

April 2022 State Authorization Updates & Information ^[1]

April 14, 2022 by erika.swain@cu.edu ^[2]

WCET-SAN is turning 12 this year—almost angsty teens! There are reportedly some exciting new resources on the way, such as best practice examples and a checklist on how to get started with professional licensure programs and disclosures (developed by myself and colleagues in the SAN-SIT on Professional Licensure), among other things. We'll be renewing our membership, which gives us access to a variety of information, news, and support—not to mention the WCET-MIX listserv, where we can seek advice and connect with colleagues across the country and in various sectors. If you're unfamiliar with all that WCET-SAN ^[3] offers, take some time to check them out, and feel free to reach out to me if you have any questions.

So, what can we do while we wait for the Department of Education to drop some officially proposed regulations on us (likely in May, probably on a Friday so we can spend all weekend reading them)? Well, WCET recommends that we take some time to do some (or all) of the following:

For Professional Licensure:

Start assessing your institution's professional licensure status in each state where you intend to serve students. Remember, the expectation is that you can "ensure" that your program meets the educational requirements of each state in which you plan to disburse Title IV aid. While we're unsure about some of the specifics (especially regarding student notifications), we should be prepared to report on how these potential rules will impact each program and future students. This information will be crucial if we need to contribute to a System (or broader) comment to the Department of Education.

- **Determine your target states.** Each program leading to licensure likely targets a few key states that contain the bulk of your enrollments. Note that the term "licensure" may be referred to as "certification," "approval," "authorization," or "permission" for certain professions. All of these terms fall under the concept of "licensure" for our purposes.
- **Ask the hard question.** Can you provide proof that your program meets the educational requirements for licensure in that profession in each relevant state? Imagine a financial aid officer is sitting across from you, asking that question. We've heard of program personnel claiming, "we don't have to do it." Prove it.
- **Conduct scenario analyses.** Based on the answer to that question, consider best- and worst-case scenarios for each program.

For State Authorization Reciprocity:

The (perceived) intent of the new rule is to limit reciprocity only to the act of applying for institutional authorization in a state and any associated fees. This is harder to gauge, as it

depends on independent actions by states and reciprocity agreements. In the meantime, you can focus on:

- **Identifying target states for delivering education (beyond Colorado).** Determine whether certain programs or populations are targeted by state. You may want to consult with admissions staff to assess how this could affect their work and recruitment strategies.
- **Creating a list of states where you serve the most students.** Where are your distance and correspondence students located? This includes Coursera and non-credit offerings, even if federal aid isn't available for those students – these offerings (including courses and alternative credentials) are still subject to state authorization regulations and policies.
- **Prepare for scenario analyses.** For your target states, estimate what additional costs might be incurred (look back to pre-SARA requirements). Did the state require specific refund policies or contributions to a tuition recovery fund? How would you cover these costs—would they be passed on to students through higher tuition or fees?

I've already reviewed a couple of programs at the Boulder campus and how we're advertising or describing them, including **Geology** (my favorite!) and the **Bachelor of Environmental Design** (specifically the Architecture and Landscape Architecture concentrations). For the Bachelor's and Master's in Geology, we determined that, since Colorado doesn't license professional geologists and these programs were designed as academic—not professional—programs, and since they are not offered in a distance modality, we would explicitly declare that they are not designed to meet licensure requirements in any state. We'll continue listing various state agencies that oversee the licensing of professional geologists, but we're clearly placing this program outside the professional licensure sphere.

As for **Environmental Design** and its concentrations, this is actually a "preprofessional" program, preparing students for further (graduate) education in Architecture and Landscape Architecture, but not providing the education required to become professionals in the field. Over the past year, we've made small adjustments to clarify this on the website and in the catalog, which is great. Recently, during discussions about a potential articulation agreement with another institution, we reaffirmed this program's preprofessional status and will be removing it from our list of general and direct disclosures in the coming weeks. Under current (and potential future) regulations, preprofessional programs are exempt from these disclosures.

I've also begun conversations with the **Accounting Department** in the Business School about recruitment and CPA requirements. In the coming weeks, I'll be adding more items to my agenda, such as reviewing distance enrollments by state.

Lastly, don't forget—**NC-SARA data reporting** starts in a few weeks! If you're one of the folks responsible, make sure you take time to review this year's [Data Reporting Webinar](#). ^[4]

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