Compliance Guide for Out-of-State Licensure and Disclosure



Revised and Updated by Program Support and Compliance

A Sub-Unit of Digital Learning Innovations

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Disclaimer

This document is published and maintained by Digital Learning Innovations' Program Support and Compliance (PSC) sub-unit.

The information provided in this document is intended for the KSU campus community to ensure compliance with the US Department of Education 34 CFR 668.14(b)(32)(i). The information contained in this guide is subject to periodic updates and revisions to ensure the contents remain as accurate as possible. While every effort will be made to maintain accuracy and currency of the information provided, it is important to note the dynamic nature of the policies, procedures, and institutional practices may necessitate changes that are not immediately reflected in this guide. KSU assumes no liability for any errors, omissions, or inaccuracies in the information provided herein.

If you find any parts of this document unclear, inaccurate, or missing, please put in a ticket using the One on One form in the DLI Service Portal. Be sure to choose "State Licensure" in the "Request Type" field. Inquiries from entities outside of KSU can be directed to Jason Rodenbeck, Director, Program Support and Compliance (jrodenb1@kennesaw.edu).

Introduction

Purpose

This guidance document provides support to the units across campus responsible for maintaining the institution's compliance with Program Accreditation and State Licensure 34 CFR 668.14(b)(32). It provides operational definitions for key terms used throughout the document as well as federal policy. It will also outline the processes that were followed to bring KSU into compliance followed by processes for sustained compliance.

Each process outlines stakeholders involved in key steps of the process and a recommended turnaround time for the work involved.

Academic Programs Leading to State Licensure

All programs in the Internal Listing of Academic Programs (ILOA) have been classified into one of four licensure statuses as listed in Table 1. This table provides examples for each licensure status category. Programs included in Category 1 require that appropriate communication is made with the students regarding the licensure status in the student's home state. This listing will be updated as new academic programs are launched. In addition, the listing will be verified regularly to ensure the current list is accurate, and no new programs need to be included or old programs removed.

Table 1: Description of Academic Program Licensure Statuses

Types of Programs in Relation to State Licensure	*Short Name*	*Examples*
Programs designed to meet the educational requirements to practice in a professionally licensed profession (initial licensure)	Required Licensure	Teaching, Nursing
Programs designed for professional development or other advancement in a professionally licensed job, i.e.: certified practitioners in the field, but not leading to additional required licensure or certification in that field for employment.	Continuing Professional Development	Teacher education in-field program leading to certificat upgrades, Nurse Educator
Programs designed to prepare students for employment in a professionally certified field, but professional certification is an option, not a requirement for employment in the field	Licensure Optional to Work in Field	Certified Financial Planner, Certified Project Manager, Certified Health Education Specialist
Programs preparing a student for a profession that does not offer professional certification or licensure.	No Licensure Available	

Stakeholders and Roles

Below is a list of stakeholders who are responsible for supporting the process to maintain compliance with the Program Accreditation and State Licensure 34 CFR 668.14(b)(32).

Table 2: Stakeholders and Roles

Unit	*Key Responsibilities*
Legal Affairs	Provide legal guidance for the implementation of the federal policy; communicate updates of the federal policy to campus stakeholders.
Academic Strategy	Initially provided reporting of out-of-state students enrolled in programs that lead to state licensure.
Enrollment Services	Communicate with out-of-state **undergraduate** students using the appropriate template based on the licensure status in the student's home state; manage registration restriction for undergraduate learners based on licensure investigation and student attestation results; upload student acknowledgement and attestation files to OnBase.
Graduate College	Communicate with out-of-state **graduate** students using the appropriate template based on the licensure status in the student's home state; manage registration restriction for graduate learners based on licensure investigation and student attestation results; upload student acknowledgement and attestation files into OnBase.
Curriculum Support Office	Manage curriculum updates and communicate to the department chair of any program that leads to state licensure that updates its curriculum that they must review the DOSL to ensure no determinations need to be changed.
Registrar	The Office of the Registrar oversees the change of major process within the change of major portal for undergraduate students. Undergraduate students who change their major into one of the identified majors that are classified under the licensure disclosure process are notified of the requirements and must complete the attestation form to change their major to the new major.
DLI: Program Support and Compliance	Maintain the DOSL; maintain the compliance guidebook; collaborate with faculty to determine out-of-state licensure status.

Guidance Definitions and Abbreviations

1) **Time of enrollment** –The date the student has first registered for classes.
2) **Student location** – A student's location is determined by the physical address that is reported on the application.
3) **Program Which Leads to State Licensure (PLSL)** – Any KSU academic program which leads to state licensure in Georgia regardless of modality.
4) **Database for Out-of-State Licensure (DOSL)** - An internal database maintained by DLI's Program Support and Compliance sub-unit which includes the results of faculty

investigations to identify whether KSU PLSL's meet requirements for licensure in other states.

Interpretations of the Legislation

In October 2023, the U.S. Department of Education ("Department of Education") issued final regulations amending the certification procedures for institutions under *Title IV* of the *Higher Education Act of 1965*, as amended ("Title IV"). The amended certification procedures create a more rigorous process for certifying an institution's eligibility to participate in Title IV. As a result, Title IV eligible schools (including KSU) must have a current program participation agreement ("PPA") signed by an appropriate KSU representative and an authorized representative of the U.S. Secretary of Education. By signing the PPA, KSU agrees to comply with the laws, regulations, and policies governing Federal Student Aid programs and funds.

The agreement includes new requirements for programs to meet educational requirements for licensure or certification in all states where the program or institution has enrolled students through distance education courses.

Pursuant to 34 CFR § 668.14(b)(32)(i) and (ii), beginning July 1, 2024[1]; please direct any questions regarding the US Department of Education 34 CFR 668.14(b)(32)(i) & (ii) to Nwakaego Nkumeh Walker at nnkumeh@kennesaw.edu or asklegal@kennesaw.edu.

[1] These regulations apply to students who newly enroll in a program *on or after* July 1, 2024. The regulations are not applied retroactively to currently enrolled students. However, under 34 CFR 668.43(a)(5)(c)(2), if KSU determines that its program does not meet requirements for state licensure or certification, or if KSU has not yet determined whether its program meets state licensure or certification requirements, it must inform all currently enrolled students who are located in that state within 14 calendar days of making that determination. Once the student is informed, it will be up to them to decide whether they wish to finish the program.

Compliance Process

Former Compliance Process

Responsible unit(s): Curriculum Support Office (CSO)

In the initial stages of KSU's compliance journey, CSO was responsible for compiling state licensure data. Since they had no central resource for tracking licensure requirements across many states and types of licenses, it was necessary to start on a student-by-student basis. Every time an out-of-state applicant applied to a PLSL, or we knew of a current student in a PLSL, a new process would be initiated for that student until the full DOSL was developed.

This initial process (outlined below) was followed for students enrolling at KSU for Fall 2024.

1) List of Licensure Programs
    a) CSO analyzed the list of current academic programs at KSU to determine which programs result in licensure
2) State List
    a) Academic Strategy generated a list of the states that students are from in those programs represented on the Licensure Program List.
3) State Investigation
    a) CSO collaborated with faculty to determine if the program offered at KSU would allow the out-of-state student to obtain licensure in their field in the student's home state
4) Develop Database
    a) CSO used the information obtained from the state investigations to develop the DOSL
5) Communicate with Student
    a) Enrollment Services or the Graduate College used the DOSL to communicate the licensure outcome with students
6) Student Acknowledge or Attest
    a) Enrollment Services or the Graduate College managed the acknowledgement or attestation and archiving processes

This initial process had several more steps for ongoing maintenance and student communication, but those have changed after a new resource was acquired to help track state licensure data. The rest of this guide will only describe those new processes.

Current Compliance Process after Acquisition of The Bookmark

Responsible unit(s): Curriculum Support Office (CSO) and Program Support and Compliance (PSC)

In the Spring semester of 2026, KSU acquired a new software package from *Higher Ed Licensure Pros* (HELP) called The Bookmark. This tool is a collection of licenses and licensure information across all 50 states and 9 US territories. It included all but two of the licenses relating to KSU PLSLs as of Fall 2026, and those two have been purchased by KSU and are being researched by HELP.

The *new* initial process for completing the DOSL was conducted as follows:

1) Data Pulldown
   a) A spreadsheet for each license in The Bookmark, including requirements for all states and territories for that license, was pulled down and placed in a shared folder.[2]
   b) Deans, program coordinators, or faculty from each of the appropriate PLSLs were invited to review the data and, for each state, make one of the following determinations:
      i) Yes - Program meets education requirements for licensure
      ii) No – Program does not meet education requirements for licensure
      iii) Under Review[3]
   c) Other considerations, such as other steps a student may need to take for their degree to lead to licensure in that state, may also be included.
   d) As the decisions were made, this information was carried over into the DOSL.

With the DOSL complete, Enrollment Services and the Graduate College can now quickly review state licensure information and communicate appropriately whenever an out-of-state student applies to a KSU PLSL. The communication process will be outlined after the Ongoing Maintenance and Audit Plan below.

[2] There are two licenses The Bookmark did not include which KSU has programs leading to. As mentioned in the text, we have purchased those and are waiting on The Bookmark to collect state data on those licenses. Until then, those programs will have an "Under Review" status for decisions.

[3] "Under Review" is used when there is not enough data to confirm a Yes or No decision.

Ongoing DOSL Maintenance and Audit Plan

Responsible unit(s): Program Support and Compliance (PSC)

Ongoing Maintenance

Because licensure data is updated continuously across all states and territories, these updates must be reviewed regularly so that disclosure determinations remain accurate. The cadence and process for this review are outlined below.

Maintenance Cadence

Updates from the prior month will be reviewed monthly, beginning November 1, 2026 by PSC.

Maintenance Process

1) On the first day of each month, filter in Bookmark for only relevant licenses and download all updates between the first day and last day of the prior month
2) Filter for updates where the answer to "May impact disclosure determination" is "Yes"
    a) If there are no "Yes" updates in the prior month, this process concludes here
3) For each "yes" update, identify the current determination, download the Bookmark redline entry for that license and state, and contact the appropriate program coordinator to confirm or change the determination
    a) If the determination is unchanged, leave the determination as-is and record in DOSL that it was reviewed, along with the review date
    b) If the determination changes, update it and record the date of the change in DOSL
4) Using the dedicated resource email (prgsupportcompliance@kennesaw.edu) notify the appropriate enrollment office point of contact of all changes to DOSL, and maintain a record of these communications

Audit Plan

To ensure ongoing accuracy and integrity of our licensure determination data, all programs will be audited on a regular cycle, as described below.

Audit Cadence

Audits follow a regular cycle in which each program's licensure determinations are reviewed once every two years, in addition to the maintenance process established above. In the second month of each semester, approximately one quarter of all licensure programs (roughly 8-9) will be audited. Programs under audit are excluded from the monthly review conducted that month, as any changes will be captured in the audit.

Audit Process

1) On the first day of the second month of the semester (February for Spring, September for Fall), download the license listing for the programs scheduled for the audit
   a) Add the current determination for each state and territory to this data
2) Program coordinators will review the determinations
   a) For any determination that is unchanged, leave the determination as-is and record in DOSL that it was reviewed, along with the review date
   b) If the determination changes, update it and record the date of the change in DOSL
3) Using the dedicated resource email (prgsupportcompliance@kennesaw.edu), notify the appropriate enrollment office contact of all changes to DOSL, and maintain a record of these communications

Other Possible Update Options

Faculty-Initiated Update

Faculty may learn of new out-of-state licensure requirements or recognize that information in the DOSL is not accurate. In this case, they should request that information be updated using the One on One form in the DLI Service Portal. Once the form is submitted, PSC will review the request within 3 business days and determine how the DOSL needs to be updated. Updates made to the DOSL will trigger notification to the Enrollment Services, and the Graduate College when applicable, to ensure that students receive the appropriate communication within 14 days.

Curriculum-Initiated Update

Responsible unit(s): Curriculum Support Office (CSO)

Curriculum changes to PLSLs will initiate a review of the information contained in the DOSL to determine if the information remains accurate. After the curriculum review process, when the program's changes have been approved, department chairs will be prompted by CSO to identify if the DOSL is accurate or if changes are needed. The department chair will request a report on that program's license using the One on One form in the DLI Service Portal. DLI's PSC team will provide the report and the department chair will determine whether any changes need to be made to the DOSL and communicate these to the PSC team.

When a Change is Made to Any Determination

For any change in determination through an update process, the PSC team will immediately notify Enrollment Services or the Graduate College (depending on the program) through the dedicated resource email so that current out-of-state students in the

affected program will receive the appropriate communication within 14 days of the change of determination.

Student Communication Process

Responsible unit(s): Enrollment Services, the Graduate College, the Registrar's office

Direct student communication will be handled by Enrollment Services, the Graduate College, or the Registrar's office. The type of communication depends on three factors:

1) When an out-of-state student is enrolling in a program that leads to state licensure,
2) When a currently enrolled out-of-state student's state of residence has changed its status in a particular PLSL,
3) And when a current out-of-state student changes their major to a PLSL.

Students who change their majors will be treated as if they are newly enrolled students and communication will be sent based on the table below. If a previously authorized program becomes unauthorized for a specific state, all students in that program from that state will need to be notified within 14 days.

Table 3: Communication Type by Student Situation

Student Situation	*Communication*	*Enrollment Hold*	*Timeframe*	*Resp. Unit*
In-state student enrolling or enrolled in PLSL	None required.	None	N/A	None
Out-of-state student enrolling in PLSL	Student is notified that licensure requirements are met or not met. If not met, student is provided opportunity to attest.	Registration hold is placed on student's account until attestation is received.	Within 14 days of enrollment	Enrollment Services / Graduate College
Out-of-state student changing majors to a PLSL	Student is notified that licensure requirements are met or not met. If not met, student is provided opportunity to attest.	Registration hold is placed on student's account until attestation is received.	Within 14 days of change	Registrar's office
Out-of-state student enrolled in a PLSL, where that student's home state has updated its policy resulting in a different determination since time of matriculation	Student is notified that licensure requirements are met or not met. If not met, student is provided opportunity to attest.	Registration hold is placed on student's account until attestation is received.	Within 14 days of new determination	PSC, Enrollment Services / Graduate Collete

Helpful Resources

USG State Licensure Resource Page