

# Developing Transparency of Educational Requirements for Consumer Protection to Educate Candidates for Regulated Professions



**December 3, 2019**

Recording available here: <https://youtu.be/R9QKm4HC4bo>

## What is CLEAR?

CLEAR promotes regulatory excellence through conferences, educational programs, webinars, seminars and symposia. The organization provides networking opportunities, publications, and research services for those involved with, or affected by, professional and occupational regulation. As a neutral forum to encourage and provide for the sharing of best practices, CLEAR serves and supports the international regulatory community and its vital contribution to public protection.



## About WCET/SAN

In March 2011, WCET (WICHE Cooperative for Educational Technologies) created the State Authorization Network (SAN) to serve institutions and organizations nationwide by providing training, support, and opportunities to collaborate to navigate regulatory compliance for out-of-state activities of post-secondary institutions. Institutions offering courses and/or programs out-of-state that lead to professional licensure or certification must determine whether the courses and/or programs meet the prerequisites for licensure or certification in the states where they are being offered and provide notification of these findings.



# Agenda

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- Purpose of Consumer Protection Disclosures for Educational Programs Leading to Professional Licensure or Certification.
- State Higher Education Institution Approval.
- Institution Approval Through Reciprocity (NC-SARA).
- Federal Regulations Requiring Institution Disclosures.



# Purpose of Consumer Protection Disclosures for Educational Programs



**Robin Y. Jenkins**  
**CGFNS/International Consultants of Delaware**

## STATE LICENSURE DISCLOSURES

Potential students/graduates must know whether a program they are enrolling in or graduated from meets the requirements for them to obtain a professional practice license in the jurisdiction where they intend to practice

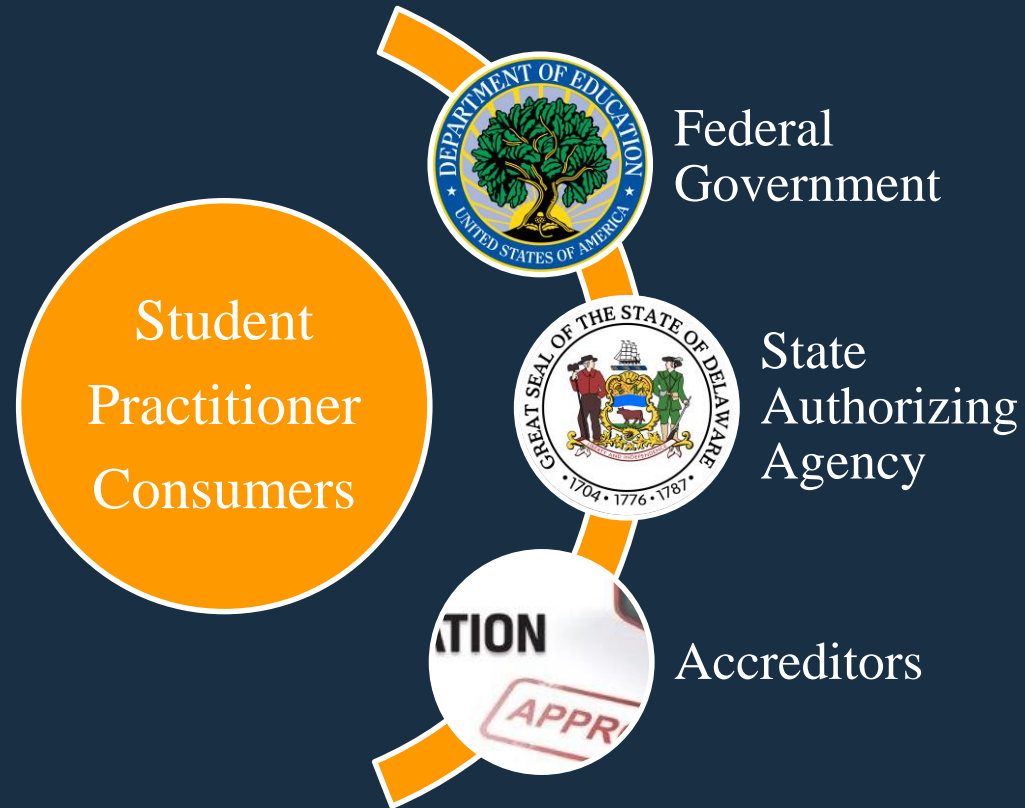


# Professional Licensure Landscape

- Mobility of professionals
- Increased licensed professions
- Alternative pathways to licensure
- Upsurge of certifications
- Lack of relationship between state authorization and professional licensing boards



# Stakeholders: Triad + 1



Professional Licensure Boards





# Current State of Affairs



# Professional Licensure Boards Are Positioned to Support

- Create linkages/relationships with state higher education approving authorities
  - ✓ Provide information on education required for professional licensing requirements
- Target stakeholders with interest in education/workforce to share licensure requirements
- Create a resource of professional licensing authorities
- Increase visibility of the issue with professional schools



# Contact Information

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# State Higher Education Institution Approval



**Angela Lee, Executive Director/DC Higher  
Education Licensure Commission**

# Charge of Higher Education Commissions/Boards

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Develop and implement licensure standards for post-secondary institutions

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Issue licenses or certify schools to operate

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Monitor for compliance

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Investigate complaints

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Issue academic transcripts for closed schools

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Other roles (i.e. Serve as State Approving Agency for veterans' education benefits)

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# Common Licensure Standards

- Integrity
- Mission
- Governance
- Administration
- Finances
- Faculty
- Instructional Program/Curriculum
- Library
- Admissions
- Retention
- Job Placement
- Student Costs
- Student Services
- Physical Plant, Equipment and Facilities
- Publicity and Advertising
- Catalog
- Refund Policy
- Emergency Operations Plan (Catastrophic Event Policy)
- C-RAC Standards



# Role of State Regulators (from a DC perspective)

- Serve as a liaison between the institution and the Commission
- Respond to general inquiries from applicants
- Review the application submission
- Conduct site visits to institutions
- Compose report and submit to the Commission along with the institutional application for their review
- Investigate complaints or other matters of non-compliance
- Implement the decision of the Commission



# Collaboration Between Higher Education and Subject Matter Experts

## Types of SMEs

- Nursing
- Emergency Medical Services
- Barbering and Cosmetology
- Massage
- Education/Teacher Preparation
- Psychology
- Physical/Occupational Therapy

## Ways we Collaborate

- Joint site visits
- Designated liaisons
- Congruence in respective rules/laws
- Attendance at each other's meetings/hearings
- Joint outreach events





# Contact Information

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# Institution Approval Through Reciprocity (NC-SARA)



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Associate Director for Regulatory Relations and Policy Support  
NC-SARA

# What is SARA?

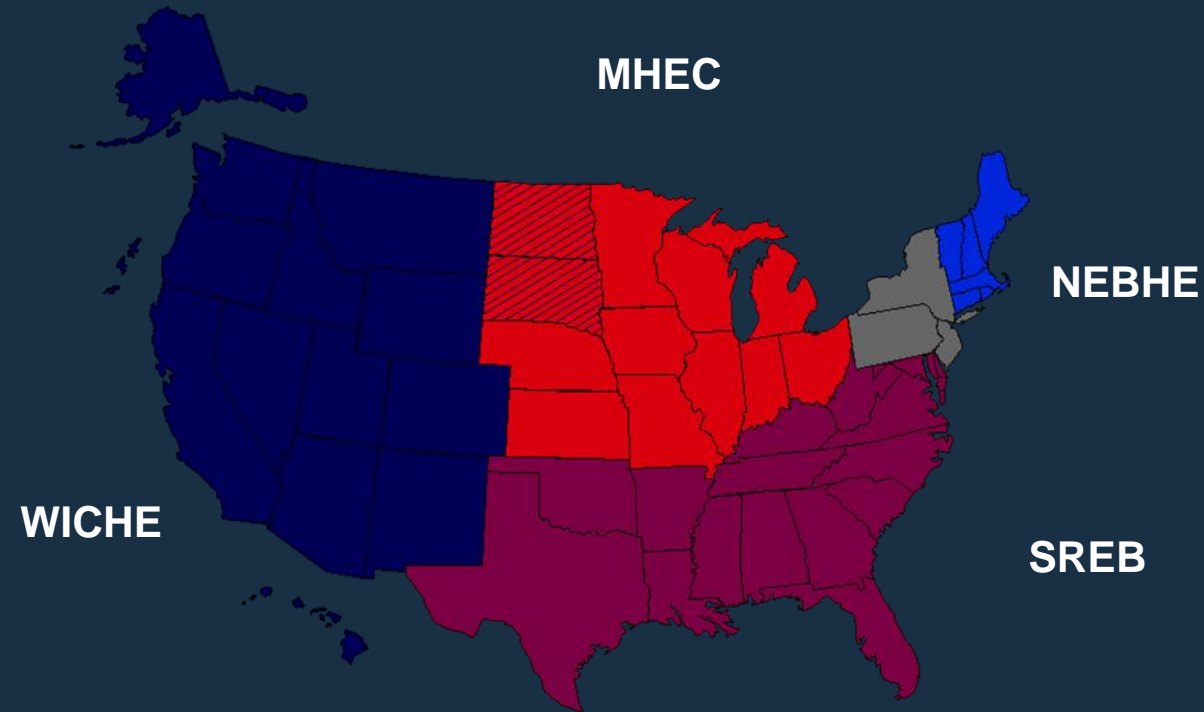
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SARA is an agreement among member states, districts, and territories that establishes comparable national standards for interstate offering of post secondary distance education.

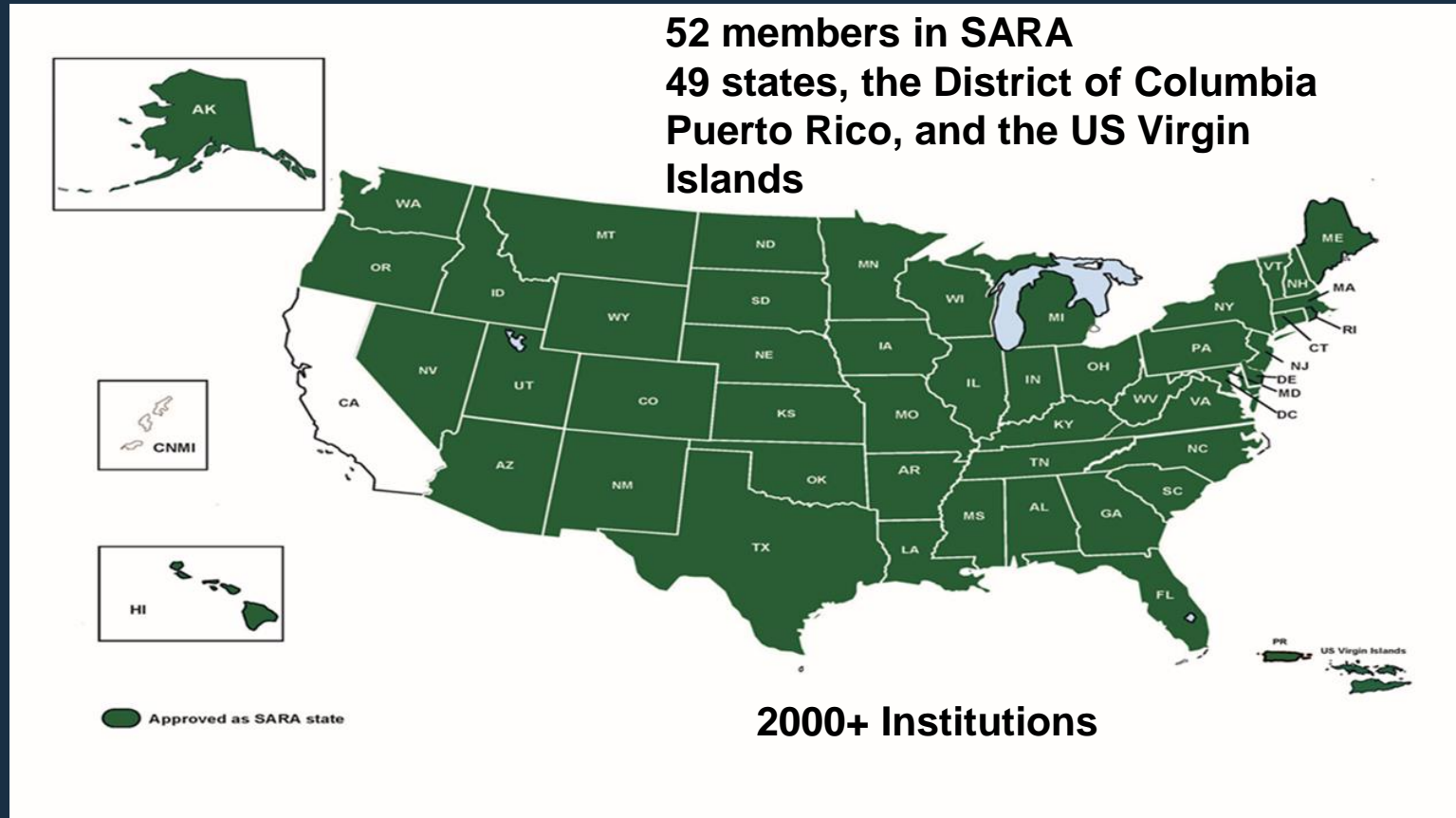


# NC-SARA

A nation-wide system of reciprocity administered by the four existing regional compacts.



# SARA Landscape



# NC-SARA Updates – Professional Licensure

## Coming Soon!

Agency Information

Working with Regional Compacts & States

Top Five:

- ✓ Counseling
- ✓ Psychology
- ✓ Social Work
- ✓ Nursing
- ✓ Teacher Education



# SARA Notifications

NC-SARA already has policies in place addressing disclosures related to professional licensure programs. The [\*SARA Manual\*](#) Policy Section 5.2 addresses requirements for notifying students in writing whether a course or program meets the educational requirements for professional licensure where the students are located.



# Contact Information

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# Federal Regulations Requiring Institution Disclosures



**Cheryl Dowd, Director,  
WCET/State Authorization Network**



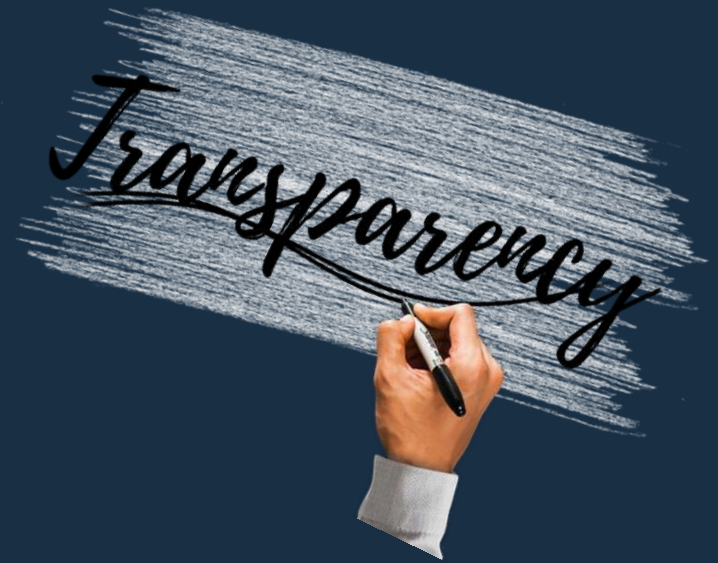
Purpose of Federal Regulations:  
Professional Licensure Disclosures for Post-Secondary Institutions

## Purpose:

- Provide Transparency for Consumer Protection

## Why:

- Ensure student financial investment in education and training will prepare the student to pursue their chosen profession.



# Key Requirements of Federal Regulations: Professional Licensure Disclosures for Post-Secondary Institutions

## Key Requirements:

- For Programs Leading to Professional Licensure or Certification.
- For all modes of instruction (face to face & distance education).
- Institutions must provide general and direct disclosures to students.



# General Disclosure Specifics in the Federal Regulations: Professional Licensure Disclosures for Post-Secondary Institutions

## General Disclosure Specifics:

- Make available to all prospective and enrolled students.
- Lists of states about curriculum meeting the educational requirements in the states.
  - List where the curriculum meets educational requirements.
  - List where the curriculum does not meet educational requirements.
  - List where the institution has not made a determination.



# Direct Disclosure Specifics in the Federal Regulations: Professional Licensure Disclosures for Post-Secondary Institutions

## Direct Disclosure Specifics:

- In writing to the student. (email ok!)
- If the curriculum does not meet state requirements or institution has not made a determination.
- Where the student is located prior to enrollment or for the enrolled student within 14 days of the institution determining the curriculum does not meet the state requirements.



INSTITUTIONS NEED STATE PROFESSIONAL BOARD HELP TO COMPLY!  
Professional Licensure Disclosures for Post-Secondary Institutions

## **Institutions need help from state professional boards.**

### **Why?**

Institutions must be able to review each state's requirements to analyze and make an assessment.

### **What do institutions need?**

Clear Access to the state requirements.



What can CLEAR Members Do to Collaborate in this Process?  
Professional Licensure Disclosures for Post-Secondary Institutions

## What can CLEAR Members Do to Collaborate in this Process?

- Communicate with Professional Boards.
- Encourage State professional boards to make their educational requirements clear and obvious on their websites.
- Encourage State professional boards to develop a process to manage the influx of inquiries from post-secondary institutions.
- Remember & share that the purpose of these inquiries is to support students that are the future professionals in these fields.



# Contact Information

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# Upcoming CLEAR Programs

- December 12, 2019 - CLEAR Webinar: Share the Data: How the CA Department of Consumer Affairs Improved Services and Created Process Efficiencies Through Open Data
- January 6-8, 2020 – NCIT Basic & Specialized, San Diego, CA
- January 8, 2020 - CLEAR Winter Symposium - Data and Technology in Professional Regulation, San Diego, CA
- January 8-10, 2020 – Midyear Business Meeting
- March 17-19, 2020 – NCIT Basic & Specialized, Raleigh, NC
- September 23-26, 2020 – Annual Educational Conference, Seattle, WA
- October 19-21, 2020 – NCIT Basic, Honolulu, HI
- November 3-5, 2020 – NCIT Basic & specialized, Toronto, ON
  
- September 22-25, 2021 – Annual Educational Conference, Washington, DC



# Introduction to Regulatory Governance Webinars

- February 27, 2020 - Foundations of Occupational and Professional Regulation
  - March 26, 2020 - Roles and Responsibilities of a Board Member
  - April 23, 2020 - Administrative Rulemaking
  - May 28, 2020 - Professional Discipline
  - June 25, 2020 - Assessing Competence
- 
- Register for individual modules, or register for the series at a package discount



# Questions?

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- You can ask a question online. You can type your question in the Q&A box.



# Thank you!

- Thank you for participating in this CLEAR Webinar in collaboration with WCET/SAN.



# Thank you!

- We would appreciate your feedback about this presentation. Once you leave the webinar, you'll be directed to an online survey page. Please take a few minutes to complete the survey.

