

Data on Professional Licensure Enrollments Across State Lines

During the discussion with OMB on October 6, 2023, the question was raised as to the number of students who are enrolled in professional licensure programs and, especially, in programs that are from institutions in other states. Since that call, we checked a few sources and provide a summary in this document.

There are no data reports regarding the number of students who are enrolled in programs leading to licensure across state lines. We provide a couple of sources of data for students who are enrolled across state lines:

- The **Department of Defense “Tuition Assistance” (TA) program** provides funding for active duty military and select family members to attend postsecondary education. At a recent Council of College and Military Education conference, the armed service representatives reported about three-quarters or more of their TA recipients were enrolled at a distance. These military-related students are typically not located in their home state.
- The **National Consortium of State Authorization Reciprocity Agreements (NC-SARA)** collects data on Out-of-State Learning Placements many of which are in programs leading to licensure. The Department’s proposed rule focuses on “the time of enrollment.” The experiential learning placements collected by NC-SARA are commonly “capstone” experiences for the program taken by students who are at or near graduation. We offer this data as a proxy for the size of the cohort of students to be affected.

We reiterate that we are concerned that neither the Department of Education nor the proponents of the proposed regulation related to Institutions Providing Programs Leading to a License or Certification (34 CFR 668.14(b)(32)(ii)) provided any data citing the need for this regulation. Neither has there been any analysis that new student notification requirements that became effective in 2020 have been ineffective and thus required this higher bar.

We also are firm in our conviction that institutions should follow all applicable state laws. Our issue is that the proposed regulation assumed one path to following state laws and leaves institutions and students in a lurch who are seeking alternative pathways to licensure in certain states.

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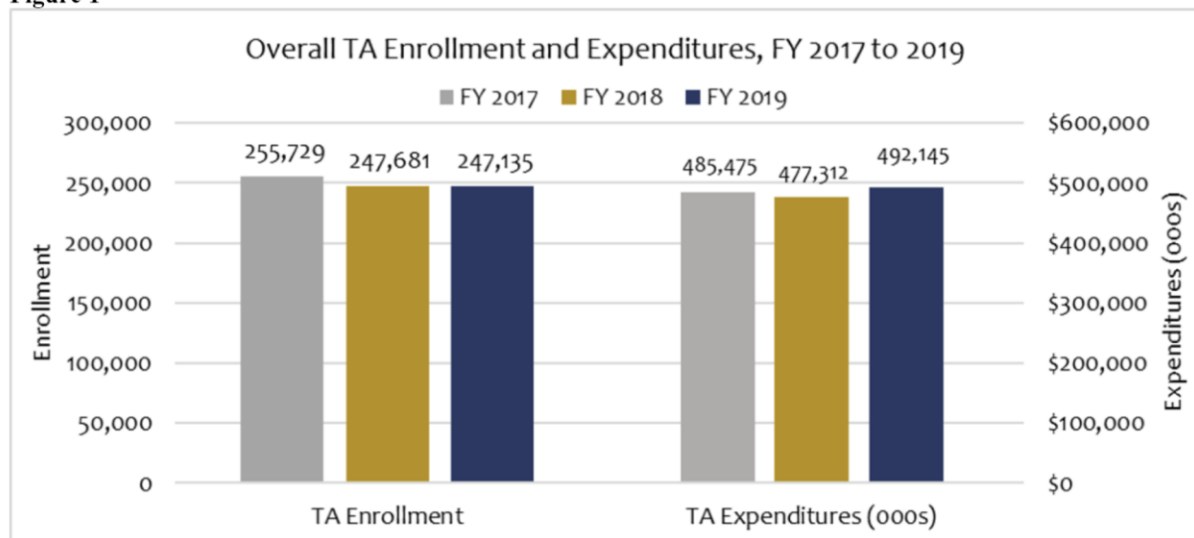
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Department of Defense “Tuition Assistance” for Active Duty Military and Families

Source: Factsheet: Defense Department Tuition Assistance Program: Enrollment and Credential Earned, by Institution Sector, for Fiscal Year 2019 - <https://vetsedsuccess.org/factsheet-defense-department-tuition-assistance-program-enrollment-and-credentials-earned-by-institutional-sector-for-fiscal-year-2019/>

Tuition Assistance is provided to active duty military and certain members of their families to allow them to pursue postsecondary education. Those military-related students are typically not located in their home state. This report from Veterans Education Services was the latest that we could find on short notice on overall Tuition Assistance participation. Tuition Assistance is managed by each branch of the service, so they typically do not create an overall census of participation. From page 2 of the report.

Figure 1



Source: Our analysis of the TA DECIDE database.

Again this indicates a large number of students participating in programs. The number who are enrolled in programs leading to licensure and the number who also qualify for Title IV aid is unknown to us at this time.

National Consortium for State Authorization Reciprocity Agreements Out-of-State Learning Placements (OOSLP)

Source: NC-SARA Annual Data Technical Report - https://nc-sara.org/sites/default/files/files/2023-10/2022_Technical_Data_Report_10-2023.pdf

NC-SARA includes institutions offering programs to students other states via distance education or other means that are allowed by the agreement. SARA institutions are located in 49 states (not California), the District of Columbia, and Puerto Rico. Each year they collect data on out-of-state learning placements for students participating in experiential learning as part of the institution's program. It is important to remember that California does not participate in SARA, so data from their institutions is not included. As a result, the numbers presented below are a significant undercount of the overall population.

Additionally, the Department's proposed rule focuses on "the time of enrollment." The experiential learning placements collected by NC-SARA are commonly "capstone" experiences for the program taken by students who are at or near graduation. We offer this data as a proxy for the size of the cohort of students to be affected.

According to the most recent report:

"There were 372,040 OOLSP (sic) reported by participating institutions for the calendar year 2022, an increase of 17.9% from the 315,504 reported in 2021. Reported OOSLP has continued to increase since 2021 after a decline during the COVID-19 pandemic in 2020." p. 24

Those enrollments were broken down by Department of Education IPEDS Classification of Instructional Programs (CIP) codes. As seen in the chart below (p. 25), the out-of-state enrollments were mostly in Health professions with Education a distance second. These fields tend to be the ones that are most subject to professional licensure requirements in each state.

Figure 16. 2022 Outgoing OOSLP Reported by CIP Code Program Area

