

Ottawa University
Policy and Procedure
for
STUDENT LOCATION & DISCLOSURES
FOR CERTIFICATION- AND LICENSURE-BOUND PROGRAMS

Effective July 1, 2024

POLICY

OVERVIEW

Certain degree programs at Ottawa University are designed to meet licensure/ certification requirements in Kansas, Wisconsin, and/or Arizona, providing required courses and preparing students to sit for licensure exams as needed. For such programs, federal regulations mandate that institutions' marketing, admissions, recruiting, advising, and enrollment practices are fully accountable to the complexity of states' regulation of licensure and certification. The purposes of this policy are:

- 1) To maintain **consistent, reliable, accessible, and current information** on the University's certification- or licensure-bound programs (CLBPs) and their status in relation to all states' and territories' requirements;
- 2) To ensure that all prospective and continuing students in Ottawa University's CLBPs are **fully informed about their programs' status** in the context of Student Location;
- 3) To **define Student Location** for the purposes of this policy;
- 4) To **prevent harms to students** that may result if their CLBP does not meet licensure/ certification requirements in their state or territory; such harms may include loss of financial aid eligibility, removal from their program of choice, or failure to satisfy the requirements of licensure or certification in their state or territory; and
- 5) To **establish a technology-supported procedure** that
 - a. Routinely and effectively distributes disclosures and
 - b. Collects CLBP student's formal attestations as to their location.
- 6) To comply with the U.S. Code of Federal Regulations, specifically 34 CFR 668.43(c) and 34 CFR 600.9, which require the institution to make a determination regarding the State in which a student is located at the time of the student's initial enrollment in an educational program and upon formal receipt of information from the student that the student's location has changed to another state or territory. This policy is necessary to provide a general structure under which the institution determines a student's location for purposes of complying with the federal rules, a condition of Title IV eligibility (i.e., the ability to offer federal student aid), and with the state authorization rules of the National Council for State Authorization Reciprocity Agreements (NC-SARA).

MAINTAINING CONSISTENT, RELIABLE, ACCESSIBLE, AND CURRENT INFORMATION

For each certification- or licensure-bound program (CLBPs) the program's Director and/or Department Chair is responsible for tracking states' and territories' certification and licensure requirements relative to

Ottawa University's curriculum. This oversight ensures appropriate guidance by faculty who have the requisite educational and/or professional background. For each state or territory, the Director/ Department Chair determines if the curriculum "meets" or "does not meet" local requirements. A formal annual review process provides for currency and reliability.

To ensure consistency and accessibility of information about the University's CLBPs, once collected and confirmed by the Director/ Department Chair, the CLBP's "meets" or "does not meet" status is added, referenced, or updated in the following contexts:

- 1) The University Catalog (with a link to the University's Disclosure Statements page);
- 2) The Jenzabar Recruitment Management (JRM) system metadata, to facilitate disclosures to prospective students;
- 3) The Disclosure Statements page on the University's public-facing website (as single source of truth);
- 4) All other materials and messages related to marketing, admissions, recruiting, and enrollment practices on behalf of the University's CLBPs.

For each program, the last date of review is provided in Disclosure Notifications, in the University Catalog, and on the Disclosure Statements page of the website, along with encouragement to students to independently investigate states' and territories' public information on certification and licensure requirements, in case of local changes that may occur in the months following the University's annual review.

FULLY INFORMING STUDENTS ABOUT THEIR PROGRAMS' STATUS

Per federal regulations (34 CFR §668.43(c)(3)), Ottawa University is responsible for fully informing students in writing about their CLBP's status as meeting—or not meeting—certification or licensure requirements in each U.S. state and territory. The University must provide timely and individualized disclosure notifications in case of changes in either Student Location or program status. Notifications regarding program status changes must be provided each year during annual review of programs' status relative to state/territory requirements. Notifications responding to student-reported changes in Student Location must be sent within 14 days, in compliance with 34 CFR §668.43(c)(2) and §668.43(c)(3)(ii)(c).

All students considering or pursuing Ottawa University's CLBPs are encouraged to investigate the unique educational requirements for licensure/certification for the state or territory in which they reside, as well as for locations where they may intend to seek licensure. The University posts or publishes annually updated information about licensure requirements in each U.S. state and territory on its Disclosures Statements page, in the University Catalog, and in any materials relevant to marketing, admissions, recruiting, advising, and enrollment. Individuals are also encouraged to engage with an academic advisor or program director before beginning any licensure degree program, to better understand the licensure /certification requirements in the student's intended state or territory of residence or licensure/ certification. As emerging professionals, students should also consult the websites of their states' or territories' licensure and certification boards.

DEFINING STUDENT LOCATION

For the purposes of this policy, Student Location is defined as follows:

- 1) For all prospective students, Student Location is defined as the home state or territory reported in the Application for Admission.

- 2) For continuing students enrolled at the two residential campuses, as of each term's start date, the Student Location is defined as the state in which the campus is located (for the campus in Surprise, AZ the Student Location is Arizona; for the campus in Ottawa, KS, the Student Location is Kansas). This definition reflects policies requiring OUKS and OUAZ students to live on campus or within a confined radius, until they reach specified points in their progress toward graduation (except in special circumstances, or in the case of seniors).
- 3) For all other continuing students, Student Location is defined as the student's home state or territory, as initially reported in the Application for Admission, and as confirmed or updated each term during the enrollment process.
- 4) For international students (and others whose homes are outside U.S. states and territories), the Student Location is defined as their place of residence while in the U.S. (For those attending at a residential campus, the Student Location is the state where the campus is located).

PREVENTING HARM TO STUDENTS

Because professional licensure and certification boards in each U.S. state and territory are responsible for setting specific local requirements for licensure/ certification, variations are inevitable. The University's programs *may* meet requirements beyond those states for which they were designed, and some states have established reciprocity agreements that support those who already hold licensure in other states. However, students seeking admission to or continuing in the University's CLBPs face certain risks if they reside or plan to seek licensure/certification in states or territories where their programs do not meet requirements. In such cases, applicants must be refused admission, and continuing students may lose their eligibility for financial aid, and they may no longer be permitted to remain enrolled in their program of choice. Clarity and transparency on the part of the University are crucial to preventing these harms.

ESTABLISHING A TECHNOLOGY-SUPPORTED PROCEDURE

The procedures outlined below establish technological supports for timely and individualized disclosure notification, as well as for institutional record-keeping. These include automated email responses to application submissions and home address updates during enrollment, electronic collection of student attestations via email, archiving of attestations in Feith, and immediate notifications to Program Directors and/ or Department Chairs in case of student relocations.

DISTRIBUTING DISCLOSURE NOTIFICATIONS

For the sake of transparency, disclosures of the geographic limitations for Ottawa University's CLBPs are distributed to CLBP students (prospective and continuing) at several key points: at initial application, upon any change in home address for students not at residential campuses, and through annual communications from Department Chairs and/or Program Directors. These disclosures are individually issued, and students must respond to disclosure notifications with their attestations to qualify for admissions or to remain enrolled at the University.

COLLECTING ATTESTATIONS

During their initial application for admission to Ottawa University, and through updates collected during enrollment each term, all students must verify their state or territory of residence. Those who apply to or are continuing their enrollment in certification- or licensure-bound programs (CLBPs) receive a University disclosure notification if their program does not meet the licensure/certification requirements of their current or updated state or territory. The University requires these students to explicitly acknowledge their disclosure notifications. Prospective students applying for admission must

acknowledge their disclosure notifications prior to being admitted; *applicants cannot be admitted* to one of the University's CLBPs if they neither reside in, nor plan to seek licensure/certification in, locations where their chosen program meets licensure or certification requirements. Continuing students who fail to acknowledge their disclosure notifications or who relocate to another state during their course of study *may no longer be eligible to enroll in the program or to receive federal financial aid*; more importantly, they may not meet requirements in the state or territory in which they intend to live and/or to seek their initial certification or licensure.

PROCEDURE

Effective July 1, 2024, licensure disclosure notification will occur according to the following flow chart:

Initial Application				
	Step 1	Step 2	Step 3	Step 4
<p>PERSONS RESPONSIBLE (or service-specific email address)</p> <p>DATA FIELDS</p> <p>ELECTRONIC INTERFACES</p> <p>STANDARD PROCESSES</p>	<p>Prospective students indicate their State of Residence and Intended Program of Study on their initial Application for Admission. Applications indicating the intention to pursue a certification-/ licensure-bound program (CLBP) are flagged for delayed acceptance; acceptance must <i>follow</i> University receipt of completed Attestation Form.</p>	<p>Admissions sends an Initial Disclosure Email to all prospective students whose intended program of study is a CLBP, to explain the dynamic of state requirements, orient students to consequences of enrolling in programs that do not meet requirements in their state of residence, and initiate collection of students' formal attestations of receipt of disclosure (required for admission).</p>	<p>Prospective students seeking to enter CLBPs submit an Attestation Form to acknowledge receipt of program disclosures and to indicate the state in which they intend to seek their initial licensure or certification. Students whose CLBP meets licensure/ certification requirements in the state where they intend to seek licensure/ certification are admitted; other students are denied admission or redirected to alternative programs.</p>	<p>To maintain a permanent institutional record, formal attestation form responses are filed in Feith by Admissions, available for review by program directors and academic advisors.</p>
Automations	Delayed acceptance flag is raised for Admissions when applicants choose CLBPs under Intended Program of Study.	Initial Disclosure Email is sent to applicants who choose CLBPs under Intended Program of Study.	Flag is raised for Admissions when student submits Attestation Form, inviting follow-up (i.e., admission, denial or redirection).	<i>FUTURE: Student submission auto-files Attestation in Feith.</i>

Ongoing Enrollment				
	Step 1	Step 2	Step 3	Step 4
<p>PERSONS RESPONSIBLE (or service-specific email address)</p> <p>DATA FIELDS</p> <p>ELECTRONIC INTERFACES</p> <p>STANDARD PROCESSES</p>	<p>Current students either confirm or change their State of Residence during Enrollment Advising each term, as recorded by the Advisor in the Student Information System.</p>	<p>To ensure all students are aware of state requirements for CLBPs and avoid issues arising from changes of major/ program, all students who change their state of residence receive a General Disclosure Email from the Registrar. Program Director sends email and invites follow-up meetings for CLBP students who change their State of Residence.</p>	<p>Students continuing in CLBPs must respond to the Attestation Form to acknowledge receipt of program disclosures and to indicate the state in which they intend to seek their initial licensure or certification. For students whose CLBP meets requirements in the state where they intend to seek certification/ licensure, Advisors approve their enrollment for the term; other students are redirected to alternative programs.</p>	<p>To maintain a permanent institutional record, formal attestation form responses are filed in Feith, by Advisors available for review by program directors.</p>
Automations	For students in CLBPs, change in State of Residence	Change in State of Residence triggers distribution of General Disclosure Email.	<i>FUTURE:</i>	<i>FUTURE: Student submission</i>

	triggers flag for Program Director.			<i>auto-files</i> <i>Attestation in</i> <i>Feith.</i>
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