



THE UNIVERSITY OF NORTH CAROLINA SYSTEM

Kelby Potter

State Authorization and Licensure Specialist

223 S. West Street, Suite 1800

Raleigh, NC 27603

kfpotter@northcarolina.edu

January 11, 2024

Dr. Wilfredo Estrada Adorno, PhD

Presidente, University of Leadership and Ministry

Via email - samantha@unilimi.org

Dear President Adorno,

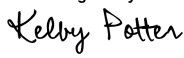
Pursuant to N.C. Gen. Stat § 116-15(d), The University of North Carolina Board of Governors (BoG) is empowered to exempt programs of study from normal state authorization requirements because of the religious nature of those programs program (the Religious Exemption). Staff for the BoG, acting under delegated authority, have awarded the Religious Exemption to the following programs at University of Leadership and Ministry:

- Certificate in Leadership & Ministry
- Associate of Arts in Leadership & Ministry
- Bachelor of Arts in Leadership & Ministry
- Master of Arts in Leadership & Ministry
- Doctor of Leadership & Ministry

These Religious Exemptions are in good standing.

University of Leadership and Ministry must continue to file annual reports to ensure the continued appropriateness of this exemption.

Sincerely,

DocuSigned by:


8BFDC2CA35C0435...

Kelby Potter

Ryan Petty, *Chair*
MaryLynn Magar, *Vice Chair*
Members
Grazie P. Christie
Layla Collins
Daniel P. Foganholi, Sr.
Erika Fritz-Ochs
Luis Fuste

February 11, 2026

Jose Alicea
University of Leadership and Ministry
3203 Amberley Park Circle
Kissimmee, FL 34743

Re: Annual Verification

Dear Mr. Alicea:

At the regularly scheduled meeting of the Commission for Independent Education held on January 29, 2026 in Orlando, Florida, your institution's annual verification by sworn affidavit was presented to the Commission for review.

The Commission accepted the affidavit as having complied with Section 1005.06(1)(f), Florida Statutes, which provides for the exemption of certain religious schools from this Commission's jurisdiction.

This letter serves as notification that your institution has met the requirements of state law and is not subject to governmental oversight for the period 1/29/2026 to 1/31/2027.

Sincerely,

Synnamon Solomon

Synnamon Solomon

Autorización OH



Jose Santos <jsantos@unilimi.org>

License to operate

Mexline@highered.ohio.gov <Mexline@highered.ohio.gov>

Mon, Aug 30, 2021
at 2:30 PM

To: Jose Santos <jsantos@unilimi.org>

Dear Dr. Santos,

Our office moved away from issuing exemption letters. You may use this email trail for your documentation. Basically, we are saying you do not need to submit payment or documentation if a program/school is exempt. We don't specifically issue your institution an exemption as we are not doing any formal review to ensure the program follows our policy. We expect that all programs that require authorization are submitted for review.

I hope this makes sense. Please let me know if you have any questions.

Thanks,
Matt

Matt Exline
Ohio Department of Higher Education
614-728-3095

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 2:27 PM
To: Exline, Matthew <Mexline@highered.ohio.gov>
Subject: Re: License to operate

Thank you, again, for your prompt response. If I may ask, if possible, to send a letter (in letterhead) conf exempt. If so, please send it to my attention to:

Dr. José A. Santos, Director of Accreditation and Academic Effectiveness
University of Leadership and Ministry
[94 Technology Drive](#)
[Garner, NC 27529](#)

On Mon, Aug 30, 2021 at 2:17 PM Mexline@highered.ohio.gov <Mexline@highered.ohio.gov> wrote:

Thank you for the clarification, Dr. Santos.

So long as your distance education programs that can be completed entirely online, you are exempt from authorization. Should the need for authorization arise, please do not hesitate to reach out.

Thanks,
Matt

Matt Exline
Ohio Department of Higher Education
614-728-3095

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 2:08 PM
To: Exline, Matthew <Mexline@highered.ohio.gov>
Subject: Re: License to operate

Thank you for your response,
We are a Non-for-profit, Christian post secondary university operating online.

On Mon, Aug 30, 2021 at 12:22 PM Mexline@highered.ohio.gov <Mexline@highered.ohio.gov> wrote:

Dear Dr. Santos,

Thank you for reaching out to the Ohio Department of Higher Education. Are you enrolling Ohio residents in a distance education/online program, or are you looking to open a brick-and-mortar location in Ohio?

Distance education programs that can be completed entirely online are exempt from authorization. Authorization (or SARA participation) is needed for distance education programs that require an on-ground experience (e.g., clinical, internship, field placement, practicum) to be completed in Ohio. I have attached the form that is completed for such programs.

Face-to-face instruction in Ohio requires a Certificate of Authorization from the Chancellor of the Ohio Department of Higher Education. Our Guidelines manual outlines the initial authorization process beginning on page 17:
https://www.ohiohighered.org/sites/ohiohighered.org/files/uploads/program-approval/Academic-Program-Review-Guidelines_070516.pdf.

Please let me know if you have any questions.

Sincerely,

Matt Exline
Director of Program Approval Operations
Ohio Department of Higher Education
[25 South Front Street](#)
[Columbus, OH 43215](#)
P: (614) 728-3095
<https://www.ohiohighered.org/>

From: Jose Santos <jsantos@unilimi.org>
Sent: Monday, August 30, 2021 11:38 AM
To: BOR Hotline <Hotline@highered.ohio.gov>
Subject: License to operate

Greetings!

The University of Leadership and Ministry is accepting enrollment from students who live in Ohio. In order to comply with the requirements of our accreditation agency ABHE, we need a license or certification to operate in Ohio. Please, send to us any relevant information on how to apply for that license or certification.

Thank you in advance for your advice and cooperation.

--

Dr. José A. Santos
University of Leadership and Ministry
Director of Accreditation and Institutional Effectiveness
Platform Coordinator/ Coordinador de Plataforma
Facultad/Faculty
(770) 856-2163 / jsantos@unilimi.org



CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.



Nonpublic Postsecondary Education Commission
2082 East Exchange Place, Suite 220
Tucker, Georgia 30084-5305

11-12-2025 12:45 PM

Notice of Exemption Status #8033E

University of Leadership and Ministry

94 Technology Drive
Garner, NC 27529

University of Leadership and Ministry has complied with the requirements of O.C.G.A. § 20-3-250.3 (a)(6) by meeting reporting requirements. The institution is subject to compliance with all other statutory provisions of the Official Code of Georgia, annotated.

Please be reminded of the annual renewal process. All religious schools in the State of Georgia must file an annual renewal application for a Notice of Exemption Status. Submit the application prior to the expiration date on the certificate in order to ensure that institutional compliance is maintained.

University of Leadership and Ministry is in compliance with the Nonpublic Postsecondary Education Commission from **12/27/2025** to **12/26/2026**. Please submit the renewal application 30 days prior to the expiration date so that institutional compliance is maintained.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "K. Shook", written over a horizontal line.

Kirk Shook
Executive Director

**GOBIERNO DE PUERTO RICO****DEPARTAMENTO DE ESTADO***Oficina de Registro y Licenciamiento de Instituciones de Educación*

16 de marzo de 2022

Dr. José A. Santos

Presidente

Universidad de Liderazgo y Ministerio

94 Technology Drive Garner, NC 27529

Estimado doctor Santos:

Saludos cordiales. El pasado año usted solicitó una reunión a la Oficina de Registro y Licenciamiento para recibir una orientación relacionada a una licencia de autorización de una institución de carácter religioso. La Oficina asignó al Sr. Luis Negrón Berríos para que atendiera su solicitud de reunión.

A raíz de la información que se compartió en la misma, originalmente se determinó que no teníamos jurisdicción debido a que las horas de los programas eran pocas; y que no se catalogaban como programas universitarios. El Reglamento para el Licenciamiento de Instituciones de Educación Postsecundaria en Puerto Rico #9272 de 2021, así lo establece y hace dicha distinción en las Secciones 9.2 y 9.2.1.

Para documentar y redactar nuestra decisión sobre la jurisdicción de nuestra Oficina en su caso particular, se le solicitó que nos proveyera por escrito las horas exactas de los programas. Al recibir la información y analizarla, nos percatamos que en efecto, sí teníamos jurisdicción dado que la mayoría de los programas eran de carácter universitario (grado asociado y bachillerato).

Así las cosas, el Sr. Negrón le orientó sobre la información que debía proveernos; y comenzar el proceso sometiendo la solicitud de licencia de autorización por medio de la plataforma provista para esos fines. Como resultado de este proceso de cumplimentar la solicitud en la plataforma, usted le mencionó al Sr. Negrón que tenía programas online (a distancia) en su oferta. Se le procedió a orientar sobre el particular y la manera de presentar esos programas en la solicitud. Esto ocasionó que usted se comunicará con el Sr. Negrón para aclarar algunos puntos.

Posteriormente, y mediante conversación telefónica, usted menciona que la Universidad de Liderazgo y Ministerio, tiene su sede en Carolina del Norte y que los programas que impartirá en Puerto Rico son totalmente online (a distancia). Esta información fue confirmada mediante correo electrónico recibido el 13 de enero de 2022. Además, se confirmó que no existe una sede de operación dentro de los límites territoriales de Puerto Rico que podamos visitar para el proceso de la licencia de autorización.

A esos fines, el Reglamento para el Licenciamiento de Instituciones de Educación Postsecundaria en Puerto Rico #9272 de 2021 establece en la Sección 9.1 lo siguiente:

Dr. José A. Santos

2

16 de marzo de 2022

“Las normas aquí contenidas aplican a toda persona natural o jurídica, o grupo de ellas, que opere una institución de educación postsecundaria dentro de los límites territoriales de Puerto Rico que ofrezca o que de algún modo declare, prometa, anuncie o exprese la intención de otorgar en Puerto Rico grados o cursos conducentes a grados, certificados, títulos u otros reconocimientos académicos oficiales de los que aquí se consideran como de educación postsecundaria, independiente del lugar donde se ofrezcan los curso. Además, se entenderá que una institución opera en Puerto Rico cuando tiene presencia en la jurisdicción de Puerto Rico, según se define en este Reglamento”.

Finalmente, con la información disponible y aplicando la Ley 212 de 2018, así como la Sección del Reglamento antes mencionada, se concluye que la Oficina de Registro y Licenciamiento no tiene jurisdicción en este caso. En otras palabras, no podemos licenciarse como institución educativa o expedirse un permiso para operar desde Puerto Rico.

Según relatado por ustedes, la intención de la Universidad es ofrecer los cursos online (a distancia) desde Carolina del Norte a personas en una o varias iglesias en Puerto Rico. Una alternativa que podría considerar es la Sección 9.2.3 del Reglamento sobre

instituciones provenientes de Estados Unidos de América que sean participantes del State Authorization Reciprocity Agreement (SARA). La misma establece lo siguiente:

“Este reglamento no aplicará a las instituciones provenientes de Estados Unidos de América que interesen ofrecer cursos o programas a distancia (online) a estudiantes residentes en Puerto Rico que son participantes del State Authorization Reciprocity Agreement (SARA) en la jurisdicción de procedencia. Las instituciones extranjeras o aquellas provenientes de Estados Unidos de América que no sean parte de SARA que interesen ofrecer cursos o programas a estudiantes residentes en Puerto Rico deberán cumplir con el procedimiento de licenciamiento dispuesto en este Reglamento”.

De modo que, recomendamos verificar si en el Estado que tiene la sede de la Universidad, participa de NC-SARA. Si participan, deben comunicarse con ellos para que reciban una orientación al respecto y auscultar la posibilidad de ser parte de SARA en dicho Estado. Esto le permitirá poder dar los cursos online en Puerto Rico sin pasar por el proceso de licenciamiento. Pero si no interesan pertenecer a NC-SARA en dicho Estado y desean de todos modos ofrecer los cursos online en Puerto Rico, tienen que licenciarse en Puerto Rico, pero con presencia física en la Isla, desde donde operen como institución educativa. Esto conforme establece nuestro Reglamento; y la Ley 212-2018, específicamente la Sección 4 (p), (q), (r) y (x).

Cualquier duda al respecto estoy a su disposición.

Atentamente,
Damaris Nolasco Ortiz

Finally, with the information available and applying Law 212 of 2018, as well as the aforementioned Section of the Regulations, it is concluded that the Office of Registration and Licensing does not have jurisdiction in this case. In other words, we cannot license ourselves as an educational institution or issue ourselves a permit to operate from Puerto Rico.

According to what you have said, the University's intention is to offer online (distance) courses from North Carolina to people in one or more churches in Puerto Rico.

New Jersey

In relation to New Jersey students, we have started the license to operate process, and this is the official response from the State Department of Higher Education.

An excerpt of the email received on August 1, 2022 at 9:59 am, is attached:

Harris-Ransom, Lori [OSHE]

Aug 1, 2022, 9:59 AM

Dear Dr. Santos Horta,

I am responding to your institution's most recent inquiry dated July 30, 2022 in regard to New Jersey's state authorization requirements and fee requirements. Please forgive any redundancy to any information I have previously provided.

When an out-of-State institution offers New Jersey residents no other programs except for distance education programs with no physical presence in the State, then licensure is not required. *N.J.A.C. 9A:1-7.5(b)*...

Sincerely,

Lori



Lori K. Harris-Ransom, JD MPA (she/her)
Assistant Director, Licensure & Accountability
Office of the Secretary of Higher Education (OSHE)
1 John Fitch Plaza, 10th Floor | PO Box 542
Trenton, NJ 08625-0542
609-984-2709 | lori.harris-ransom@oshe.nj.gov

Autorización TEXAS

Response from The Texas Workforce Commission.

----- Forwarded message -----

From: **Career Schools** <career.schools@twc.texas.gov>

Date: Tue, Apr 26, 2022 at 4:58 PM

Subject: RE: Authorization to operate

To: Jose Santos <jsantos@unilimi.org>

Cc: Cathie.Maeyaert@highered.texas.gov <Cathie.Maeyaert@highered.texas.gov>, Paul.Shuler@highered.texas.gov <Paul.Shuler@highered.texas.gov>, Career Schools <career.schools@twc.texas.gov>

Good afternoon,

We believe that based on activities in the state of Texas, The University of Leadership and Ministry is not a "Career School or College", as defined in Tex. Educ. Code § 132.001(1), and the information required to be posted per Tex. Educ. Code § 132.202 can be found on your [website](#). Accordingly, The University of Leadership and Ministry has been added to the Texas Workforce Commission Career Schools and Colleges database as a "not regulated" school.

This does not negate or supersede any requirements, including any postings, required by the Texas Higher Education Coordinating Board.

If the circumstances of the educational offerings in Texas should change, that would require licensing or exemption, please notify our office at career.schools@twc.texas.gov.

Please do not hesitate to contact us should you have additional questions or concerns.

Thank you,
Career Schools and Colleges
Texas Workforce Commission

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Response from Massachusetts

Stone, Kristen (DHE) <KStone@dhe.mass.edu>

August 18, 2022, 11:11 am

Dr. Santos,

Thank you for your inquiry. Massachusetts does not offer a religious exemption for degree-granting authorization. Rather, all out-of-state institutions are held to our physical presence policy, which I have included below. As long as your institution does not engage in the activities listed, Massachusetts Board of Higher Education authorization would not be required for your institution to offer 100% distance education programs.

At this time, the Massachusetts Board of Higher Education's (BHE) definition of physical presence does not include 100% distance education or experiential learning activities, such as internships, externships, clinical, or practical within the Commonwealth. However, if an institution also engages in the one of the following activities, BHE approval is required:

- 1. Occupying, regardless of ownership, an actual physical location for instructional purposes, whether synchronous or asynchronous instruction;*
- 2. Maintaining an administrative office to facilitate instruction in the Commonwealth, or for purposes of providing information to prospective students or the general public about the institution, or enrolling students or providing services to enrolled students;*
- 3. Providing office space to instructional or non-instructional staff;*
- 4. Establishing an institutional mailing address, street address or phone number in the Commonwealth.*

Please feel free to contact me directly if you have any questions.

Best,

Kristen

Kristen Stone, MPP

Assistant Director for Academic & Veterans Affairs
Massachusetts Department of Higher Education
One Ashburton Place, Room 1401
Boston, MA 02108
Phone: (617) 994-6959
Fax: (617) 727-0955

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