



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER

Operating Policy and Procedure

HSC OP: 60.15, **Out-of-State Educational Activities (State Authorization)**

PURPOSE: The purpose of this Health Sciences Center Operating Policy and Procedure (HSC OP) is to align university practices with the U.S. Department of Education, the National Council for State Reciprocity Agreements (NC-SARA), and individual state authorization compliance requirements for the delivery of education to Texas Tech University Health Sciences Center (TTUHSC) students located outside the state of Texas.

REVIEW: This HSC OP will be reviewed by May of each year by the Office of Academic Planning and Compliance (APC) and General Counsel, with recommendations for revisions forwarded to the Academic Affairs and Curriculum Committee, with final approval by the Academics Council.

BACKGROUND:

As an accredited public institution that participates in federal financial aid programs and meets U.S. Department of Education regulations and as a member of the National Council for State Authorization Reciprocity Agreements (NC-SARA), TTUHSC must act in compliance with various regulations that govern its out-of-state educational activities, commonly referred to as “state authorization.”

Compliance ensures that out-of-state educational activities conducted by TTUHSC adhere to the federal, state, and territorial regulations in states or U.S. territories where the activities are conducted; students are able to sit for licensure or certification upon completion of their program; and protects our schools, programs, faculty, staff, and students.

Failure to comply with these requirements at the institutional-level could result in the revocation of Title IV federal financial aid funds.

DEFINITIONS:

- **State Authorization.** A term used to describe the state, federal, and professional licensing board regulations that impact where institutions of higher education can operate. These requirements affect online programs, on-ground experiences, and programs that are designed to lead to licensure or certification in a professional field.
- **SARA.** State Authorization Reciprocity Agreement is an agreement among states, districts, and territories that establishes comparable national standards for interstate offering of post-secondary distance education. SARA has no effect on state professional licensing requirements.
- **NC-SARA.** The National Council for State Authorization Reciprocity Agreements is the governing body of the reciprocity agreement. NC-SARA is a nonprofit member organization that helps expand students’ access to educational opportunities and ensure more efficient, consistent, and effective regulation of distance education programs.
- **Licensing Program.** An educational program that, after successful completion, would be sufficient to meet the respective state licensure or certification requirements for that occupation, if the program is designed to meet the educational requirements for specific license and is required for employment in an occupation.
- **Direct Disclosure.** A written communication sent directly to an enrolled or prospective student in a program that leads to licensure, if the professional licensing program does not meet the state educational requirements in the state of the student's location.
- **General Disclosure.** A written communication on a document or webpage that may be viewed by all prospective students, enrolled students, faculty, and staff that lists all states for which the institution has determined its curriculum does or does not meet state educational requirements for programs leading to licensure or certification.

- **State of Location.** Refers to the state or U.S. territory where a student is physically located while engaged in their academic program, determined by the “Local Address” provided by the student in the portal.
- **Enrolled.** The status of a student who has completed the registration requirements (except for the payment of tuition and fees) at TTUHSC.

POLICY/PROCEDURE:

1. General Professional Licensure Disclosures

- General professional licensure disclosures are required for academic programs leading to professional licensure or certification, or advertised to, or required for employment, including both online and face-to-face programs.
- School officials must determine for all states and U.S. territories whether its curriculum does or does not meet state educational requirements for licensure or certification.
- This information is made available to all prospective students, current students, faculty, and staff on the [TTUHSC State Authorization webpage](#).
- TTUHSC schools review and update this information annually, or as made aware of changes impacting licensure.

2. Direct Professional Licensure Disclosures

- Direct professional licensure disclosures are required for academic programs leading to professional licensure or certification, including both online and face-to-face programs.
- School officials must notify, in writing, prospective out-of-state students who inquire about a program leading to licensure if the program does not meet educational licensure requirements in the student’s state of location. A direct email to the student satisfies this requirement.
- School officials must also notify, in writing, currently enrolled students if they become aware of changes to licensure programs that impact the ability for students to seek licensure in the state where the student is located. Notification must be made within 14 days of the school becoming aware of the change. A direct email to the student satisfies this requirement.
- Current Student Local Address Tracking
 - Students are prompted to update their local address through the portal every six months.
 - If a student enters a new address in a state where the TTUHSC program has determined licensure requirements for their program are not met, they will immediately receive a prompt informing them that educational requirements are not met in their selected state. This prompt serves as a direct disclosure to the student.

3. Professional Licensure Attestations

- Programs cannot enroll students from states where the program does not meet licensure/certification requirements. If desired by the student, program officials can discuss the attestation process.
 - If the student does not intend to seek licensure in their state of location, the student can submit an attestation form identifying the state where they intend to seek licensure, provided it meets licensure requirements for the program.
 - Students who successfully return their attestation and indicate they intend to seek licensure/employment in a state that meets educational requirements can be matriculated into the program and proceed with course registration.
 - Students who do not intend to seek licensure/employment in a state where educational requirements for licensure are met or do not submit a completed attestation by the last day of registration for their specific program cannot be matriculated into the program. Best practice would be to collect an attestation at the time of registration.

- b. This guidance is applicable to any student who enrolls in a distance education program/course that leads to licensure/certification in their first semester of enrollment.
- c. The [attestation form](#) is available for program use through Dynamic Forms.

4. Out-of-State Learning Placements

- a. As a member of NC-SARA, TTUHSC is required to account for all out-of-state placements (i.e., internships, externships, clinicals, field experiences, practicums, etc.) that are required for degree completion or professional licensure, offered for course credit, or offered for a fee.
- b. APC staff request that TTUHSC schools provide a listing of students by program and location who participated in an out-of-state placement for the previous calendar year, due annually in June.