



## Bridging the Gap Between Postsecondary Education Regulation & Professional Licensure

Presented April 24, 2018 by:

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- The Three Players – What Do They Do?
- Terminology
- Why Care About State Authorization Agencies?
- Why Care About SME Agencies?
- How Do State Authorization Agencies Communicate with SME Agencies?
- What Should Institutions Expect From State Authorization Agencies and SME Agencies?
- Resources
- Questions

Areas of Discussion

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Institutions

Educating Students

Subject Matter Expert (SME) Agencies

These are state agencies that are charged with many functions which may include approving educational programs or institutions and approving applicants for state licensure, certification, registration and the like. Programmatic approval may be required to legally offer the program in the state.

State Authorization Agencies

These are state agencies charged with authorizing, approving, or certifying postsecondary educational institutions and, in some states, their programs. If an institution is not exempt, as a general rule it must be authorized in order to legally operate the institution in the state.

The Three Players – What Do They Do?

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Authorized, Approved, or Certified –

- These are terms used by State Authorization Agencies to describe the status of an institution indicating that the institution is legally able to operate in the state or serve students in the state. The general term is “State Authorization.” The State Authorization Agency may also apply these terms to programs.
- These are terms used by SME Agencies to describe a program that can legally be offered in a state or to students in a state. SME Agency approval is not always required in a state in order to offer a program.

Licensed, Certified, Registered –

- These are terms used to describe a state credential issued to an individual that allows that individual to engage in a particular profession or vocation.

Terminology

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Curriculum or Program Review – This or a similar term might be used by a State Authorization Agency or a SME Agency to describe a review of the curriculum of a program to determine whether a graduate of the program meets the educational requirement to apply for professional licensure.

- In some states, the State Authorization Agency might require the institution to request a curriculum review from the SME Agency before the State Authorization Agency will review the program regardless of whether the SME agency approves the program or institution.
- Not all SME Agencies will perform this function.

Terminology

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You should care about state authorization agencies for the following reasons . . . .

1. Students
2. Compliance with State Law
3. Condition to Receipt of Title IV
4. Condition to Other Federal Dollars (VA, WIOA, etc.)
5. State Disclosure Requirements

Why Care About State Authorization Agencies?

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There are many reasons to care about SME agencies – here are a few . . .

1. Educational Standards for Licensure
2. Professional/Occupational Licensure Entry Requirements
3. Professional/Occupational Licensure Examinations
4. Compliance with State Laws Regarding Professional Practice
5. Employment Requirements
6. Federal and SARA Disclosure Requirements and Misrepresentation

Why Care About SME Agencies?

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Examples of Higher Education Authorities Collaborating with SME Agencies:

- Nursing
- Emergency Medical Services
- Barbering and Cosmetology
- Massage
- Education
- Psychology
- Physical/Occupational Therapy

How Do State Authorization Agencies Communicate with SME Agencies?

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A Look at the District of Columbia:

Successes	Challenges
MOU to codify our relationship	Timing of meetings and actions of respective boards do not always align
Joint site visits	Conflicting rules and regulations
Designated liaisons who attend each other's meeting and serve as a direct POC	Leadership changes
Outreach to stakeholders	

How Do State Authorization Agencies Communicate with SME Agencies?

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When Communicating with a State Authorization Agency, Institutions should keep in mind . . .

- Institutions should not expect a State Authorization Agency to provide approval on behalf of a SME Agency
- Institutions should not assume that a State Authorization Agency can provide contacts for all SME Agencies in a state or is familiar with the functions of all SME Agencies
- Institutions should not assume that a State Authorization Agency has knowledge of the program subject matter
- State Authorization Agencies are not always the same as a SARA Portal Entity

What Should Institutions Expect From State Authorization Agencies and SME Agencies?

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When Communicating with a SME Agency, Institutions should keep in mind . . .

- A SME Agency and a State Authorization Agency likely use different standards
- It may need to ask the SME Agency two possible questions; Curriculum/Program Review, Program Approval, or both
- The focus is centered on public protection of consumers who will be treated by the educated and licensed person
- Institutions should not assume that the SME Agency is familiar with the terminology of a higher education authorization
- SME Agencies may have no idea what SARA is or any knowledge of disclosures required by Title IV or SARA

What Should Institutions Expect From State Authorization Agencies and SME Agencies?

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There are many resources available for the Three Players. Give these a try.

- Council on Licensure Enforcement & Regulation (CLEAR) – [www.clearhq.org](http://www.clearhq.org)
- National Association of State Administrators & Supervisors of Private Schools (NASASPS) – State Contact List - <https://nasasps.org/resources/state-contact-list/>
- State Authorization Network (SAN) – <https://wcetSAN.wiche.edu>
- State Authorization Issue Pages on WCET – <https://wcet.wiche.edu/focus-areas/policy-and-regulation/state-authorization>
- State Authorization Reciprocity Agreement (SARA) – State Portal Entity Contacts - <http://www.nc-sara.org/content/state-portal-entity-contacts>

Resources

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Resources

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QUESTIONS?

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