State-Specific Professional Licensure Disclosure Policy

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SECTION I. PURPOSE

This policy establishes the requirement, timing, and process for the University of St. Thomas to disclose state-specific professional licensure or certification information to students in particular educational programs.

This policy is intended to comply with the requirements set forth by the United States Department of Education in the Code of Federal Regulations for educational institutions that participate in any student financial assistance program authorized by Title IV of the Higher Education Act of 1965, as amended, including, but not limited to, 34 CFR § 600.9(c)(2) (regarding the determination of the State in which a student is located), 34 CFR § 668.43(a)(5)(v) (regarding public disclosure of professional licensure requirements), 34 CFR § 668.43(c) (regarding individualized disclosure of professional licensure requirements), and 34 CFR § 668.14(b)(32) (regarding compliance with specific provisions of the program participation agreement submitted to the Secretary of Education), as well as the requirements for participating institutions set forth in Section 5.2 of the National Council for State Authorization Reciprocity Agreements (NC-SARA) Policy Manual.

SECTION II. SCOPE AND APPLICABILITY

This policy governs professional licensure disclosures to all currently enrolled and prospective students in any educational program at St. Thomas which is designed or advertised to meet state educational requirements for a specific professional license or certification that is required by a state for employment in an occupation.

This policy applies to employees assigned to academic units (as defined below) and all employees assigned to the Innovation and Technology Services division (including, but not limited to, the Enterprise Data and Registrar units), Enrollment Services, and the Office of Accreditation, Assessment, and Curriculum.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

a. ***Academic Unit*** means a St. Thomas school, college, or academic department or program, center, or institute.

b. ***Currently enrolled student*** means:

   1. an individual who is enrolled in an undergraduate degree program and has a declared major in the SIS; or

   2. an individual who is enrolled in a graduate degree or licensure program.

c. ***Educational program*** means a program of study leading to a specific undergraduate degree, graduate degree, certificate (post-baccalaureate or post-Masters), or licensure program.

d. ***ITS*** means St. Thomas's Innovation and Technology Services division, or a successor division, that is responsible for developing initiatives and providing services that enhance faculty and student success, improve campus services and processes, increase communication and awareness, and create and reflect best information technology practices in higher education.

e. ***Location*** means the state or non-U.S. country in which a currently enrolled student or a prospective undergraduate student is physically located when taking one or more courses at St. Thomas (recorded as "Local Address" in the SIS), or the state or non-U.S. country in which a prospective undergraduate direct admission student or a prospective graduate student is physically located when submitting an application for admission to any educational program (recorded as "Home Primary Address" in the SIS).

f. ***Professional license or certification*** means educational or degree requirements, professional examinations, background checks, character and fitness qualifications, work experience, fingerprinting, or other requirements that may be required by a state to practice a regulated profession.

g. ***Prospective student*** means:

    1. an individual who is enrolled in an undergraduate degree program and who does not have a declared major in the SIS (also referred to as a ***prospective undergraduate student***);

    2. an individual who submits an application for direct admission to an undergraduate degree program (also referred to as a ***prospective undergraduate direct admission student***); or

    3. an individual who submits an application for admission to a graduate degree or licensure program (also referred to as a ***prospective graduate student***).

h. ***State*** means a state, territory, or freely associated state of the United States, including (without limitation) the District of Columbia, American Samoa, the Commonwealth of the Northern Mariana Islands, the Commonwealth of Puerto Rico, Guam, the Virgin Islands, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau. The latter three are also known as the Freely Associated States.

i. ***Student Information System (SIS)*** means the various information management systems that St. Thomas uses to record, maintain, and manage student data, including, but not limited to, data on admission and retention, advising, housing, registration, and student financial accounts.

SECTION IV. GENERAL REQUIREMENTS

Supervisors of the relevant units in this Section will designate specific employees within their respective units to timely undertake the responsibilities set forth in this Section.

A. Identification of Educational Programs Subject to This Policy

The Office of Accreditation, Assessment, and Curriculum will work with academic units to identify and maintain a centralized list of educational programs that are designed or advertised to meet state educational requirements for a specific professional license or certification that is required by a state for employment in an occupation.

B. State-by-State Determination

For each educational program identified pursuant to Section IV.A of this policy, the appropriate academic unit must determine and document whether completion of the program would be sufficient to meet licensure requirements for employment in every state. The determination for each state can be one of the following:

1. MEETS:
    a. The curriculum **meets** state educational requirements for licensure or certification;
    b. The curriculum **meets** state educational requirements for licensure or certification ***if***:
        i. the student completes additional items ***before*** degree conferral; ***and***
        ii. the academic unit ***can*** adapt its curriculum to include the additional required items.

    These items may include additional or specific requirements for coursework, credits, or practicum/internship hours; or
    c. The curriculum **meets** state educational requirements for licensure or certification ***if***:
        i. the student completes additional items ***after*** degree conferral; ***and***
        ii. the student ***can*** find employment in an occupation that the program prepares the student to enter immediately upon completion of the program.

    These items may include additional or specific requirements for coursework, credits, or supervised hours.
2. DOES NOT MEET:
    a. The curriculum **does not meet** state educational requirements for licensure or certification;
    b. The curriculum **does not meet** state educational requirements for licensure or certification because:
        i. the student must complete additional items ***after*** degree conferral; ***and***
        ii. the student ***cannot*** find employment in an occupation that the program prepares the student to enter immediately upon completion of the program.

    These items may include additional or specific requirements for coursework, credits, or supervised hours;
    c. It **cannot be determined** if the curriculum meets state educational requirements for licensure or certification; or
    d. It **has not been determined** if the curriculum meets state educational requirements for licensure or certification.
3. DOES NOT EXIST: The state **does not issue** licensure or certification for employment in the occupation that the program prepares the student to enter.

For each educational program identified under to Section IV.A of this policy, the appropriate academic unit will be responsible for collecting the required information necessary to make the state-by-state determinations for their unit's educational program(s) and reporting that information to the Office of Accreditation, Assessment, and Curriculum. The Office of Accreditation, Assessment, and Curriculum will then be responsible for maintaining a centralized record of all state-by-state determinations for all relevant educational programs.

C. Annual Review

To ensure the information collected, recorded, and communicated under this policy is accurate and updated in a timely manner, the appropriate academic unit must, at least once each academic year, review and verify the state-by-state determinations made and recorded pursuant to Section IV.B of this policy. Whenever an academic unit determines a state determination has changed and needs to be updated, the appropriate academic unit must report that information to the Office of Accreditation, Assessment, and Curriculum within seven (7) calendar days of making such determination. If the state-by-state determinations are included in course catalogs or marketing materials pursuant to Section V of this policy, the appropriate academic unit also must update those materials within fourteen (14) calendar days.

D. Requirements and Process for Determining the Location of Students

1. Currently Enrolled Students and Prospective Undergraduate Students

Designated St. Thomas employees will be responsible for implementing a process to require all currently enrolled students and prospective undergraduate students to timely verify their location at the beginning of the fall and spring academic terms, in accordance with instructions provided by St. Thomas. To facilitate the collection of information on the location of these students, the supervisors of the following units will designate specific employees within their respective units to timely undertake the following actions:

a. ITS has responsibility to create and maintain the appropriate "Local Address" field(s) in the SIS for the recording of each student's location.

b. The Office of Student Data and Registrar has responsibility for ensuring that students are given an appropriate prompt in the SIS to the following effect: "Below is the Local Address information we currently have on file for you. This should be the address where you will live during the coming semester." St. Thomas will require students to confirm or correct the information before they can continue in the SIS. The Office of Student Data and Registrar will ensure that the location submitted by the student is recorded in the appropriate field(s) in the SIS.

2. Prospective Undergraduate Direct Admission Students and Prospective Graduate Students

To facilitate the collection of information on the location of prospective undergraduate direct admission students and prospective graduate students, supervisors of the following units will designate specific employees within their unit to timely undertake the following actions:

a. ITS has responsibility to create and maintain the appropriate "Home Primary Address" field(s) in the SIS for the recording of each prospective student's location when submitting an application for admission to any degree- or certificate-granting program.

b. Enrollment Services will require prospective students who complete an application for admission to enter their "Home Primary Address" as part of the application. The applicable unit exercising this responsibility will ensure that the location submitted by the prospective student is recorded in the appropriate field(s) in the SIS.

SECTION V. PUBLIC DISCLOSURE REQUIREMENTS

The supervisor of each academic unit will designate specific faculty and/or employees within their respective unit to coordinate with the Office of Accreditation, Assessment, and Curriculum to

publicly disclose the state-by-state determinations made pursuant to Section IV.B of this policy for all applicable educational programs. Specifically, the state-by-state determinations must be published on the appropriate educational program webpage and/or on the Professional Licensure Disclosures webpage maintained by the Office of Accreditation, Assessment, and Curriculum. Academic units also may (but are not required to) include the state-by-state determinations in course catalogs or marketing materials. Wherever the state-by-state determinations are published, the academic unit or Office of Accreditation, Assessment, and Curriculum must include the date on which the information was last updated by including a statement such as, "This information was last updated on <<*Month Day, Year*>>."

SECTION VI. INDIVIDUALIZED DISCLOSURE REQUIREMENTS

Supervisors of the units designated in this Section will designate specific faculty and/or employees within their respective units to timely undertake the responsibilities set forth in this Section.

A. Currently Enrolled Students

Pursuant to Section IV.D.1 of this policy, St. Thomas will collect the location of its currently enrolled students.

1. Comparison of Student's Location to State-by-State Determinations

At least annually, a designated employee in the Office of Accreditation, Assessment, and Curriculum shall compare the reported locations of currently enrolled students in educational programs identified under Section IV.A of this policy to the state-by-state determinations recorded pursuant to Section IV.B of this policy.

2. Student Notification

If the comparison completed pursuant to Section VI.A.1 of this policy indicates that the educational program's curriculum DOES NOT MEET state requirements for licensure or certification in the state where the student is located (per Sections IV.B.2 and IV.D.1 of this policy), the student shall be notified of this determination via e-mail within fourteen (14) calendar days, with student's academic advisor(s) and designated professional licensure specialist cc'ed on the notification e-mail.

B. Prospective Undergraduate Students

Pursuant to Section IV.D.1 of this policy, St. Thomas will collect the location of its prospective undergraduate students.

1. Comparison of Student's Location to State-by-State Determinations

A designated employee in each educational program identified under Section IV.A of this policy shall compare a prospective undergraduate student's reported location to the state-by-state determinations recorded pursuant to Section IV.B of this policy upon receipt of a completed "Major/Minor Declaration Form" in which the student indicates their intent to declare a major in the educational program.

2. Student Notification and Required Attestation

If the comparison completed pursuant to Section VI.B.1 of this policy indicates that the educational program's curriculum DOES NOT MEET state requirements for licensure or certification in the state where the student is located (per Sections IV.B.2 and IV.D.1 of this policy), the designated employee in the educational program shall require the student to complete an Attestation Statement

form before the “Major/Minor Declaration Form" will be reviewed and approved. This form will be developed in coordination with the Office of Accreditation, Assessment, and Curriculum.

The Attestation Statement form will notify the student that the educational program in which they intend to major does not meet state requirements for licensure or certification in the state where the student is located. To complete the form, the student must specify the state where they plan to seek employment after graduation and that state must be one for which the educational program meets state requirements for licensure or certification. If a student does not complete and submit the Attestation Statement form, the “Major/Minor Declaration Form" cannot be approved.

C. Prospective Undergraduate Direct Admission Students and Prospective Graduate Students

Pursuant to Section IV.D.2 of this policy, St. Thomas will collect the location of its prospective undergraduate direct admission students and prospective graduate students.

1. Comparison of Student’s Location to State-by-State Determinations

ITS will create and maintain an automated process within the SIS to compare a prospective student’s reported location to the state-by-state determinations recorded pursuant to Section IV.B of this policy when a prospective student is completing an on-line application for admission to any educational program identified under Section IV.A of this policy.

2. Student Notification and Required Attestation

If the comparison completed pursuant to Section VI.C.1 of this policy indicates that the educational program’s curriculum DOES NOT MEET state requirements for licensure or certification in the state where the student is located (per Sections IV.B.2 and IV.D.2 of this policy), ITS will create and maintain an automated process within the SIS that requires the student to complete an Attestation Statement form before they can continue with and complete the application for admission. This form will be developed in coordination with the Office of Accreditation, Assessment, and Curriculum.

The Attestation Statement form will notify the student that the educational program to which they are applying does not meet state requirements for licensure or certification in the state where the student is located. To complete the form, the student must specify the state where they plan to seek employment after graduation and that state must be one for which the educational program meets state requirements for licensure or certification. If a student does not complete and submit the Attestation Statement form, they cannot complete and submit an application for admission.