



Procedures and Standard for College Operations

Procedure 109.1: NC-SARA Professional Licensure Disclosures

Approved by: *J. Williams* Date: 6/18/2020
President

History: This procedure was created to facilitate compliance with CFR § 668.74, and section 5.2 of the NC-SARA Handbook (2020). **Revised** NA

Additional History:

Related Policies, Procedures or Standards: NA

Additional References: 34 § CFR 668.72(c)(2); NC-SARA Handbook

I. Introduction

SARA – the State Authorization Reciprocity Agreement – provides a streamlined, reciprocity based process for participating postsecondary institutions to gain approval to offer interstate distance education in SARA member states without individually applying to each State for such approval, subject to certain limitations. SARA centralizes the authorization process for each SARA-participating institution in a single state that SARA calls the institution's "Home State." Institutions approved by their states to participate in SARA must be appropriately accredited and meet academic and financial requirements designed to protect and benefit students (NC-SARA Manual, 2020). NC-SARA is the National Council for State Authorization Reciprocity Agreement (NC-SARA).

SARA does not cover professional licensing board approval for programs leading to state licensing (or certification). SARA does, however, require that proper notification be given to students as to whether courses or programs will meet the professional licensure requirements in states where the students are located.

The College identified four programs that call into this category, and this procedure outlines the steps Central Penn College takes to ensure compliance.



II. Definitions

Current Student: A Central Penn College student who is currently enrolled in for-credit courses.

General Public: any member of the community, in addition to faculty, staff, and current students.

Home State: a SARA-Member State where an Institution holds its Legal Domicile, Authorization, and is Accredited. To operate under SARA, an Institution must have a single Home State.

Professional Licensure, Licensure, or Certification: A process of State or other governmental entities that establishes standards of practice and gives legal permission to practice a profession by providing licenses to individuals who meet those standards.

Prospective Student: An non-Central Penn student who expresses interest in enrolling in one of the College's programs.

SARA: State Authorization Reciprocity Agreement.

SARA Manual: the most current version of a document of that name, containing information about the operation and policies of SARA, as maintained on NC-SARA's website at www.nc-sara.org.

State: a State, commonwealth, organized territory or district (District of Columbia) of the United States.

III. Procedure/Standard Statement

Central Penn College offers four programs that meet the educational requirements for external testing for certification. These programs are PTA, OTA, MA, and Phlebotomy. National certification in these fields does not necessarily equate to being licensed or certified to work in all states. As a result, the College created two distinct categories aimed at ensuring current and prospective students are informed about whether or not these programs meet the educational requirements for each State. These categories include general disclosures and direct disclosures.



General Disclosure:

The general disclosure procedure aims at providing licensure and certification information to inform current students, prospective students, and the general public about Central Penn programs that lead to a student's eligibility to apply for national certification.

The College maintains a Professional Licensure Directory for educational programs that qualify a graduate to apply for a certification or licensure. This directory contains the contact information for all state licensing agencies for the PTA, OTA, MA, and Phlebotomy programs. The directory indicates whether or not Central Penn's educational program(s) meet the educational requirements of that State, does not meet the requirements of the State, or if the College is unable to decide either way. The directory also notes if a state does not require a license or certification to practice, although the student may still become certified.

Direct Disclosures:

The College uses direct disclosures to inform prospective and current students when the program does not meet the educational requirements of the State where the student resides, or when the College is unable to make such a determination. The College does not send direct disclosures to students where the program meets the educational requirements where the student resides.

Applicants or Potential Students:

When a potential out-of-state student makes contact with the College about the PTA, OTA, MA, or Phlebotomy program, the admissions department will:

- Review the master list on the College's Student Right to Know webpage
- Determine if the educational program meets, does not meet, or is unable to determine if it meets the educational requirements for the individual's home state.
- Send a written notice, via email, to the potential student if the Central Penn program does not meet the educational requirements of the home state or if the College was unable to determine if the educational program meets the requirements. This email must also include the contact information of the state licensing board, of the applicant's home state, for the profession associated with the program.



Current Students:

The College also keep current students informed about the program's ability to meet the educational requirements of states other than the home state. Students that move out-of-state receive a direct disclosure (once the College becomes aware).

When a current student, enrolled in OTA, PTA, MA, or Phlebotomy, notifies the College of a change of address, and that change of address is outside of the institution's home state, the Registrar's office will:

- Review the master list on the College's Student Right to Know webpage
- Determine if the educational program meets, does not meet, or is unable to determine if it meets the educational requirements for the individual's home state.
- Send a written notice, via email, to the current student if the educational program does not meet the educational requirements of the home state or the College was unable to determine if the educational program meets the requirements. This email must also include the contact information of the state licensing board, of the applicant's home state, for the profession associated with the programs.

IV. Implementation: July 1, 2020