

State Authorization § 600.9(c)(2)(ii) – Institutional Policy for Determining a Student’s Location

TEMPLATE

I. Purpose

- A. Ensure compliance with the 2019 state authorization federal regulations that mandate institutions meet requirements for state reciprocity agreements [34-CFR 600.2], state authorization [34 CFR 600.9(c)], and professional licensure notifications [34 CFR 668.43(a)(5)(v) and 34 CFR 668.43(c)].
- B. This policy provides a structure to determine a student’s location for purposes of complying with these regulations. Compliance is a condition of Title IV eligibility.

II. Definitions

- A. Location-A student’s location shall be defined as the place in which a student is currently living (e.g. current address or mailing address if no current address exists) at the time of enrollment before making a financial commitment and while enrolled in a professional or occupational licensure or certification program, not the student’s state of residency.
- B. Prospective student-Prospective student means an individual who has contacted an eligible institution requesting information concerning admission to that institution.
- C. Enrollment-for the purposes of this policy enrollment has occurred when a student admitted to a professional or occupational licensure or certification program has registered for courses.

III. Policy

Institutions must make a determination of the state in which a student is located both at the time of the student’s initial enrollment in an educational program and upon formal receipt of information from the student that their location has changed. This location will then be used for the purpose of disclosing state-specific professional licensure information. In addition to general disclosures on their website, institutions are required to make direct disclosures to students. This means that prospective and enrolled students must be told in writing (which may include email or other electronic communication) whether a degree program meets the educational requirements of the state where they are located. This policy applies to all students and all academic programs leading to professional licensure, regardless of mode of delivery.

- A. For new students, the disclosure must be sent directly to the students before the student makes a financial commitment to enroll in the program. The determination of the student's location will be made using the student's current address.
- B. If a student changes location to a different state in any period of enrollment, a direct disclosure communication must be sent to the student regarding professional licensure within 14 days of the location change notification.

Students may report a change in location using either the Change of Address/Phone Number form or on the Student Record Update Form in STAR. The Physical Address section on these forms will identify students whose physical address state has changed.