

The University of Scranton
Student Location Policy and Procedures for the Purposes of Professional Licensure
Disclosures

A. Policy Statement

This policy and procedures are in accordance with [34 CFR 668.43](#) and 600.9 which outline institutional responsibilities for determination of student location and the use of location information for the purposes of professional licensure and certification determinations, notices, and disclosures. Institutions must satisfy the educational requirements for professional licensure/certification in any state from in which it enrolls students.

Under regulation, the U.S. Department of Education (Department) requires that an institution must make a determination regarding the State in which a student is located at the time of the student's initial enrollment in an educational program and, if applicable, upon formal receipt of information from the student that the student's location has changed to another State.

For the specific purposes of professional licensure/certification program regulations,

- An institution must make a determination regarding the State in which a prospective student enrolling in a professional licensure program is located **prior to enrollment**.
- An institution must make a determination regarding the State in which a student enrolling in a professional licensure program is located **at the time of the student's initial enrollment in the program**.
- An institution must make a determination regarding the State in which **a student currently enrolled** in a professional licensure program, whether offered on campus or via distance education is located; and
- If applicable, upon formal receipt of information from the student, in accordance with the institution's procedures, the State in which a student currently enrolled in a professional licensure program, whether offered on campus or via distance education, **has relocated to**.

The institution must, upon request, provide written documentation of its determination of a student's location, including the basis for such determination. This policy describes the processes used by The University of Scranton to define, gather, and update the location of prospective and enrolled students for a program leading to professional licensure or certification, as defined below. For the purposes of this policy, student location may be different from that used by the University for federal and other reporting, such as IPEDS or the State Authorization Reciprocity Agreement (NC-SARA)¹.

B. Determination of Student Location

¹ For IPEDS reporting, location is defined as the student's permanent address. For distance education, per SARA, this is the state, territory, or district where the student is located while receiving the instruction.

The University utilizes the definitions below to define the location of a prospective student prior to enrollment; an enrolled student at the time of initial enrollment; and change of location for currently enrolled students, for professional licensure/certification programs.

C. Definitions:

- a. Professional Licensure/Certification Programs: an educational program that is (1) designed to meet the educational requirements (a.) for a specific professional license or certification, and (b.) is required for employment in an occupation; or (2) is marketed or advertised as meeting the educational requirements for licensure or certification required for employment in an occupation.
- b. Enrolled Student: an individual who has completed the registration requirements (except for the payment of tuition and fees) at the institution that he or she is attending.
- c. Prospective Student: an individual who has contacted an eligible institution requesting information concerning admission to that institution.
- d. Location, prospective student: the state in which the student is located at the time of inquiry or application.
- e. Prior to Enrollment: before the student enters into an enrollment agreement, or in the event that an institution does not provide an enrollment agreement, before the student makes a financial commitment² to the institution. This is generally considered the time prior to the student's payment of enrollment deposit.
- f. State: any of the fifty U.S. States, the District of Columbia, and other U.S. territories.
- g. Time of initial enrollment: the first day of the first term of enrollment in which the student is enrolled in the professional licensure/certification program, and takes at least one course during that enrollment/pay period.
- h. Time of initial enrollment, accelerated programs: first day of first term of enrollment in the professional licensure/certification graduate program after the undergraduate degree is awarded.
- i. Location, time of initial enrollment:
 - i. Students in on-campus, face-to-face programs are considered to be located in the State of Pennsylvania at the time of their initial enrollment, unless that student is enrolled in one or more distance education courses during the first enrollment/payment period.³
 - a. If a student enrolling in an on-campus program is enrolled in one or more distance education courses during their first enrollment/payment period, the student is considered a distance education student. Their location is defined as the state/territory in which they are located at the time of their initial enrollment in the distance education course(s).

² This commitment may be in the form of submission of enrollment deposit or other tuition payment.

³ Guidance from the Department indicates that any student who will be attending a licensure program face-to-face, on-campus can be considered to be located on-campus at the time of their initial enrollment.

- ii. Students in distance education programs are considered to be located in the state/territory listed on their application materials, unless the student attests in writing their location has changed to a different state/territory.
- j. Location, currently enrolled student: the state/territory in which the student is located while enrolled in the educational program. This is generally considered the current permanent home mailing address, unless the student has affected a change of address. Within the Banner student information system, this is designated as: Mailing Address (MA).
- k. Location: the known place of the student's presence based upon information provided by the student at the time of inquiry, application, or current enrollment as articulated above.

D. Related Policies, Procedures, and Resources:

U.S. Code of Federal Regulations [34 CFR 600.9\(c\)\(2\)](#); [§ 668.14\(b\)\(32\)](#)

[U.S. Department of Education Certification Procedures: Professional Licensure FAQs \(2024\)](#)

Enrolled Student Change of Address Procedures: To effect a change of address, an Address Correction Form must be formally submitted via the process established by the Office of the Registrar and Academic Services. See:

<https://www.scranton.edu/academics/registrar/address-correction-form.shtml>

- E. Date of Implementation:** This policy and procedures update previously established policy (2020) is effective as of July 1, 2024.
- F. Review Cycle:** The policy and procedures contained herein will be reviewed annually or following updates to related regulation or policy.