National Council for State Authorization Reciprocity Agreements
MHEC · NEBHE · SREB · WICHE

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.

SARA policy:

The *SARA Policy Manual* Subsection 5.2 - Programs Leading to Professional Licensure

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. For SARA purposes, these requirements will also apply to non-Title IV institutions and programs**.**

1. What general public disclosures are required per 34 CFR 668.43(a)(5)(v) for programs 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, a list of all States where the institution has determined, including as part of the institution's obligation under § 668.14(b)(32), that the program does and does not meet such requirements

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)?

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 institution in accordance with § 668.14(b)(32).

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)?

If the institution makes a determination under paragraph (a)(5)(v) 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. 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. 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.

7. Can institutions reference the NC-SARA Professional Licensure Directory and fulfill the disclosure requirements?

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

8. 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;…

9. 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, ED provided these Questions and Answers: **https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/certification-procedures-questions-and-answers#ldr**

10. For SARA purposes, are professional licensure disclosures required for non-credit programs?

Yes, if the non-credit program is designed to meet educational requirements for a specific license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.

11. For SARA purposes, are professional licensure disclosures required for non-Title IV programs?

Yes, if the non-Title IV program is designed to meet educational requirements for a specific license or certification that is required for employment in an occupation, or is advertised as meeting such requirements.

12. The Professional Licensure Directory on the NC-SARA website is helpful. Will other programs/careers be added?

NC-SARA does not plan to include all boards in the Professional Licensure Directory, as there are over 1,300. However, staff will be reviewing data gathered on SARA institutions to determine whether to add additional boards to the directory in the future.