

Licensure Programs: Program Length

Background

While updating the Title IV program eligibility rules, the Department of Education (ED) changed the program length limitation for programs leading to state licensure in occupations requiring a license. Prior to the October 2023 rule, programs leading to state licensure could be no longer than 150 percent of the minimum time required by a state for licensure in the related occupation. The new rule, effective July 1, 2024, notes that programs must not be longer than 100 percent of the hours required for licensure by the state where the institution is located. For distance programs, the program length must also not exceed 100 percent of the hours required for licensure in the state(s) where students reside and/or intend to seek employment. **This rule does not apply to occupations that require a student to obtain a degree: nursing, education, accounting, etc.**

What will be “in effect” as of July 1, 2024?

All programs leading to state licensure in a given occupation must not be longer than 100 percent of the minimum time required for licensure in the state where your institution is located and the states where institutions enroll distance education students. This change will impact students enrolling on July 1, 2024, and after. Programs do not need to be updated for students already enrolled before July 1, 2024.

What should our institution do to prepare?

If your institution offers any programs that lead to state licensure, then you should review each of those programs to check your state’s minimum hours requirements. This will vary by state as all state requirements differ and the occupations that require a state license differ. If your institution does not offer non-degree programs that lead to state licensure in any occupation, then no action is needed. If your institution has a program leading to licensure that is longer than 100 percent of the hours required by the state, the program must be adjusted immediately. The adjustment will not impact currently enrolled students. The adjustment is effective as of July 1, 2024, and thus is only for students beginning programs on that date or later.

For distance education, if licensure programs are provided to out-of-state students via distance education, then institutional communications must note for which states the program leads to licensure and only enroll students from those states or students intending to move to those states.

Potential repercussions for program length changes

Title IV Pell funding eligibility is limited to programs that are at least 600 hours over a minimum of 15 weeks. If your institution has a program leading to licensure that needs to be adjusted below this threshold, those enrolled in the program can no longer use Pell or other Title IV aid to cover the cost. Direct loans may still be available.

If your institution has a distance education student from another state and that student intends to work in their home state, but your program is longer than the minimum hours required for licensure in that student’s state, your institution cannot enroll that student. If the student declares (with documentation) an intent to move to your institution’s state OR to a state in which your program is eligible, then institutions may enroll that student.



Q&A

Q1. Is a grace period offered if a state changes the program hours?

A1. No. Programs must be updated as of July 1, 2024 for any students enrolling on that date or later. Students currently enrolled are not impacted by the change.

Q2. Does a student only have to provide an attestation once? What happens if, during their student career, they change their mind?

A1. We don't know the process for a student to change their intended state of residence or employment.