



## Private Career School Licensing Requirement Exemptions pursuant to ORS 345.015:

November 2025

A Private Career School License (PCS License) is generally required for anyone providing career training in Oregon as described in ORS 345.010(2).

There are some situations, however, in which a person or school providing such training would be exempt from this licensing requirement. Those exemptions are listed in ORS 345.015.

### Explicit HECC “Approval” Not Required:

Except for ORS 345.015(8), the exemptions listed in ORS 345.015 **do not require a formal exemption from the HECC**. This means they allow a person, business, or other entity to freely engage in exempt activity as described in ORS 345.015(1) to ORS 345.015(7) and ORS 345.015(9) to ORS 345.015(11) as long as all of their activity falls within one or more of the exemptions listed.

On the other hand, if a person or business provides training that is not exempt, or provides a mix of exempt and non-exempt training, then the person or business would still need to obtain a license before providing the non-exempt training.

To better understand what is covered by each of the statutory exemptions, you may find the following guidance document helpful. Please see our [PCS Forms and Procedures web page](#) for the **Private Career Schools Licensing Exemption-Related Checklist / Guidance Document**.

*Note: If you have been contacted already by a HECC specialist regarding possible unlicensed training activity, you can also use the guidance document to help you determine what kinds of information you can provide regarding training you believe is exempt. This can help limit the scope of a Cease-and-Desist type directive, for example.*

### What the HECC Does Regarding Exemptions:

**Provide General Guidance:** The HECC can provide general exemption guidance. Note that HECC licensing staff cannot, however, provide advice on how a school or program can fit within an exemption. They will be able to tell you if any of your planned instructional activities will or might require licensing. The goal of such a conversation is not to assist you in finding the line where an exemption kicks in, but to assist you with the licensing process. In general, you can consult your own legal counsel if you have questions about exactly where the boundary of an exemption lies. Please see our [PCS Forms and Procedures web page](#) for the **Exemption General Guidance Document**.

**Provide a Nonbinding Compliance Letter for Non-licensed programs:** Please let a specialist know if you believe it is clear that an exemption applies, and would like the HECC to provide a confirmation letter stating that you have informed the HECC regarding your instructional plans and that the HECC has not required licensing at the current time. Such a letter does not bind the HECC in the future if your school begins engaging in non-exempt activity, or if the HECC learns information that changes its assessment.

**Initiate Enforcement Action:** The HECC may initiate inquiries or enforcement action against an unlicensed person or entity for activity that may not be covered by the ORS 345.015 exemptions. Enforcement options include “cease and desist” type notice letters, civil penalties, court injunctions or other actions targeting unlicensed activity.

**Provide an exemption under ORS 345.015(8):** The eighth exemption listed in statute, ORS 345.015(8), can only excuse a school from licensing requirements if the school first applies to the HECC, and then the HECC subsequently “grants” the exemption. Without such a grant, a school cannot cite ORS 345.015(8) as a reason not to be licensed. Here is the form to request that HECC grant your school an exemption under ORS 345.015(8). Please see our [PCS Forms and Procedures web page](#) for the **Exemption Request Form for ORS 345.015(8)**.

**Consider Your Request for a Formal, Binding Ruling:** If you want the HECC to consider a formal, binding ruling regarding your school's suitability for an exemption, you can submit a “Petition for a Declaratory Ruling” as defined by the Oregon Administrative Procedure Act, pursuant to ORS 183.410 and OAR Chapter 137 Division 2. Note that the HECC does not have to provide such a ruling, even if one is requested. Please see our [PCS Forms and Procedures web page](#) for the **Petition for Declaratory Ruling Form. Please use this form.**