

# BETWEEN THE LINES, BEHIND THE WORK:

Survey Findings on  
the True Scope of  
Licensure Compliance

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## Acknowledgements

The authors would like to thank the following individuals for their time and assistance throughout the development of the survey and writing of this report:

- ▶ Erika Swain and Michael Jolley for reviewing the survey design and questions.
- ▶ NC-SARA staff for reviewing the survey questions and assisting in distributing the survey.
- ▶ Miranda Hines and Kristen Brown for reviewing and providing valuable feedback on the preliminary draft of this report.
- ▶ The 228 people who responded to the survey and provided valuable information.
- ▶ The individuals who volunteered additional time for one-on-one interviews to discuss professional licensure compliance management at their respective institutions in more depth.

## Recommended Citation and License

Cheverton, S., and Kerensky, K. (January 2026). Between the Lines, Behind the Work: Survey Findings on the True Scope of Licensure Compliance. State Authorization Network (SAN), a network of the WICHE Cooperative for Educational Technologies (WCET).

## Additional Resources

For related resources, see <https://wcetsan.wiche.edu/resources/professional-licensure>.

For inquiries or more information contact [san-info@wiche.edu](mailto:san-info@wiche.edu).

## AI Use Acknowledgements

ChatGPT, Gemini, and Copilot were used to suggest edits throughout for grammar, clarity, flow, and thematic connections; and Zoom AI to create initial drafts of interview transcripts. The outputs were reviewed, edited for accuracy, and integrated into this final report.

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# EXECUTIVE SUMMARY

Professional licensure compliance has become a labor-intensive and high-stakes area of responsibility for higher education. Unlike other compliance domains with centralized guidance or standardized processes, licensure compliance requires institutions to track, interpret, and communicate highly variable requirements across more than fifty jurisdictions, multiple professions, and oftentimes numerous institutional programs. This work not only places significant demands on staff time and institutional resources but also has the potential for direct consequences, not only for institutions, but for student access and equity, as state-specific requirements influence where institutions offer programs and where students can enroll.

In 2024, new federal regulations significantly raised the stakes for institutions offering programs that lead to professional licensure. Whereas previously institutions were required to disclose certain licensure information to prospective and enrolled students, colleges and universities must now also certify that each licensure program meets the educational requirements in the state where a student is located at the time of initial enrollment. If the program does not meet the requirements, the institution cannot enroll the student except in very narrow circumstances. Failure to comply risks fines, loss of Title IV eligibility, reputational damage, and can possibly lead to restricted student access to essential career pathways. Since these determinations are not validated by state licensing boards, this results in a risk-based process, where differences in institutional resources and risk tolerance will heavily influence in what programs prospective students can enroll based on where they are located, which in turn could create barriers to student choice in programs.

This report, based on a nationwide survey of institutions, offers a systematic snapshot of how institutions are experiencing and responding to the demands of professional licensure compliance and highlights the significant impact on staff, resources, and students. The following findings highlight the scope of the work and the growing risks and consequences for both institutions and students:

► **The scope of work is wide and complex.**

Compliance staff must manage a wide range of responsibilities, including monitoring and interpreting requirements from multiple boards, aligning academic curricula with educational requirements for licensure, ensuring accurate public disclosures,

and coordinating across senior administration (vice provosts, deans, etc.) admissions, academic units/departments, IT, and legal offices to develop institution-wide policies and procedures. These requirements affect a wide range of programs, including Nursing, Teacher Education, Mental Health, Health Science, Professional Accountancy/CPA, Social Work, Engineering, and many others.

► **The stakes are high for institutions and students.** Noncompliance risks fines or loss of Title IV eligibility, reputational damage, and harm to students. Several institutions reported restricting enrollment in certain states due to compliance challenges, directly limiting opportunities for students.

► **Workload has intensified.** Eighty-six percent of respondents reported a moderate or significant increase under the new federal certification requirements. The survey results confirm that many institutions operate without a dedicated compliance team, instead layering responsibilities onto existing staff. Furthermore, many rely on manual processes, creating inefficiencies and elevating risk. This burden disproportionately affects staff with limited support and can be particularly acute at smaller institutions or those that lack dedicated compliance resources. Importantly, even a few additional hours can be major for staff with already expanding job responsibilities.

## KEY TAKEAWAYS FOR INSTITUTIONAL LEADERS AND POLICYMAKERS

### TREAT LICENSURE COMPLIANCE AS ENTERPRISE RISK

- ▶ **Why care:** Noncompliance can trigger fines, student harm, and reputational damage.
- ▶ **Act by:** Elevating oversight to senior or cabinet-level discussions and embedding compliance in enterprise risk management.

### INVEST IN CAPACITY TO PREVENT BURNOUT AND TURNOVER

- ▶ **Why care:** Overworked teams are more prone to mistakes, creating systemic risk.
- ▶ **Act by:** Allocating dedicated staff, cross-training, and leveraging technology to reduce manual burden.

### PROTECT STUDENT ACCESS WHILE MAINTAINING STANDARDS

- ▶ **Why care:** Some institutions are limiting enrollment in certain states or programs due to compliance strain—reducing access and equity.
- ▶ **Act by:** Supporting shared resources, templates, and collaborative infrastructure to sustain reach without compromising rigor.

### PUSH FOR POLICY ALIGNMENT ACROSS LEVELS

- ▶ **Why care:** Conflicting federal, state, and licensure rules create inefficiencies and compliance gaps.
- ▶ **Act by:** Advocating for harmonized standards and guidance that promote clarity and consistency.

### CREATE LASTING SYSTEMS INSTEAD OF QUICK FIXES

- ▶ **Why care:** Reacting to each new rule separately creates confusion and risk over time.
- ▶ **Act by:** Building clear processes, connected data systems, and shared accountability so compliance work holds up under change.

## The Path Forward

Institutions must navigate the structural and regulatory challenges inherent in professional licensure compliance while maintaining student access to programs. Many barriers stem from misalignment between federal institutional requirements and state licensure processes. Addressing these challenges requires sustained effort and shared responsibility: institutions can strengthen systems, equitably manage compliance workloads, and embed compliance into campus operations, while policymakers can improve coordination, clarify expectations, and enhance transparency. Collaborative dialogue between institutions and policymakers is essential to ensure that licensure standards remain rigorous enough to protect the public while also allowing students fair and timely access to programs so they can complete their education and enter the workforce as qualified professionals.

We do not yet know how these compliance pressures will affect the supply and distribution of licensed professionals, but the actions institutions are taking, such as limiting enrollment in certain states or professions, suggest possible long-term impacts on the professional pipeline. Understanding these effects will require assessing how policy reforms influence student access to licensure programs and, ultimately, entry into the workforce. Future research will be essential to identify scalable institutional models, best practices, and policy frameworks that help align compliance obligations with equitable access to educational opportunities and a well-prepared professional workforce.

Efforts to maintain professional licensure pathways that are both rigorous and attainable, while enabling student access and workforce development, need sustained attention and collaboration to achieve this goal. Institutional leaders play a key role in reinforcing the importance of compliance, while collective action to simplify systems, share solutions, and coordinate strategies, can help ensure that licensure pathways serve students, institutions, and the broader communities they are meant to protect.



# INTRODUCTION & METHODOLOGY

## Purpose of the Survey and Report

In 2024, federal certification procedure regulations introduced new institutional obligations for programs leading to professional licensure. Institutions must now certify that each professional licensure program meets educational requirements in the state where a student is located at the time of initial enrollment. Against this backdrop, the State Authorization Network (SAN) and Sarah Cheverton, State Authorization Compliance Officer at James Madison University, launched this survey in early 2025 to better understand how institutions are managing these new expectations and what early effects they are seeing on workload, resource allocation, and student opportunity.

The purpose of this report is to provide an early, data-informed view of how federal and state-specific professional licensure requirements affect institutions and students. Specifically, the report seeks to quantify workload impacts, highlight greatest areas of institutional strain, explore compliance management strategies, and identify opportunities for institutional and policy improvement and alignment. Importantly, we hope to inform institutional leaders and policymakers about the implications for staffing, resources, and student access.

This report seeks to make visible the often-invisible work of licensure compliance and to provide actionable insights that support sustainable and effective policies and practices. By establishing the study's purpose, context, and methodology, this section provides the foundation for interpreting the findings that follow.

## Methodology & Respondent Overview

To understand the real-world impact of professional licensure compliance, we combined a structured survey with follow-up interviews. The survey gathered information about how institutions are managing workload, staffing, resources, and compliance management practices, while the interviews provided richer context regarding institutional challenges and decision-making processes, and allowed institutions to share concrete examples, highlight innovative practices, and explain challenges in their own words.

The survey was open from March through April 2025 and was sent to State Authorization Network (SAN) member institutions. Responses reflected a range of institutional types, sizes, and licensure program portfolios, ensuring the analysis could capture variation in how different institutions structure and experience compliance work.

## SURVEY DESIGN

The survey included a combination of open- and close-ended questions. Key areas of focus included (1) the scale of workload changes following the July 2024 federal certification procedures regulations, (2) strategies for managing compliance (including how institutions handle disclosures), (3) operational challenges and adequacy of resources, and (4) restrictions on professional programs and potential impacts.

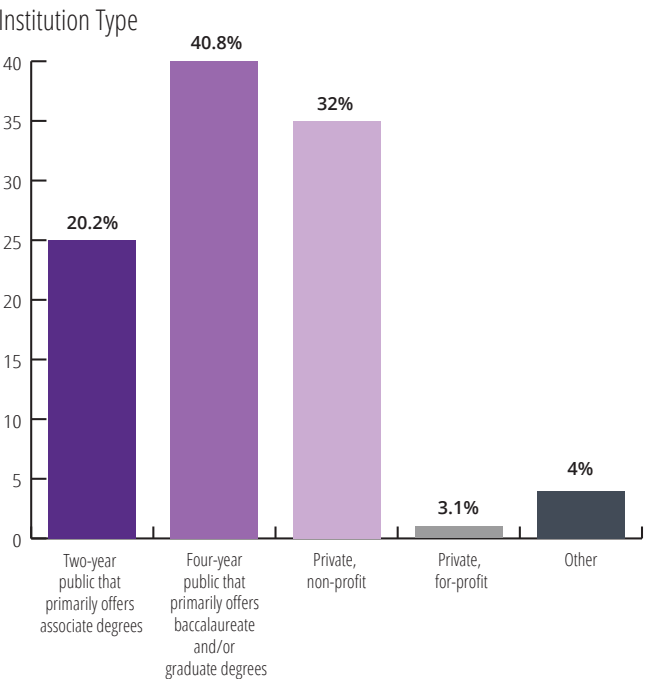
## RESPONDENT DEMOGRAPHICS

Respondents represented a wide spectrum of institutional types, roles, and program portfolios. The following snapshots provide a broad overview of the respondents' characteristics. More detailed breakdowns will be provided throughout the report and appendices where relevant.

### INSTITUTION TYPE

The survey included a broad range of higher education institutions (see **Figure 1.1**), such as:

- **Public institutions:** Two-year (20.2%) and four-year (40.8%) colleges and universities.
- **Private institutions:** Non-profit (32%) and for-profit (3.1%) schools.
- **Other specialized institutions:** A small number of respondents (4%) represented unique institutional types, such as system offices overseeing multiple campuses, career schools, graduate-only or law schools, vocational and technical programs, and specialized health-focused institutions.



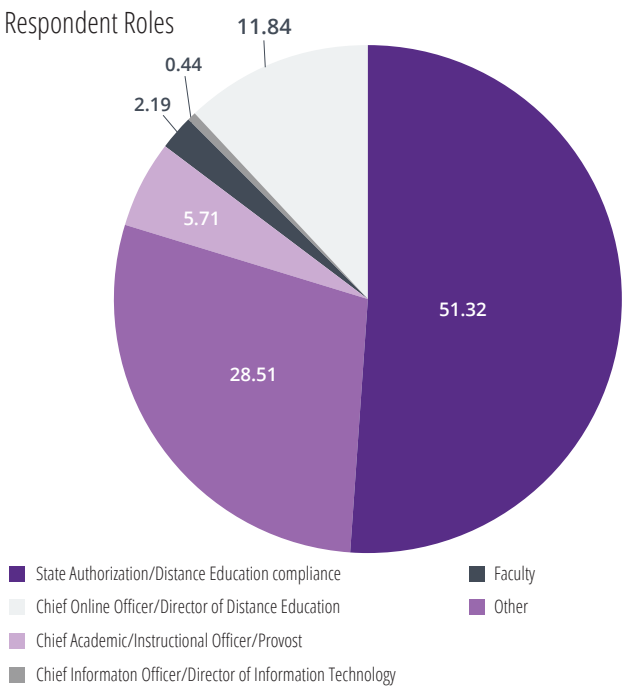
**Figure 1.1:** A chart showing the percentage breakdown of respondents by institution type.

As a whole, the distribution of types of institutions is similar to that in the general population of institutions across the U.S. According to the [National Student Clearinghouse Research Center Spring 2025 data](#), public four-year institutions have the largest sector of enrolled students (41%), followed by public two-year colleges (26%) and private non-profit four-year schools (22%). Private for-profit institutions have 5% of

the total enrollment. While our sample has a higher proportion of private non-profits and a slightly lower proportion of two-year publics, the numbers seem reasonable enough to make inferences about the general population of institutions.

### RESPONDENTS' ROLES AT THE INSTITUTION

In addition to institutional diversity, the survey captured a wide range of roles and responsibilities among those engaged in professional licensure compliance (see **Figure 1.2**). About half (51.3%) of the respondent group identified their position as compliance-focused staff. The remainder of the group (48.7%) classified their position as one broader or outside of the state authorization compliance focus: program directors, admissions officers, and other personnel involved in licensure-related activities. The diversity of respondent roles offers valuable context for interpreting differences in workload discussed later in the report and appendices.



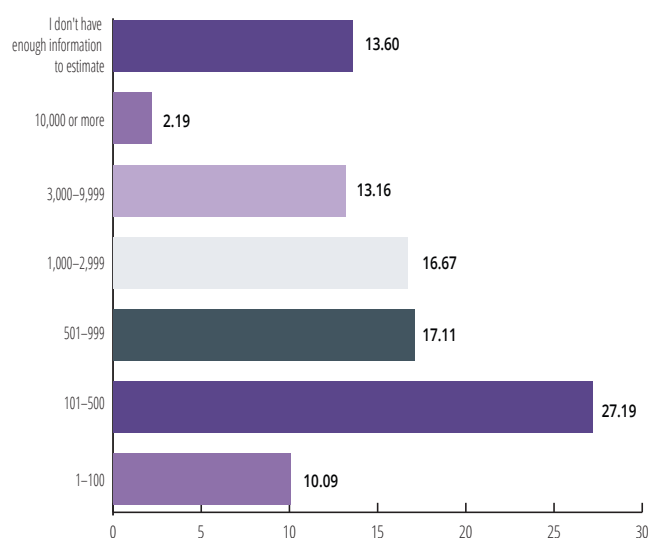
**Figure 1.2:** Percent breakdown of respondents by their role at their institution.

### OTHER KEY RESPONDENT CHARACTERISTICS

Several additional characteristics help contextualize the survey results:

- ▶ **Institution size:** Ranged from fewer than 1,000 student FTE (full-time equivalent enrollment) (9.7%) to over 20,000 (22.4%) student FTE. Those with an IPEDS FTE of between 3,000-9,999 were most commonly represented, making up almost 30% of the responses.
- ▶ **Licensure program portfolio:** Spanned from a handful of 1-5 licensure programs (32.5%) to 50+ programs (11.4%) across multiple professions. Of the range of choices, institutions with 1-5 licensure programs were the most represented, followed next by institutions with 6-10 (16.2%) and those with 11-15 (11.4%).
- ▶ **Student Enrollment in Licensure Programs:** Answers ranged from an estimated 1-100 students enrolled in licensure programs (10.1%) to over 10,000 (2.2%). The most common estimate selected was 101-500 students (27.2%), although a combined 30% of respondents estimated licensure program enrollment between 1,000-9,999 students (see **Figure 1.3**).

Estimated Student Enrollment in Licensure Programs



**Figure 1.3:** Percent breakdown of the estimated student enrollment in licensure programs in responding institutions.

## LIMITATIONS

This survey represents an early, systematic effort to capture data on professional licensure compliance in higher education. As such, it provides a valuable preliminary snapshot of trends, challenges, and emerging practices, while also highlighting areas where further research and longitudinal data collection are needed. Some methodological considerations that are worth noting:

- ▶ **Subjective workload assessments:** Because respondents self-reported the perceived impact of licensure compliance, there is inherent variability in what constitutes “moderate” or “significant” workload. Estimations of weekly hours provided additional context but do not fully standardize perceptions.
- ▶ **Sampling considerations:** Participation was voluntary, and institutions with larger compliance teams or more significant challenges may have been more likely to respond.
- ▶ **Scope of qualitative data:** Interviews were used to illustrate themes and provide examples rather than produce comprehensive case studies.
- ▶ **Timing:** SAN conducted the survey during March–April 2025, shortly after implementation of the 2024 certification procedure regulations, which may have heightened perceptions of workload and complexity.
- ▶ **Survey Fatigue:** The total number of respondents dropped by approximately 20% (from 228 to 182) in the last few questions of the survey.

Despite these limitations, the findings offer a meaningful view of the current state of professional licensure compliance across a broad range of institutions. They illuminate emerging trends, highlight operational realities, and provide actionable insights for both institutional leaders and policy-makers, while laying the groundwork for ongoing research and monitoring.

# THE SCOPE AND COMPLEXITY OF PROFESSIONAL LICENSURE COMPLIANCE

The work of professional licensure compliance often operates behind the scenes, but its impact on students and institutions is significant. Unlike other areas of Title IV federal financial aid compliance, or even institutional accreditation, there is no single set of rules, centralized authority, or shared terminology to guide this work. Instead, institutions must navigate requirements that shift across states and professions.

This work became even more consequential on July 1, 2024, when the federal certification procedures regulation (34 CFR 668.14(b)(32)(ii)) took effect. The rule requires institutions to determine, at the time of a student's initial enrollment in a licensure program, whether that program meets the educational requirements for licensure in the state where that student is located. If the program does not meet the requirements, the institution cannot enroll the student, except in the limited circumstance where the student formally attests that they intend to pursue employment in another state where the program meets educational requirements

for licensure. Because this certification is now embedded in an institution's Program Participation Agreement (PPA) with the U.S. Department of Education, compliance is directly tied to Title IV eligibility. Noncompliance may lead to sanctions, fines, or even loss of federal financial aid access.

This section provides an overview of the many layers of this work, illustrating why this work is not quick or straightforward, and why, as we will see in later sections, institutions report high levels of burden and concern about sustainability.

## Breadth of Compliance Responsibilities

At its core, professional licensure compliance requires institutions to ensure that their licensure programs (including programs at all degree levels and across all modalities, from campus-based programs to online and hybrid models) meet all applicable federal and state requirements in every jurisdiction where they are offered. These obligations extend well beyond curriculum alignment. Institutional responsibilities encompass approvals, disclosures, and faculty and clinical/experiential learning obligations. Staff are not only interpreting regulatory language but also translating those requirements into processes, policies, and communications that affect students, faculty, and administrators. In concrete terms, institutional staff must:

- ▶ Track and interpret requirements from more than fifty jurisdictions.
- ▶ Confirm and continually update information for dozens of academic programs, many with multiple tracks or specializations.
- ▶ Translate requirements into accurate public disclosures and individualized communications to prospective and current students.
- ▶ Coordinate with senior administration, academic units/departments, faculty, admissions, IT, legal teams, and more to ensure consistent and accurate application of institutional procedures, including ensuring system updates take place, which comply with all legal and regulatory requirements.

Institutions must address several core areas of responsibility, including at a high-level, (1) approvals and authorizations from licensure boards, (2) adherence to educational

### At a Glance: The Certification Procedures Rule (Effective July 1, 2024)

**Regulation:** 34 CFR 668.14(b)(32)(ii)

#### What it requires:

- ▶ At the time of initial enrollment, the institution must determine whether the program meets educational requirements for licensure in the state where the student is located.
- ▶ If the program does not meet the requirements, the institution may not enroll the student in that program.

#### Why it matters:

- ▶ Compliance decisions are risk-based and rest on the institution's interpretation of regulations, rather than official state licensing board approval procedures.

requirements across multiple jurisdictions, and (3) timely and accurate student-facing notifications and disclosures. Together, these three areas provide a useful framework for understanding the scope of professional licensure compliance. But the reality is that each category carries overlapping compliance obligations. The following points unpack these obligations in more detail, illustrating how those core areas expand into a complex web of federal and state-level requirements.

- ▶ **Institutional Approvals:** Institutions are responsible for obtaining appropriate approvals from state higher education agencies in every state where students are located while enrolled. This approval can be obtained either directly from the state or via participation in reciprocity such as that provided by participating in the State Authorization Reciprocity Agreements (SARA).
- ▶ **Licensure board approvals & state requirements:** Some states require institutions to obtain program approval by the relevant state licensing board in the state in which the student receiving the instruction is located. Similarly, some states require institutions to notify state boards or seek approval of clinicals or experiential learning activities in the state in which the activity occurs. Furthermore, some states may require that program instructors or faculty hold a state license in the state where the student is located to teach online or to oversee experiential instruction taking place in the state. Note: These board requirements would not be covered by participation in SARA as SARA covers institutional approval from the state higher education agency, not obligations to other state entities.
- ▶ **Federal requirements:** Under the certification procedures regulation (34 CFR 668.14(b)(32)(ii)), institutions must determine at the time of a student's enrollment whether a program meets educational requirements for licensure in the student's location (or intended place of employment).
- ▶ **Disclosures & notifications:** Institutions must comply with federal Title IV rules (34 CFR 668.43), VA benefits regulations (38 CFR 21.4253 & 21.4259), and Pell requirements for incarcerated students (34 CFR 668.236). If an institution participates in SARA, it must also comply with SARA policy, such as Section 5.2 (which applies

to non-Title IV institutions and the non-Title IV programs of SARA-participating institutions).

- ▶ **Financial aid considerations:** Under FAFSA simplification and the 2022 Consolidated Appropriations Act, professional licensure costs must be incorporated into the student cost of attendance.
- ▶ **Misrepresentation & consumer protection:** Federal misrepresentation regulations (34 CFR 668.71–72) prohibit false or misleading claims about licensure eligibility, including by intentional, or unintentional, omission. States also retain enforcement authority under their own consumer protection laws.

Professional licensure compliance touches multiple regulatory layers at once including state higher education agencies, state licensure boards, federal Title IV requirements, consumer protection laws, and accreditation standards. As the above list shows, the challenge is not just the amount of information to be managed, but the variety and overlap of responsibilities institutions must navigate. This complexity matters because compliance ultimately shapes a student's path to licensure. If requirements are misinterpreted or overlooked, students may find themselves with a degree but unable to practice in their chosen field.

Much of this work happens behind the scenes, requiring staff to make complex interpretations and coordinate across the institution. As one respondent put it:

*"I think institutional leaders have the misconception that this research is easy and quick to do. It's not! I struggle to get them to understand what it takes and why it's so complicated."*

## Why This Work Is Challenging

The regulatory framework above is only the starting point. The actual work of compliance is far more challenging than it might appear on paper. The challenge arises from the following overlapping pressures:

### 1. Federal Certification Procedures Regulations Require Risk-Based Determinations

A fundamental source of complexity is the federal certification procedures regulation (34 CFR 668.14(b)(32)(ii)). This rule places the responsibility squarely on institutions to determine whether their programs meet the educational

requirements for professional licensure in the state where a student is located at the time of enrollment. If the program does not meet the requirements, the institution is prohibited from enrolling the student except in very narrow circumstances. What this means in practice is that institutions must interpret published regulations, compare them against their program's curriculum, and decide whether they are confident enough to determine that the program meets educational requirements and enroll a student.

It is crucial to understand, however, that these determinations are not validated by state licensing boards. Boards frequently decline to provide confirmation, refer institutions back to their posted materials, or indicate that determinations are made only when an individual applies for licensure. This lack of a validation process results in a fundamentally risk-based process. To add further layers to this risk is the fact that many staff responsible for coordinating this work are not trained as attorneys and often lack subject-matter expertise in the curriculum.

By shifting the burden of determination to institutions and removing the possibility of deferring to a state board approval process, the certification procedures regulation elevated institutional responsibilities and risk. Compliance staff must now make independent, risk-based determinations grounded in their own analysis of state regulations and program curricula, often without confirmation or guidance from state licensing boards. It requires repeated cycles of review, cross-departmental coordination, translation into student-facing language for notifications and disclosures, and escalation to senior leadership for risk assessment and decision-making.

## **2. State Requirements are Complex and Inconsistent.**

No two states have identical structures when it comes to what they require of programs. Some require program approval for out-of-state programs, and still others impose conditions on clinical placements or faculty credentials. Institutions also share that even within a single state board, interpretations of what is required can differ depending on which staff member responds to an inquiry, and rules may shift without notice. Even institutions authorized to operate in a state through SARA or direct authorization may still need separate licensure board approval for regulated programs.

When program or clinical approvals are required, institutions must submit applications and supporting data that can be extensive. Boards may require, among other things, detailed evidence of curriculum, faculty licensure or qualification verification, site-specific approval of clinical placements, affiliation agreements with in-state facilities, and payment of application or renewal fees.

## **3. This work is often managed with limited resources.**

Despite the complexity, most institutions manage licensure compliance with limited resources. Survey responses show many institutions rely on a single staff member, or distributed efforts across multiple offices, to handle professional licensure compliance. Furthermore, we observed that among our respondents, those in non-compliance positions tended to represent institutions with fewer than 10,000 students, which may show connections between institutional size and dedicated compliance staffing. Staff turnover can create major vulnerabilities, as institutions are exposed to risk if the one person who knows how to navigate state regulations leaves. Successful compliance requires input and coordination across the institution, including senior administration, academic departments, admissions staff, legal and compliance officers, IT and web teams, and more. Yet, because responsibilities are often dispersed, coordination may falter, which could lead to gaps, misunderstandings, or lack of ownership. Institutions report that buy-in, shared understanding of responsibilities, and process ownership across units remain persistent barriers.

The limited resources go beyond personnel and extend into lack of technological resources. Licensure research and determinations are still largely manual. Institutions frequently rely on spreadsheets, emails, and other documents. Few robust technological solutions exist to automate or streamline the work. This means staff must repeatedly enter, check, and update the same information across multiple institutional systems or platforms.

## **Why Compliance Decisions Matter: Institutional and Student Risk**

The stakes extend beyond administrative burden. For institutions, compliance missteps can lead to state enforcement actions, loss of authorization, loss of Title IV eligibility, or lawsuits. Supplying students with inaccurate or incomplete information can result in wasted time and financial loss for



students and, in some cases, denial of licensure after graduation. Students who believe they were misinformed may submit complaints to regulators or accreditors, elevating the institution's exposure to legal and reputational risk. Some institutions mitigate risk by restricting or prohibiting enrollment from certain states, which directly limits student access.

## **From Complexity to Effort: Quantifying the Workload**

By laying out these dimensions, this section establishes the context for understanding why institutions report heavy workload increases in our survey. The next section will quantify that workload, showing how these compliance demands translate into increased weekly hours, staffing requirements, and overall institutional investments.

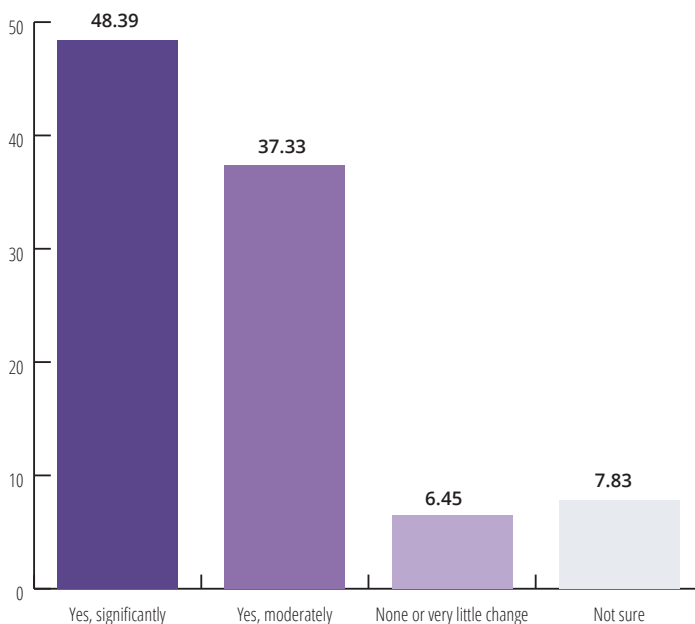
# COMPLIANCE WORKLOAD IMPACT

The federal certification procedures regulations (referred to throughout as federal regulations) have had a measurable impact on professional licensure compliance. This section analyzes how institutions reported changes in workload and identifies the tasks most responsible for those increases.

## Overall Increase in Workload

Survey responses indicate that many institutions have experienced an increase in workload related to the federal regulations. Eighty-five percent of respondents reported either a significant (48%) or moderate (37%) increase (see **Figure 3.1**). The survey did not define “significant” or “moderate,” so these responses reflect respondents’ subjective perceptions rather than uniform thresholds. To better understand these subjective perceptions, we also asked participants to estimate the number of hours added weekly, allowing for comparison between perceived and reported increases. These responses are therefore valuable for illustrating how the impact is influenced not only by the number of additional hours but also by an individual’s role, baseline workload, and capacity to adjust other responsibilities.

Overall Perceived Increased in Workload



**Figure 3.1** illustrates the overall percent distribution of perceived increases.

Most institutions (72%) added between 1–10 hours of workload per week, though a smaller portion (12.1%) reported increases of more than 20 hours per week during peak implementation periods. Weekly increases of 4–6 hours per week was the most reported (24.7%) range. As described in survey comments and interviews, the workload was often cyclical rather than steady, with peak demands during spring and early summer 2024 for research, process adjustments, and staff training. While some respondents noted that their workload eased after automation or policy clarification, others described a transition from setup to maintenance. As one respondent explained:

*“The initial review required significant hours per week (around 30 hours weekly for six weeks). Then the work decreases significantly. However, it will increase again when a new program is approved or when annual reviews come due.”*

## DIFFERENCES BY INSTITUTIONAL AND RESPONDENT DEMOGRAPHICS

Workload increases related to the federal regulations were felt across institutions of all sizes, with smaller and larger institutions reporting the most pronounced effects. Smaller schools appear to feel the impact most acutely, while larger ones face greater operational complexity. Mid-sized institutions showed more uncertainty, suggesting evolving or less centralized compliance structures.

Several notable patterns connecting the scope of licensure offerings, the number of students enrolled into those licensure programs, and the intensity of workload increases were also observed. Although both large and small institutions reported significant workload growth, the nature and intensity of that growth appear to vary depending on institutional scale and the number of students and programs affected. Approximately 72% of institutions offering more than twenty programs reported a significant increase. Roughly three-quarters of institutions offering fewer than ten programs reported moderate or significant increases, typically estimating 1–10 additional hours per week. Many of these smaller institutions reported workload increases of similar perceived intensity (“significant”) as their larger peers, despite the smaller absolute number of programs or students affected.



Who feels the most increase depends somewhat on role. Sixty percent of compliance-focused staff reported significant increases in workload, compared to only 40% of respondents with broader roles. Conversely, among those reporting “no or very little” increase, 71% were non-compliance staff. It is unclear if these results suggest that those working most directly with state authorization requirements are both more exposed to the increase and more likely to recognize it.

## INCREASED WORKLOAD: WHY IT MATTERS AND WHAT TO DO

### Even small increases can strain teams.

A few extra hours per week can create real pressure depending on baseline workload, staffing, and other responsibilities. Don’t assume “only a few hours” is low impact.

### Scale changes how strain shows up.

Smaller institutions may lack staff to absorb new work, while larger ones face added complexity across units. Consider how structure and workload distribution influence risk.

### Impact depends on role and support.

Workload increases affect people differently based on other responsibilities, tools, and training. Assess capacity, not just hours.

### Multiple tasks add up.

Research, disclosures, coordination, monitoring, and reporting each contribute to the total workload. Look at the full picture when planning staffing and managing risk.

## Hours and Distribution of Work

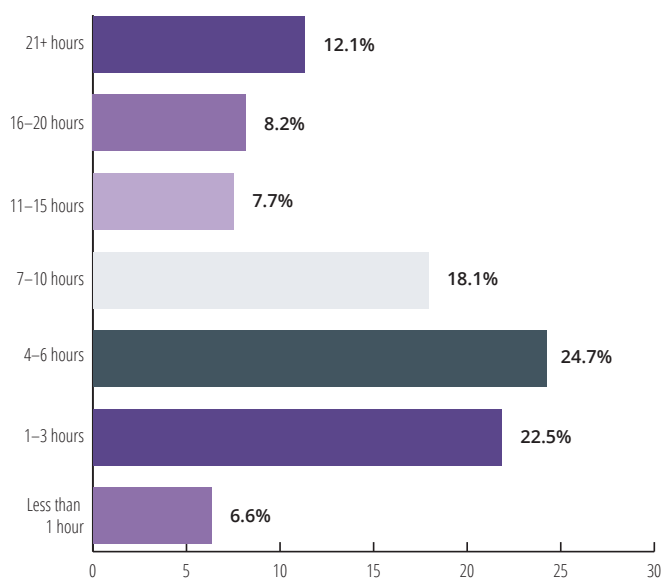
As noted earlier, the survey did not define “significant” or “moderate,” when capturing respondents’ unique perceptions of workload increases, and so, for additional context, participants were asked to estimate weekly hours of additional work. Overall, the data suggests a positive relationship

between various institutional characteristics and the number of additional workload hours, although the data also show wide variation within groups. Comments indicate that in some cases, the workload is distributed across multiple units, making it difficult for them to determine the degree to which the workload has increased. Furthermore, the data show varying perceptions of how many additional hours of work constitute a significant or moderate increase.

## OVERALL RESULTS

Respondents estimated the average number of hours per week their workload increased to comply with the new regulations. The estimated number of hours ranged from less than 1 hour per week to more than 21 hours. Among the institutions that reported a *significant* workload increase, 60% estimated that their workload increased by an average of at least 7 hours per week; 20% estimated an additional 7-10 hours and 18% estimated twenty-one or more. Among the institutions reporting a *moderate* increase, estimates trended towards fewer hours per week: 72% of this group estimated an average of *fewer* than 7 hours per week, though a few institutions estimated much higher workloads, including 21+ hours/week (see **Figure 3.2**).

Increase in Average Weekly Workload



**Figure 3.2** shows increase in average weekly workload.

## INSTITUTIONAL TYPE, SIZE AND NUMBER OF ADDITIONAL WORKLOAD HOURS

Workload increases varied across institutions, with both institutional characteristics and individual perceptions shaping how these changes were experienced. While larger institutions and those with extensive program portfolios generally reported higher additional hours, perceptions of what constitutes a “significant” or “moderate” increase were highly relative. More than half of all institutions added fewer than 7 hours per week, but four-year public institutions reported notably higher increases, with 61% estimating seven or more additional hours, including 20% with 21 or more hours. Smaller two-year public institutions tended to report more modest increases. Larger institutions reported both higher perceived workloads and higher hours overall.

While data indicate some degree of relationship between institutional characteristics and perceptions of workload, upon closer inspection we found a bit of a mismatch between perception of workload and the actual hours. What feels significant to one may not to another, i.e., a few hours of additional work per week might feel minor to someone already devoting many hours to compliance whereas someone who typically spends just one hour per week on licensure-related tasks may consider a similar increase substantial. For example, some institutions reported a significant impact but estimated an average of fewer than 3 hours of additional work per week while others considered 21 or more hours a “moderate” increase in workload. For readers interested in a detailed breakdown by institutional type, size, and program portfolio, including variations in reported hours and how perceptions diverge from actual workload, see **Appendix A**.

Despite how respondents categorized the increased workload, many expressed additional stress when trying to meet expectations. As one respondent shared,

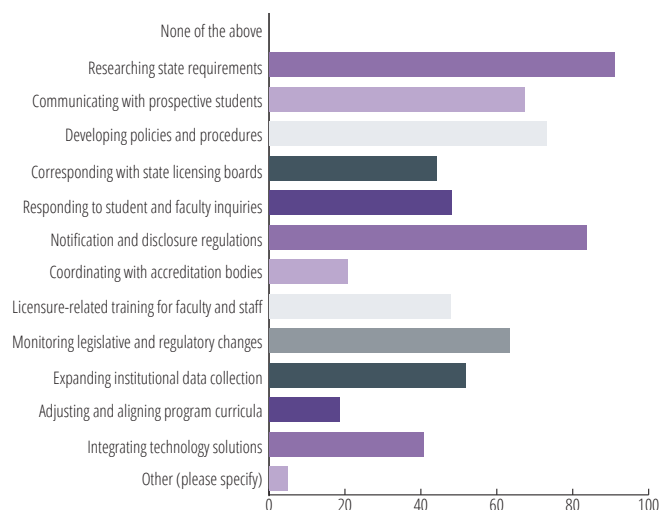
*“It has been an undue burden. 4–6 hours doesn’t sound like a lot, but 50 states, plus territories and multiple programs, it’s a lot for one person. All these requirements are burdensome. No public institution wants to harm students. There has to be a better way.”*

## CORE AREAS OF INCREASED RESPONSIBILITY

Survey responses reveal that institutions are experiencing expanded workload across multiple dimensions of professional licensure compliance. While nearly every participating institution reported some increase in activity, the five areas

that emerged most frequently as sources of additional work include researching state requirements (90%), communication with students through disclosures (85%), internal coordination of policy development and training (79%), ongoing monitoring of state and federal requirements (63%) and expanding institutional reporting and data collection (51%) (see **Figure 3.3**).

Compliance Workload Increase



**Figure 3.3** shows areas where compliance workload has increased the most.

These results underscore that “compliance workload” is a compilation of tasks that differ based on institutional demographics and the institutional compliance infrastructure. While some institutions are expending effort to interpret and document licensure requirements, others are devoting more time to internal coordination, policy alignment, or communication with students and programs. Both realities are valid and reveal how the same regulatory environment can produce markedly different operational pressures across institutions.

# ENROLLMENT RESTRICTIONS AND PROGRAM AVAILABILITY

As the 2024 federal certification procedures take effect, many institutions are reassessing student enrollment and program delivery to balance regulatory obligations with educational access. A central question explored in this survey was whether institutions have chosen to limit enrollment or modify programs in response to state-specific licensure requirements and the pressure that the federal certification procedures regulations added. However, while the survey offers early insights into these institutional strategies, these results should be viewed as an early snapshot, providing directional indicators rather than definitive counts. Respondents could report across multiple programs, and the survey was not designed to capture student-level enrollment figures.

The findings suggest that compliance requirements prompt meaningful operational decisions across a wide range of programs and professional fields. The remainder of this section explores the early themes that emerged from institutional responses, including the program areas most affected, state-level restrictions and regional patterns, and implications for students and workforce distribution.

## Enrollment Restrictions and Institutional Comparisons

State-specific licensure compliance requirements continue to influence how institutions manage enrollment in professional licensure programs. Roughly one-third of institutions (32%) reported restricting at least one licensure program or limiting enrollment in specific states. Institutions share several challenges, regardless of whether they restrict enrollment, with both groups citing the complexity and variability of state regulations as major barriers. Staffing limitations and workload pressures emerged as universal challenges, as did the difficulty of tracking student location and program eligibility, and the ongoing need for reliable information sources.

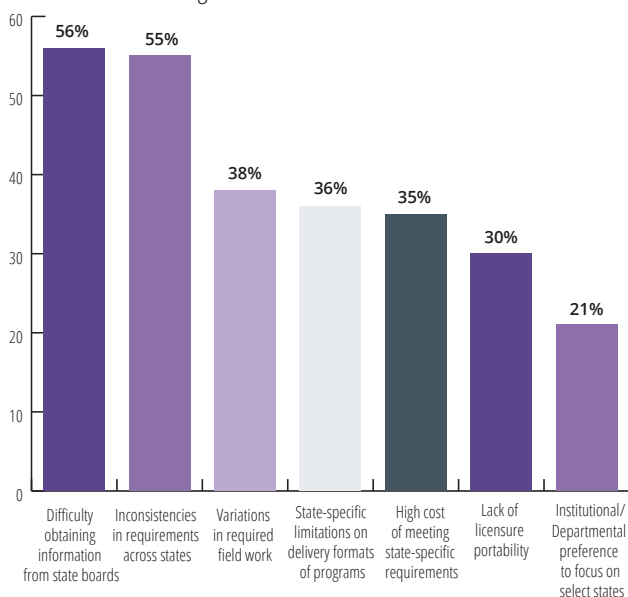
Where institutions that restrict or not restrict enrollment most diverge is their approach to risk management and enforcement. Institutions that restrict enrollment tend to emphasize risk avoidance; specifically, preventing students from enrolling in programs that do not meet state educational requirements. Their strategies often center on

automation and system-level controls, such as application blocks that prevent ineligible enrollments. In contrast, institutions that do not restrict enrollment frequently described their primary challenges as related to information volume, research, and ongoing maintenance. Their strategies lean toward monitoring and communication, including regular reviews, compliance committees, and cross-departmental coordination. Taken together, these findings indicate that institutional approach is more shaped by resource capacity and risk posture. Both strategies are shaped by common pressures and reflect deliberate adaptations to institutional context.

## REASONS FOR RESTRICTIONS

When asked to identify the primary reasons behind enrollment restrictions, institutions pointed to a combination of information gaps, cost burdens, and regulatory inconsistencies. The most common challenge (56%) was difficulty obtaining clear or updated information from state licensing boards, followed closely by inconsistencies in educational requirements across states (54%). Over one-third of the respondents (35%) cited the high cost of meeting state-specific licensing board requirements. Another 36% referenced state-specific limitations on the delivery of licensure programs, particularly those restricting online or hybrid modalities (see **Figure 4.1**).

Reasons for Restricting Enrollment



**Figure 4.1** shows the primary reasons for enrollment restrictions.

For readers interested in a detailed breakdown of the variations in institution type, size, role, workload increase, and disclosure and automation practices of institutions that restrict enrollment and those institutions that do not restrict enrollment, see **Appendix B**.

## Program Areas Most Affected

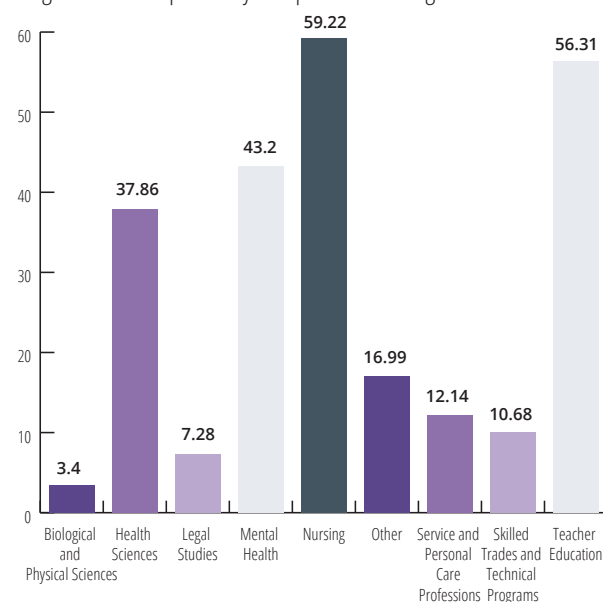
Survey findings indicate that state-specific licensure requirements are shaping institutional decisions about where and how professional programs can be offered, influencing both student access and institutional strategy. Roughly one-third of institutional respondents had implemented at least one restriction across their licensure programs. Most reported doing so selectively, targeting specific states or programs where compliance was deemed unmanageable or risk exposure was too high. While the survey did not capture student-level enrollment data, institutional responses suggest that hundreds of licensure programs across the reporting institutions could potentially be affected by these decisions.

Across institutions, a consistent pattern emerged in the fields most frequently cited as impacted by state-specific licensure compliance burdens, including Nursing (59%), Teacher Education (56%), Mental Health (43%), and Health

Sciences (38%) (see **Figure 4.2**). Among these, Teacher Education programs were frequently subject to enrollment restrictions, with some institutions limiting participation to students in only one state (the institution's home state) or a small number of states. Nursing programs were similarly constrained, primarily due to significant variation in clinical placement, and supervisory and preceptor requirements across jurisdictions. These variations often necessitate program-by-program determinations that can limit multistate offerings.

Beyond these core professional fields, institutions identified challenges across a broad range of other programs, including Professional Accountancy/CPA, Social Work, Engineering, Speech-Language Pathology, Corporate and Continuing Education, Veterinary Technology, Chiropractic, Pharmacy Technician programs, Architecture, Physician Assistant Studies, Dental Hygiene, Midwifery, Real Estate, Fire Science, and Library Technology. This breadth underscores that licensure-related compliance obligations are not confined to a few highly regulated professions but increasingly intersect with a wide array of academic programs.

Programs Most Impacted by Compliance Challenges



**Figure 4.2** shows the percentage of respondents who indicated that the listed programs were most affected by state licensure compliance requirements.

While these findings illustrate which program areas face the greatest compliance burdens, they also raise an important question: *where* are these challenges most concentrated?

## Geographic and Regulatory Patterns of Enrollment Restrictions

To better understand the geographic patterns and implications of these compliance pressures, the survey asked respondents to identify a limited number of states and programs where they have chosen to restrict enrollment. Respondents were not asked to provide a comprehensive list of all restricted states, as doing so could have been too time-intensive and might have discouraged survey participation. Instead, institutions were invited to share three to five examples that best represented their most significant restrictions. Consequently, the findings reflect patterns rather than exhaustive lists, revealing where institutions most often encounter barriers to multistate operation.

### MOST FREQUENTLY RESTRICTED STATES

Even within these limited submissions, clear regional patterns emerged. Institutions reported restricting or considering restricting enrollments in a wide range of states, citing a mix of regulatory complexity, cost, and limited institutional capacity. Certain states were mentioned repeatedly, including California, New York, Texas, Washington, Colorado, Georgia, and Tennessee.

We also observed some trends regionally. On the West Coast (CA, OR, WA), restrictions were frequently cited in Nursing, Teaching Education, and Counseling due to stringent clinical placement and online delivery limitations. In the South (TX, GA, TN, FL), common challenges related to educator preparation and mental health/counseling programs, with varied curricular and practicum standards cited as complications. In the Northeast (NY, NJ), distinct educational prerequisites and complex board-specific processes made compliance difficult, especially for Teacher Education and Counseling programs. Furthermore, respondents reported that in the Mountain/Plains regions (CO, UT, NM, SD, WY), challenges centered around inconsistent requirements for licensure eligibility and limited portability of credentials. Taken together, these findings reveal that enrollment restrictions are not concentrated in one region or profession.

### PRIMARY DRIVERS OF ENROLLMENT RESTRICTIONS

These geographic patterns suggest that institutions face the most significant compliance barriers in states where licensure requirements are complex, differently defined, or difficult to interpret, particularly when compounded by high compliance costs or limited reciprocity. Overall, institutions identified several recurring reasons (see **Figure 4.3**) for restricting enrollment in specific states:

REASON	PERCENTAGE (%) OF MENTIONS	DESCRIPTION/COMMON EXAMPLES
Difficulty obtaining clear or updated information from licensing boards	58%	Commonly cited in California, New York, Washington, and Florida; respondents noted inconsistent guidance and lengthy review processes.
Inconsistencies in educational requirements	56%	Variations in prerequisite coursework, clinical hours, or degree levels (e.g., Colorado, New Mexico, Montana, New York).
Fieldwork or clinical placement discrepancies	36%	Especially relevant to Nursing and Teacher Education programs where supervision and placement rules differ.
Limited licensure portability or reciprocity	36%	Challenges noted in states with unique board processes (e.g., Florida, California, Oregon).
High compliance costs	33%	Concentrated in large states with complex regulations; institutions cited additional staff time and fees.

*Figure 4.3 outlines the primary drivers of enrollment restrictions by frequency and with examples.*

## Implications for Students and Workforce Distribution

Institutions' decisions around professional licensure compliance, including whether to restrict enrollment in certain states, have the potential to carry direct consequences for students, programs, and the broader workforce.

### RISKS, REALITIES, RESPONSES

#### For Institutions

- ▶ **Key programs are most affected.** Nursing, Teacher Education, and Mental Health licensure requirements are particularly complicated. Planning and extra support can help keep these programs running smoothly.
- ▶ **Resources shape decisions.** Some programs are restricting enrollment because of complicated compliance requirements. Staff, tools, and workflows determine whether restrictions are needed. Investing in systems and training can reduce unnecessary limits.

#### For Policymakers

- ▶ **Support institutions, reduce risk.** Rules can limit student opportunity. Complex or inconsistent licensure requirements make it harder for students to enroll across states. Guidance, streamlined processes, and accessible information help schools comply without unnecessarily restricting students.
- ▶ **Institutions want to comply.** Policymakers should consider that resource inequities, not institutional philosophy, drive much of the variation in compliance practices.
- ▶ **High-impact programs are vulnerable.** Nursing, Teacher Education, and Mental Health are most affected—policy adjustments here can prevent bottlenecks in the workforce pipeline.

### ACCESS TO PROGRAMS

State-specific licensure compliance decisions directly affect student access and program participation. Restrictions or

compliance-driven requirements can limit where students can enroll, particularly for those in high-need regions or those pursuing licensure in multiple states. Variability in clinical, fieldwork, or other state-specific requirements may also slow student progress or necessitate supplemental coursework, especially in fields such as Nursing, Teacher Education, and Mental Health programs.

### WORKFORCE DISTRIBUTION

By restricting programs in certain states, institutions may unintentionally concentrate professional preparation in regions with clearer or more navigable regulations. This concentration can influence local and regional workforce availability, affecting the distribution of licensed professionals in high-demand fields. To balance compliance risk with student opportunity, institutions often adopt layered strategies—including selective enrollment, disclosures, attestation processes, and centralized tracking systems. Resource limitations, however, may constrain the scope of these strategies, potentially affecting student access.

It should be noted that avoiding risk and additional workload challenges altogether by taking actions such as limiting enrollment to the host state or only a handful of states will likely unnecessarily exacerbate the already shrinking workforce issue, especially in professional areas. Consider Georgetown University's September 2025 report, [Falling Behind: How Skills Shortages Threaten Future Jobs](#) (Smith, et. al, 2025), which projects that licensed occupations, including nurses, teachers, accountants, engineers, attorneys, and physicians, will face significant skill shortages by 2032.

### Data Parameters and Context

While this study reflects a valuable and timely snapshot of institutional practices related to professional licensure compliance, certain contextual factors and data constraints shape the interpretation of the findings. Because institutional reporting systems for licensure-related data vary widely, many survey questions relied on informed estimates rather than comprehensive institutional counts. The survey did not request student-level or program-level data, focusing instead on institutional perspectives, perceptions, and operational approaches. As such, the results provide meaningful directional insight into how institutions manage compliance, rather than an exhaustive census of affected students or programs. Nevertheless, preliminary patterns provide useful

context for observing potential impacts in states or professional fields where enrollment decisions could shift.

The longer-term implications of enrollment restrictions and compliance practices, such as potential effects on student access, licensure attainment, and workforce distribution, are still emerging. The survey captures a point in time when institutions are actively adapting to regulatory changes, and continued monitoring will be essential to understand how these adjustments influence student and workforce outcomes over time.

Institutions are approaching these challenges with a combination of staffing, operational systems, and process workflows to manage complex and variable licensure requirements. The next section explores emerging institutional trends and practices, including how institutions are evolving their compliance infrastructure in response to an expanding regulatory landscape.



# INSTITUTIONAL STRATEGY AND PRACTICE

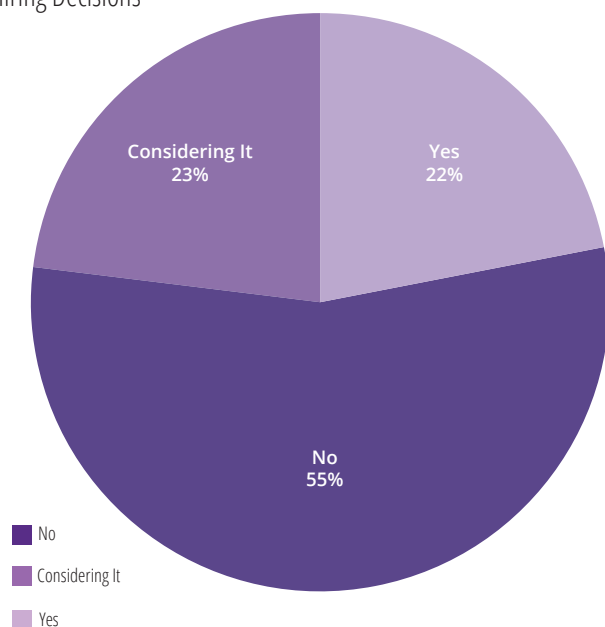
## Introduction

As noted in Section 3, 85% of the respondents indicated a significant or moderate workload increase with most (65%) acquiring 1-10 hours of additional work per week and others adding upwards of 20 hours of additional work. The 2024 regulations generated additional work in multiple areas of compliance work. For some, “All these requirements are burdensome.” This section will show how institutions have turned to a variety of strategies to manage the expanded compliance demands created by the 2024 regulations. This section analyzes how institutions interpret, operationalize, and sustain compliance.

## Hiring Additional Staff

Despite the increased workload, often resting on a single staff person, only 22% of those institutions reported hiring additional staff (see **Figure 5.1**). Another 23% were considering it. More than half (55%) did not hire additional staff. Comments clarify, however, that a decision not to hire additional staff should not be interpreted as meaning

Hiring Decisions



**Figure 5.1** showing types of hiring decisions.

**A decision not to hire additional staff should not be interpreted to mean that additional staff are not needed; resource limitations and competing priorities, perhaps more prevalent among smaller institutions, often contribute to the decision not to hire.**

While sample sizes slightly skew the data, detailed analysis suggests differences between these groups. For example, institutions that hired staff tend to be larger-sized institutions (10,000 or more students) and offer more licensure programs. Of the institutions considering hiring staff, it is split between large and small institutions. Nearly two-thirds (65%) of the institutions that did *not* hire are smaller. For more information on hiring decisions by type of position, institution, and institution size, please see **Appendix C**.

Comments indicate that in many institutions, especially smaller ones with fewer than 10,000 students, resource limitations and competing priorities prevent acquiring help, even if the regulations have led to “additional workload on a team of one.” For example, one respondent noted:

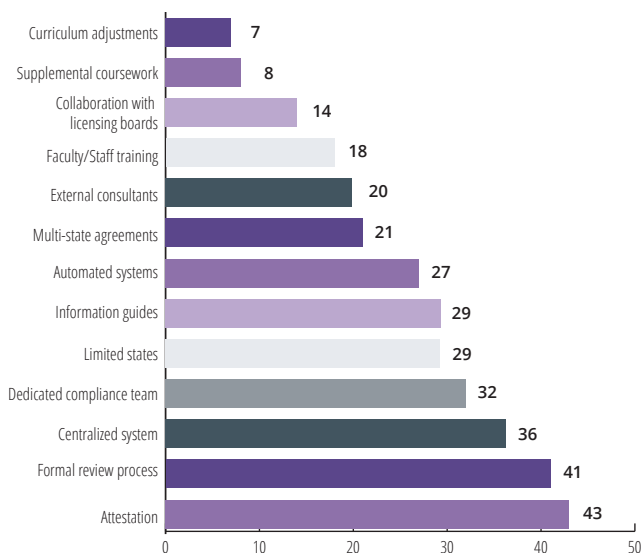
*“The only reason we have not hired additional staff to support this effort is there is no budget for it. As a result, it is placed as additional workload on a team of one.”*

## Strategies for Dealing with Differing State Requirements

Respondents were asked to identify specific strategies they use to address the variation of licensure requirements across states by selecting from a list of fourteen different strategies. The most frequently selected options were (1) offering the opportunity for students to submit an attestation in applicable situations (43%); (2) creating a process for regularly reviewing and updating licensure information (41%); (3) implementing a centralized system for documenting research (36%); and (4) establishing a dedicated team or individual responsible for licensure compliance (32%) (see **Figure 5.2** for the complete list).



### Frequency of Institutional Response to Differing State Requirements



**Figure 5.2** shows what percentage of institutions are enacting each response to differing state requirements.

Many comments describe frustrated staff who are too overburdened to implement all the strategies required to support an effective compliance effort. For example, one respondent noted:

*"We should be doing many of the things listed above but with very limited capacity it is very difficult."*

### Method Used to Make Program Status Decisions

The new federal regulations heighten institutional anxiety around the risk of misinterpretation and non-compliance. For institutions, the risk seems even greater when making determinations for programs in complex fields such as nursing or teacher education.

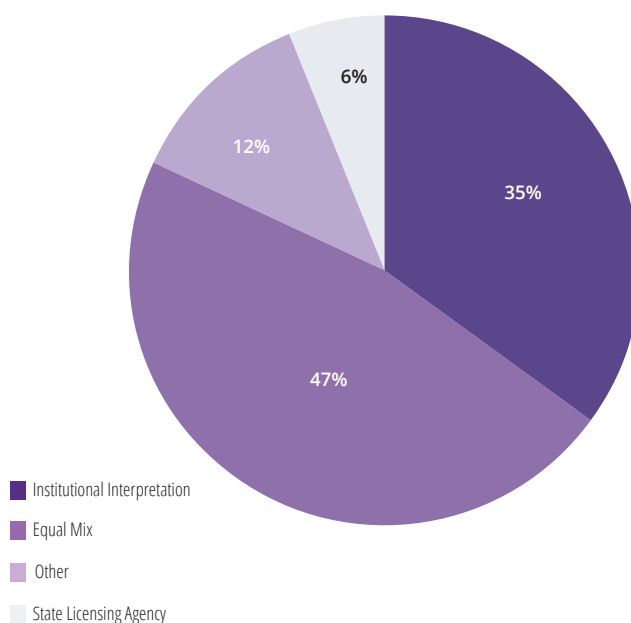
#### Interpretations Matter!

Institutions handle rules differently—leaders need to make sure staff have support and clear guidance.

Confirmation from a state licensing authority is the best method for ensuring that an institution's licensure program meets the state's licensure requirements. However, only 6% of the institutions reported depending on that approach (see **Figure 5.3**). As noted previously, some institutions report that communication with the licensing organizations is often challenging. Licensing agencies are themselves often understaffed and therefore "slow to respond" or even unresponsive. Information provided may be unclear.

Instead, about one third (35%) of the institutions rely primarily on their own interpretation of state regulations. Some require individual programs to conduct their own research, while others centralize reporting based on program input. Academic units and compliance teams often collaborate on these interpretations. However, the largest portion of the institutions (47%) report using a mixed approach, i.e., relying on their own interpretation of the licensure requirements and seeking confirmation from a state licensing organization. For some, "confirmation" is simply referring to the entity's website. Some institutions leverage third-party tools and other resources to conduct preliminary research, support internal determinations, and cross-check data found by internal staff or provided by state agencies.

### Percent of Institutions Using Program Determination Method



**Figure 5.3** showing program determination methods by percent of institutions.

While in general, institutional size or type have little effect on which method is used, data suggest that two-year public institutions and those with fewer than 10,000 students are somewhat more likely than other sized and type institutions to depend on state agencies for program determinations. The data provides no clear explanation of why these groups are more likely than other groups to use this method.

## Disclosure Processes

Per the federal regulations, institutions must make specific information about their licensure programs publicly available: a list of states and territories where the institution has determined whether a program meets or does not meet educational requirements for licensure. If the program does not meet all of the requirements in a state or territory in which a prospective student is located at time of enrollment, the institution must directly notify a prospective student that the institution cannot enroll them in the program unless the prospective student attests that they plan to seek employment in a state or territory in which the program does meet the requirements. Institutions must also directly notify *currently* enrolled students if the institution no longer meets the requirements in the student's state or territory or whether the student has relocated to a state or territory in which the institution's program does not meet the requirements; in this case, the student can remain enrolled.

To effectively comply with the regulations, institutions must develop processes and procedures that enable those in compliance roles to acquire the necessary state information and student data, make required information publicly available, identify prospective students whose location prohibits enrollment, identify enrolled students whose program no longer meets requirements in the student's current location, and directly notify both prospective and enrolled students. If the institution elects to use a student attestation, it must develop processes and procedures around that option as well. Institutions must make determinations based on current state licensure requirements.

Developing these processes and procedures requires collaboration across multiple institutional units; the design, development, and management of multiple processes; regular monitoring of state/territory licensure requirements; and constant evaluation of student location. To understand institutions' practices around disclosure, the survey asked respondents to indicate the presence of public and direct

disclosure processes at their institutions, use of the optional student attestation, and the breadth of associated collaborative efforts.

## PUBLIC DISCLOSURE PROCESS

Ninety-three percent (93%) of the respondents who were asked if their institution has a public disclosure process reported that their institutions do. Two percent (2%) reported they did not have one, while 6% reported not being sure if they did. The data suggests that, to some extent, the respondent's position, type of institution, and institutional size influence the responses.

While 100% of respondents in compliance roles reported that their institutions have a public disclosure process, 12% of those in non-compliance positions reported that they are not sure if their institutions have a public disclosure process. Similarly, ninety-eight percent (98%) of institutions with more than 20,000 students report having a public disclosure process while 84% of those with fewer than 1,000 students report having one; notably, 11% of those with fewer than 1,000 students report not being sure.

While a large majority of all institutions report having a public disclosure process, slight variations exist among the type of institution. One hundred percent of the private for-profit institutions report having a public disclosure process, while 6% of the two-year publics do not have one, and similarly small percentages of the two-year publics (6%), four-year publics (6%) and private non-profits (3%) were "not sure" if their institutions have one.

## DIRECT DISCLOSURE PROCESS

Overall, 77% of the respondents reported having a direct disclosure process while 8% reported not having one. Interestingly, while only 6% of the group reported not being sure if their institutions have a *public* disclosure process, more than twice that percentage (15%) reported not being sure if they have a *direct* disclosure process. As with the presence of a public disclosure process, the data suggest that, to some extent, the respondent's position, type of institution and institutional size influence the responses. Respondents in non-compliance positions are even less likely to know if their institution has a direct disclosure process than knowing about a public process. Four-year public institutions are the most likely to have one in place; only 3% report not having one. The largest institutions are much more likely to have a

direct disclosure process in place: 88% of institutions with 20,000 or more students reported having one. For more information on the impact of the respondent's position, type of institution, and institutional size on the direct disclosure process, please see **Appendix C**.

### SYSTEMS AND UNITS INVOLVED IN THE DIRECT DISCLOSURE PROCESS

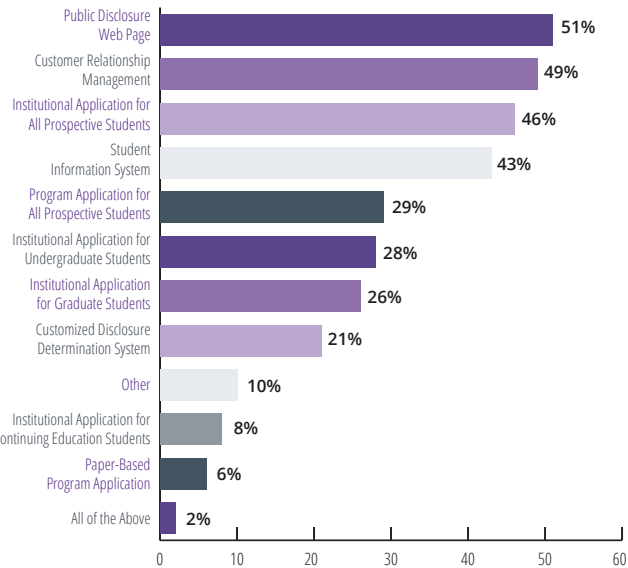
At minimum, the direct disclosure process requires access to a variety of data and subprocesses that the responsible unit must use to determine if a disclosure is warranted and to create and deliver the disclosure directly to the student. Those data and subprocesses are typically associated with various systems which are often managed by various campus units. An institution's organizational structure, extent of centralization, degree of access restrictions and other factors dictate the number of systems and units involved in the direct disclosure process.

Those responsible for compliance must have adequate time and the appropriate skills and knowledge to identify all data necessary to accomplish compliance tasks, determine which systems and units must be involved, and collaborate effectively to develop efficient and effective supporting processes. Collaborative tasks might involve identifying requirements, redesigning existing processes, granting restricted access privileges to systems and data, and testing new processes.

### SYSTEMS

Survey respondents were asked to identify both the systems and the units involved in their institution's direct disclosure process. The "systems" list included ten systems, including a paper-based program application. The five most frequently selected options include Centralized Public Disclosure Website (51%), Customer Relationship Management (49%), Institutional Application for All Prospective Students (46%), Student Information System (43%), and Program Application for All Prospective Students (29%) (See **Figure 5.4** for the complete list.) Only 6% of the group selected, "Paper-based program application."

Systems Used in Direct Disclosure Process

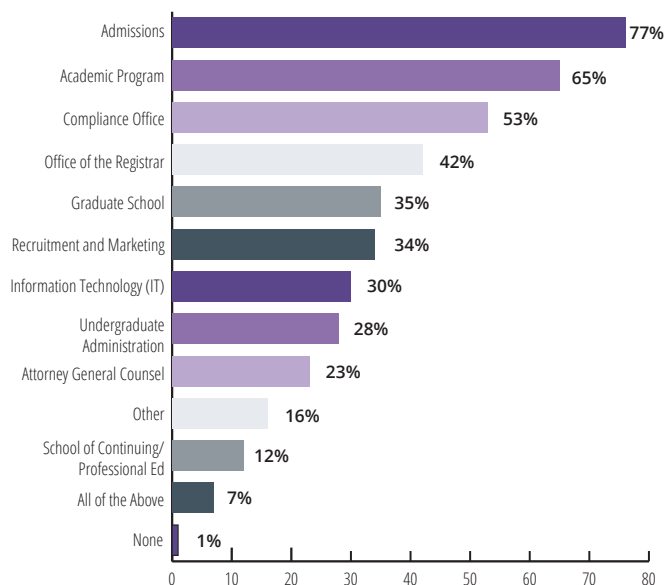


**Figure 5.4** showing the systems used in direct disclosure process.

### UNITS

Survey respondents were then asked to identify the campus units involved in their institution's direct disclosure process by selecting one or more from a list of ten units. As shown in **Figure 5.5**, the five most frequently selected options include Admissions (77%), Academic Program (65%), Compliance Office (53%), Officer of the Registrar (42%), and Graduate School (35%). Twenty-six respondents listed other units involved in the direct disclosure process, including online learning, institutional effectiveness, financial aid, advising, academic affairs, and more.

### Units Involved in Direct Disclosure Process



**Figure 5.5** shows the units involved in direct disclosure process.

## AUTOMATION

Computer automation involves moving work from people following procedures to computer hardware following instructions built into software. Automating the often tedious and time-consuming work of compliance can enhance efficiency, increase accuracy, and improve communication with students and among institutional collaborators. However, the process of developing automated business processes and supporting systems requires considerable time and costs, coordination among multiple units, specialized skills, and administrative support.

For some institutions, the scarcity of appropriate resources limits their ability to automate direct disclosures or other compliance tasks. Other institutions might determine that little benefit can be gained from automating their disclosure process. The current research considered only the degree of automation integrated into the direct disclosure process; it did not explore to what extent an institution might benefit from it. The degree of *need* for process automation is an area for further exploration.

Survey respondents were asked to select from a list of five options the most fitting description of the level of automation built into their institution's direct disclosure process. Options ranged from "Fully Manual Tasks" to "Fully Automated Tasks."

Responses show that a "mostly manual" direct disclosure process is most common across all institutions, but only slightly more so than an "equal combination of manual and automated tasks." "Fully automated tasks" is the least common level of automation used; only 6% of the institutions report using a fully automated direct disclosure process. For more information on the impact of the respondent's position, type of institution, and institutional size on the institution's automation processes, please see **Appendix C**.

## A CAUTION

Despite the benefits of task automation, respondents cautioned that even when the direct disclosure process is "fully automated," manual reviews of data, disclosures, attestations, and other output are sometimes required, especially around unique circumstances. All automated systems require some degree of human intervention and oversight. Efforts to estimate human resource needs should consider this reality of automation, regardless of its breadth and level of sophistication.

### Automation helps but does not replace people.

Most institutions are only partially automated. Leaders should invest in smart automation while keeping manual oversight where needed.

# CONCLUSION & RECOMMENDATIONS

This report provides an early snapshot of how institutions are adapting to the requirements of professional licensure compliance following implementation of the 2024 federal certification procedures. The findings suggest that institutions are encountering notable operational challenges in interpreting and implementing both federal and state-level requirements amidst the newly added pressures of certifying that programs meet educational requirements in all states where students are located at the time of initial enrollment.

The regulatory burden described by respondents extends beyond staff hours. Institutions reported difficulty interpreting unclear or inconsistent policies, navigating conflicting guidance, and reconciling differing state-specific licensure rules. These challenges may influence decisions about student enrollment or program availability, particularly in highly regulated fields such as Nursing, Teacher Education, and Mental Health. As one respondent explained:

*“Our state licenses over 200 programs. Many schools and departments have decided there is no possibility of properly researching requirements for states other than our own, which has dire implications for our ability to support out-of-state students.”*

While the findings highlight common patterns, such as workload intensity, regulatory ambiguity, and varying institutional capacity, they should be interpreted as baseline insights rather than comprehensive conclusions. The data provides an important starting point for tracking trends, identifying pain points, and informing both practice and policy. Continued monitoring will be important to understand how these policies influence student access, licensure attainment, and workforce distribution over time. Future research could expand on this foundation by incorporating more precise student- and program-level data, surveying state licensure boards, and tracking longitudinal outcomes to evaluate the effectiveness of institutional strategies. Automation may offer partial relief, but the complexity of managing multi-jurisdictional compliance will remain a defining feature of this work.

## Recommendations for Institutions & Policymakers

The survey findings and interviews highlight both the operational burdens institutions face and the systemic challenges rooted in state and professional regulatory structures. Addressing these issues requires action at multiple levels. Institutions can take steps to strengthen internal processes, allocate resources more strategically, and improve communication with students, while policymakers have an opportunity to reduce unnecessary complexity and better align federal and state licensure requirements with the realities of higher education. The following recommendations are organized accordingly.

### FOR INSTITUTIONS:

Survey responses indicate that many institutions continue to navigate professional licensure compliance with limited capacity and uneven resource allocation. Recommendations for institutions therefore center on strengthening infrastructure, distributing workload among multiple roles and teams, and fostering long-term sustainability. These approaches require strategic leadership and cross-unit collaboration to ensure compliance systems can endure personnel transitions and evolving regulatory demands. Institutions might consider:

- ▶ Conducting workload assessments and reviewing staffing models to better understand where responsibilities are concentrated. Where possible, reallocate or expand staff capacity to balance workload and maintain coverage during staff transitions or absences.
- ▶ Building shared responsibility and continuity frameworks that distribute compliance functions across multiple roles. Shared responsibility and process documentation not only improve efficiency but also support succession planning to ensure continuity if key personnel change.
- ▶ Embedding compliance awareness within the broader institutional culture, engaging faculty, program directors, and administrators as shared stakeholders in licensure-related processes.

- ▶ Prioritizing clear, proactive communication with students to help prevent program access disruptions and guide academic planning in regulated programs. Consistent messaging also strengthens institutional credibility and student trust.
- ▶ Developing or acquiring technological tools and systems that automate disclosures, track student locations, and centralize licensure data. Well-designed systems not only improve efficiency but also make it easier for future staff to maintain compliance continuity.
- ▶ Participating in peer networks or communities of practice to exchange tools, templates, and lessons learned. This can be especially valuable for smaller institutions seeking scalable approaches and support structures that mitigate the risks of limited staffing.

## FOR POLICYMAKERS:

Institutions alone cannot address the structural and regulatory challenges inherent in professional licensure compliance. Many barriers stem from misalignment between federal institutional requirements and state licensure processes, rather than intentional complexity. Recommendations for policymakers therefore emphasize improving coordination, transparency, and consistency, while preserving the core purpose of professional licensure which is public and consumer protection:

- ▶ At the state level: Continue safeguarding public protection through appropriately rigorous standards while exploring ways to clarify and align state-specific requirements. Greater consistency in how educational requirements are defined, reviewed, and documented across states can reduce confusion for both institutions and students without diminishing quality.
- ▶ At the federal level: Evaluate opportunities to better coordinate institutional compliance requirements with the realities of state licensing processes. This could be done by ensuring diverse representation in rulemaking and policy development processes. These could include voices from state licensing boards, institutional compliance professionals, and other practitioners that can bridge the gap between policy design, implementation realities, and illuminate unintentional barriers that could arise.
- ▶ At the federal level: Acknowledge the corresponding impact on state licensing boards. When requirements are not fully aligned with state processes, licensing boards may experience a surge in institutional inquiries seeking clarification or confirmation of program eligibility. Many boards are not resourced or authorized to manage this volume of requests and may be legally limited in the types of responses they can provide. This can strain staff capacity, delay responses, and inadvertently create tension between institutions and state regulators.
- ▶ Across both levels: Assess the effectiveness of existing institutional requirements before expanding or redesigning them. The prior federal disclosure regulations were in place for only a brief time before the certification procedures requirements relating to professional licensure programs were introduced. Conducting evidence-based evaluations can help ensure future regulations are targeted, feasible, and grounded in measurable impact. These evaluations could cover a review of institutional compliance data, student understanding of disclosures, and other outcomes from prior rulemakings.
- ▶ Across both levels: Support portability and reciprocity mechanisms that enable qualified graduates to pursue licensure in multiple states. This could include expanding participation in interstate compacts, promoting model standards, or developing alternate pathways to licensure for graduates from out-of-state or online programs.
- ▶ Across both levels: Consider the downstream impact of policy design on institutional resources, student access, and state capacity. Regulatory approaches that provide clear definitions and consistent expectations help institutions plan effectively and maintain compliance without compromising student opportunity.
- ▶ Across both levels: Encourage structured collaboration between regulators, professional associations, and institutions to streamline processes and share best practices that uphold quality while easing procedural burden.



These recommendations highlight that effective professional licensure compliance depends on shared understanding and coordination across all levels to ensure that well-intended policies translate into practical, sustainable outcomes for students and regulators alike. Institutions can improve internal processes and communication, but meaningful progress will depend on policy frameworks that are coherent across jurisdictions and informed by data-driven evidence of what works.

## Questions for Future Research/ Monitoring

Clarifying how compliance operates in practice will be key to building more sustainable systems and informed policy decisions. The findings of the survey and interviews surface several questions that warrant deeper study:

- ▶ Staffing models and sustainability: Which staffing and resource allocation models best sustain compliance without overburdening staff? How do these models function at institutions of varied sizes and missions?
- ▶ Technology, automation, and human oversight: What tools and platforms are most effective at reducing manual burden without compromising accuracy? How do institutions evaluate and sustain these systems over time? As automation and AI tools become more common, how can institutions balance technological efficiency with the necessary human oversight to ensure accuracy, interpretation, and accountability?
- ▶ Understanding compliance complexity: How can future research address misconceptions about the time, expertise, and cross-departmental coordination required to maintain compliance? What data or case studies could help illustrate the operational realities to policymakers, institutional leaders, and other stakeholders?
- ▶ Student impact: How do compliance demands affect student enrollment, access, and progression, especially for online or border-state students? How do disclosure practices affect students' decision-making and progression into licensed professions?
- ▶ Institutional engagement: What strategies successfully engage institutional stakeholders in compliance work? How do institutions foster buy-in and reduce resistance?
- ▶ Policy adaptation: As policy evolves at both state and nationwide levels, how are institutions adapting their compliance structures?
- ▶ Equity and access: How do disparities in institutional capacity affect which students and programs remain available across states? What mechanisms can ensure that compliance obligations do not unintentionally narrow opportunity?

By posing these questions, this report establishes areas that future studies, collaborations, and policy evaluations can build upon. Answering them will require not only additional data but also continued dialogue between institutions, professional associations, regulators, and students.

## SHARED SUCCESS STARTS HERE

### FOR INSTITUTIONAL LEADERS

#### **Build for the Long Game**

Design compliance systems that evolve with regulations and blend smart automation with human judgment.

#### **Invest in People, Not Just Processes**

Prioritize staffing, training, and clear workflows to prevent burnout and maintain continuity.

#### **Communicate Early and Often**

Keep students informed to promote transparency and protect their access to programs.

#### **Collaboration Is Your Safety Net**

Use peer networks and cross-campus partnerships to share solutions.

### FOR POLICYMAKERS

#### **Simplify the Rulebook**

Align and clarify regulations across jurisdictions to reduce unintended barriers.

#### **Make Mobility Possible**

Support licensure portability through compacts, model standards, and other flexible pathways.

#### **Consider Real-World Impact**

Look beyond legal text to how rules affect institutional capacity, student access, and workforce needs.

#### **Create Space for Collaboration**

Promote structured dialogue among regulators, institutions, and associations to streamline requirements.

## Conclusion and Next Steps

This report offers a foundation for understanding the multifaceted impact of federal and state professional licensure compliance on institutions, students, and regulators. As online and cross-border education grows, and both state and federal oversight intensify, the need for sustainable and coordinated compliance structures becomes even more critical. Beyond ensuring access to professional pathways, the realities of workload balance, staffing continuity, and succession planning must be addressed to preserve institutional capacity and prevent compliance gaps when personnel or priorities shift. Sustained investment, policy clarity, and collaboration among stakeholders are key to ensuring compliance processes remain both effective and durable.

Moving from early insights to sustained understanding will require ongoing data collection, broader institutional participation, and stronger alignment between institutional practices and regulatory frameworks. As policies evolve, ongoing monitoring will help identify where compliance requirements enhance or restrict student mobility and where they may create unintended challenges for institutions or regulators.

Through continued dialogue, shared resources, and collaborative inquiry, the higher education community can move toward a compliance ecosystem that is proactive, coordinated, and student-centered but also resilient and capable of supporting both regulatory integrity and institutional stability over time.



# ADDITIONAL DATA ON COMPLIANCE WORKLOAD IMPACT (SECTION 3)

## Purpose of This Appendix

This appendix provides supplemental data tables, figures, and descriptive details referenced in Section 3: Compliance Workload Impact. These additional breakdowns illustrate the variation in workload increases by institution type, size, and role, and they offer insight into how specific institutional characteristics shape the scale and perception of compliance-related workload changes.

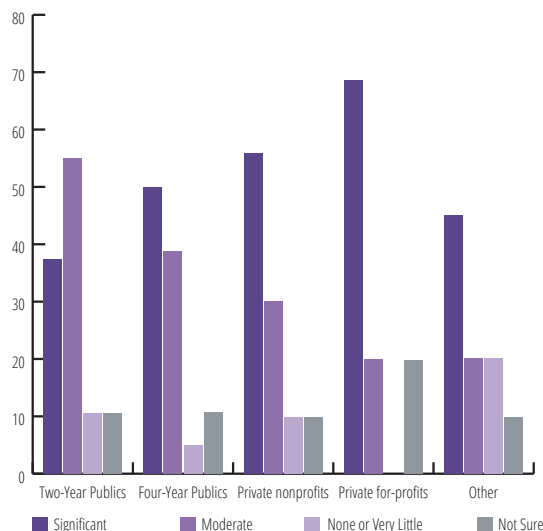
## A.1 Differences by Institution Type and Size

The tables below detail how reported workload increases varied across institution types and sizes.

### PERCEIVED INCREASE BY INSTITUTION TYPE

All types of institutions experienced increases, though to varying degrees. Private for-profits were most likely to describe a significant increase (68%), albeit with a small sampling size, while two-year publics most often reported moderate increases (54%) (see **Figure A.1.1**).

Perceived Workload Increase by Institution Type



**Figure A.1.1** showing average weekly hourly increase for those who reported a significant increase in workload.

### PERCEIVED INCREASE BY INSTITUTION SIZE (FTE ENROLLMENT)

Except for institutions with 1,000–2,999 students, a slight majority of all institution sizes reported a significant increase in workload compared to moderate or minimal change.

- ▶ Smallest institutions (<1,000 students): 55% reported a significant increase — the highest of any group.
- ▶ Mid-sized institutions (1,000–2,999 students): evenly split (37% significant, 37% moderate).
- ▶ Large institutions (10,000–19,999 students): most likely to report significant increases.
- ▶ Largest institutions (20,000+ students): nearly evenly divided (49% significant, 45% moderate).
- ▶ Mid-sized institutions overall (1,000–9,999 students): twice as likely as others to report being “not sure” about workload changes, possibly indicating unclear lines of responsibility or ongoing process adjustments.

## A.2 Estimated Additional Weekly Work Hours

The following data outlines how compliance workload, and the estimated additional weekly hours of workload, compare across institutional size, type, and program portfolio. Similar data is shared showing how perceived workload increases compared to estimates of hourly workload increases.

### INSTITUTIONAL SIZE

The number of hours of workload generally increased with institution size, but not always.

- ▶ Almost half (45%) of those with fewer than 1,000 students estimated three or fewer additional hours per week, while institutions with 10,000 or more students were the most likely to report 16-20 or 21 or more hours of additional work per week.

- ▶ However, while the data show a general trend, they also show that many institutions of many sizes estimate a wide range of additional work hours.
  - For example, 39% of the institutions with fewer than 1,000 students estimated adding an average of 7-15 or 21 or more workload hours per week.
  - Twenty-one percent (21%) of the institutions with 20,000 or more students estimated only 1-3 hours of additional work.

Some notable results emerged when institutional type and size were viewed together.

- ▶ Of all four-year public institutions reporting twenty-one or more additional hours, 47% have 20,000 or more students. However, 27% have only 3,000-9,999 students.
- ▶ Private, non-profit institutions reported variability across sizes.
  - While most small private non-profit institutions (<1,000 students) estimated fewer than an average of 7 additional hours, one estimated up to 21+ hours/week of additional work.
  - The private non-profits with 3,000-9,999 students estimated anywhere from fewer than 1 hour/week to 21 or more hours of additional work.

## LICENSURE PROGRAM PORTFOLIO

Data suggest a somewhat positive relationship between the number of programs offered and the number of hours added to the workload.

- ▶ Of those institutions offering from 1 to 10 and 16-20 programs, more than 70% estimated from less than 1 hour to 6 hours of additional work per week.
- ▶ Of those offering 21-40 programs, approximately 63% reported 7 to 21 or more additional hours of work per week.
- ▶ Of those offering 41 to 50 or more programs, 80% reported seven to more than 21 hours of additional work per week.
- ▶ Twenty-five percent of the institutions offering more than fifty programs reported 21 or more hours of additional work.

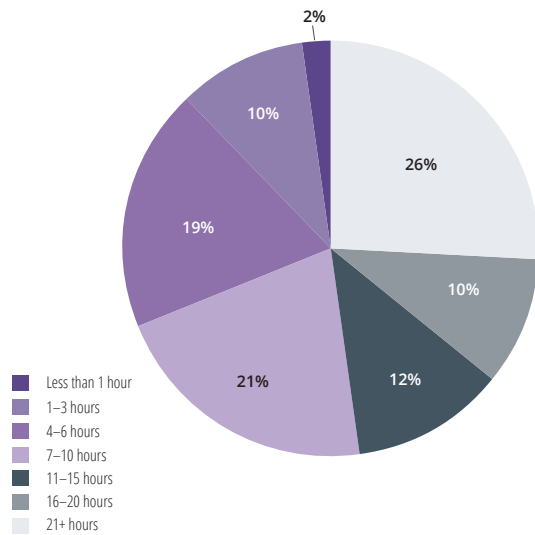
- ▶ Notably, of the institutions offering 11-15 programs, 48% reported from less than 1 hour to 6 hours of additional work and 51% reported 7 to 21 or more hours of additional work.

## HOW PERCEIVED WORKLOAD IMPACT COMPARES TO HOURLY INCREASES IN WORKLOAD

While data indicate some degree of relationship between institutional characteristics and perceptions of workload, upon closer inspection we found a bit of a mismatch between perception of workload and the actual hours. What feels significant to one may not to another, i.e., a few hours of additional work per week might feel minor to someone already devoting many hours to compliance whereas someone who typically spends just one hour per week on licensure-related tasks may consider a similar increase substantial. For example:

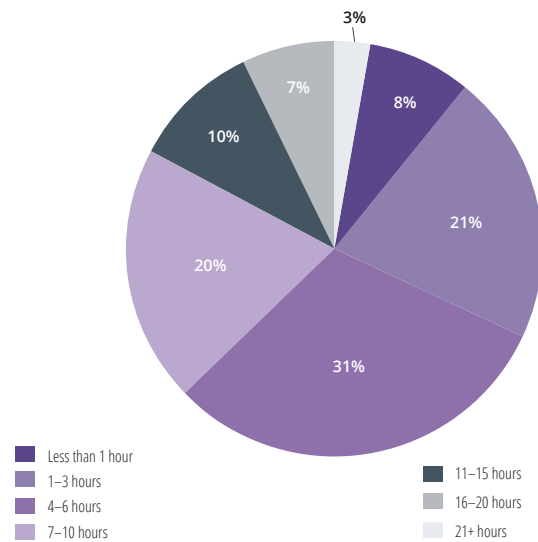
- ▶ Some institutions reported a significant impact but estimated an average of fewer than 3 hours of additional work per week (see **Figure A.2.1**) while others considered 21 or more hours a “moderate” increase in workload (see **Figure A.2.2**).
- ▶ Between institution types, we observed that two-year public institutional perceptions generally aligned with hours, whereas private nonprofit institutions showed wider variations.
- ▶ Larger institutions reported both higher perceived workloads and higher hours overall. However, of the institutions with 3,000-9,999 students that considered the workload increase significant, slightly more than 50% of that group reported an increase of 4-6 hours (32%) while 23% reported an increase of 21 or more hours per week.

Hourly Reports by Institutions Reporting Significant Increases



**Figure A.2.1** shows average weekly hourly increase for those who reported a significant increase in workload.

Hourly Reports by Institutions Reporting Moderate Increases



**Figure A.2.2** shows average weekly hourly increase for those who reported a moderate increase in workload.

# ADDITIONAL DATA ON ENROLLMENT RESTRICTIONS AND PROGRAM AVAILABILITY (SECTION 4)

## Purpose of This Appendix

This appendix provides supplemental data tables, figures, and descriptive details referenced in Section 4: Enrollment Restrictions and Program Availability. These additional breakdowns illustrate the variations in institution type, size, role, workload increase, and disclosure and automation practices of institutions that restrict enrollment and those institutions that do not restrict enrollment.

## B.1 Institutional Characteristics/ Practices of Those Restricting Enrollment

Among respondents who indicated that their institution restricts enrollment in one or more programs or states, several clear demographic and operational trends emerge.

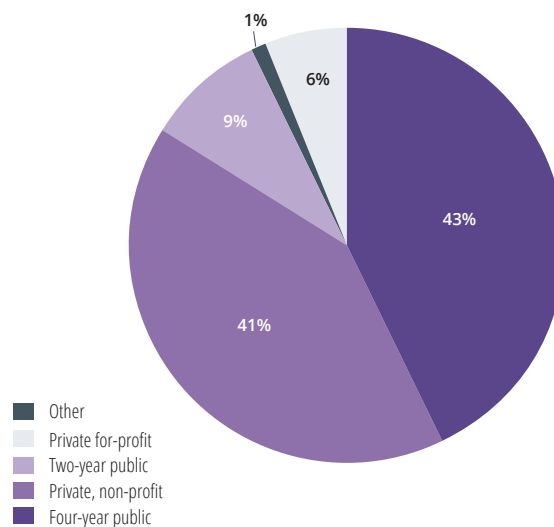
### RESPONDENT ROLE AT THE INSTITUTION

Most respondents (72%) representing these institutions that restrict enrollment held positions directly related to state authorization or distance education compliance.

### TYPE OF INSTITUTION

The largest share of institutions reporting enrollment restrictions were four-year public (43%) and private nonprofit institutions (41%) (see **Figure B.1.1**).

Types of Institutions That Restricted Enrollment



**Figure B.1.1** shows the types of institutions that restricted enrollment.

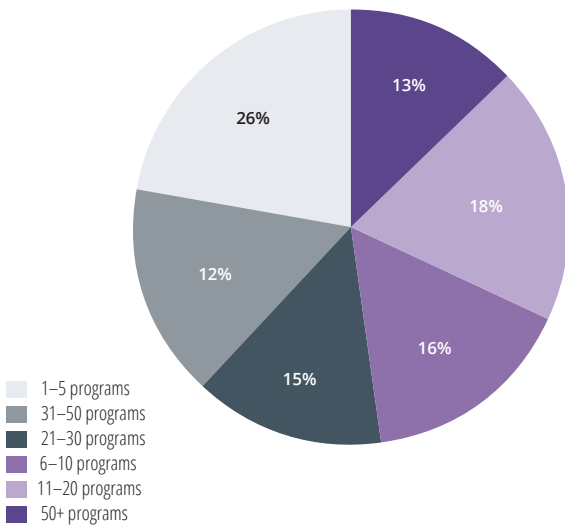
### INSTITUTION SIZE

Enrollment restrictions were most common among those enrolling 3,000–9,999 students (27%), 10,000–19,999 students (20%), and 20,000 or more (30%). Institutions under 3,000 student FTE accounted for fewer than 25% of those restricting enrollment.

### LICENSURE PROGRAM PORTFOLIO SIZE

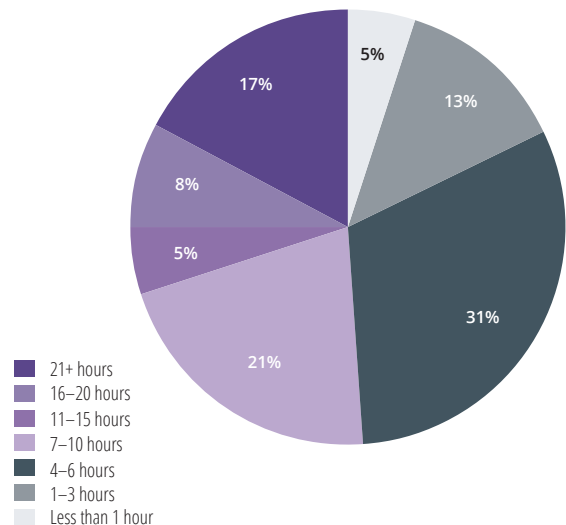
Institutions implementing restrictions also tend to manage a large portfolio of licensure programs. A majority (57%) reported overseeing eleven or more licensure programs, with 13% offering more than fifty. A small subset of smaller institutions restricted enrollment despite offering only a handful of licensure programs. In terms of student reach, the most frequently reported professional licensure program enrollment range was 501–1,000 (26%) followed closely by 1,000–2,999 students (25%) (see **Figure B.1.2**).

Licensure Program Portfolio Size of Institutions that Restrict Enrollment



**Figure B.1.2** shows the licensure program portfolio size of institutions that restrict enrollment.

Magnitude of Workload Increase



**Figure B.1.3** shows the magnitude of weekly workload increases.

## WORKLOAD INCREASE

The institutions that reported restricting enrollment overwhelmingly described sharp increases in compliance-related workload tied to the U.S. Department of Education's certification procedures. Nearly all institutions that restricted enrollment reported increased workload since the certification procedures took effect. Just over one-quarter of respondents reported increases of 16 or more hours per week. Another 52% indicated moderate increases of 4–10 hours weekly (see **Figure B.1.3**). These findings illustrate the depth of the compliance challenge that led many institutions to adopt restrictive enrollment strategies.

## DISCLOSURE, ATTESTATION, AND AUTOMATION PRACTICES AMONG INSTITUTIONS RESTRICTING ENROLLMENT

Among institutions that restrict enrollment, these limits operate within a larger compliance framework emphasizing transparency and accuracy. The sections that follow examine how these institutions use disclosures, attestations, and automation to support that framework.

### PUBLIC AND DIRECT DISCLOSURE PROCESSES AND STUDENT ATTESTATION PRACTICES

Nearly all respondents that restricted enrollment confirmed that their institution maintains a web-based public disclosure process for licensure programs and that the institutions maintained a process for direct disclosures to prospective students.

These institutions diverged in their use of student attestation processes. Approximately 59% of respondents reported using attestations. Those not using attestations provided several rationales. Many viewed attestations as too resource-intensive to implement effectively, while others cited legal or regulatory risk. Several respondents indicated that their institution deemed it safer to restrict enrollment

entirely rather than manage attestations for students in restricted states.

## **AUTOMATION AND SYSTEM INTEGRATION**

Institutions' direct disclosure workflows also vary in automation and integration. Only about 8% of respondents reported fully automated systems. Another 23% described their processes as mostly automated, often requiring minimal human oversight once student location data are verified. The largest group (approximately 38%) indicated a balanced mix of manual and automated steps, such as automatically flagging students by location while still requiring staff review and final communication. Meanwhile, roughly 30% of institutions continue to rely primarily or entirely on manual workflows, preparing disclosures individually and tracking compliance activity by spreadsheets and other manual tools. Respondents frequently cited resource limitations as a barrier to greater automation.

## **B.2 Institutional Characteristics of Those Not Restricting Enrollment**

Institutions that did not restrict enrollment in professional licensure programs represented a diverse range of roles, sizes, and institutional types. The findings show that institutions not restricting enrollment continue to face substantial and growing compliance workloads, shaped by institutional size, program count, and staffing structure.

### **RESPONDENT ROLE AT THE INSTITUTION**

Approximately 41% of respondents from institutions did not restrict enrollment were dedicated state authorization or distance education compliance professionals. Another 13% were senior academic leaders, such as provosts and chief academic officers. A small percentage represented online learning administrators. The remaining other respondents included faculty, deans, institutional research and accreditation staff, registrars, instructional designers, and other administrators. State authorization and distance education staff most often reported moderate to significant increases—typically 1-3 or 4-10 additional hours per week.

### **TYPE OF INSTITUTION**

Non-restricting institutions represented a mix of four-year publics (39%), private nonprofits (31%), two-year publics

(23%), and private for-profits (2%); 5% categorized themselves as "other."

### **INSTITUTION SIZE**

Most reported FTEs (full-time equivalent student enrollments) of 1,000-2,999 (23%); 3,000-9,999 (28%); and 20,000 or more (21%).

### **LICENSURE PROGRAM PORTFOLIO SIZE**

Institutions that do not restrict enrollment reported a wide range of professional licensure program portfolios. The largest share (38%) offered 1-5 programs, typically institutions enrolling between 100-999 students.

### **WORKLOAD INCREASE**

Even institutions that did not restrict enrollment reported measurable workload increases attributed to the U.S. Department of Education's certification regulations for professional licensure programs. Forty-five percent reported a significant increase while 38% reported a moderate increase. Nine percent reported no or very little change and another 9% indicated that they were not sure what level of increase had occurred. The largest percentage of institutions (22%) reporting significant workload increases had acquired 1-3 more hours of work per week.

### **DISCLOSURE, ATTESTATION, AND AUTOMATION PRACTICES AMONG INSTITUTIONS NOT RESTRICTING ENROLLMENT**

Institutions that do not restrict enrollment are addressing compliance challenges primarily through guidance, infrastructure, and process development. Their top strategies emphasize organizational structure and documentation.

Forty-three percent of these institutions utilize attestations to confirm that the student intends to seek licensure in a qualifying state. These institutions also report using multi-state licensure agreements or compacts (21%), external consultants or research services (17%), and, less frequently, direct collaboration with licensing boards (14%). A smaller share (6%) offer supplemental coursework or alternative pathways to meet state-specific requirements, reflecting the resource intensity of such efforts.

Manual systems such as shared spreadsheets, documentation logs, and Teams pages remain common. Despite growing

recognition of its value, automation remains limited in licensure compliance management. Half of the institutions that do not restrict enrollment rely at least partially on manual processes to manage direct disclosure processes (18% fully manual, 32% mostly manual). About 22% use mostly automated disclosures or attestation workflows. Only 5% use fully automated processes. Seventeen percent (17%) reported using an equal combination of manual and automated processes.

# ADDITIONAL DATA ON INSTITUTIONAL STRATEGY AND PRACTICE (SECTION 5)

## Purpose of This Appendix

This appendix provides supplemental data tables, figures, and descriptive details referenced in Section 5: Institutional Strategy and Practice.

## C.1 Hiring Decisions

This section provides more detailed information on hiring decisions by type of position, institution, institution size, number of licensure programs, and workload increase.

### THOSE THAT DID NOT HIRE STAFF

The largest portion of the survey group did not hire staff.

- ▶ A little more than one third (38%) of that group are private non-profit institutions, a slightly higher portion than that of all who answered the question about hiring (33%) and of the entire respondent group (32%).
- ▶ Sixty-five percent (65%) of those that did not hire staff have fewer than 10,000 students, a slightly higher percentage than that of all who answered the question about hiring (57%) but only slightly higher than that of the entire respondent group (62%).
- ▶ Twenty-nine percent offer 1-5 licensure programs, a slightly higher portion than that of the group who answered the hiring question (27%) but a slightly lower portion than the entire respondent group (32%).

### THOSE THAT HIRED STAFF

The institutions that hired additional staff (40 respondents) were:

- ▶ Largely 4-year public and private non-profit institutions, much the same as in the entire survey sample.
- ▶ However, nearly two-thirds (63%) of the hiring institutions have 10,000 or more students, almost twice the percent of institutions in the entire sample with 10,000 or more students.

- ▶ Furthermore, 51% of these institutions offer more than twenty licensure programs while only 37% of all survey respondents reported offering more than twenty programs.

### THOSE CONSIDERING HIRING STAFF

Those considering hiring staff tended to be smaller institutions than those who had hired staff. In addition, this group included fewer public and more private non-profit institutions, and overall, offered fewer licensure programs.

- ▶ Specifically, 56% of the institutions considering hiring have fewer than 10,000 students while 63% of those who had hired have 10,000 or more students.
- ▶ Only 13% of those who decided to hire additional staff enrolled fewer than 3,000 students while 27% of those who considered it have fewer than 3,000.
- ▶ Finally, 39% of those institutions considering hiring had more than twenty licensure programs as compared to 51% of those institutions who had hired.

### WORKLOAD INCREASE AND HIRING DECISIONS

Those institutions that had hired staff or were considering hiring staff reported a significant workload increase, although those simply considering it reported having fewer hours of additional work than those who had hired additional staff. Furthermore, while 8% of both groups reported a significant increase in workload, what respondents in each group considered "significant" differed:

- ▶ Overall, those only *considering* hiring reported a smaller number of hours increase in workload.
- ▶ Specifically, 60% of those who hired staff, and reported a significant workload increase, reported having an additional 10 or more hours/week to their work schedule; 40% added 21 or more hours.
- ▶ However, only 22% of those *considering* hiring staff and reporting a significant workload increase added that much work.



- ▶ A large majority (78%) added ten or fewer hours to each week's work; 59% added 6 hours or less.

## NUMBER OF LICENSURE PROGRAMS OFFERED AND HIRING DECISIONS

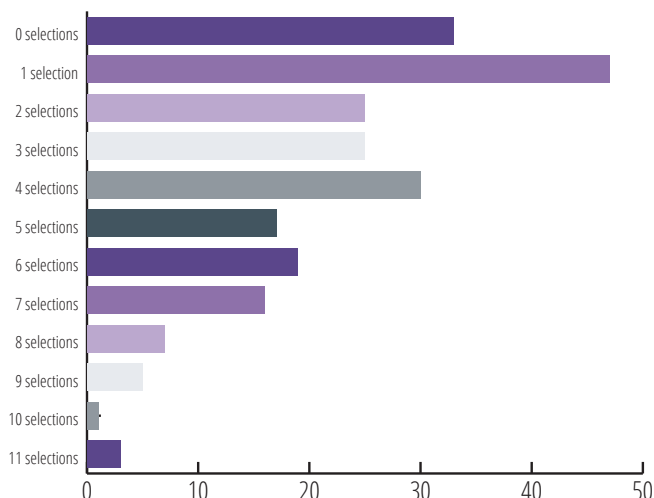
While institutions that hired staff are more likely than other institutions to offer more licensure programs, the number of programs offered by an institution does not necessarily correlate with a hiring decision. Except for institutions offering 41-50 programs, a large majority of which reported *considering* hiring, the number of programs offered by an institution seemed to have little overall influence on the institution's decision to hire or not to hire staff.

## C.2 Strategies for Dealing with Differing State Requirements

Respondents were asked to identify specific strategies they use to address the variation of licensure requirements across states. Specifically, they were asked to select from a list of fourteen different responses which strategies their respective institutions implemented.

- ▶ While 14% of the respondents selected no strategies, a large majority (86%) selected one or more of the possible responses (see **Figure C.2.1**). Of that group, 21% selected only one strategy.
- ▶ Thirty-five percent (35%) selected 2-4 strategies.
- ▶ Twenty-two percent (22%) selected 5-7.
- ▶ Only 8% selected more than seven, including the "Other" option.

Number of Strategies Selected by Number of Institutions



**Figure C.2.1** shows the number of strategies selected by institutions.

Of all 196 respondents who selected one or more strategies, the most frequently selected options were:

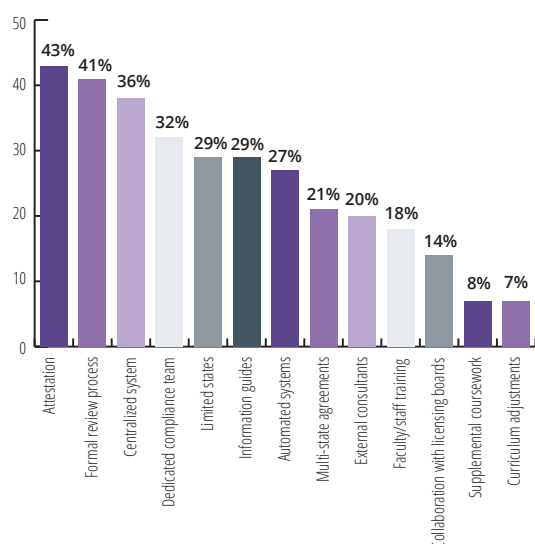
- (1) Offering the opportunity for students to submit an attestation in applicable situations (43%).
- (2) Creating a process for regularly reviewing and updating licensure information (41%).
- (3) Implementing a centralized system for documenting research (36%).
- (4) Establishing a dedicated team or individual responsible for licensure compliance (32%).

Fewer than 30% of the respondents selected one or more of the other strategies (see **Figure C.2.2**).

- ▶ Only 14% identified "Increased collaboration with licensing boards" as a strategy.
- ▶ Respectively, only 8% and 7% selected, "Offered supplemental coursework or pathways to meet out-of-state licensure requirements" or "Adjusted curriculum to align with multiple state licensure standards."

- Of those that selected “Offered supplemental coursework,” more were private for-profit or non-profit institutions of various sizes.
- Of those that selected “Adjusted curriculum,” more were other types of institutions with fewer than 1,000 students (however, as sample sizes are quite small, these data should be viewed with caution).

Frequency of Institutional Response to Differing State Requirements



**Figure C.2.2** shows the frequency of response to differing state requirements.

Of those respondents who selected only one strategy:

- Nineteen percent selected, “Developed state-specific licensure information guides for students.”
- The remaining selections were distributed among nine other strategies.
- Only one respondent in this group selected, “Adjusted curriculum to align with multiple state licensure standards.”

- Respondent comments describe additional strategies such as a coordinated decentralized research approach in which programs and departments lead compliance efforts, establishment of a centralized research team, development of state-specific licensure information guides for students, faculty and staff, and more.

## C.3 Direct Disclosure and Automation Processes

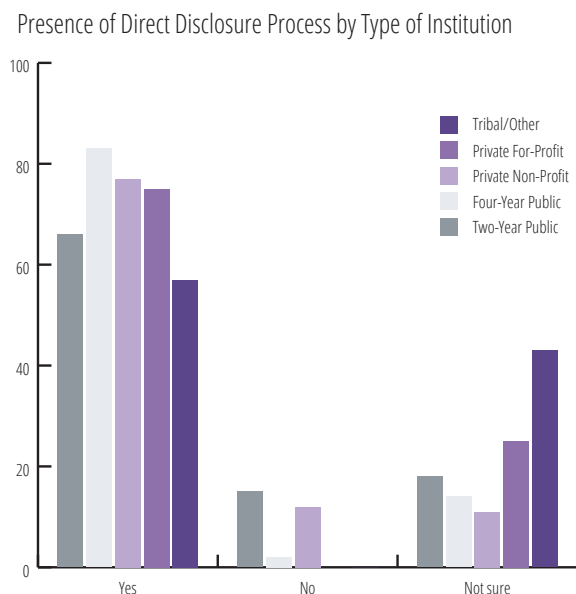
This section provides more detailed information on disclosure and automation processes by type of position, institution, and institution size.

### DIRECT DISCLOSURE PROCESS BY TYPE OF POSITION

Respondents in non-compliance positions are less likely to know if their institution has a direct disclosure process than knowing about a public process: while 12% reported not being sure if their institutions have a public disclosure process, almost twice that many (23%) reported being unsure about direct disclosures processes.

### DIRECT DISCLOSURE PROCESS BY TYPE OF INSTITUTION

Two-year public institutions are somewhat less likely to have a direct disclosure process in place; 67% reported having a process in place while 15% reported not having one (see **Figure C.3.1**). Four-year public institutions are the most likely to have one in place; only 3% report not having one. Like the group overall, an average of 17% of the respondents across all four types of institutions reported not knowing if their institutions have a direct disclosure process.



**Figure C.3.1** shows the presence of direct disclosure process by type of institution.

## DIRECT DISCLOSURE PROCESS BY INSTITUTION SIZE

The largest institutions are much more likely to have a direct disclosure process in place:

- ▶ Eighty-eight percent of institutions with 20,000 or more students reported having one; only 6% of the respondents from those institutions reported not being sure.
- ▶ Respondents for institutions with 1,000-2,999 students were the least likely to have a direct disclosure process (17% indicated that their institutions do not have one) and the least certain about the presence of such a process (26% reported not being sure).

## DIRECT DISCLOSURE SYSTEMS AND UNITS

Survey respondents were asked to identify both the systems and the units involved in their institution's direct disclosure process. Those who selected at least one option from each list reported that anywhere from 1 to 10 systems and 1 to 10 units are involved in the direct disclosure process. Two systems and two units were the most frequently selected options: 26% reported using two systems in their direct

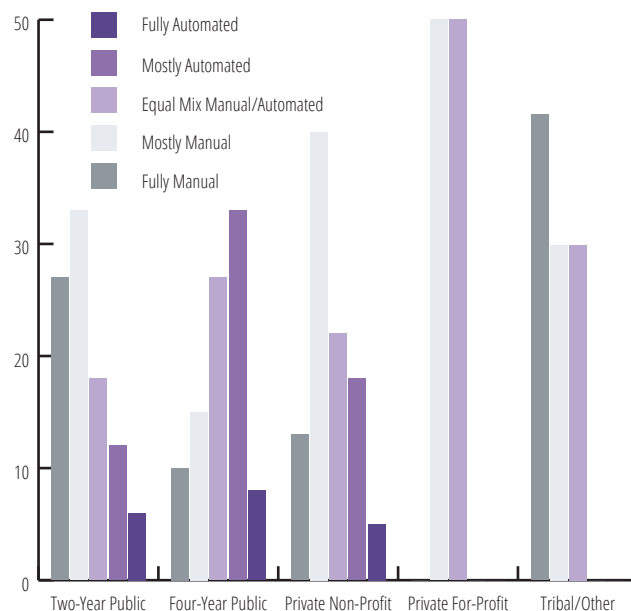
disclosure process; 21% reported that two units are involved in the process.

## AUTOMATION BY TYPE OF INSTITUTION

While each type of institution has a mix of automation methods across its members, more detailed data show that certain methods are more common at each type of institution (see **Figure C.3.2**). For example:

- ▶ Sixty percent of the two-year public institutions use a “mostly” or “fully manual” process while 60% of the four-year publics use an “equal combination of manual and automated tasks” or “mostly automated tasks.”
- ▶ Sixty-two percent (62%) of the private non-profits and 100% of the private for-profits use a mostly manual or combination process.
- ▶ Forty-three percent (43%) of the other types of institutions use a “fully manual” process.

## Level of Automation by Type of Institution

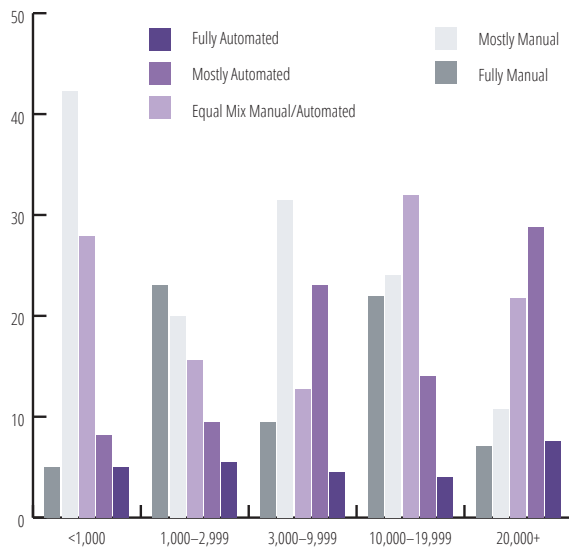


**Figure C.3.2** shows the levels of automation by type of institution.

## AUTOMATION BY INSTITUTIONAL SIZE

Institutional size influences the degree of automation (see **Figure C.3.3**). Smaller institutions with fewer than 10,000 students tend to use a more manual process. The largest institutions, those with 20,000 or more students, are much more likely than any other sized institution to use a fully automated process.

Level of Automation by Institutional Size



*Figure C.3.3 shows the levels of automation by institutional size.*



