

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.

Current SARA policy:

The [SARA Policy 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 general public disclosures are required per [34 CFR 668.43\(a\)\(5\)\(v\)](#) effective July 1, 2020 for all program leading to professional licensure, regardless of modality (online or face-to-face)?

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, information regarding whether completion of that program would be sufficient to meet licensure requirements in a State for that occupation, including—

(A) A list of all States for which the institution has determined that its curriculum meets the State educational requirements for licensure or certification;

(B) A list of all States for which the institution has determined that its curriculum does not meet the State educational requirements for licensure or certification; and

(C) A list of all States for which the institution has not made a determination that its curriculum meets the State educational requirements for licensure or certification

2. What is meant by "prospective" student?

Prospective student means an individual who has contacted an eligible institution requesting information concerning admission to that institution per [34 CFR 668.41\(a\)](#).

3. What individualized direct disclosure is required to be provided to a prospective student per [34 CFR 668.43\(c\)\(1\)](#) effective July 1, 2020?

If the institution has made a determination under [paragraph \(a\)\(5\)\(v\)](#) of this section that the program's curriculum does not meet the State educational requirements for licensure or certification in the State in which a prospective student is located, or if the institution has not made a determination regarding whether the program's curriculum meets the State educational requirements for licensure or certification, the institution must provide notice to that effect to the student prior to the student's enrollment in the program.

Per 34 CFR 668.43(c)(3), the disclosures must be made directly to the student writing, which may include through email or other electronic communication.

4. What individualized direct disclosure is required to be provided to an enrolled student per [34 CFR 668.43\(c\)\(2\)](#) effective July 1, 2020?

If the institution makes a determination under [paragraph \(a\)\(5\)\(v\)\(B\)](#) of this section that a program's curriculum does not meet the State educational requirements for licensure or certification in a State in which a student who is currently enrolled in such program is located, the institution must provide notice to that effect to the student within 14 calendar days of making such determination.

Per 34 CFR 668.43(c)(3), the disclosures must be made directly to the student writing, which may include through email or other electronic communication.

5. 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.

6. 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.

7. 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.

8. Does the general disclosures requirement apply to professional schools, such as dentistry, optometry and medicine?

Yes.

9. 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.

10. 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.

11. 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 the institution could say "yes" with an explanation that a specific state course must also be taken. Another viewpoint is that any missing component would not meet the requirements. It will be important for the institution to decide what will best benefit students as the institution decides how to handle this issue and to do so consistently.

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. What are the federal regulations addressing Certification in the Program Participation Agreement (PPA) per 34 CFR 668.14(b)(32)(ii) effective July 1, 2024?

By entering into a program participation agreement, an institution agrees that—

In each State in which: the institution is located; students enrolled by the institution in distance education or correspondence courses are located, as determined at the time of initial enrollment in accordance with 34 CFR 600.9(c)(2); or ...each student who enrolls

in a program on or after July 1, 2024, and attests that they intend to seek employment, the institution must determine that each program eligible for title IV, HEA program funds...

(ii) Satisfies the applicable educational requirements for professional licensure or certification requirements in the State so that a student who enrolls in the program, and seeks employment in that State after completing the program, qualifies to take any licensure or certification exam that is needed for the student to practice or find employment in an occupation that the program prepares students to enter;...

[Federal Register / Vol. 88, No. 209 / Tuesday, October 31, 2023 / Rules and Regulations 74697](#)

15. Has the U.S. Department of Education (ED) provided answers to Frequently Asked Questions about the federal regulations addressing Certification in the Program Participation Agreement (PPA) per [34 CFR 668.14\(b\)\(32\)\(ii\)](#) effective July 1, 2024?

Yes, on May 17, 2024, ED provided these Questions and Answers:

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2024/certification-q-and-a.html>

16. The Professional Licensure directory on the NC-SARA website 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, staff will be reviewing data gathered on SARA institutions to determine if, in the future, other boards will be added to the directory. <https://nc-sara.org/professional-licensure-directory>