Licensure Research Solution - The Bookmark

April 16, 2024
Introductions

Nan Kalke, PhD
- Specialized accreditation
- Program and curriculum content alignment to external standards
- Ensure program operations meet quality assurance standards
- Licensure research

Kris Maul, JD
- 15 years specializing in licensure
- Research, analysis and curriculum
- Compliance processes and systems
- Board communication and advocacy
- Student and graduate support
• **What is Required**: Federal regulations and SARA policy

• **How to Determine**: Work required to make “meets” or “does not meet” determination

• **Our Services**: The Bookmark and Additional Support

• **Your Questions**
What is Required
Federal Title IV Regulations (34 CFR 668.43 and 34 CFR § 668.14) and SARA Policy (v. 21.1 § 5.2) require:

- Understand
- Certify
- Communicate
Understand how licensure programs meet educational requirements for licensure in each state and U.S. territory where recruiting, advertising, and enrolling.

- Applies to programs of all modes of delivery
  - Physical campus, distance/virtual and hybrid

- Determine if “meets” or “does not meet”.
  - “Not determined” ok while completing the research and curriculum comparison work or for campus-based, “face-to-face” programs if all students located in campus state.
Program Participation Agreement (PPA) Certification

- Connected to the program’s eligibility for participation in Title IV

Starting July 1, 2024, each institution must certify that any program that prepares students for licensure (or State certification) meets educational requirements

- Where the institution is located, AND

- Where students are located (or where students attest to plan to be licensed and employed after completing the program) at time of initial enrollment in licensure program
  - **CANNOT ENROLL** students located in “does not meet” or not determined, unless written attestation is completed.

Title IV use by individual student doesn’t matter.

**Example student location policies and written attestations**
On April 9, the U.S. Department of Education (ED) released an Electronic Announcement that provides an opportunity for some institutions to extend the compliance timeline past July 1 for the new PPA Certification requirement for licensure programs.

ED is providing a limited opportunity for institutions with circumstances that are unique, time-specific, and outside the control of the institution that prevents compliance with the new PPA Certification requirement by July 1 to document the circumstances that prevent compliance and use that information as a defense in an enforcement action.
Communicate licensure information to prospective and current students:

- **Public disclosures (website)**
  - “Meet” or “does not meet”
    - “Not determined” no longer required
  - U.S. states/territories (59) where students are located OR advertising/recruiting for the licensure program.
  - SARA-if “not determined”, first must make all reasonable efforts and provide board contact info

- **Individual direct disclosures (email)**
  - Student location is key
  - 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”
Final VA rule announced January 18, 2023, effective on February 17, 2023 (modifies 38 CFR 21)

- 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.

In April 2024, VA clarified that this applies to location of institution – where State Approving Agency (SAA) has granted approval
How to Determine “Meets” or “Does Not Meet”
How to Determine “Meets” or “Does Not Meet”

In order to understand, certify, and communicate, institutions must:

- **Research educational requirements**
  - Statutes/regulations
  - Board/agency websites
  - Application materials
  - Reliable third-party sources

- **Compare to program**
  - Detailed course comparison, at times, but not all programs

- **Conclude if “meets” or “does not meet”**
Considerations

Time
● Between 2-8+ hours per state/territory to research each license type.
  ○ Across 59 jurisdictions (50 states, D.C., and 8 territories) adds up to **118-472 hours of research for one license-type.**
● Average institution has at least 10 license related programs, **1180-4720 hours of research necessary.**
● Additional 2-4+ hours per state/territory for each license type, to compare coursework/field experiences (not needed for all licenses or in all states/territories)

Expertise
● Research includes locating and interpreting statutes, regulations, rules and policy manuals.
● Locating reliable third-party sources of information to confirm findings is important.

Cost
● Institutions* have estimated **$22,000 per license type for initial research and $11,000 each year for updates**, utilizing staff/faculty to complete research.

Research Solution: The Bookmark
HELP’s online database of educational requirements for licensure in all U.S. jurisdictions

The Bookmark is created by HELP through:
- Review and analysis of state statute, regulation, rule, and policy
- Communication with state board or agency to clarify requirements (when needed)
- Assessment of information on board/agency website and license application materials

The Bookmark includes information for all components of educational requirements for licensure, including:
- degree type
- specialized accreditation
- total credits
- specific courses
- exams
- any additional educational requirements
The Bookmark

- Information can be downloaded by subscribers in .csv and .pdf formats for documentation purposes and internal use.

- All information is updated on an annual basis, or as soon as HELP learns of a change in state/territory requirements.

- All users will receive an email whenever information is updated in The Bookmark. Users can opt out.

- Changes and updates are also tracked in an updates and history log for every state/territory for each license type. The updates log can be downloaded in .csv and .pdf formats.
Available now

- Teacher: Communication Arts and Literature
- Teacher: Early Childhood Education
- Teacher: Elementary Education
- Teacher: English as a Second Language
- Teacher: French
- Teacher: German
- Teacher: Health
- Teacher: Mathematics
- Teacher: Music Education-Instrumental
- Teacher: Music Education-Vocal
- Teacher: ML Communication Arts/Literature
- Teacher: ML Mathematics
- Teacher: ML Science
- Teacher: ML Social Studies
- Teacher: Physical Education
- Teacher: Reading/Literacy
- Teacher: Science-Chemistry
- Teacher: Science-General Science
- Teacher: Science-Life Sciences
- Teacher: Science-Physics
- Teacher: Social Studies
- Teacher: Spanish
- Teacher: Special Education-Academic and Behavioral Strategist (mild to moderate only)
- Teacher: Special Education-Autism Spectrum Disorders
- Teacher: Special Education-Emotional Behavioral Disorders
- Teacher: Special Education-Learning Disabilities
- Teacher: Visual Arts
- Teacher: World Languages and Cultures (French K-12)
- Teacher: World Languages and Cultures (German K-12)
- Teacher: World Languages and Cultures (Spanish K-12)
- Educational Leadership_Principal
- Educational Leadership_Special Education Director
- Educational Leadership_Superintendent
# The Bookmark - License Types

## Available Now
- Alcohol and Drug Counselor
- Athletic Trainer
- Audiologist
- Behavior Analyst
- Behavior Analyst Assistant
- Certified Public Accountant
- Dietitian
- Emergency Medical Technician
- Marriage and Family Therapist
- Music Therapist
- Nurse Anesthetist
- Nurse Midwife
- Nurse Practitioner
- Nursing Home Administrator
- Occupational Therapist
- Occupational Therapist Assistant
- Optician
- Paramedic
- Paralegal

## Available Soon
- Peace Officer/Law Enforcement Officer
- Professional Counselor
- Physical Therapist
- Physical Therapist Assistant
- Physician Assistant
- Psychologist
- Radiologic Technician
- Registered Accounting Professional
- Registered Nurse
- School Counselor
- Social Worker: LSW (Bachelor's)
- Social Worker: LGSW/LICSW (Master's)
- Speech-Language Pathologist

## Coming Soon
- Library Information Science
- Medical Lab Science
- Practical Nurse (LPN)
- School Psychologist
https://www.higheredlicensurepros.com/thebookmark
<table>
<thead>
<tr>
<th>State/Territory</th>
<th>Accreditation Required</th>
<th>Accreditation Accepted as Meeting Educational Requirements?</th>
<th>Curriculum Comparison Needed?</th>
<th>Specific</th>
<th>Must Core</th>
<th>Supervise</th>
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### Alaska Specific Coursework Requirements

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<tr>
<th>State/Fxx</th>
<th>Board/Age Board/Age License T1</th>
<th>Specialize/Specialize</th>
<th>Curriculum Comparison Needed?</th>
<th>Specific Coursework</th>
<th>Must Credits/Courses Be Part of Degree Program?</th>
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</table>

1. To meet the requirements of AS 08.29.110(a)(5), an applicant’s degree must be from an institution of higher education in the United States that is accredited by a regional or national accrediting agency and the degree must have included course work in at least eight of the following subject areas:
   - (1) the helping relationship, including counseling theory and practice;
   - (2) human growth and development;
   - (3) lifestyle and career development;
   - (4) group dynamics, processes, counseling, and consulting;
   - (5) assessment, appraisal, and testing of individuals;
   - (6) social and cultural foundation, including multicultural issues;
   - (7) principles of etiology, diagnosis, treatment planning, and prevention of mental and emotional disorders and dysfunctional behavior;
   - (8) marriage and family counseling and therapy;
   - (9) research and evaluation;
   - (10) professional counseling orientation and ethics.

2. To meet the requirements of AS 08.29.130, an applicant’s degree must be from a foreign college or university approved by the board that meets the standards of a regionally or nationally accredited education institution in the United States. To be approved, a degree from a foreign college or university must have included course work in at least eight of the subject areas listed in (a)(1) - (10) of this section.

3. An applicant who has not obtained enough graduate semester hours in the applicant’s earned master’s degree in counseling or a related professional field to meet the 90 graduate semester hours required under AS 08.29.110(a)(3)(6) may obtain the additional graduate semester hours needed to meet that requirement from an accredited program in (a) of this section either online or at an institution.

4. If applying on or after February 1, 2022, an applicant must have a minimum of three graduate level credits in ethics. Alaska Admin. Code tit. 12, §120-120

5. (a) (3) has successfully completed either
   - (A) an earned doctoral degree in counseling or a related professional field from a regionally or nationally accredited institution of higher education approved by the board, or
   - (B) an earned master’s degree in counseling or a related professional field, from a regionally or nationally accredited institution of higher education approved by the board, and at least 60 graduate semester hours in counseling or after earning the master’s degree.

Alaska Stat. Ann. §00.29.110 (West)
Exam(s) Required
Statute/Regulation/Rule Citation
Notes
Last Reviewed Date
Feedback Form (Send us your questions, comments or information about your experience with licensure)

HISTORY LOGS

No records found.

IMPORTANT: Information is current as of the date listed. State/Territory boards can change educational and other requirements for licensure from time-to-time through formal legislation or rule-making processes, different board interpretation, or by updating application forms or other publications. 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, including federal disclosure requirements, should be considered and evaluated with legal counsel prior to communicating licensure information to prospective students and students.
Experience of current member of The Bookmark

Kate Grimes
Director of Academic Compliance
Franklin University

- How to use The Bookmark in compliance efforts.
- Unexpected use of information to support new program development and online expansion.
The Bookmark Cost and Additional Services
The Bookmark Membership - Cost

**Enterprise** - starting at $25,000/year for 10 users ($2,500 for each additional user)

- Designed for an association/organization. User seats can be utilized in any way across the association/organization.
- Access to exclusive webinars, templates, and other resources
- One virtual kick-off meeting for all users to review Title IV and NC-SARA requirements, demonstrate The Bookmark, and answer questions

AICUO is considering facilitating an Enterprise membership, if enough interest.
Additional Services and Support

Webinars and Work Sessions

Examples:
- Project kick-off meeting with Academic Officers/Compliance Leaders to review Title IV and NC-SARA requirements, and demonstrate The Bookmark.
- One-hour work sessions where examples of public and individual direct disclosure language and student location policies will be provided. Institutions can bring their own public/direct disclosures for review.

Course Alignments
- Individual institution’s program course and syllabi review.
- Curriculum will be compared to state-specific course requirements for the license.
- HELP will need to work with curriculum subject matter experts at institution to complete the project.

Custom Research Projects
- For license types not available in The Bookmark.
- Nursing Board approval/authorization and faculty licensing requirements.

Costs vary, depending on number of factors including frequency, license type, timeframe, and number of institutions.
Questions
34 CFR 668.43(a)(5)(v) - Institutional Information (public notifications for programs leading to professional licensure or certification for all modalities)

(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, 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;
(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 program.

(2) 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.

(3)(i) Disclosures under paragraphs (c)(1) and (2) of this section must be made directly to the student in writing, which may include through email or other electronic communication.

(ii) (A) For purposes of this paragraph (c), an institution must make a determination regarding the State in which a student is located in accordance with the institution's policies or procedures, which must be applied consistently to all students.

(B) The institution must, upon request, provide the Secretary with written documentation of its determination of a student's location under paragraph (c)(3)(ii)(A) of this section, including the basis for such determination.

(C) An institution must make a determination regarding the State in which a student is located at the time of the student's initial enrollment in an educational program and, if applicable, upon formal receipt of information from the student, in accordance with the institution's procedures under paragraph (c)(3)(ii)(A) of this section, that the student's location has changed to another State.
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;
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;
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.