



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

# 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 668.43\(a\)\(5\)\(v\)](#) - 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.*

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