Policies & Procedures

Department: Academic Affairs Office
Policy Title: Licensure and Certification Disclosure, v3
Date Issued: 22 September 2020
Date Revised: 13 May 2024 to update to July 1, 2024 requirements
Approved by: Lorie Cook-Benjamin, Chief Academic Officer

Purpose: Comply with federal disclosure requirements 34 CFR § 668.43 - Institutional information regarding preparation for licensure and certification by different states.

Scope: Impacts include Academic Affairs, Admissions & Enrollment, Marketing

Policy and Procedure:

Federal regulations require institutions to disclose publically and individually to students how programs requiring professional licensure for employment apply to the state in which the student is, or plans to be located. In order to be in compliance with regulations, three steps are needed:

1. Determine the list of applicable programs
   - Federal regulations require disclosures for programs “If an educational program is designed to meet educational requirements for a specific professional license or certification that is required for employment in an occupation, or is advertised as meeting such requirements, a list of all States where the institution has determined, including as part of the institution's obligation under § 668.14(b)(32), that the program does and does not meet such requirements;” see 34 CFR (668.43)

2. Determine a Public Disclosure policy
   - A single public disclosure webpage will be maintained at: https://www.doane.edu/institutional-research-institutional-effectiveness/general-licensure-certification-disclosure

3. Determine an Individual Disclosures policy
   - From 34 CFR § 668.43 (c) (emphasis added)
     “(c)(1) If the institution has made a determination under paragraph (a)(5)(v) of this section that the program's curriculum does not meet the State educational requirements for licensure or certification in the State in which a prospective student is located, or if the institution has not made a determination regarding whether the program's curriculum meets the State educational requirements for licensure or certification, the institution must provide notice to that effect to the student prior to the student's enrollment in the institution in accordance with § 668.14(b)(32).
     (2) If the institution makes a determination under paragraph (a)(5)(v) of this section that a program's curriculum does not meet the State educational
requirements for licensure or certification in a State in which a student who is currently enrolled in such program is located, the institution must provide notice to that effect to the student within 14 calendar days of making such determination.”

4. Determine an attestation process for students located outside those states in which the program meets the requirements, but students plan to work in states in which the requirements are met.

1. List of Applicable Programs:

The following programs at Doane University have been identified for each college and will be referred to as Professional Licensure and Certification Disclosure Programs (PLCD Programs) as they may enroll students in programs satisfying 34 CFR § 668.14(b) and prepare students for licensure or certification.

<table>
<thead>
<tr>
<th>College</th>
<th>Program</th>
<th>Modality</th>
</tr>
</thead>
<tbody>
<tr>
<td>In person (Nebraska)</td>
<td>Distance Education</td>
<td></td>
</tr>
<tr>
<td>Arts &amp; Sciences</td>
<td>Engineering</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Business</td>
<td>Accounting-Public</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Education</td>
<td>Master of Arts in Counseling</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Education</td>
<td>Master of Education in School Counseling</td>
<td>Yes</td>
</tr>
<tr>
<td>Education</td>
<td>Master of Education in Educational Leadership</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Education</td>
<td>Initial Program at the Advanced Level</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Education</td>
<td>Graduate Endorsements:</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>YES via compact with</td>
</tr>
</tbody>
</table>

Accordingly, the only program requiring individual disclosure are the Master of Education in School Counseling program and the graduate education endorsement areas.

## 2. Public Disclosure
The Public Disclosure webpage provides the disclosure for each program for which a disclosure is required. The basic template below will be followed for each program. The disclosure page is linked from the Consumer Information page on the Doane Website and the program pages on the Doane website.

<table>
<thead>
<tr>
<th>PROGRAM NAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;&lt;General information about licensure in this program&gt;&gt;</td>
</tr>
</tbody>
</table>

States for which Doane University has determined that its curriculum MEETS the state educational requirements for licensure or certification includes:
- Nebraska
- <optional, list of other states via a compact agreement>

States for which Doane University has determined that its curriculum DOES NOT meet the state educational requirements for licensure or certification includes:

3. Individual Disclosure

Definitions

**Prospective student** - a student who has formally requested information about a program from the institution, and been entered into the university’s information system.

**Enrolled in the program** - a student accepted, formally declared to the university the program of study being pursued, and enrolled in courses.

**Location** - A student's location is placed in Colleague through the application process to Doane. Students verify the address as part of initial enrollment in classes. For students registered as taking classes in person, the state of Nebraska will be utilized for the location disclosures. The state in their home address field will be used for those enrolled via Distance Education.
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All students are required to submit an address during the initial application. Students are responsible for notifying the institution of any changes of address.

Individual Disclosure:

1. Every prospective student requesting information from Doane will be sent an email with a link to the public disclosures webpage prior to enrollment. The emails will be sent after acceptance to the program and prior to enrollment via SalesForce.
2. Every current student will be sent an email with a link to the public disclosures webpage upon registering for classes. The email template will be maintained by the Registrar.
3. Students currently ENROLLED in a PLCD program who submit a change of location (state) will be sent a link to the public disclosures webpage as well as information related to the specific program within 14 calendar days by the Office of Institutional Effectiveness.

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Email disclosure for all prospective undergraduate students

<<EMAIL template for prospective and all current students>>

Email from: admissions@doane.edu
Subject: Licensure and Certification disclosure

Dear ________,

Doane University offers several programs that prepare students to meet the educational requirements for licensure/certification in certain states. These programs include:

- Accounting-Public
- Engineering
- Educator Preparation Programs including Elementary Education, Special Education, Physical Education, Health Education, middle school and secondary education endorsements.

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page. States often have state-specific additional licensure and/ or certification requirements that Doane University will not guarantee.

States for which Doane University has determined that its curriculum MEETS the state educational requirements for licensure or certification include:

- Nebraska
States for which Doane University HAS NOT DETERMINED that its curriculum meets the state educational requirements for licensure or certification include:


Please contact your program representative or admissions counselor to discuss the requirements.

<<SIGN OFF>>

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Email disclosure for all prospective Master of Arts in Counseling

Email from: admissions@doane.edu  
Subject: Licensure and Certification disclosure

Dear _____,

Doane University offers several programs that prepare students to meet the educational requirements for licensure/certification in certain states. These programs include

- Master of Arts in Counseling

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page. States often have state-specific additional licensure and/ or certification requirements that Doane University will not guarantee.

States for which Doane University has determined that its curriculum MEETS the state educational requirements for licensure or certification include:

- Nebraska

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States for which Doane University HAS NOT DETERMINED that its curriculum meets the state educational requirements for licensure or certification include:


Please contact your program representative or admissions counselor to discuss the requirements.

<<SIGN OFF>>

Graduate Education programs

Email disclosure for all prospective students with program separately for each of the following.

- Master of Education in School Counseling
- Master of Education in Educational Leadership
- Initial Program at the Advanced Level
- Education Specialist

Email from: admissions@doane.edu
Subject: Licensure and Certification disclosure

Dear ______,

Doane University offers several programs that prepare students to meet the educational requirements for licensure/certification in certain states. These programs include

- <<INSERT PROGRAM NAME>>

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page. States often have state-specific additional licensure and/ or certification requirements that Doane University will not guarantee.
States for which Doane University has determined that its curriculum MEETS the state educational requirements for licensure or certification include:

- Nebraska,
- Alabama, Colorado, Florida, Kansas, Kentucky, Nebraska, Oklahoma, Oregon, Pennsylvania, Utah via Interstate Teacher Mobility Compact

States for which Doane University HAS NOT DETERMINED that its curriculum meets the state educational requirements for licensure or certification include:


Please contact your program representative or admissions counselor to discuss the requirements.

<<SIGN OFF>>

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Email disclosure for all prospective endorsement areas in graduate education. Can send as one area.

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Email from: admissions@doane.edu
Subject: Licensure and Certification disclosure

Dear ______,

Doane University offers several programs that prepare students to meet the educational requirements for licensure/certification in certain states. These programs include:

- Early Childhood Endorsement
- ESL Endorsement
- Reading Specialist Endorsement
- Reading and Writing Endorsement
Special Education Endorsement

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page. States often have state-specific additional licensure and/or certification requirements that Doane University will not guarantee.

States for which Doane University has determined that its curriculum MEETS the state educational requirements for licensure or certification include:

- Nebraska,
- Alabama, Colorado, Florida, Kansas, Kentucky, Nevada, Oklahoma, Oregon, Pennsylvania, Utah via Interstate Teacher Mobility Compact

States for which Doane University HAS NOT DETERMINED that its curriculum meets the state educational requirements for licensure or certification include:


Please contact your program representative or admissions counselor to discuss the requirements.

<<SIGN OFF>>
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<<EMAIL template for registration confirmation emails>>
As licensure/certification requirements vary by state, all students should consult the Public Licensure and Certification Disclosure page prior to enrollment. Please be aware that states often have state-specific additional licensure and/or certification requirements. Students considering relocating should contact their program representative in order to determine if the program meets the new state requirements.

<<EMAIL template for students that change location. >>
Dear _______,

Doane University offers several programs that prepare students to meet the educational requirements for licensure/certification in certain states. These programs include

- <NAME OF PROGRAM>

As you have indicated a change to your state location, we want you to be aware that this may impact your ability to obtain licensure/certification in that state.

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page immediately. Please be aware that states often have state-specific additional licensure and/or certification requirements. Please contact your program representative immediately to discuss the requirements.

<<Insert contact information>>

4. Attestation Process

Students located in a state in which the program does not meet the requirements for licensure or certification may still enroll in the program at Doane upon signing and returning the following form (See 34 CFR 668.14(b)(32). From the comments (see page 14) on the legislation,

“According to ED staff contact, Vanessa Gomez, ‘a hardcopy written attestation from the student would fulfill this requirement, as well as an email where the school can
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reasonably authenticate that such a communication was sent from the student’s email address. As with any documentation maintained in an electronic format, it would be necessary for the institution to be able to reproduce the contents of the email upon request from an auditor or Department compliance official.”

The form must be scanned and emailed from a Doane University email address assigned to the student in order to ensure the message came from the student. A copy of the email and copy of the attestation will be stored in SalesForce and collected as part of the Enrollment process.

The attestation must be received prior to enrollment in the program. The language for the attestation comes from Cline Williams. A Word template should be sent to students, and then an email from their Doane email address with the form completed sent to Enrollment@doane.edu.

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I, [print name], understand that the [Program] at Doane University does NOT meet the educational requirements for licensure or certification of my current location, [state]. I attest that I have a concrete plan to seek licensure and employment in a state that Doane has identified as “meets” licensure and certification, upon completing the program, and for this reason, I want to enroll in the Program. Specifically, I plan to seek licensure and employment in the state of [state] [1].

I understand and acknowledge that my enrollment is conditioned upon my attestation that I plan to seek licensure and employment in a state that Doane has identified as “meets” licensure and certification, upon completion of the Program. I also understand that relocation to a different state or change in my plan to seek employment to a state other than the state identified herein, during the course of Program, may impact my enrollment status in the Program and my ability to receive financial aid funding.

Printed Name:
Signed:
Date:

Scan and send a copy to: Enrollment@doane.edu
Prospective students should identify one specific “meets” state where they intend to seek licensure and employment after completing the Program. I made it broader because one or more of the programs “meet” licensure and certification requirements of states other than Nebraska (e.g. Master of Education in School Counseling).

5. Policy Updates

This policy, including the list of programs, will be reviewed each January and June by the Office of Institutional Effectiveness. Additionally:

Prospective Students Updates

1. On a biannual basis in January and June, the Office of Institutional Effectiveness will request from the Admissions Office and Enrollment Office a report of states to the Office of Institutional Effectiveness for which at least 10 students apply for admission to a PLCD program.
2. Within 7 days, the Office of Institutional Effectiveness will submit to the appropriate Dean the list of states for the programs.
3. With 10 working days, the Deans will determine if the program meets the state educational requirements for licensure or certification in which the prospective students are located and communicate the results to the Office of Institutional Effectiveness. Choices are
   1. The curriculum MEETS the state educational requirements for licensure or certification.
   2. The curriculum DOES NOT meet the state educational requirements for licensure or certification.
   3. The University HAS NOT DETERMINED if its curriculum meets the state educational requirements for licensure or certification. In this case, the state will still be listed in DOES NOT meet the requirements.
2. Within _14_ calendar days of receiving the information, the Office of Institutional Effectiveness will update the Public Licensure Disclosures webpage.
   1. If the status of any State changes, the list of enrolled students will be notified of any changes to the status of licensure/certification for the states residing in if changed to undetermined or does not meet.
   2. If an email is sent, the list of students, copy of email, and evidence of sending the email will be stored by the Office of Institutional Effectiveness.
New Program Updates

1. Deans will be responsible for contacting the Office of Institutional Effectiveness if program modification impacts licensure or certification requirements for new or existing programs.

2. Every January and June, the Office of Institutional Effectiveness will review the catalog for any updates to programs that may impact licensure or certification. The Office of Institutional Effectiveness will then proceed with the procedure from steps 2 through 4 in the Prospective Student Updates section of this policy.

Impacts to other Policies

Deans
Deans are responsible for determining if licensure and/or certification disclosures are required prior to new programs being submitted for approval.

Registrar
The general policy will be added to the undergraduate and graduate catalogs:

Licensure and Certification: Doane University regularly updates program requirements in order to prepare students for licensure and certification as appropriate. In order to comply with federal disclosure requirements, up to date information about licensure and certification can be found on the Public Licensure and Certification Disclosure page. Prospective and current students are encouraged to research the requirements in their current or intended state of residence to ensure that their intended enrollment in a program will meet the requirements of their state’s licensing agency.

Registrar and Marketing
Each PLCD program webpage and catalog entry must also contain the following message:

As educational requirements vary by state, students interested in these programs should consult the Public Licensure and Certification Disclosure page immediately. Please be aware that states often have state-specific additional licensure and/or certification requirements. Please contact your program representative immediately to discuss the requirements

References:

- https://www.doane.edu/graduate-and-adult/online/state-authorization
- https://www.nc-sara.org/professional-licensure-directory
6. Frequently Asked Questions

1. What is this all about?
   a. The federal government requires us to disclose that our programs may prepare potential students for licensure and certification in only certain states as different states have different rules. We are disclosing this information to all students prior to enrollment in those programs.

2. What happens if the student attends class in Nebraska?
   a. If the student will attend class in Nebraska at one of our locations, then that student is considered as located in Nebraska at enrollment. We disclose to them that our program may not satisfy a program in the future state in which they are located.

3. What if the student attends online?
   a. In this case, the student is considered located in the state of their home address. They must sign the attestation that they intend to seek employment in Nebraska (or a state in which Doane meets the requirements) upon completing their program prior to enrollment.