

# Administrative Policy: Determining Student Location

## I. Purpose

This policy establishes university procedures for determining and documenting a student's physical location for purposes of compliance with Title IV of the Higher Education Act of 1965, as amended ("Title IV"), New York State authorization regulations, and professional licensure disclosure obligations. The university shall maintain accurate and current records to ensure that programs meet applicable state educational requirements for licensure or certification and that required disclosures are provided to students.

## II. Scope

This policy applies to:

- All applicants and enrolled students in programs that lead to professional licensure or certification.
- All academic levels (undergraduate, graduate, professional).
- All modalities of instruction (on-campus, online, hybrid, experiential learning, clinical placements, internships, externships, practica).

## III. Definitions

1. "Student Physical Location" means the U.S. state or territory of the student's permanent ("home") address and residence at the time of Initial Enrollment, as self-reported by the student. After Initial Enrollment, for continuing or matriculated students, "Student Physical Location" means the "current" or "campus" address in which the student is physically present while engaging in coursework, clinical experiences, internships, or other required programmatic activities. For students with a permanent address that does not include a U.S. state or territory (e.g., students living outside of the United States), their location will be considered the State of New York.
2. "Initial Enrollment" means the first term or session in which a student confirms their intent to enroll in a licensure-leading program at the university.

## IV. Policy Statement

1. Determining Location at Initial Enrollment.

The university shall determine Student Physical Location at the time of Initial Enrollment by requiring each applicant to self-identify their permanent address (state or U.S. territory) on the admissions application or enrollment agreement, and certify that the information provided is accurate and complete.

The university reserves the right to request additional documentation if needed to verify accuracy.

## 2. Ongoing Verification of Student Location.

Students are required to maintain an accurate permanent (“home”) as well as a local address, if applicable, in the student information system. Students must notify the university of any change in Student Physical Location to another U.S. state or territory within ten (10) business days of a change of address or location. Notably changes in modality that result in relocation (e.g., remote study in another U.S. state or territory), a supervised clinical or experiential placement in a different state, or a programmatic in-person component that the student will complete in another state requires the student to self-report.

## 3. Documentation of Location.

The university shall maintain a record of: (1) the Student Physical Location at Initial Enrollment; (2) any changes in Student Physical Location reported by the student; and (3) the effective date of each documented location. Student Physical Location will be stored in the student information system and maintained as part of the student’s official educational record.

## 4. Use of Student Physical Location Information, as defined in section III.1 above

The university shall use Student Physical Location information for the following purposes:

- (a) Determining whether a program meets state educational requirements for licensure;
- (b) Providing required licensure disclosures to prospective and enrolled students;
- (c) Determining whether enrollment is permissible under Title IV eligibility requirements;
- (d) Ensuring compliance with state authorization laws and NC-SARA, if applicable;
- (e) Supporting informed advising regarding post-graduation licensure pathways.

## 5. Failure to Report Accurate Student Physical Location.

Students are responsible for providing accurate Student Physical Location information. Failure to do so may result in, among other things: (a) delayed or denied enrollment in required courses or clinical placements; (b) ineligibility for Title IV financial aid for certain programs; or (c) delayed or jeopardized eligibility for state licensure.

## **V. Responsibilities**

1. Student Responsibilities. Student responsibilities under this policy include: (a) accurately reporting Student Physical Location at initial enrollment; (b) updating the university within ten (10) business days of any change in Student Physical Location; and (c) reviewing licensure disclosures provided by the university.
2. University Responsibilities. University responsibilities under this policy include: (a) collecting, verifying, and documenting Student Physical Location as required; (b) using

updated location data in evaluating program compliance with state licensure requirements; (c) providing timely individualized disclosures when required; and (d) maintaining accurate public disclosures of where licensure-leading programs meet or do not meet requirements.

## **VI. Review and Update of Policy**

This policy will be reviewed annually or sooner if federal or state regulations change.

### **Responsible Office:**

The Office of Enrollment Management  
Office of the Provost  
Registrar's Office

### **Effective Date:**

March 19, 2026 (approved)

### **Policy History:**

Approved March 19, 2026