



POLICY TITLE: Determining Student Location in Online Programs

RESPONSIBLE OFFICE(S): Office of Assessment and Accreditation Support

EFFECTIVE DATE: July 1, 2020

LAST REVISION DATE: July 16, 2020

PURPOSE

The U.S. Department of Education requires institutions offering distance education or correspondence courses to be authorized by each state in which the institution enrolls students, if such authorization is required by the state. CFR 600.9 – State Authorization, effective July 1, 2020, requires that USF have a policy for determining student location that is consistently applied to all students. This determination must be made at the time of the student’s initial enrollment in an educational program, and upon formal receipt of information from the student in accordance with the institution’s procedures, that the student’s location has changed to another state. Upon request, USF must provide written documentation of its determination of location to the U.S. Secretary of Education.

WHO IS AFFECTED BY THIS POLICY

This policy applies to staff members who administer USF’s online programs, faculty members who teach and/or advise students in USF’s online programs, and students in USF’s online programs.

POLICY AND PROCEDURES

A determination of a student’s location is made at the time of application on review of the completed student application for admission. Documentation of how the determination was made is the completed student application for admission, which is maintained in a USF system of record. A student’s initial location at the time of enrollment is then documented in the Local Address field in USF’s official student information system of record (Banner). Local Address is defined as where a student is physically located while engaged in their academic program. Students who are not located in a state in which USF is authorized to enroll distance education students or otherwise exempt from authorization may not be enrolled.

USF is further responsible for keeping information about student location up-to-date for students in online programs. Should a faculty or staff member be notified in writing by a student that the physical location where the student will be engaged in their academic program has changed, this is considered formal receipt of information and must be documented.

Students are required to notify the university of a change in location. Each semester starting at the first day of classes, an automated system prompts students to verify and, if necessary, update their Local Address through USF’s intranet (myUSF) which is recorded in Banner. Failure to verify or update their Local Address will result in the inability to log in to USF systems. Students may also update their Local Address at any time in self-service Banner.

In addition to updates made by students in Banner, documentation of changes in physical location can also include, but is not limited to, clinical placement affiliation agreements, internship processes and procedures, academic session registration, USF or program-administered surveys, advisory email, or

registration in other academic events. This documentation must be kept on file and the address must be updated in the Local Address field in Banner.

Students must be made aware at the start of their enrollment in an online program that continued enrollment in an online program is subject to where the student is physically located while taking the course(s); that they are required to notify USF of any changes in state location; and that should they relocate to a state in which USF is not authorized or otherwise exempt their enrollment and/or licensure eligibility may be negatively affected.

If faculty or staff of an online program determine that a student has relocated to a state in which USF is not authorized or otherwise exempt, they must notify the Office of Assessment and Accreditation Support.

Staff and faculty of USF's online programs are responsible for checking with the Office of Assessment and Accreditation Support when there are questions about enrollment eligibility and state authorization.

The Office of Assessment and Accreditation Support is responsible for regularly reviewing reports on updates to student Local Addresses to flag changes in state and to ensure students have not relocated to states where USF is not authorized or otherwise exempt.

Documentation of the determination of student location must be provided when requested by a state, the U.S. Secretary of Education, and/or by the Office of Assessment and Accreditation Support.

DEFINITIONS

Formal Receipt of Information is defined as anytime a student notifies USF in writing of an update to their physical location.

Local Address is defined as where a student is physically located while engaged in their academic program.

RESOURCES

[Detailed State Authorization Status List](#)

usfstateauth@usfca.edu

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APPROVAL HISTORY

SVPAA on June 25, 2020; Council of Deans on June 30, 2020