



ADMINISTRATIVE POLICY #30-15 (2022) PROFESSIONAL LICENSURE DISCLOSURES

Policy Title: Professional Licensure Disclosures

Policy Type: Administrative

Policy Number: 30-15 (2022)

Approval Date: 02/10/2022

Responsible Office: The Office of the Provost and Vice President for Academic Affairs and the Office of the Vice President for Operations and Chief Strategist for Institutional Effectiveness

Responsible Executive: Provost and Vice President for Academic Affairs

Applies to: University Community and Prospective Students

POLICY STATEMENT

Norfolk State University is committed to adhering to the policies and requirements set by the United States Department of Education (DoE) and the National Council for State Authorization Reciprocity Agreements (NC-SARA). In accordance with DoE and NC-SARA requirements, whenever a Norfolk State University program is designed to meet educational requirements for a specific professional licensure or certification, or is advertised as meeting such requirements, the University will make public and directly notify prospective and enrolled students by a list of (1) all States for which the University has determined that its curriculum meets the State educational requirements for licensure or certification; (2) all States for which the University has determined that its curriculum does not meet the State educational requirements for licensure or certification; and (3) all States for which the University has not made a determination that its curriculum meets the State educational requirements for licensure or certification.

Norfolk State University has established procedures to ensure compliance with DoE and NC-SARA policies. This professional licensure policy applies to Vice Presidents, Admissions, Enrollment Services, Deans, Department Chairs, Program and Department Directors, Undergraduate and Graduate Program Coordinators, College/School and Departmental Curriculum Committees, as well as faculty and staff advising prospective and enrolled students on degree program registration or selection.

PURPOSE

Norfolk State University offers programs leading to professional licensure within the Commonwealth of Virginia. States vary as to what professions require licensing and how licensure is acquired. Some States require an individual to graduate from an accredited program. Others require individuals to obtain additional coursework, additional fieldwork, background checks, passing additional State licensing exams, additional fees, or other requirements. The Department of Education and National Council for State Authorization Reciprocity Agreement (NC-SARA), as part of the negotiated rulemaking policy that addressed accreditation, State authorization, and other topics, implemented U.S. Code of Federal Regulations, specifically 34 CFR 668.43(a)(5)(v) and 34 CFR 668.43(c) which requires universities to provide public and direct disclosure information to prospective and enrolled students about the status of their professional licensure programs.



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Norfolk State University is a member of the NC-SARA, which enables the provision of distance learning programs and coursework to residents of States other than Virginia. NC-SARA membership, however, does not grant reciprocity or an exempt status from state professional licensing requirements. To maintain recognition with the Department of Education and NC-SARA, the University is required to adhere to all federal laws and regulations associated with its status and must include in its policies, regardless of a program's instructional modality, provisions for public and direct disclosures of academic programs that require professional licensure or certification. Licensing requirements in the Commonwealth of Virginia may not be recognized as sufficient to obtain a license in other States, as additional educational requirements may be required and are subject to change.

The University will determine through reasonable, good-faith effort if professional education in a given program meets or does not meet the applicable professional licensure educational requirements in the fifty States and territories, or if the University has not yet made a determination in that respect.

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DEFINITIONS

Professional Licensure Program: A certificate, undergraduate minor, undergraduate or graduate degree program intended or advertised to satisfy educational prerequisites for a State-issued professional license, certification, or other credential offered by a third party required for employment.

Professional Licensure Disclosure Statements: Announcements made by the University that provide information to the general public (i.e., public disclosure) or by directly notifying students (email, letter, etc.) about whether programs leading to professional licensure or certification meet educational requirements for licensure or certification in a particular State.

State Authorization Reciprocity Agreements (SARA): An agreement among member states that authorizes an institution located and legally authorized in a State covered by the agreement to provide out-of-state activities to students located in other States covered by the agreement.



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Student Location: The current address listed in the student record (Note: Student location is determined by a student's current address in the student record, not the permanent address).

CONTACTS

The Provost and Vice President for Academic Affairs officially interprets this policy and is responsible for obtaining approval for any revisions required by BOV Policy #01 (2014) Creating and Maintaining Policies throughout the appropriate governance structures. Questions regarding this policy should be directed to the Office of the Provost and Vice President for Academic Affairs.

STAKEHOLDERS

University-wide Community and Prospective Students

POLICY CONTENTS

In accordance with the US DoE Federal Regulations, specifically 34 CFR 668.43(a)(5)(v) and 34 CFR 668.43(c) and NC-SARA policies, Norfolk State University will publicly make available and directly notify enrolled and prospective students about information on its academic programs leading to professional licensure prior to and upon enrollment.

Public Disclosure

The University provides public disclosure of information regarding professional licensure programs on its website under the Professional Licensure page, which indicates whether completion of a professional licensure program would be sufficient to meet educational requirements for licensure in States across the country. Academic department chairs and program directors administering such programs who serve as content experts, in collaboration with the Office of Academic Effectiveness, will annually investigate rules of professional licensing boards to determine if programs meet, do not meet, or unable to determine a state's requirements for licensure or certification. This public disclosure will indicate the States where the University has determined through reasonable, good-faith efforts the status of professional licensure programs.

Direct Disclosure

Prospective undergraduate and graduate students will be provided with direct disclosure, as required by 34 CFR 668.43(c), by the University's Office of Admissions or Enrollment Management and Academic Affairs in writing (via email, other electronic communication, or mail) if

- The intended curriculum for which professional licensure or certification is required does not meet the State educational requirements for licensure or certification in the State where the prospective student is located; or
- The University has not made a determination regarding whether the program's curriculum meets the State educational requirements for licensure or certification in the State where the prospective student is located.

Prior to enrolling in any program, prospective students living and/or working outside of the United States should verify their current residency status that makes them eligible to enroll in programs and courses and for financial aid purposes. Prospective students should also confirm with the appropriate certifying agency whether successful completion of any degree program will meet the



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credentialing requirements of the country in which they intend to seek employment, as to certain types of employment, or for advanced/specialized educational programs.

Enrolled students will receive direct disclosure notification, as required by 34 CFR 668.43(c), from the respective Department or Program within 14 calendar days of enrollment at the institution in writing (via email, other electronic communication, or mail) if

- The intended curriculum for which professional licensure or certification is required does not meet the State educational requirements for licensure or certification in the State where the prospective student is located; or
- The University has not determined whether or not the program's curriculum meets the State educational requirements for licensure or certification in the State where the prospective student is located.

Should a student relocate during the course of a program to another state, it may impact the student's ability to remain in the program, meet the state licensure requirements, and/or continue to receive financial aid funding. Before considering relocation, it is the student's responsibility to inform the institution of personal changes to their record and discuss authorization and licensure eligibility requirements. Per [34 CFR 668.43\(c\)\(3\)\(ii\)](#), institutions must provide the Department of Education with the institutional determination of where the student is located upon request. To achieve this, an institution must establish policies or procedures to determine where students are located. Institutions must determine where a student is located both at the time of enrollment and after receiving information provided by the student to clarify that the student's location has changed. NSU collects location information from students as part of the registration process, wherein students are asked to provide their physical location. This information is collected every semester.

Norfolk State University shall not be held liable if a student is unable to qualify for licensure or certification in any jurisdiction or cannot obtain a practicum/internship location because every situation is unique and requirements may change.

EDUCATION AND COMPLIANCE

The Office of the Provost and Vice President for Academic Affairs provides oversight for this policy in academic affairs by maintaining the website for public disclosure and direct disclosure to enrolled students in related programs. The Vice President for Operations and Chief Strategist for Institutional Effectiveness provides oversight for implementing this policy through the Offices of Admissions, Enrollment Management, and Registrar by providing notification and disclosure to prospective students.

All institutions administering the Title IV funds through the federal Department of Education are required to adhere to this regulation and procedures stated in this policy. Failure to comply with this policy and its related procedures may result in penalties against the University by the Department of Education, as well as sanctions against the University's membership by NC-SARA.



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PUBLICATION

The University Policy on Professional Licensure Disclosure will be published and disseminated to the University community at large. The Office of the Provost and Vice President for Academic Affairs will make every effort to

- Communicate the policy in writing to the University community at large within 14 days of approval;
- Submit the Professional Licensure Disclosure Policy for inclusion in the online Policy Library within 14 days of approval;
- Post the Professional Licensure Disclosure Policy on the Academic Affairs website; and
- Educate and train all stakeholders and appropriate audiences on the policy contents as necessary.

EVALUATION

Every three years, this policy shall be evaluated by the Office of the Provost and Vice President for Academic Affairs. After evaluating this policy, improvements or recommendations to strengthen the University Policy on Professional Licensure Disclosure must be submitted to the Provost and Vice President for Academic Affairs for review.

REVIEW SCHEDULE

- Next Scheduled Review: 02/10/2025; xx/xx/xxxx\
- Approved by: President's Cabinet
- Approval Date: 02/10/2022; xx/xx/xxxx
- Revision History: New; xx/xx/xxxx
- Supersedes: N/A

RELATED DOCUMENTS

[34 CFR Sec. 668.43](#)

FORMS

There are no forms associated with this policy and procedures.