

# Professional Licensure Compacts: Myth v. Fact

## INTRODUCTION

U.S. Department of Education regulations, effective July 1, 2020, require Title IV institutions to share professional licensure disclosures for programs of all modalities publicly. Specifically, an institution must make readily available to enrolled and prospective students a list of all states where:

- 1) an institution's curriculum meets educational requirements for professional licensure or certification,
- 2) an institution's curriculum does not meet educational requirements for professional licensure or certification, or
- 3) the institution has not determined whether the curriculum meets educational requirements.

In addition to public disclosures, an institution must also provide a direct disclosure to a student before enrollment if

- 1) the institution's curriculum does not meet educational requirements for professional licensure or certification in the student's state, or
- 2) the institution has not determined whether its curriculum meets educational requirements for professional licensure or certification in the student's state.

A direct disclosure (often by email or letter) must also be sent to a current student within 14 days if an institution determines that a program's curriculum no longer meets educational requirements for licensure in the state where the student is located.

The purpose of sharing these disclosures is to educate students about professional licensure requirements, which vary from state to state. Students need to understand whether they will be able to apply for a professional license in a particular state upon the completion of their program. As students become more mobile during their program or after graduation, it's also essential for students to understand the impact which moving to a different state may have on their eligibility to apply for a license.

Institutional staff are researching state licensure requirements across a variety of licensed fields to comply with federal requirements. This research task can be difficult for individuals who are unfamiliar with state licensure processes or requirements. National licensure compacts and agreements add to the complexity and can result in common misunderstandings about the interstate mobility of new graduates and licensed professionals.

Compacts and other interstate licensure agreements facilitate the mobility of licensed professionals across member states. However, these agreements are not the same as reciprocity agreements, and each agreement is uniquely structured. For example, the national nursing compact (NLC) functions very differently than the national educators agreement (NASDTEC). These agreements have a significant impact on a student's ability to obtain professional licensure in one state after completing their program in another state. Institutions are responsible for providing accurate licensure disclosures to

## Professional Licensure Compacts: Myth v. Fact

students, so it is essential for staff who are completing licensure research to understand how a relevant licensure compact or agreement operates.

### WHAT IS THE NURSE LICENSURE COMPACT?

The [Nurse Licensure Compact](#), or NLC, is an interstate agreement that allows licensed nurses whose primary state of residence (PSOR) is a compact state to practice in other compact states under one multistate license. The NLC applies only to registered nurses (RNs), licensed practical nurses (LPNs), and licensed vocational nurses (LVNs). The NLC does not cover advanced practice registered nurse (APRNs) licenses. As of February 2020, [32 states have implemented the compact](#).

The NLC operates under a mutual recognition model that is similar to the model used for state driver's licenses. Under that model, an individual obtains a driver's license in their home state but may drive in other states with that license because those states are members of the Driver's License Compact. However, when the individual moves and changes their primary state of residence to a new state, they must obtain a new driver's license in the new state.

Similarly, the NLC allows a nurse who resides in a compact state to apply for a multistate license in their primary state of residence. (Residents of non-compact states are not eligible for a multistate license.) All applicants for a multistate license must meet [11 uniform licensure requirements](#), including meeting licensure requirements in the applicant's PSOR. With a multistate license, a nurse can practice in all compact states either in person, or through telehealth. However, if the nurse moves to a new compact state, they will need to obtain a new multistate license in that state. It's important to note that a multistate license is not valid for practice in a non-compact state. Practice in non-compact states would require a separate state license.

### Myths v. Facts About Multistate Nursing Licensure

Misconceptions about multistate nursing licensure are common. Institutions need to understand the facts about the Nurse Licensure Compact.

**Myth:** A multistate nursing license serves as a national license.

**Fact:** While the goal of the NLC is for all 50 states to join, nevertheless, a multistate license is a state-issued license. The multistate license authorizes RNs, LPNs, and LVNs to practice in all compact states only. A nurse must obtain a new multistate license if they move and change their primary state of residence to a new state.

**Myth:** Compact states have licensure reciprocity with other compact states.

**Fact:** The NLC is a compact agreement and is not the same as reciprocity. The multistate license enables a nurse with primary state of residence in a compact state to practice in all compact states without completing any additional applications, taking any tests, or paying any fees in each of those states. Practice may be in-person or via telehealth. Reciprocity, on the other hand, refers to when a nurse in a non-compact state wishes to practice in another state, needs to apply for a license by endorsement in that state, complete all of the requirements, and pay related fees. (This is commonly referred to as transferring your license). That is burdensome, costly, and involves a wait for processing time. States that participate in the NLC issue both multistate and single-state licenses. A nurse who resides in a compact state but does not meet requirements for a multistate license may be considered for a single state license.

## Professional Licensure Compacts: Myth v. Fact

### How does the NLC impact online programs and licensure program research?

State nursing boards may regulate pre-licensure or post-licensure nursing education offered by an out-of-state institution, and board requirements vary significantly from state to state. Nursing boards may require approval to provide online courses or on-ground clinical experiences, and/or may need remote faculty to be licensed in the state. State authorization staff should review each nursing board's regulations to determine whether an institution may offer nursing education programs in the state.

A state's participation in the NLC could potentially expand opportunities for institutions to offer nursing programs across state lines. For example, if a state nursing board in a compact state requires online faculty to be licensed in the state, a faculty member may be able to meet the requirement with a multistate license. Similarly, if nursing students are completing a post-licensure nursing program, a student with a multistate license would have expanded access to clinical telehealth or in-person opportunities. Students who hold a multistate license may practice nursing via telehealth or in-person when a patient is located in another compact state.

In addition to meeting board requirements to offer nursing education in another state, institutions must research and disclose whether a nursing program meets educational requirements to apply for licensure in each state. When drafting licensure program disclosures, state authorization staff should understand how the NLC impacts licensure processes. For example, it's essential to communicate that multistate license applicants must meet licensure requirements in their primary state of residence and that a multistate license is valid for practice. At the same time, a nurse has a primary state of residence in a compact state. If the nurse were to change the primary state of residence to a non-compact state, that same license is no longer multistate but rather is then a single state.

## WHAT IS THE NASDTEC INTERSTATE AGREEMENT?

The National Association of State Directors of Teacher Education and Certification Interstate Agreement, also known as the [NASDTEC agreement](#), allows an educator who has completed an approved program and has a certificate in one member jurisdiction to earn a certificate or license in another member jurisdiction. Unlike full reciprocity agreements or compact agreements, member states and jurisdictions can add additional requirements called Jurisdictional Specific Requirements (JSRs). JSRs can include additional state coursework (i.e., Arkansas History, Arizona Constitution, etc.), years of teaching experience, program approval comparability, etc.

States may have unique JSRs, but all member states agree on a list of definitions and standards, including:

- **Approved program** means "a planned program of study leading to licensure or certification in the appropriate Member Jurisdiction. Approved programs may be either traditional or non-traditional. A non-traditional is a post-baccalaureate program in which the candidate may be employed as an educator prior to completion of the program," as defined by the U.S. Department of Education
- The *minimum* essential components of an approved educator preparation program must include:
  - A. A Bachelor's degree (either prior to admission to the program or as part of the program).
  - B. A supervised clinical practice; and

## Professional Licensure Compacts: Myth v. Fact

### C. A planned program of study<sup>1</sup>

- **School** means an "institution, other than a home school, which offers instruction for students of any grade, birth-Grade 12, which satisfied the compulsory attendance requirements for the Member Jurisdiction in which the institution is located."<sup>2</sup>

This agreement intends to increase the mobility of educators between member states. A teacher who has completed an approved educator preparation program or has a certificate in a member state can generally earn a certificate in another member state but may be required to complete that member state's JSRs within a specific time frame. For inexperienced educators (usually three years or less of teaching experience), the state may compare that educator's preparation program to their standards. Additional coursework or requirements may apply before that educator can earn a certificate or license in that state. Students graduating educator preparation programs will fall into one of these two categories, which will have an impact on their ability to pursue certification in a state other than the one in which they attended their program.

## Myths v. Facts about the NASDTEC Interstate Agreement

**Myth:** The NASDTEC Interstate Agreement is a reciprocity agreement that allows a teacher certified or licensed in one state to become certified or licensed in another state automatically.

**Fact:** The Agreement does not provide licensure reciprocity even if a state member is a "full reciprocity state." Most states have minimum Jurisdictional Specific Requirements (JSRs) for new graduates or educators who move to their state and earn certification or licensure. These Jurisdictional Specific Requirements may include, but are not limited to:

- Testing or assessments
- Course-delivery methodology (i.e., online, hybrid, or face-to-face programs)
- Continuing professional development
- Curriculum comparability
- Specific coursework

**Myth:** All programs and certificates approved in one NASDTEC member state will be accepted in another member state.

**Fact:** Member states and jurisdictions are not required to accept an educator preparation program approved in another member state. Provisional or temporary certificates or licenses are not included in the Interstate Agreement, and other member states and jurisdictions may not accept them. States may require educators with provisional or temporary

---

<sup>1</sup> While a "planned program" is not defined in the NASDTEC Agreement, see the definition of an approved program in the first bullet to see the two types of programs accepted as an approved program: traditional and non-traditional.

<sup>2</sup> NASDTEC Agreement 2015-2020;

[https://cdn.ymaws.com/www.nasdtec.net/resource/resmgr/Interstate\\_Agreement/NASDTEC\\_Agreement\\_2015-2020.pdf](https://cdn.ymaws.com/www.nasdtec.net/resource/resmgr/Interstate_Agreement/NASDTEC_Agreement_2015-2020.pdf)

## Professional Licensure Compacts: Myth v. Fact

certificates or licenses to complete additional requirements before they can teach. States rarely guarantee that an out-of-state educator program will be accepted for educator certification or licensure in their state.

### How does the NASDTEC Agreement impact student licensure?

Most students graduating from an educator preparation program will fall into the category of an inexperienced teacher (i.e., three years or less of teaching experience for most states). An educator preparation program is approved by a state board to allow the student to pursue certification after completion of the program. For example, the Kentucky Education Professional Standards Board approves a Kentucky institution's Special Education program, which allows students who complete that program to become certified to teach Special Education in Kentucky. There are often additional requirements the student must complete, such as state assessments, background checks, etc. before the student can receive professional certification.

Students who complete an educator preparation program in one state, but wish to teach in another usually have two options:

**Directly Pursue Certification in Another State:** The first is to directly pursue teacher certification in another state without becoming certified in the state where the student attended the educator preparation program. Some states will recognize an educator preparation program from another state, and the student can easily apply for teacher certification. Other states will meticulously compare the student's educator preparation program against their state standards, comparing course requirements, admissions standards, or teaching assessments. In many of these cases, the student must meet ALL of the state's criteria before they can receive a certification in that state. This path can become burdensome and does not guarantee that the student will be able to obtain certification in another state.

**Become Certified in the State of the Student's Educator Preparation Program:** The second is for the student to become certified in the state in which their educator preparation program is located, after completing the state's assessments and other requirements. Once certified, the student can then pursue certification in another state. Most states in the NASDTEC Interstate Agreement will recognize a student's certification in another member state and only require the student to complete any relevant Jurisdictional Specific Requirements, rather than examining whether the student's program meets the new state's standards. However, some states will have more requirements from students with fewer years of teaching experience.

Please note that neither route guarantees a student will be able to become certified in another state. While the NASDTEC Interstate Agreement eliminates some obstacles for students transferring between member states, students must be aware that they are taking a risk by pursuing an educator preparation program not approved in the state in which they wish to be certified.<sup>3</sup> Many state boards require institutions to communicate this risk to prospective students if the institutions want to operate in their state.

---

<sup>3</sup> Some institutions with significant out-of-state enrollment often choose to pursue a formal approval process by another state's educator licensure board in order for the institution's students to pursue licensure directly in that state. One benefit of this route is that students completing the institution's program can pursue licensure directly as if they had completed an in-state educator

## Professional Licensure Compacts: Myth v. Fact

### How does the NASDTEC Interstate Agreement impact online programs and licensure research?

The Interstate Agreement allows increased mobility of licensed educators between states, which expands opportunities for teacher education graduates to teach in different settings across the nation potentially. It is important to note that a state's participation in the NASDTEC Interstate Agreement does not give an institution automatic approval or exemption to offer online programs in that state. Institutions should contact the appropriate state professional licensure board to inquire about their requirements regarding the provision of online programs, student teaching, and/or educational practicums. Also, note that some state professional licensure boards require an institution to complete their approval process for graduates to pursue licensure in their state directly. Institutions that do not have the appropriate state professional licensure board approval must disclose to prospective students in that state that the students must apply for teacher licensure as out-of-state applicants upon graduation. Failure to do so may result in adverse action. The NASDTEC agreement does not waive the responsibility of the institution to acquire the appropriate approvals or exemptions to offer distance learning or other activities in another state.

Institutional staff who are researching and disclosing state licensure information should be careful to research any [Jurisdictional Specific Requirements](#) for a state. Some teaching areas may have JSRs unique to that area. For example, an Arkansas Social Studies Licensure Content Area may require applicants to take Arkansas history coursework within a given timeframe. Special education is also a subject area that often has additional JSRs in each member state. It is essential to communicate these other requirements to students and to encourage the student to talk with the appropriate state professional licensure board before enrolling in a program. Institutions should work closely with program staff and university legal counsel to determine how out-of-state educator licensure requirements, JSRs, and other pertinent information will be disclosed to students to meet federal requirements.

## CONCLUSION

The NLC and NASDTEC were put in place to streamline licensure processes and increase mobility for licensed professionals. Although the goals of the compacts are the same, the details and structure of each compact are very different. Similar compacts exist for other licensed professionals, such as physical therapists and EMTs, but it is essential to review the details of each compact to understand the impact on licensure.

Institutional staff researching licensure requirements must have an accurate understanding of how each licensure agreement or compact works. Misunderstandings are common and could potentially cause institutions to present students with inaccurate licensure information.

So how should an institutional staff navigate research related to licensure compacts and agreements?

---

preparation program. However, not all states provide this option and this option can require substantial applications, fees, site-visits, annual reviews, etc. Institutions interested in this route should discuss the option with the state's educator licensing board.

## Professional Licensure Compacts: Myth v. Fact

- 1) Review the compact or agreement website and resources that outline crucial information for students, professionals, and educators. Agreements and compacts can change over time, may not exclude changes in state licensure, or may have exceptions that impact how a professional or student becomes licensed in a new state.
- 2) Continue to research state regulations regarding authorization for online programs or other educational activities in a state. Compacts and agreements do not impact whether an institution can provide licensure programs in a given state.
- 3) Research each state's requirements for licensure. A state may have additional requirements for new professionals or students moving to the state. Remember that the U.S. Department of Education regulations require institutions to disclose whether an institution's curriculum meets or does not meet the educational requirements for professional licensure in another state (unless the institution has not decided). Disclosing that a student can transfer a license or can work in a state under a compact or multistate license does not meet federal licensure disclosure requirements that the institution's curriculum meets the educational requirement in a state.

Licensure research is a demanding and complex task, especially for institutions and staff who are unfamiliar with a licensed field. However, institutions can view this new requirement as an opportunity to become experts in the complex professional licensure world that students will enter after they graduate. The institution that must notify that the curriculum does not meet state requirements will serve their students well by effectively and transparently sharing this information. Even if the curriculum does not meet state educational requirements, the institution can do well by providing students with the full picture and other alternatives for pursuing licensure or certification.

Thank you very much to the WCET/SAN Special Interest Team for Professional Licensure:

- Emily Woods, Distance Learning Compliance Coordinator, University of Kentucky.
- Lisa Siefker, State Authorization Program Manager, The Ohio State University.
- Leeann Fields, Executive Director, Office of Educational Compliance, UNLV.
- Ashley Stettler, Program Coordinator, Eastern Washington University.
- Cairesse Grimes, Office of the Provost Coordinator, Mount Saint Mary's University.
- Jacqueline Hodges, Program Manager, University of Alabama.
- Matthew Gidley, Graduate Program Coordinator, Northern Arizona University



This work is licensed under a [Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International License](https://creativecommons.org/licenses/by-nc-sa/4.0/). The content of this resource should not be considered to be or used as legal advice. Legal questions should be directed to legal counsel.