

# UNIVERSITY OF TOLEDO (UTOLEDO) STATE AUTHORIZATION AND PROFESSIONAL LICENSURE DISCLOSURE COMPLIANCE HANDBOOK

## I. INTRODUCTION

This Handbook sets forth the processes and procedures developed to comply with federal and state laws and regulations relating to state authorization and professional licensure disclosures, and the State Authorization Reciprocity Agreement (SARA)<sup>1</sup>.

## II. ROLES AND RESPONSIBILITIES

The primary stakeholders involved in implementing the compliance plan are the Provost's Task Force on State Authorization (PTF), Associate Deans, Program Directors, Undergraduate Admissions, and College Of Graduate Studies (COGS). Other stakeholders include, but are not limited to, UToledo Online and the Office of Marketing and Communication.

The general description of the roles and responsibilities of the primary stakeholders follow. For a specific description of roles and responsibilities, see *Appendix A*.

The PTF is *the process leader and decision maker*. It is the internal coordinating body tasked with developing, communicating, educating, evaluating, and continuously improving processes and procedures designed to comply with state and federal regulations relating to state authorization and professional licensure disclosure, and SARA.

The PTF is Co-chaired by the Director of State Authorization (DSA) and the Provost's designee. The point person for the PTF is the DSA. Other members include senior representatives from Institutional Research, Office of the Registrar, and Information Technology.

Colleges that house online programs and/or programs leading to professional licensure or certification, regardless of the modality of delivery, are responsible for *content creation and management*. This includes but is not limited to identifying/inventorying programs, tracking student location, researching/reviewing licensure requirements in each state, and, together with the DSA, determining the disclosures necessary for each program.

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<sup>1</sup> SARA is an agreement among its member states, districts and United States territories that establishes comparable national standards for interstate offering of postsecondary distance education courses and programs. Through reciprocity, an institution authorized under SARA criteria in its home state is considered authorized in all other SARA states. Professional licensure disclosure requirements under SARA align with the federal regulation requirements and go a bit beyond.

Currently, forty-nine states plus the District of Columbia, the United States Virgin Islands, and Puerto Rico are members of SARA. California is the only state that is not yet a member. Ohio became a SARA state in March 2015 and the University of Toledo became a SARA institution in August 2015. Through the annual renewal application process, the University of Toledo continues to be recognized by the Ohio Department of Higher Education (ODHE) and the National Council for the State Authorization Reciprocity Agreement (NC-SARA) as an institution in good standing.

### III. DOCUMENTATION OF INSTITUTIONAL AUTHORIZATION

Federal regulations<sup>2</sup> require “Title IV” institutions to be authorized to offer distance education and on-ground educational activities in the state in which a student is located. Institutions that are not authorized risk losing eligibility to disburse Title IV loan, grant, and work study funds. The regulation recognizes that participation in SARA meets the authorization requirement. An institution must provide documentation of authorization to the United States Department of Education, upon request.

To meet this requirement, the DSA maintains documentation of UToledo SARA membership and annual renewals.

- Put SARA Approval and Renewal Documentation on the Z Drive; Internal Audit, Common, State Authorization

### IV. DISCLOSURE OF AUTHORIZATION STATUS

#### A. State Authorization

Federal regulations require institutions to publicly disclose the institution’s state authorization status.<sup>3</sup> The PTF posts and maintains authorization information on the State Authorization [website](#). Specialty and program accreditation information is posted on relevant program webpages.

#### B. Disclosure of Licensing Board Authorization, Approval, or Exemption Status

If the program leads to a professional license and/or certification, program directors are responsible for conducting research in states outside of Ohio to determine 1) state professional licensure board requirements for authorization, approval, or exemption before engaging in educational activity, and 2) whether the program meets educational requirements for licensure in states in which students are engaging in educational activities outside of Ohio. For detailed information on this process, see *Section VII: Professional Licensing Requirements and Disclosures*.

##### 1. Online Licensure Programs

Currently, UToledo does not offer any online programs that lead to licensure. If online programs leading to licensure are offered, the programs are responsible to seek and maintain professional licensing board approval or exemption before engaging in educational activity in connection with the online licensure program. Programs must disclose the licensing board status to students and stakeholders via the inquiry/admission emails and the program website.

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<sup>2</sup> 34 Code of Federal Regulations (CFR) 600.9(c)

<sup>3</sup> 34 CFR 668.43(a)(6) and 34 CFR 668.72(n)

## 2. On-ground Licensure Programs

Programs are responsible to seek and maintain professional licensing board approval or exemption before students engage in educational activities in that state. Programs must disclose the licensing board status to students and stakeholders via the inquiry/admission emails and the program website.

## V. TRACKING AND REPORTING STUDENT PHYSICAL LOCATION

Federal and state regulations and SARA require reporting on student location. Tracking and reporting requirements apply to online programs and campus-based programs with out-of-state educational experiences, e.g., internships, externships, or clinical placements. The analysis is based on *where the educational activity is occurring*.

In accordance with the federal regulation<sup>4</sup>, UToledo determines location at the time of a student's ***initial enrollment*** in a program, which is documented in the enrollment record. Students are expected to formally notify the program director/advisor of any change of address to another state.

A process for tracking student location on a semester basis follows. Data for current students are gathered from lists of courses with off campus and out-of-state educational activities generated from Banner each semester. These courses, designated in Banner as SARA courses, is maintained by the PTF, and updated by the Associate Deans. To ensure the accuracy of those lists, twice per year, an email with a list of SARA designated courses for Fall then Spring and Summer, is sent to the Associate Deans to edit, as necessary.

UToledo collects data from students and faculty and/or placement coordinators. Students enrolled in SARA designated courses receive an email asking where the student will be located during the semester. If they are living in another state during the semester, the student is provided with instructions to change their local address. The address is updated in Banner and used to report on their location for State Authorization purposes for the given semester. The email follows:

*Our records indicate that you are registered for a course, or courses, this \_\_\_\_\_ semester that include off-campus and/or out of state educational activities. These courses are flagged with a SARA course attribute. You can see this designation by logging into your student schedule, clicking on the title of your course, then selecting the Attributes tab.*

*To comply with federal and state laws, we are required to confirm the state you will reside in while taking this course. Please login to the myUT Portal and confirm or update your local address. To update your address:*

- *Login to the [myUT](#) Portal and select the 'Student' tab*
- *Next, select the 'Update Addresses & Phones' link from the menu on the left (found towards the bottom of the page)*
- *Follow the two-factor authentication steps to securely access your account*
- *Enter the local address of where you will reside during the semester*
- *Select Submit.*

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<sup>4</sup> CFR 600.9(c)(1)(ii)

*Maintaining compliance allows UToledo to offer these types of educational opportunities. We appreciate your help in confirming or updating where you will be living during the semester.*

*Sincerely,  
Office of the Registrar*

Two methods are employed to gather data from faculty and/or placement coordinators. For colleges with tracking software or reporting templates, the PTF extracts data from existing reports on or before the end of the semester. All other colleges (College of Health and Human Services, College of Arts and Letters, College of Natural Sciences and Mathematics, College of Medicine and Life Sciences, and College of Nursing), use the *student location tracking tool* in the faculty tab in the MyUT self-service portal. Before the end of each semester, the Associate Deans of the colleges using the *student location tracking tool* receive an email requesting they remind faculty to record student location for that semester. A second email is sent approximately one month later.

#### A. Exclusively Online Students

UToledo determines the physical location of exclusively online students when the student is enrolled in an online program. That information is stored in Banner. The student's physical location is updated each semester, in accordance with the procedure outlined above.

#### B. On-campus Students

UToledo determines the physical location of students when the student is enrolled in the program and uses the local address provided by the students on the enrollment record. The student's physical location is updated each semester, in accordance with the procedure outlined above.

### **VI. NEW OR REVELOPED ONLINE PROGRAMS**

UToledo uses the Curriculum Inventory Management System to propose new or redeveloped courses and/or programs. As part of the approval process, the faculty member making the proposal is required to answer questions to determine whether that course/program needs to be designated as a SARA course/program for student location tracking and reporting purposes. It also includes questions regarding programs leading to licensure. Those answers will determine whether, and the type of disclosures that may be necessary.

### **VII. PROFESSIONAL LICENSURE REQUIREMENTS AND DISCLOSURES**

#### A. General Disclosures

Federal regulations and SARA<sup>5</sup> require an institution to disclose whether a program leading to licensure or certification fulfills educational requirements for state licensure or certification or is advertised as meeting those requirements. For each state, institutions are required to disclose

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<sup>5</sup> In certain circumstances, SARA also requires disclosure of contact information of applicable licensing boards, *SARA Policy Manual*, 21.1, Section 5.2

whether the program 1) meets educational requirements for licensure, 2) does not meet educational requirements for licensure, or 3) the institution has not determined whether a program meets educational requirements for licensure<sup>6</sup>.

This requirement applies to prospective and enrolled students and for all licensure programs, regardless of whether the program is offered online or on campus. Posting this information on the institution's public website meets this public disclosure requirement.

The UToledo [Professional Licensure Information webpage](#), fulfills this requirement.

The landing page also contains hyperlinks to individual webpages for each of the UToledo programs leading to licensure/certification disclosing whether the program *meets, does not meet* or it is *not yet determined if it meets* educational requirements in each state. Disclosure statements also appear in the University Catalogue, and on the COGS and program webpages.

Currently, UToledo does not offer any online programs leading to licensure. For on-campus programs leading to licensure, the program directors are responsible to maintain and update the content annually and send any changes to the DSA to update on the Professional Licensure Information program webpages.

#### B. Direct Disclosures

Under the federal regulations, if an institution determines that a program *does not meet* educational requirements for licensure in states outside of Ohio, the institution must provide a *direct written disclosure* to the student prior to enrollment in the program. If the institution determines that a program's curriculum does not meet educational requirements for licensure in a state where a currently enrolled student is located, the institution must provide notice to that effect within 14 days.<sup>7</sup> An email sent to the student meets the requirement.<sup>8</sup>

In addition to requiring SARA institutions to satisfy federal disclosure requirements, NC-SARA requires that after all reasonable efforts, if an institution is unable to determine whether a program will meet state professional licensure requirements, the institution must provide a student or applicant with current contact information for the applicable licensing board and advise the student or applicant to determine whether the program meets licensure requirements in the state.<sup>9</sup> The [Professional Licensure Information](#) page for each program provides contact information for the applicable licensing board, which fulfills this requirement.

To fulfill the direct, individualized notification requirements, UToledo employs a three-prong approach, which covers the main portals of entry for student inquiry, application, and enrollment. The stakeholders directly involved in this process include Undergraduate Admissions, COGS, and the Associate Deans and Program Directors in colleges that house programs leading to licensure.

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<sup>6</sup> 34 CFR 668.72(c)(2), 34 CFR 668.43(a)(5)(v)

<sup>7</sup> 34 CFR 668.43(c)

<sup>8</sup> 34 CFR 668.43(c)(2)

<sup>9</sup> [SARA Policy Manual](#), 21.1, Section 5.2

## 1. Undergraduate Admissions

Students inquiring about undergraduate programs leading to licensure receive a direct, individualized email directing them to the [Professional Licensure Information](#) webpages to learn whether the program of interest *meets*, *does not meet* or it is *not yet determined if it meets* educational requirements in each state. It further directs students who are inquiring/applying from a state or wish to practice in a state other than Ohio to contact the program director, **prior to applying**, to discuss requirements to practice in that state.

## 2. COGS

COGS is the main portal for inquiries and/or applications of graduate students. Upon receipt of an application, a direct, individualized email is sent to each student directing them to the [Professional Licensure Information webpages](#) to learn whether the program of interest *meets*, *does not meet* or it is *not yet determined if it meets* educational requirements in each state. Disclosures are also posted in New Student Orientation and under the resource tab on prospective and current student webpages.

For programs that ***meet educational requirements***, the email will include the following language, and will be updated, as necessary:

Completion of UToledo's \_\_\_\_\_ program meets educational requirements to apply for a license in Ohio and \_\_\_\_\_ (insert the name of the State from which the student is inquiring/applying).

Please review the information regarding state licensure eligibility on the [Professional Licensure information](#) webpage. Use this webpage as a reference as state requirements may change. Please contact the Program Coordinator with any questions.

\_\_\_\_\_ I acknowledge that I read and understand the information on the Professional Licensure Information program webpage.

For programs that ***do not meet educational requirements***, the email will include the following language, and will be updated, as necessary:

Completion of UToledo's \_\_\_\_\_ program does not meet educational requirements to apply for a license in \_\_\_\_\_(insert the name of the state from which the student is inquiring/applying).

To meet \_\_\_\_\_ (insert the name of the state from which the student is inquiring/applying) educational requirements students need to \_\_\_\_\_(insert whether and how UToledo's program can meet those requirements). Please consult with the Program Director for more information.

Please review the information regarding state licensure eligibility on the [Professional Licensure information](#) webpage. Use this webpage as a reference as state requirements may change.

\_\_\_\_\_ I acknowledge that I read and understand the information on the Professional Licensure Information program webpage.

### 3. Associate Deans and Program Directors

Students inquiring about graduate programs leading to licensure through the college program pages receive the same direct, individualized email as the one sent by COGS.

If, in isolated cases, the institution decides to allow applications to be processed for students located in states for which it knows the institution's program(s) will not meet educational requirements for licensure, or states in which it cannot determine whether that is the case, the institution obtains an explicit written statement from the student indicating that the student understands that to be the case. For students who receive these disclosures and subsequently enroll, the program director collects a record of acknowledgement from students as proof that they received this disclosure prior to enrollment using Form A.

#### Form A

	
<b>Out of State Professional Licensure/Certification Acknowledgment Form</b>	
I, _____, have reviewed with _____ the professional licensure requirements <small>(First and last name of student) (First and last name of Advisor)</small>	
for a _____ license/certification in the state of _____ and understand that I may <small>(Name of license/certificate) (Name of state(s))</small>	
not be eligible for licensure or may need to fulfill additional requirements to obtain a license in that state.	
Student Acknowledgment*	College Official Acknowledgment
Print Names _____	_____
Signatures _____	_____
Student ID _____	Meeting Date _____

When a current student notifies the program director<sup>10</sup> of a change of location and/or intent to practice in a state in which the program does not meet or it is not yet determined if it meets educational requirements in that state, the program director advises the student within 14 days of receipt of that information. In each case, the program director/advisor documents the receipt and acknowledgement of understanding using the same form (Form A).

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<sup>10</sup> The regulation puts the burden on the student to notify the program of relocation plans. There is a disclaimer on the bottom of both the State Authorization and Professional Licensure Information webpages, which can be used in syllabi and catalogues.



#### 4. Application Disclosure [*we have yet to get this incorporated into applications*]

*UToledo academic programs are designed to prepare students to sit for applicable licensure or certification in Ohio. If you plan to pursue licensure or certification in a state other than Ohio, please review state educational requirements for licensure and certification and state licensing board contact information on the [Professional Licensure Information](#) webpages.*

*If you are planning to pursue professional licensure or certification in a state where the UToledo program does not meet or it is not yet determined if it meets eligibility requirements for licensure, please contact the program director/advisor **prior** to beginning the academic program. You can also contact the appropriate licensing entity in that state for information and guidance.*

\_\_\_\_\_ I read and understand the above.

***International Applicants:*** *A country may or may not regulate distance education provided to students in its jurisdiction and may or may not require foreign higher education institutions to comply with distance education regulations. At this time, UToledo cannot guarantee that a program meets curriculum requirements or professional licensure or certification requirements in your country.*

\_\_\_ I have read and understand the above.

All UToledo applicants must check the acknowledgement stating they understand the disclosure before submitting the application. If an applicant does not check the acknowledgement, the application cannot be processed.

### **VIII. PROFESSIONAL LICENSURE REGULATORY REVIEW**

To ensure UToledo online programs and campus-based programs with out-of-state educational activities continue to meet state professional licensing board authorization requirements and educational requirements for licensure, the program director reviews and verifies relevant regulations annually.

If a regulatory review reveals that a program's status has changed, or that a program no longer meets educational requirements for licensure in a state, the Program Director will notify the DSA and follow the process outlined in *Section IX: Change in Program Authorization Status* in the next section.

### **IX. CHANGE IN PROGRAM AUTHORIZATION STATUS**

Regulations impacting authorization to offer a program or educational requirements for licensure may change, leading to a change in a program's status in one or more states. When the program



director becomes aware of a regulatory change that impacts a program's status, the program director will communicate the change to the DSA.

If the program is no longer "Authorized," the program director will consult with the Associate Dean and the DSA to determine whether any currently enrolled students are impacted by the change in program status. If currently enrolled students are impacted, the DSA will request a teach out from the relevant regulatory board to allow currently enrolled student(s) to complete the program in the state. If the board will not grant a teach out, the DSA and program director will coordinate a communication informing the student of the change in program status within 14 calendar days to meet federal requirements<sup>11</sup>.

The DSA also updates the program status in real time on the [Professional Licensure Information](#) webpages.

#### A. Assess Program Authorization Requirements

If the program intends to engage in activities that are not covered by UToledo participation in SARA, the DSA, must be notified prior to offering those activities. Activities that are not covered by SARA are defined in the [SARA Manual](#), Section 5.10(a), 5.11(d)(1).

For purposes of SARA, if an institution has *Physical Presence*, it must meet the State's current non-SARA requirements. Physical Presence is triggered if UToledo does any of the following in a State:

- Establishes a physical location for students to receive synchronous or asynchronous instruction. This is intended to mean a semi-permanent fixed space, such as leased, rented, owned, or donated space.
- Requires students to physically meet in a location for instructional purposes more than twice per full-term (quarter or semester) course for a total of more than six hours. It does not apply to designated short courses.
- Offers a "short course" that requires more than 20 contact hours in one six-month period.
- The 20-hour limit can be used only for a short course that runs, for example, four days and is completed. It applies only to short courses and cannot be used with a full-term course, to which separate provisions apply.
- Provides office space to instructional or non-instructional staff.
- Carries out field study or field research located at a field station, research station or other physical site at which a faculty member or other institutional employee or contractor supervises or otherwise directs two or more students in an activity exceeding the allowable short course length set forth in Subsection 5.10(a)(5) and which either bears academic credit or is a requirement for a course or program.

For a contract for supervised field experiences to be covered by SARA, such a contract cannot provide for the placement of more than 10 students from an individual academic program placed

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<sup>11</sup> 34 CFR 668.43(c)

simultaneously at one clinical or practicum site, unless approval for a larger number is provided by the out of state SARA State Portal Entity.

## B. Update Program Status

After researching relevant state and professional licensing board regulations and determining the program's status, the Program director notifies the DSA with updates of the program's status in each state. The DSA will make the appropriate changes on the state authorization website. The program directors will ensure that any program webpages maintained by the college include a link to the Professional Licensure Information webpage.

## X. STUDENT COMPLAINT INFORMATION

Federal regulations remove the requirement to document a complaint process in the state where a student is located but requires institutions to document a complaint process in the institution's home state<sup>12</sup>. The SARA Manual requires SARA-participating institutions to disclose the institution's complaint process and SARA's complaint process to students participating in activities in a SARA member state<sup>13</sup>.

Within the State Authorization website, a [webpage](#) is dedicated to institutional complaint information and information about SARA complaint processes. The information on the webpage fulfills the requirements enumerated in the federal regulations and SARA.

## XI. ADVERSE ACTIONS

Federal regulations require Title IV institutions to make information regarding adverse actions readily available to current and prospective students. Specifically, institutions must disclose "if an enforcement action or prosecution is brought against the institution by a State or Federal law enforcement agency in any matter where a final judgement against the institution, if rendered, would result in an adverse action by an accrediting agency against the institution, revocation of State authorization, or limitation, suspension, or termination of eligibility under title IV, notice of that fact."<sup>14</sup>

The PTF works with the Office of Legal Affairs and the Department of Internal Audit and Compliance to monitor adverse actions that may require disclosure. The PTF will publicly post any required disclosure information on the State Authorization website.

## XII. STATE REFUND POLICIES

Federal regulations<sup>15</sup> require Title IV institutions that offer distance education programs to make public disclosures to enrolled and prospective students about "refund policies with which the

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<sup>12</sup> 34 CFR 668.43(b)

<sup>13</sup> *SARA Policy Manual*, 21.1, Section 4

<sup>14</sup> 34 CFR 668.43(a)(20)

<sup>15</sup> 34 CFR 668.50(b)(6)

institution is required to comply by any state in which enrolled students reside for the return of unearned tuition and fees.”

UToledo participation in SARA covers the requirement to disclose other states’ refund policies to enrolled and prospective students. For a SARA institution, the home institution’s refund policy applies for students located in a SARA state.

### **XIII. NC-SARA REPORTING**

To maintain institutional participation in SARA, UToledo must annually submit two reports on student location. The first reflects the number of exclusively distance education students enrolled in online programs. The second reflects the numbers of students enrolled in campus-based programs completing off-campus and out-of-state field experiences.<sup>16</sup>

#### **A. Online Student Location**

SARA-participating institutions must annually report online enrollments to NC-SARA. Online enrollment data reported to NC-SARA is the same data provided to the Integrated Postsecondary Education Data System for the previous Fall Enrollment report, disaggregated by state/district/territory. Location data is determined by the local address the student provides in Banner.

#### **B. On-ground Out-of-State Placements**

SARA-participating institutions must annually report out-of-state student placement data for the previous calendar year. Data sets for out-of-state placements are collected after each semester either via the *Student Location Tracking Tool* located in the Teaching Toolkit under the Faculty & Advisor tab in myUT or through existing college collection systems.

Courses providing placement data are determined by the SARA designation in Banner. The PTF sends the Associate Deans an email in October and March to cross-check the accuracy of the course lists. Emails to the Associate Deans are also sent at the end of each semester to remind faculty to complete location reporting.

### **XIV. NC-SARA RENEWAL**

SARA-participating institutions are required to complete an annual renewal application to continue participation in the agreement. The renewal process is outlined in the SARA Manual<sup>17</sup>.

The DSA is designated as the UToledo SARA contact. NC-SARA must be notified regarding a change in the institution’s SARA contact information at [info@nc-sara.org](mailto:info@nc-sara.org).

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<sup>16</sup> See *SARA Policy Manual*, 21.1, Section 6, Data Submission Requirements

<sup>17</sup> *SARA Policy Manual*, 21.1, Section 3.6

The SARA contact receives an institution renewal notification email from NC-SARA 90 days in advance of the renewal deadline. At that time, the DSA prepares the Application for Institutional Renewal<sup>18</sup> for the Provost's signature.

Ohio's SARA Portal Entity, the ODHE also sends an email to the SARA contact with renewal information and an Ohio Supplemental application. After confirming the Full-Time Equivalency, ODHE sends an invoice for the state-level renewal fee.

After ODHE approves the application, ODHE will send a letter outlining the remaining renewal steps, and NC-SARA will send an invoice for the NC-SARA renewal fee. After payment is complete, the SARA contact will receive a receipt for payment of the NC-SARA renewal fee and a SARA renewal confirmation letter.

## APPENDIX A

### Specific Roles and Responsibilities

- a. **Provost's Task Force (PTF) on State Authorization/Director of State Authorization (DSA)**
  - i. Research and analyze applicable federal and state laws and regulations on state authorization and professional licensure disclosure and maintain required records
  - ii. Monitor changes in laws and regulations, and make necessary adjustments
  - iii. Prepare and submit required renewal applications and submit required reports and to the National Council for State Authorization Reciprocity Agreement (NC-SARA) annually.
  - iv. Review and update the *State Authorization Compliance Handbook* annually, and as needed, to ensure processes are up-to-date and are compliant with current state and federal regulations and SARA policies.
  - v. Develop and execute communication plan and education and training programs for administration, faculty and staff relating to federal and state laws and regulations.
  - vi. Evaluate processes by completing a compliance analysis biannually
  - vii. Maintain, update, and continuously improve university state authorization website
  - viii. Ensure consistent application of processes and procedures
  - ix. Develop and provide program directors with standard public and direct disclosure language
  - x. Support academic and service units in content management for the achievement of institutional compliance and education goals, including but not limited to, student location tracking and reporting and professional licensure disclosure requirements.
  - xi. Establish and maintain excellent working relationships with regulators and State Authorization and Professional Licensure professional organizations/networks, on behalf of the university
  - xii. Participate in professional development to help establish and promote best practices.
    - i. [Maintain list of third parties/vendors for which University assumes responsibilities under SARA. \[put under recommendations/action steps\]](#)

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<sup>18</sup> [nc-sara.org/apply-renew](http://nc-sara.org/apply-renew)

- b. **Associate Deans: State Authorization Liaisons**
  - i. Point of contact for State Authorization compliance in the college
  - ii. Share PTF communications/requirements for state authorization compliance to faculty and staff
  - iii. Cross-check lists of courses with SARA designation for accuracy biannually
  - iv. For colleges using the *Student Location Tracking – Off Campus Educational Activities* tool in the Faculty/Advisor tab, ensure faculty teaching courses with SARA designation complete student location reports at the end of each semester.
  - v. Support program directors as they determine and identify impacted programs
  - vi. Support program directors as they conduct research into licensure prerequisites in other states through consultation
  - vii. Support required disclosure processes by periodically reviewing and updating
  
- c. **Program Directors: Programs Leading to Professional Licensure**
  - i. Review and analyze licensure requirements in each state and send any updates to the Director of State Authorization (DSA), annually.
  - ii. Disclose state authorization and professional licensing board status to students
  - iii. Regularly review the list of students participating in experiential learning opportunities (e.g., internships, student teaching, clinicals) and online courses outside the state of Ohio to ensure that required professional licensure board authorizations for those activities are in place. Request confirmation emails or approval letters, if necessary. Copy the DSA, upon receipt.
  - iv. Monitor professional programs leading to licensure engaging in off-campus and/or out-of-state experiential learning opportunities and online courses—for any changes of authorization status in states outside of Ohio
  - v. Advise prospective and current students regarding licensure eligibility in each state and provide the reasons why the program does not meet eligibility requirements. Offer pathway to eligibility, if possible.
  - vi. Document counseling session with students who chose to enroll from states in which the program does not meet educational requirements for eligibility to sit for licensure in that state.
  - vii. Document counseling session with current students who provide notification to practice in a state in which the program does not meet educational requirements for eligibility to sit for licensure.
  
- d. **Undergraduate Admissions and the College Of Graduate Studies (COGS)**  
 The Offices of Undergraduate Admissions and the COGS are responsible for including professional licensure disclosures, provided by the DSA, to prospective students inquiring or applying to programs leading to licensure.
  
- e. **UToledo Online**  
 Maintain evidence of compliance with the Council for Regional Accrediting Commissions (C-RAC) Guidelines and the 21<sup>st</sup> Century Distance Education Guidelines, if adopted, and as applied by Higher Learning Commission.
  
- f. **Office of Marketing and Communications**  
 Collaborate to ensure all materials represent UToledo programs per federal regulations and SARA. Two requirements are enumerated. First, marketing materials must accurately reflect the nature of the program, e.g., materials for online programs must include any on-

ground educational experiences required. Second, programs leading to licensure must have a hyperlink to the Professional Licensure Information webpage.