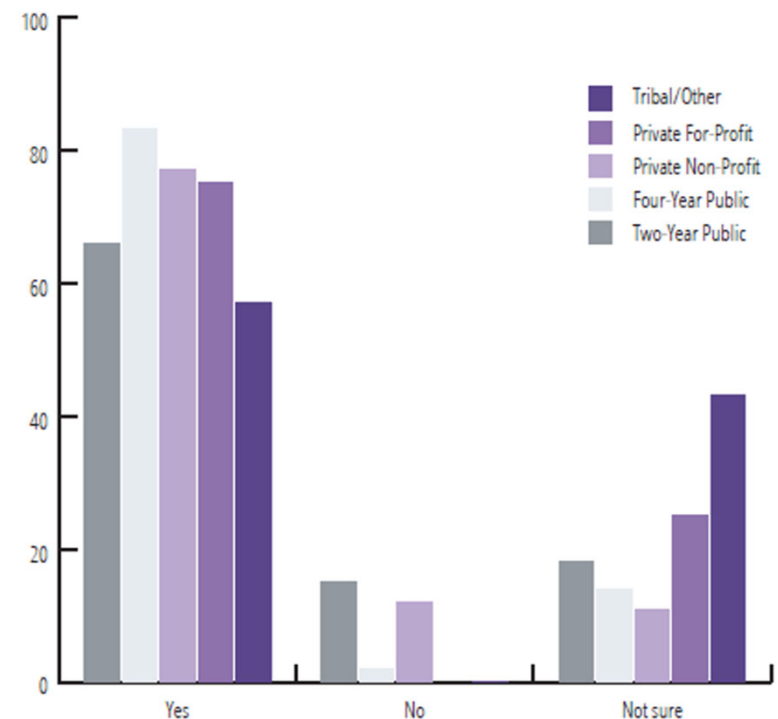
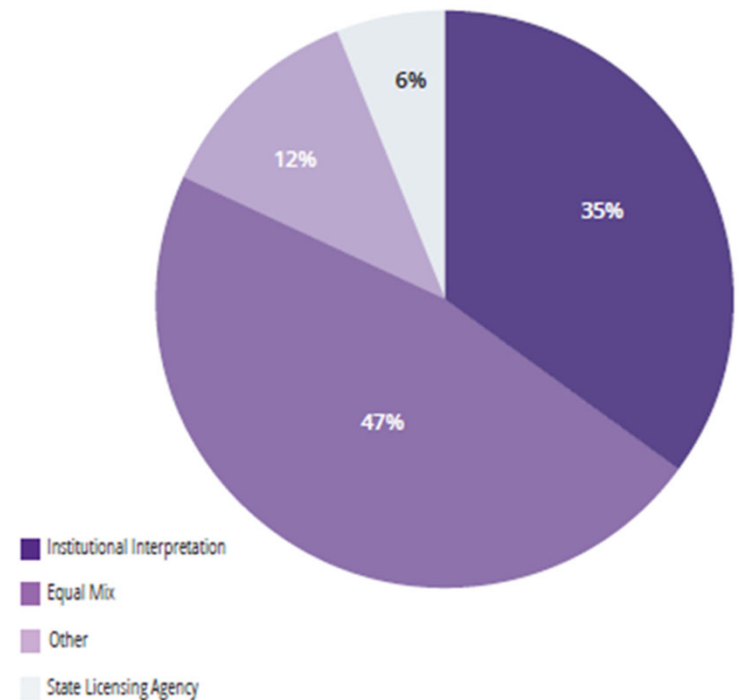


Figure C.3.1 shows the presence of direct disclosure process by type of institution.

Institutions Are Making High-Stakes Decisions Without Clear Answers

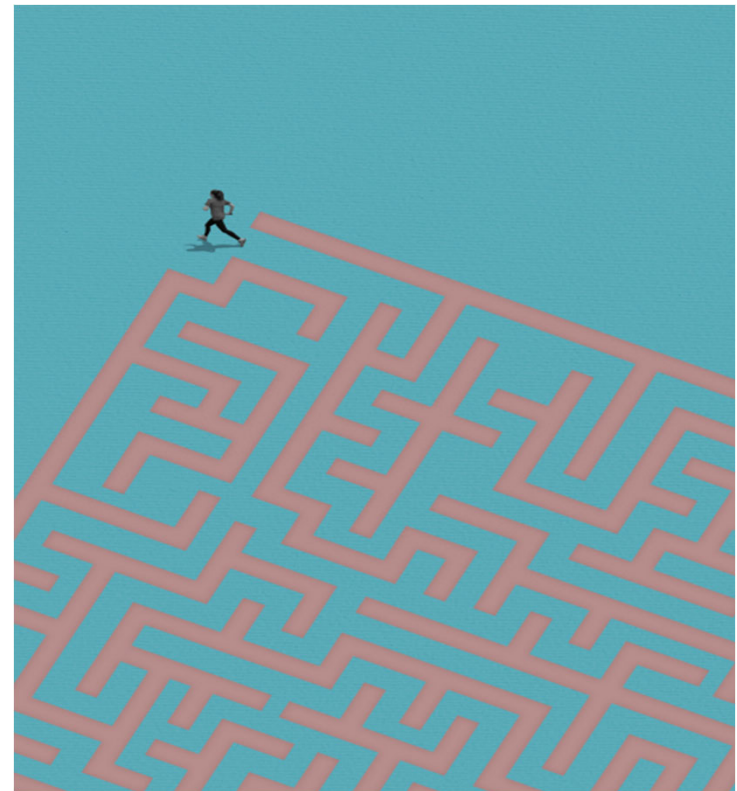
- Only 6% rely on direct confirmation from state licensing boards
- 35% rely on their own interpretation
- 47% use a mixed approach (internal interpretation + external sources)
- The variability of institutional interpretations may create confusion for students and program completers.

Percent of Institutions Using Program Determination Method

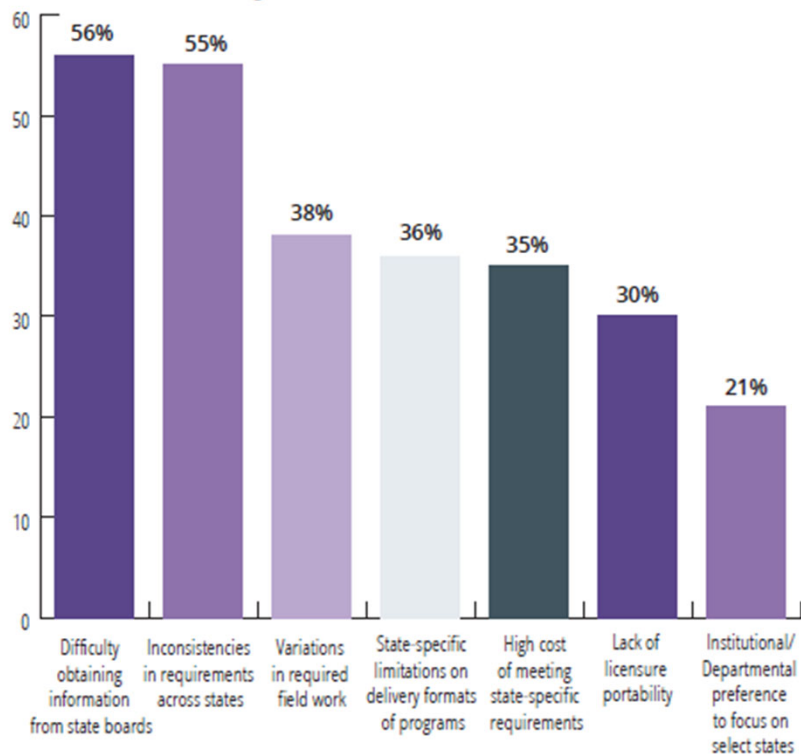


Why Decision-Making Is So Challenging in Practice

- + State requirements vary significantly
- + Licensing boards operate differently across jurisdictions
- + Some boards cannot provide binding determinations
- + Requirements are not always centralized or clearly published
- + Institutions must often independently interpret regulations



Reasons for Restricting Enrollment



Restrictions Often Reflect Gaps in Available Information

- ~32% of institutions report restricting programs or states
- The most common challenge (56%) was **difficulty obtaining clear or updated information from state licensing boards**, followed closely by **inconsistencies in educational requirements across states** (54%).
- Over one-third of the respondents (35%) cited the **high cost of meeting state-specific licensing board requirements**.
- Another 36% **referenced state-specific limitations** (particularly those restricting online or hybrid modalities)

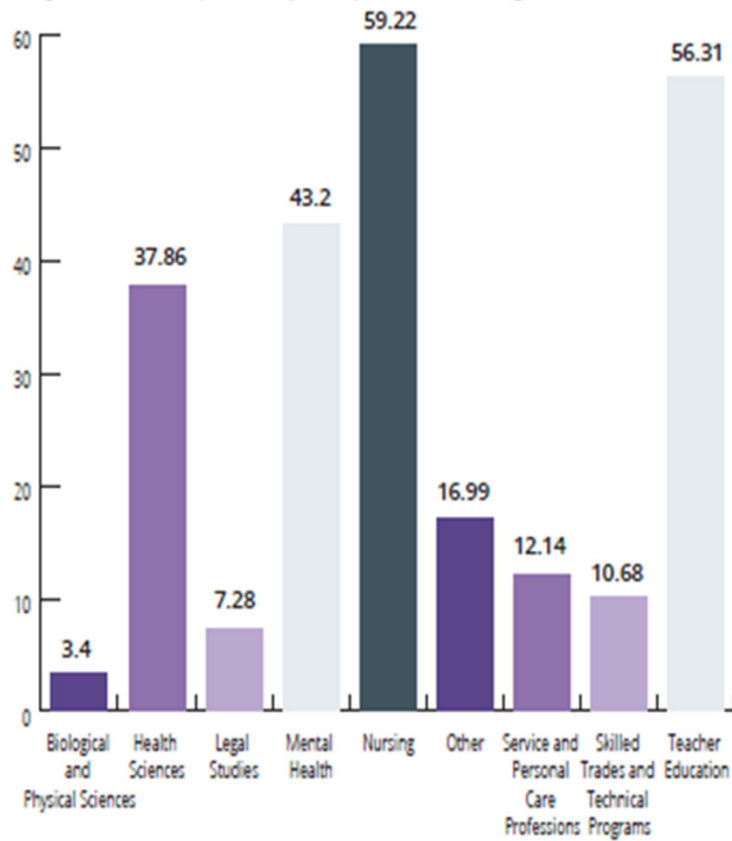


AUDIENCE POLL #3

Select all professions/programs where you have had to restrict enrollment due to licensure requirements:

- Nursing
- Teacher education / educator preparation
- Mental health professions (e.g., counseling, social work, psychology)
- Service and personal care professions (e.g., cosmetology, culinary, hospitality-related licensing areas)
- Skilled trades and technical programs (e.g., HVAC, electrical, automotive, construction)
- Other (please specify in chat)
- We have not had to restrict enrollment in any programs for these reasons

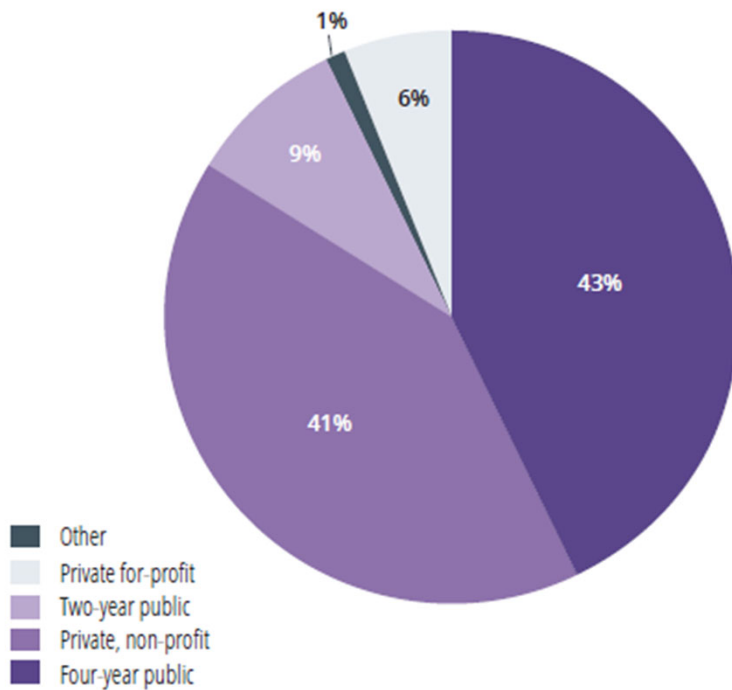
Programs Most Impacted by Compliance Challenges



A Closer Look at Where Restrictions Are Occurring

- ~32% of institutions report restricting programs or states
- Most commonly restricted fields:
 - Nursing (59%)
 - Teacher Education (56%)
 - Mental Health (43%)
 - Health Sciences (38%)
- Frequently restricted states include: California, New York, Texas, Washington, Colorado, Georgia, and Tennessee.

Types of Institutions That Restricted Enrollment



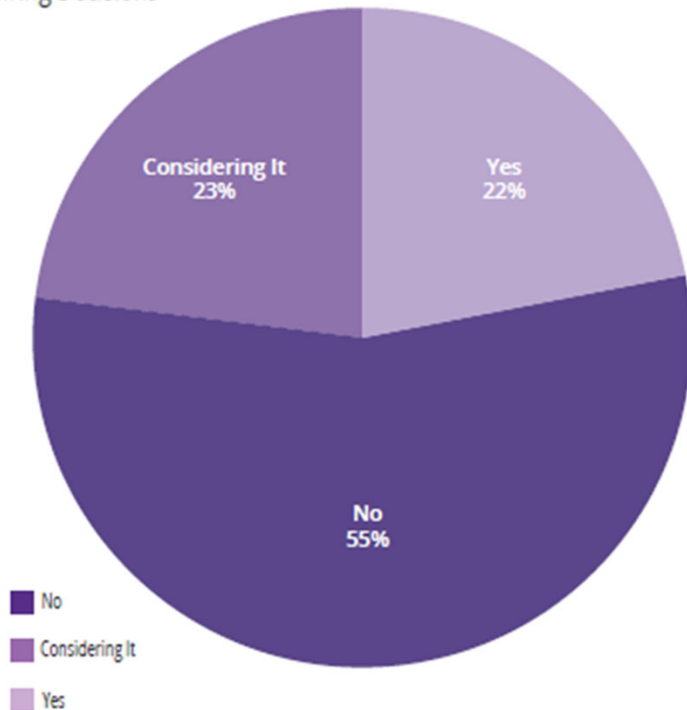
More Programs, More States — More Risk Exposure

- The largest share of institutions reporting enrollment restrictions were four-year public (43%) and private nonprofit institutions (41%).
- Institutions implementing restrictions also tend to manage a large portfolio of licensure programs.
- Just over one-quarter of respondents reported increases of 16 or more hours per week. Another 52% indicated increases of 4–10 hours weekly.

Resource Disparities Drive Uneven Risk and Enrollment Decisions

- Variation in staffing capacity across institutions
- Differences in systems, tools, and internal resources
- Divergent levels of risk tolerance in compliance decision-making

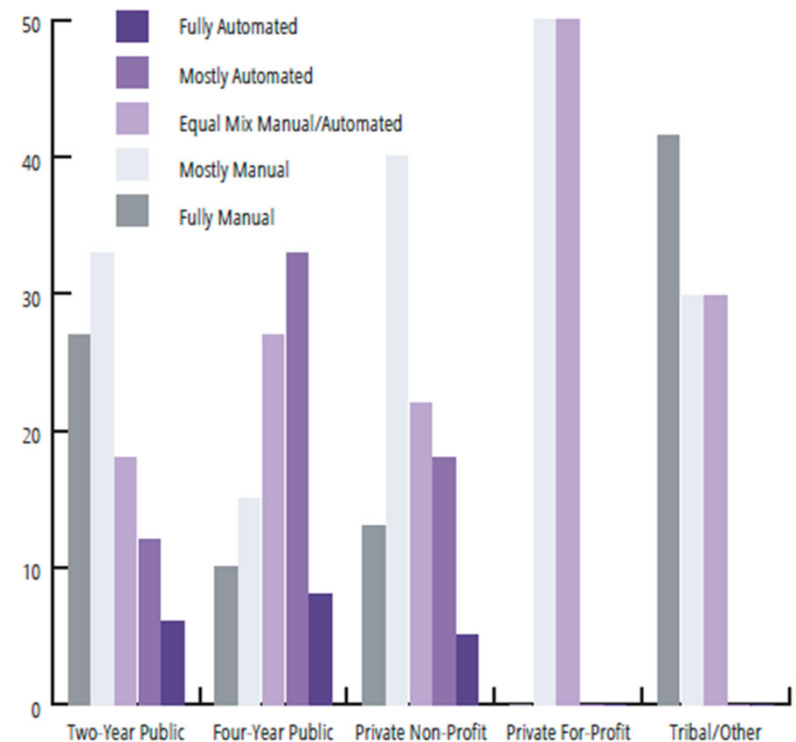
Hiring Decisions



Automation Helps – But Does Not Replace People

- 4-year public institutions more likely to automate some or majority of processes
- Private non-profits and profits more likely to use a mostly manual or combined process

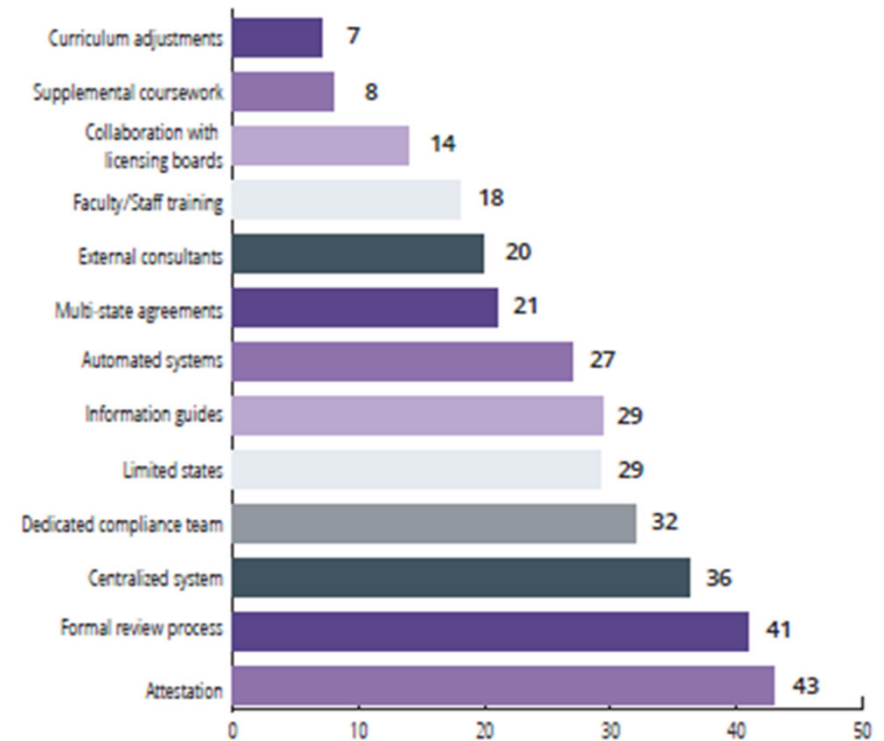
Level of Automation by Type of Institution



Institutions Are Building Systems Within Capacity Limits

- 43% use student attestation processes
- 41% regularly review and update licensure information
- 36% rely on centralized documentation systems
- Institutions also use manual + automated tracking systems and a range of internal workflows

Frequency of Institutional Response to Differing State Requirements




Insights from Licensing Boards



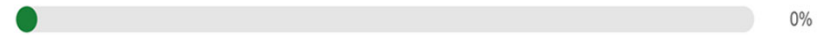
Licensing Agencies Left Out of Federal Rulemaking

- Licensing agencies were not directly consulted in developing federal regulations affecting professional licensure.
- Limits alignment between federal policymaking and state licensure authorities
- Highlights a need for stronger collaboration in the broad licensing community

 Have you collaborated with the U.S. Department of Education to develop regulations relating to professional licensure that impact an institution's ability to serve students?

Multiple Choice Poll  23 votes  23 participants

Yes - 0 votes



No - 23 votes

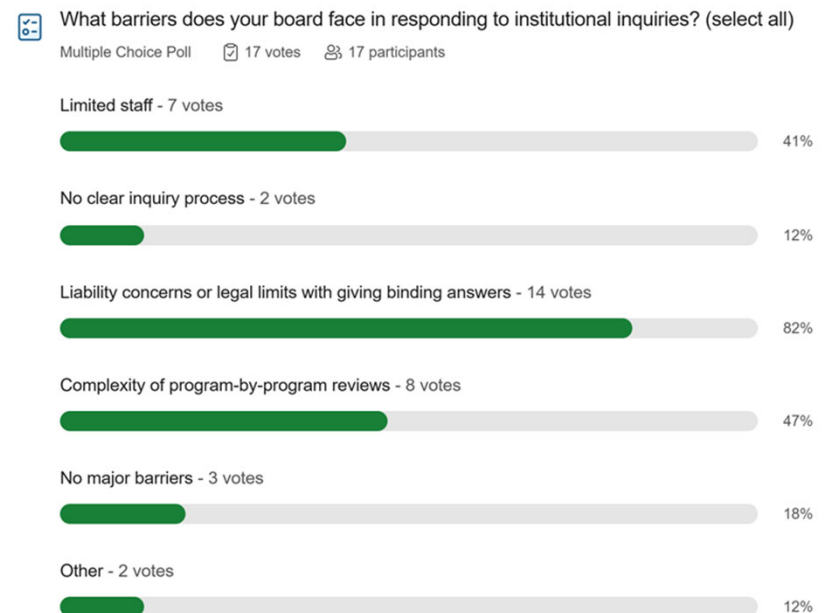


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Capacity Constraints and Compliance Risk Shape Board Responses

Key Pressures on Boards:

- Competing demands: renewals, CE, complaints, background checks
- High volume of institutional inquiries
- Limited staff and subject matter expertise
- Legal risk in providing compliance determinations



Institutional Understanding of Licensure Requirements Varies Widely

In your experience, how well do institutions understand your state's licensure requirements when they contact you?

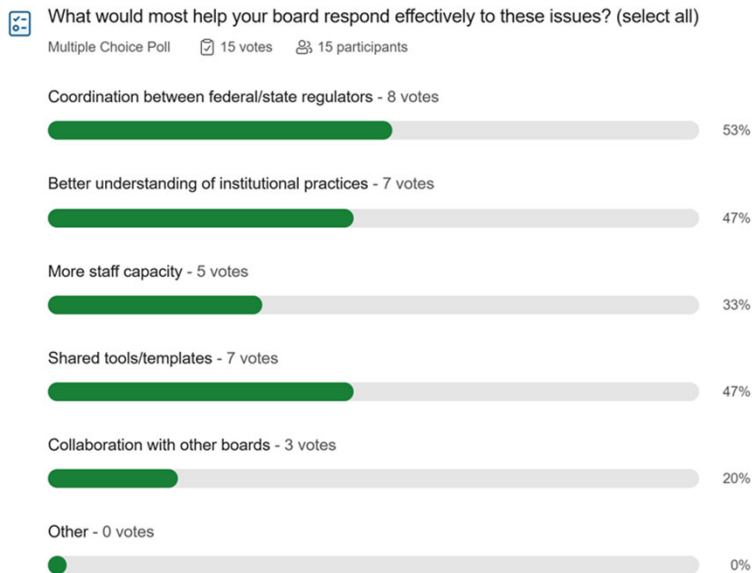
Multiple Choice Poll 18 votes 18 participants



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- 0% say institutions understand requirements very well.
- 28% report some understanding; 22% report limited understanding.
- 50% say understanding varies significantly by institution.
- Highlights a clear need for guidance and education on licensure requirements.

What Supports More Responsive Licensing Boards?



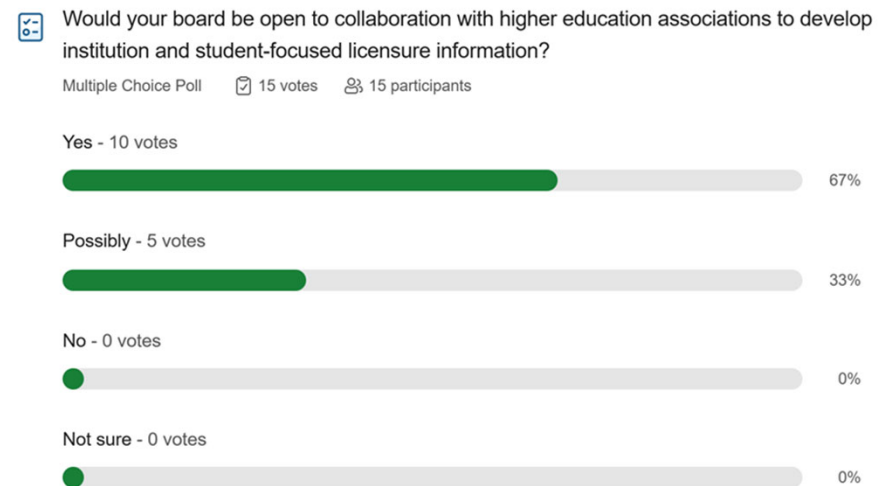
Top Needs Identified by Licensing Agencies:

- Greater coordination between federal and state regulators (53%)
- Better understanding of institutional practices (47%)
- Shared tools and templates (47%)
- Increased staff capacity (33%)
- Collaboration with other boards (20%)

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Strong Interest in Collaboration with Higher Education Community

- 67% are open to collaborating with higher education associations.
- 33% indicated they would possibly collaborate.
- Highlights collaboration as a pathway for meaningful opportunities for cross-sector engagement.



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From Findings to Action



Promoting Compliance with Leadership: Using Data to Drive Action

- +Use data to demonstrate workload and complexity
- +Support case for resources and prioritization
- +Highlight need for institutional coordination
- +Connect to institutional mission or strategic goals.



Working Across the Institution: Using Data to Coordinate Compliance Efforts

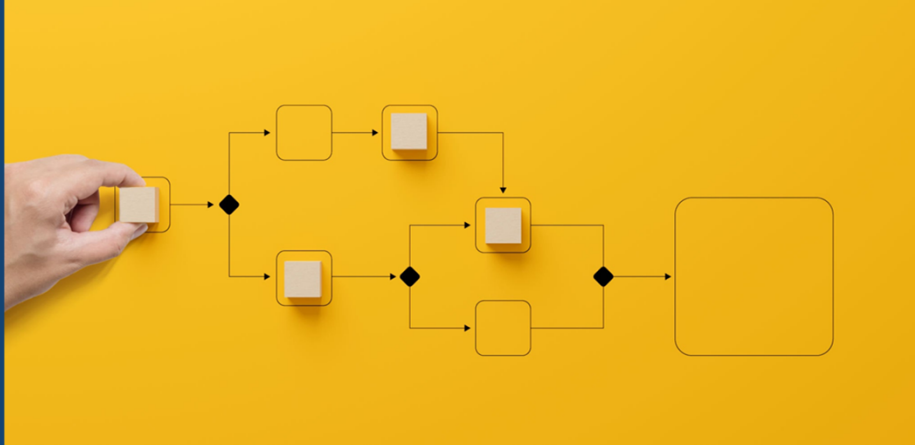
- + Cross-functional work: Compliance, Legal, Admissions, IT, Registrar, Academic units.
- + Requires coordination and defined roles.
- + Use survey data as a neutral starting point to show this is a shared, institution-wide responsibility.



Working with Academic Programs: Using Data to Influence Program Decisions

- +Use state variation data to explain why program requirements can change depending on where a student is located.
- +Connect compliance to real program decisions like admissions criteria, clinical/practicum placements, and student disclosures.





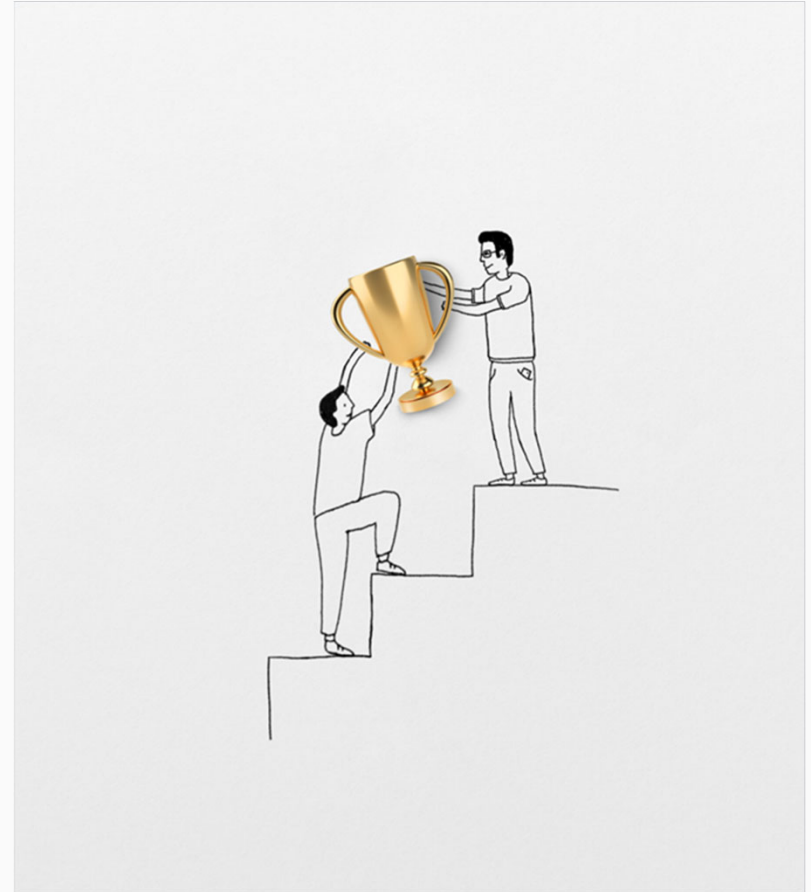
Implementation and Process Considerations

- + Building compliance systems that can adapt as regulations evolve.
- + Investing in people, training, and sustainable processes.
- + Communicating clearly and early with students.
- + Collaborating within and across campuses, along with peer institutions.
- + Recording your research, process and plan for future success.



- A designated compliance leader, such as a compliance officer or a compliance committee
- Effective lines of communication and collaboration
- Written policies and procedures
- Training and education
- Monitoring and auditing
- Enforcement mechanisms
- An effective documentation strategy

Resource: [Creating a Compliance Program \(SAN Essentials\)](#)



- Compliance Director
- Provost Office
- Program Directors
- Faculty/Curriculum SMEs
- Enrollment/Admissions
- IT
- Financial Aid
- Possibly External Expert, like HELP



Higher Education Licensure Pros



NEW
THE BOOKMARK

One-of-a-kind licensure research tool designed for higher education

The Bookmark

- Expertly researched licensure requirements for all U.S. jurisdictions
- Over 80 license types available
- Regularly updated

Consultation

- Licensure Program audit
- Policies and processes
- Custom research
- Trainings and education

State Authorization Network (SAN)

Since 2011, the State Authorization Network (SAN) has empowered its members to successfully resolve postsecondary statutory and regulatory compliance challenges.

We provide expert analysis, resources and training to prepare for emerging issues, collaborate on compliance strategies, develop solutions and evaluate their efficacy.

The screenshot shows the SAN website homepage. At the top, there is a navigation bar with the SAN logo (a purple circle with a white 'S' and 'AN' next to it) and the text 'STATE AUTHORIZATION NETWORK a network of WCET'. To the right of the logo are links for 'Search', 'Contact Us', 'Join SAN', and 'Logout'. Below the navigation bar is a horizontal menu with links for 'State Authorization 101', 'About SAN', 'Membership', 'Events', and 'Resources'. The main content area features a large blue graphic of a map of the United States with a network of white lines connecting various points, representing the network. To the left of this graphic is a white box with the text: 'The State Authorization Network The leader for guidance and support for navigating state and federal regulatory compliance for out-of-state activities of postsecondary institutions.' Above this text are icons for 'View', 'Edit', 'Delete', 'Revisions', and 'Clone'. To the right of the map graphic is a dark blue box with the text: 'SAN members, log in for exclusive content.' Below this text is a 'Login to Member Portal >' button. Further down is a 'Learn more about SAN!' section with a box containing the text: 'The State Authorization Network (SAN) - Meeting an Important Need >'. Below this is a 'Not a member?' section with a 'Join SAN Membership >' button. At the bottom of the page is a 'Topic Areas' section with a grid of nine topic cards: 'Federal Regulations' (with an image of the US Capitol), 'Professional Licensure' (with an image of people in a meeting), 'Reciprocity (SARA)' (with a map of the US), 'Military Students' (with an image of a soldier), 'SANSational Awards' (with an image of people smiling), 'Compliance Requirements (Non-SARA)' (with an image of a stack of papers), 'History' (with an image of colorful binders), 'Student Complaints' (with an image of papers and a person), and 'Other Higher Education Issues' (with an image of a person sitting on a bench).

Questions?



Resources

- [Survey Report - *Between the Lines, Behind the Work: Survey Findings on the True Scope of Licensure Compliance* \(2026\)](#)
- [Certifying Compliance in an Uncertain Landscape: Survey Findings on the Impact of Professional Licensure Requirements](#) (WCET Frontiers Blog)
- [Professional Licensure Requirements Handbook 2nd edition](#) (2024)
- [SAN Professional Licensure Landing/Issue Page](#)
- [The Licensure Lowdown, HELP's blog](#)
 - [The Real Work Behind Licensure Compliance: What a New National Survey Confirms](#)
 - [Who's Really Tracking Professional Licensure at Your Institution?](#)
- [NC-SARA Licensure webpage](#)



Higher Education
Licensure Pros



Thank You!!

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