

Licensure and Certification Disclosure Policy

Policy Owner: Office of the Provost

Adopted: February 2021

I. Policy Statement

Federal law (34 CFR 668.43(a)(5)(v) and 34 CFR 668.43(c)) requires certain disclosures by an educational institution with respect to its programs that are designed to meet or advertised as meeting educational requirements for professional licensure or certification required for employment in a particular occupation. An institution is required to make these disclosures readily available to enrolled and prospective students and, in some instances, requires direct notification to enrolled and prospective students.

General Disclosures

If an educational program offered by Washington University in St. Louis is designed or advertised to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, the program is required to issue a “general disclosure” containing the following information:

(A) A list of all States and U.S. territories for which the institution has determined that its curriculum *does* meet the State educational requirements for licensure or certification;

(B) A list of all States and U.S. territories for which the institution has determined that its curriculum *does not* meet the State educational requirements for licensure or certification; and

(C) A list of all States and U.S. territories for which the institution has not made a determination that its curriculum meets the State educational requirements for licensure or certification;

General disclosures may be posted on a School’s website, in the University Bulletin, or in a School’s student handbook, but the website should be maintained and information should be up to date.

Direct Disclosures

In addition, the program is required to issue an individualized “direct disclosure” to any current or prospective student in writing if the student is located in a State that falls within categories (B) or (C) above. In those two situations, the institution must inform the student directly of that status. This direct disclosure should be in writing and should be emailed or sent by mail to the student *before* the student’s enrollment in the program (i.e., before the student signs an enrollment agreement or makes a financial commitment to the university).

For a student currently enrolled in the program, if the program makes a later determination that the program does not meet educational requirements for licensure or certification in the State

where the currently enrolled student is located, the program must provide notice directly to the student in writing within 14 calendar days of making that determination.

For a student currently enrolled in the program who notifies that university that they have relocated to another State, the program must provide a direct disclosure to that student in writing, within 14 days of the relocation notice, if the student has relocated to a State that falls within categories (B) and (C) above.

NC-SARA

Washington University participates in the National Council for State Authorization Reciprocity Agreements (SARA), which provide a voluntary, regional approach to state oversight of postsecondary *distance* education. For SARA purposes, according to the *SARA Manual Section 5.2*, institutions that are unable, *after all reasonable efforts*, to determine whether a program will meet state professional licensure requirements shall provide the student or applicant with current contact information for any applicable licensing boards, and advise the student or applicant to determine whether the program meets requirements for Licensure in the State where the student is located. SARA has indicated that “all reasonable efforts” require that programs research the licensure requirements for each State where its students are located. If information is not readily available or clear, programs should contact the relevant State licensing board for further information. If the licensing board is unresponsive or the requirements are still unclear, only then may the program disclose in good faith that it has not made a determination as to whether it meets licensure requirements in a particular State.

II. Applicable Programs

- Programs are subject to these disclosure requirements if any of the following questions are answered affirmatively:
 1. Was the educational program **designed to meet educational requirements** for a **specific professional license** or certification?
 2. Is the **license or certification required for employment** in the occupation?
 3. Is **completion of the program** sufficient to **meet STATE licensure requirements**?
 4. Or did the institution **advertise** that the program meets requirements?
- For federal regulations, ALL educational programs described above, regardless of modality (i.e., distance education and in person)
- For SARA compliance, courses or programs subject to SARA Policy as per the SARA Manual
- Notifications are required even if the program is accredited by a national or regional accrediting body. Accreditation does not absolve WashU from providing disclosures for a program.

III. Student Location

For purposes of this policy, the current student location is the State where the enrolled student is located and is based on the “Home” address entered into the SIS. This applies to all students (i.e., undergraduate, graduate, and professional) and programs.

- For a prospective student, this is the State of the prospective student’s location at the time the student applies for admission or intends to enroll.
- For students whose permanent address does not include a U.S. State or territory (e.g., students living outside the United States), their location will be considered the State of Missouri.

IV. Processes

1. *Annual compliance*: On an annual basis in July, the Provost’s Office will ask each school to review their current information and report the following:
 - List all programs leading to licensure/certification subject to this policy
 - Template of disclosure message(s)
 - Written confirmation that direct disclosures have been made to:
 - Prospective students prior to enrollment if (B) or (C) in Section I are true
 - Currently enrolled students who have relocated, within 14 days of change of “Home” address in SIS
 - Currently enrolled students within 14 days of any new determination that the student is located in a State that now falls within (B) or (C) in Section I
 - Provide contact information for State licensing board when no determination is made (*SARA Manual Section 5.2*)
 - Links to websites or copies of the documents containing the general disclosures required in Section I.
 - Program-level liaisons and their contact information to whom student lists and/or inquiries are sent
2. *Student relocation*: Direct disclosure notification within 14 days of an address change in SIS
 - The Office of the University Registrar will run a weekly query looking for “Home” address changes in SIS during the prior week and send any updates to the designated School/Program contact
 - The School/Program then has 7 calendar days’ time to contact students and remain in compliance with the 14 day window
 - Office of the University Registrar will send notification based on list of contacts and programs provided
 - Schools/Programs must document that the direct disclosure was made by retaining records of each direct disclosure
3. *New determination*: Direct disclosure notification within 14 days if a program newly makes a determination
 - If a program newly makes a determination about licensure in a State, they must make a direct disclosure to any student whose “Home” address in SIS reflects that State

- Programs must document that the direct disclosure was made by retaining records of each direct disclosure
4. *SARA Compliance with Section I (C):*
- If no determination has been made, the program must provide the student or applicant with current contact information for any applicable licensing boards, and advise the student or applicant to determine whether the program meets requirements for Licensure in the State where the student is located.
 - Programs must document that the direct disclosure was made by retaining records of each direct disclosure

V. Location of Disclosure Information

- Websites (i.e., Provost’s Office, Schools)
 - Student Consumer Information (link: <https://wustl.edu/about/compliance-policies/registrar/student-consumer-information/>)
 - Provost’s Office
 - Individual Schools
- Application materials, marketing documents, etc.

VI. Definitions

- *Location* – For the purposes of this policy, this is the “Home” address in SIS and must be used by all programs.
 - “Local” address should be where the student resides while studying at WashU.
 - “Home” address should reflect the student’s more permanent address that is typically stable throughout the student’s career of study.
- *General Disclosure* – This communication may be posted on the website, in the University Bulletin, in School’s Student Handbooks, in Program admissions materials, etc.
- *Direct Disclosure* – This must be a direct communication to the student in writing, which may include through email or other electronic communication.