



Professional Licensure Frequently Asked Questions

At NC-SARA we hear frequently from institutions, states and territories about how best to handle professional licensure disclosures in the context of SARA institutional approvals. In June 2020, the NC-SARA Board agreed to align Section 5.2 of the *SARA Manual* with the Federal Regulations at 34 §CFR 668.43. Additionally, SARA institutions will continue to include the professional licensure board contact information when a determination has not yet been made.

Sara Manual section 5.2 - Programs Leading to Professional Licensure

SARA has no effect on State professional licensing requirements. 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 under 34 §C.F.R. 668.43. For SARA purposes, these requirements will also apply to non-Title IV institutions.

For SARA purposes, institutions that are unable, after all reasonable efforts, to determine whether a program will meet state professional licensure requirements shall provide the student or applicant with current contact information for any applicable licensing boards, and advise the student or applicant to determine whether the program meets requirements for Licensure in the State where the student or applicant is located.

1. What is meant by "prospective" student?

Prospective student means an individual who has contacted an eligible institution requesting information concerning admission to that institution 34 §CFR 668.41 (a).

2. Please list the difference in general and direct disclosures.

General disclosures will be a "yes," "no," or "not yet determined" whether your program curriculum will meet the requirements in each of the 50 states and will be listed on your website. Direct disclosures must be in writing (electronic is fine) directly to the student. Direct disclosures are required when you know your program will not lead to a license in a particular state and when you have not yet made the determination.

- 3. Now that disclosures around licensure are for online and face-to-face students, given potential student mobility, wouldn't institutions be required to provide licensure notification for all 50 states?**
Yes.
- 4. Does an institution need to send direct disclosures to students who are located in the same state that the institution is located?**
Direct disclosures are only required if the institution has determined that the program does not meet requirements, or a determination has not yet been made.
- 5. If a program prepares students to sit for a licensure test rather than qualifying to receive a license upon program completion, does that fall under this requirement?**
Yes, check state by state. A program preparing a student to sit for an exam upon graduation is usually treated the same as a program leading directly to licensure.
- 6. For professional licensure disclosures under the federal regulations, institutions only need to discuss whether their program meets the educational requirements and not disclose various states' testing requirements or work experience requirements, correct?**
Correct.
- 7. Does the general disclosures requirement apply to professional schools, such as dentistry, optometry and medicine?**
Yes.
- 8. Are we required to provide direct disclosure to students in post-licensure programs (e.g., nursing) regarding state-by-state requirements?**
Yes, if the program could lead to a new or second license.
- 9. If an institution has a counseling program but it is not available online, is it adequate to simply address whether the program meets the home state standards for licensure or must we address any prospective student's home state also?**
The institution must ensure where the student is located. Sometimes even campus-based programs can impact students in bordering states. For general disclosures, after making a reasonable effort to determine, an institution may indicate that the program does not meet requirements or does not know if the program meets requirements in all states but their home state.

- 10. If a state has a licensure requirement that out of state applicants take an additional "state cultural" or "state history" course that is provided in the state, but the program meets all other educational licensure requirements, does this imply that the program does not lead to licensure?**

Opinions vary on this. One thought is that you could say "yes" with an explanation that a specific state course must also be taken. Another view point is that any missing component would not meet the requirements. It will be important for your institution to decide what will best benefit your students as you decide how to handle this issue and to do so consistently.

- 11. If the state does not have any information about the educational requirements of a certain licensure/certificate - what do we need to write on the statement?**

After all reasonable efforts, you should state that a determination has not yet been made. and provide the prospective student with current contact information for any applicable licensing boards

- 12. Can an institution have one single disclosure covering all states to send out to all students?**

For general disclosures outlining all states and territories is acceptable; direct disclosures, however, must be specific to the state and the student.

- 13. Can institutions reference NC-SARA professional licensure directory and fulfill the disclosure requirements?**

No. The directory is provided to help institutions have contact information to make it easier to contact the licensing board to determine whether your programs will meet requirements in other states. The disclosures require an analysis of each state by your institution for each of your applicable programs.

- 14. We have tried repeatedly to reach out to a licensing agency for teacher education to see if our program meets state professional licensure requirements. The agency has not responded. How do we note this on our site as not being able to confirm?**

You may indicate that a determination has not yet been made, and provide the prospective student with current contact information for any applicable licensing boards,

- 15. For clarification, under NC-SARA can an institution simply state it doesn't know if a program leads to licensure as it appears the federal regulation will permit?**

SARA requires that you first make all reasonable efforts to make a determination and provide the prospective student with current contact information for any applicable licensing boards.

16. If a prospective/currently enrolled student indicates that their current physical location is not in the U.S. (50 States/Territories), what does that mean for direct disclosures?

The disclosures are for the fifty states and territories; ensure that the student notifies you if they move from outside the US to one of the fifty states and territories.

17. The Professional Licensure directory on the NC-SARA web site is helpful. Will other programs/careers be added?

NC-SARA does not have any plans to list all boards, as there are over 1,300. However, starting in 2021 staff will be reviewing data gathered on SARA institutions to determine if, in the future, other boards will be added to the directory. <https://ncsara.org/professional-licensure-directory>