

Determination of Student Location Policy for Licensure Direct Disclosures

Overview

In accordance with U.S. Department of Education licensure disclosure requirements, ORU records the location of prospective and current students. ORU tracks this location to determine if licensure disclosure requirements are needed in the following instances:

- At the time a prospective student goes through the process of admission
- At the time of initial enrollment in an academic program designed or advertised as leading to licensure required for employment in an occupation:
 - When a student enrolls at the university for the first time
 - When a student changes their academic program
- At the time a current student formally updates their local address information

Background

34 CFR 668.43(c)(3)(ii) requires institutions to have a policy to determine the location of a student at the time of the student's initial enrollment for the purpose of sending required licensure disclosures. This location should be updated upon formal receipt of new location information from the student. Additionally, 34 CFR 668.43(c)(1) requires that institutions send appropriate licensure disclosures to prospective students according to their location. 34 CFR 668.43(c)(2) requires that institutions send appropriate licensure disclosures to current students according to their location. Further, NC-SARA policies require institutions to annually report student enrollment according to student location information as determined for the institution's IPEDS enrollment report.

Definitions

Location: the state of a student's local address, which may be different than a student's state of residence

Program: an academic program designed or advertised as leading to licensure

State: any of the 50 states, the District of Columbia, or other U.S. jurisdiction (i.e. territories)

Determination of Location

Prospective Students

34 CFR 668.41(a) defines a prospective student as "any student who has contacted an eligible institution requesting information concerning admissions to that institution". The Preamble of the Department of Education 2019 Federal Rule as recorded in the Federal Register (Vol. 84, 58886) indicates that institutions send disclosures to prospective students prior to signing an enrollment agreement or making a financial commitment. Therefore, institutions need to make location determination of prospective students prior to enrollment or accepting a financial commitment from a student.

ORU asks prospective students to provide their current address information as part of their application for admission. This information is stored in the ORU system of record. The Admissions office tracks

location information of students in programs designed or advertised to meet educational requirements for licensure once students are admitted to ORU. This process ensures that appropriate professional licensure disclosures are sent to students prior to their enrollment or making a financial commitment to the university.

Current Students

ORU requires students to provide their local address as part of the registration process for initial enrollment and for enrollment in subsequent terms. This data is stored in the ORU system of record.

The Academic Authorizations Office (AAO) tracks local address changes for students enrolled in programs identified as designed or advertised to meet professional licensure criteria. The AAO sends updated address information to the Colleges for any student who will need to receive a professional licensure disclosure due to their new location, new program, or new determination that a program does not meet educational requirements for licensure.

Note: Students taking on-campus classes at ORU's Main Campus have Oklahoma as the state for their location.

License/Certification Direct Disclosures

Criteria for Direct Disclosures

In accordance with 34 CFR 668.43, ORU sends written direct disclosures to prospective and current students. These disclosures are sent as emailed letters.

Prospective Students

ORU sends professional licensure direct disclosures to admitted prospective students interested in an academic program designed or advertised to meet educational requirements for a specific license/certification required for employment in an occupation, if one of the following is true:

- ORU has not determined whether the student's program of interest meets educational requirements for licensure/certification in the State/territory where the student is located.
- ORU has determined that the student's program of interest does not meet the educational requirements for licensure/certification in the State/territory where the student is located.

Current Students

ORU sends a direct disclosure to a current student if ORU has made a determination that the student's program does not meet the educational requirements for licensure/certification in the State/territory where the student is located. This disclosure is sent to the student within 14 calendar days of making such determination. Additionally, a student receives appropriate licensure disclosures if the student changes their location or program.

Direct Disclosures

The direct licensing/certification disclosures state:

1. Determination of information regarding licensure/certification educational requirements (one of the following):
 - ORU has not determined whether the student's program of interest meets educational requirements for licensure/certification in the State/territory where the student is located.

- ORU has determined that the student’s program of interest does not meet the educational requirements for licensure/certification in the State/territory where the student is located.
2. Contact information for the appropriate licensing body if ORU has not determined whether the student’s program of interest meets educational requirements for licensure/certification in the State/territory where the student is located.

Prospective Students

Undergraduate Students

The Admissions Office tracks prospective student location and sends necessary disclosure communication in coordination with the Academic Authorizations Office to prospective students where direct disclosure criteria applies.

Graduate Students

The Graduate Programs coordinate with the Admissions Office to track prospective student location and send necessary disclosure communication in coordination with the Academic Authorizations Office to prospective students where direct disclosure criteria applies.

Current Students

The Academic Authorizations Office obtains location and program data at the beginning of every term and monitors if a student changes their local address or their academic program on the system of record anytime between terms. The Academic Authorizations Director sends updated location information to the Colleges. The report to the Colleges makes special mention of the programs designed or advertised to meet educational requirements for a specific professional license or certification that is required for employment in an occupation.

The Colleges in coordination with Academic Authorizations Director ensure disclosure communication is sent to students if they need to receive any updated licensure/certification disclosure information due to their new location, program, or if a new determination has been made regarding an academic program not meeting education requirements for licensing/certification in the location of the student.

Timing of Direct Disclosures

Prospective Students

The publication of the updated Federal guidelines on disclosures states, “the Department [of Education] expects that the institution will provide this disclosure before a student signs an enrollment agreement or, in the event that an institution does not provide an enrollment agreement, before the student makes a financial commitment to the institution.” (Federal Register, Vol. 84, 58886). ORU sends direct disclosures to prospective students before signing an enrollment agreement or making any financial commitment.

Current Students

34 CFR 668.43(c)(2) requires that institutions notify current students within 14 days if a program designed or advertised as meeting educational requirements for licensure/certificate required for employment in an occupation no longer meets the licensure educational requirements for a given state. In accordance with the Federal guideline, ORU sends the disclosure letter to students located in the said state within 14 calendar days of making the above determination.