

Preparing for SARA Policy Changes: Essential Insights for Professional Licensure Programs

May 21, 2025



Host: Sara Appel
Director of M-SARA



Any resources available
will be posted on the
MHEC website post-event.



Engage with colleagues in
the chat.



Keep your questions in
the Q&A!



Please complete our
survey.



Kris Maul, JD

- 15 years specializing in professional licensure in higher education
- Research, analysis and curriculum
- Compliance processes and systems
- Board communication and advocacy
- Student and graduate support



Agenda

- **Overview**
 - What is Required: Federal regulations and SARA policy
- **Implementation Challenges and Considerations**
 - Identifying licensure programs
 - Research and curriculum comparisons
 - Student location policy
 - Disclosures—Public and Individual Direct
- **Our Services**
- **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.



Overview



Institution Responsibility

Federal Title IV Regulations ([34 CFR § 668.43](#) and [34 CFR § 668.14](#)) require:

- **Understand**
 - Satisfy educational requirements
- **Certify**
 - Must “Meet” to enroll
- **Communicate**
 - “Meets” or “Does not Meet”

SARA Policy ([§ 5.2](#)) requires:

- **Understand**
 - Satisfy educational requirements
- **Communicate**
 - “Meets” or “Does not Meet”



SARA Policy 5.2 Programs leading to professional licensure

Effective through June 30, 2025:

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 is located.**



SARA Policy 5.2 Programs leading to professional licensure

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Note: This includes any offering (even non-credit) designed or advertised for licensure that is covered by SARA.



Understand

Understand how **licensure programs** (all modalities) meet educational requirements for licensure in each state and U.S. territory where **recruiting, advertising, and enrolling**.

- Licensure is umbrella term for something State-issued and required for employment in an occupation or profession.
- Licensure Program is one designed or advertised as preparing students for licensure.
- Requires researching each state/territory requirements and comparing program, including specific courses or supervised experiences.



Certify

Program Participation Agreement (PPA) Certification

- Agreement to participation in Title IV. Long list of “terms and conditions”.

As of July 1, 2024, each institution must **certify** that any program that prepares students for licensure meets educational requirements

- **Where the institution is located, AND**
- **Where *distance education* students are located at time of initial enrollment in licensure program**
 - *Distance education*=any student taking one or more class online during first term of enrollment in licensure program.

Written Attestation exception: or where students attest to plan to be licensed and employed after completing the program

CANNOT ENROLL students located in “does not meet” or not determined location, unless written attestation is completed.



Communicate licensure information to prospective and current students:

- ***Public disclosures (website)***
 - “Meets” or “does not meet”
 - “Not determined” no longer required
 - Should be “meets” in all U.S. states/territories where students are located OR advertising/recruiting for the licensure program.
- ***Individual direct disclosures (email)***
 - Student location is key
 - As determined by institution’s policy and process
 - Prior to Initial Enrollment if “not determined” or “does not meet”
 - Would also need written attestation
 - 14 calendar days from becoming aware of change to “does not meet”



Additional Responsibilities - Dept of Veterans Affairs

Final VA rule effective on February 17, 2023 (modifies [38 CFR 21](#))

Where institution holds State Approving Agency (SAA) approval for the program:

- Must meet all instructional curriculum licensure requirements
- **PLUS Additional Disclosures**
 - *Publicly disclose in a prominent manner any conditions or additional requirements, including training, experience, or examinations required to obtain the license, certification, or approval for which the program of education is designed to provide preparation.*



Risks and Impacts

Any and all Title IV non-compliance measures possible, including ability to participate in federal student aid programs.

Ability to participate in State Authorization Reciprocity Agreement (SARA)

Also:

- Misrepresentation and Borrow Defense to Repayment
- Accreditors also enforcing

Challenges

- Licensing boards/agencies generally will not review or approve out-of-state programs.
- Up to each institution to understand if programs meet educational requirements in states where enrolling, recruiting, and advertising.
 - Requires research of educational requirements and comparison of each program.
 - Work is time consuming, labor intensive and requires expertise.



Implementation Challenges and Considerations



Which of these are licensure programs?

[Slido.com](#)
#2743 625

[Present link](#)



Licensure Programs Considerations

Licensure is umbrella term – certification, certificate, endorsement, authorization, registration, etc. Key: Is it state/territory issued and required for employment.

Title IV regulations do not specify which programs are licensure programs.
Different institutions (located in different states) may come to different conclusions.

Designed

- Professional/curricular standards, including programmatic accreditors
- Is licensing exam data reported
- Expectation that most graduates will seek licensure

Advertised

- Program description in catalog and website
- References to license or licensing exam preparation or eligibility
- Claims about career opportunities that require a license



Question:

How will I know if our program “meets” the educational requirements in a state? Will this be a one-time comparison?



Research and Curriculum Comparisons Considerations

This work takes time and people power!

- Locate, review and understand educational requirements
- Compare coursework and practicum/internship/student teaching hours

Specialized accreditation - important but may not “meet” requirements

- Accreditation meets all educational requirements
 - Example: Athletic Training (CAATE)
- Accreditation plus demonstration of specific courses
 - Examples: Social Work (CSWE+) and Counseling (CACREP+)

Regular review required!

- Cadence of review and updating determinations not dictated

Documentation is important—how would you defend determination?



Where is this student located?

Slido.com

#4189 360

Present link



Student Location Policy Considerations

Every institution must have student location policy used for PPA Certification and disclosures.

- Policy should be reviewed and updated on regular bases (like any other policy)
- Applied consistently at institution
- Policy made available to Department of Education if requested

How will your student location policy treat:

- Applicants/prospective students who will be relocating to campus for face-to-face program
- Graduate vs. undergraduate
- Students commuting across state borders
- International students
- Military-affiliated students



Student Location Policy Examples

Example 1

Student location

For the purpose of this policy, institutions must determine student location (i.e., state) in order to disclose state-specific professional licensure information:

1. At the time of the student's initial enrollment in an educational program, and
2. Upon formal notification by the student of a change in the student's location

All other College and system policies that determine residency for the purpose of tuition assessment are not superseded by this policy.



Student Location Policy Examples

Example 1 (cont.)

Prospective student location

For the purpose of this policy, a prospective student's location is **the state of the prospective student's residency at the time the student has applied for admission, intends to enroll and is then entered into the student record system.** For students whose permanent address does not include a U.S. state or territory (e.g., students living outside the United States), their location will be considered the state of Illinois.

Enrolled student location

The student location for enrolled students is the state where the enrolled student resides and is based on the permanent home address entered into the student record system. For students whose permanent address does not include a U.S. state or territory (e.g., students living outside the United States), their location will be considered the state of Illinois.



Student Location Policy Examples

Example 2

Institutions will determine the location of a student for purposes of providing accurate professional licensure disclosures in the following way. The “Local Address” field within the university’s Student Information System (SIS) will be recorded as each student’s location. The university defines the Local Address as, “**A physical address where a student currently or will live and/or frequently stay during the time they will be taking classes for the upcoming term.** It is a place of residence where someone would be most likely to find the student; where the student puts their head down at night.”



Is a direct disclosure required?

Slido.com
#1174 620

Present link



Disclosures Considerations

Remember **applies to all modalities, not just online/distance education!**

Public Disclosures

Listing of states/territories where determined “meets” and “does not meet”. May choose to still disclose “not determined”, but no longer required.

- Should only be advertising programs and recruiting students in “meets” states/territories.
- Programs can include states/territories that do not issue or require a license in “meets” if also include information that no license issued or required.

Direct Disclosures

Must send to prospective students prior to initial enrollment in licensure program if located in “does not meet” or “not determined”. Current students within 14 calendar days.

- Determined by student location policy.



Our Services



Our Services and Support



- One-of-a-kind database of educational requirements for professional and occupational licensure
- Provides information needed to compare programs and make “meets” or “does not meet” determinations
- Includes over 80 license types
- Information for all 59 U.S. states and territories

Additional Services

- Webinars and Work Sessions
- Consultation
- Detailed Curriculum Comparisons
- Custom Research Projects

Costs vary, depending on number of factors including frequency, license type, timeframe, and number of institutions.

www.higheredlicensurepros.com



Questions



ED Regulation (effective 7/1/24) : PPA Certification

34 CFR § 668.14(b)

(32) 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 for the purposes of paragraphs (b)(32)(i) and (ii) of this section, 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;



ED Regulation (effective 7/1/24): Public Disclosures

34 CFR § 668.43(a)(5)(v)

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;



ED Regulation (effective 7/1/24): Individual Direct Disclosures

34 CFR § 668.43(c)

(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).

(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.



Certification Procedures Q&A



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