

Effective Date	5/1/2026
Policy Number	ACA-PL-107
Sponsor	Provost
Responsible Office	Provost's Office / Academic Affairs
Next Review Date	5/1/2031

I. REASON FOR POLICY

SUNY Fredonia is dedicated to protecting students and following all SUNY, state, and federal laws. This policy aligns Fredonia with recently updated regulations from the U.S. Department of Education on “Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit (ATB),” which affect Title IV financial aid funds.

The stated intention of the regulation amendment is to ensure that students, especially those pursuing learning via distance education, undertake financial commitments to higher education with a clear understanding that their studies will support the pursuit of their intended licensed career path in their designated U.S. State. Specifically, this policy defines the location of the student when they begin their initial enrollment with Fredonia for the purposes of reporting data regarding enrollment (to NC-SARA, for example) and communicating required certification or licensure disclosures.

II. POLICY STATEMENT

SCOPE

This policy addresses SUNY Fredonia’s process for determining a student’s location, especially in relation to their potential pursuit of academic programs intended to result in professional licensure or certification. Per federal regulations and in accordance with 34 CFR 600.9(c), the policy indicates how the location of a student at the time of the student’s initial enrollment will be defined. It also clarifies processes to be followed when a student’s location changes. As of July 1, 2024, it applies to all students, with additional procedures for programs that lead to professional licensure or certification to support required disclosures under 34 CFR 668.43.

POLICY

Student location is determined at the time of initial enrollment at SUNY Fredonia. For purposes of this policy, the student location is the State where the enrolled student resides and is based on the physical

location of the student. A student's residence and physical location is considered to be New York if their permanent address is in the state.

A prospective student's location is defined as the State of residency at the time that the student applies for admission; that remains their location until their initial enrollment at Fredonia, at which time their location becomes the address/state associated with their initial enrollment as defined in section IV. For students with a permanent address outside of a U.S. State or territory (e.g. students living outside the United States), their location will be considered the State of New York.

The student location remains in effect unless and until the student follows campus practices as defined at fredonia.edu/academics/registrar to update their permanent address such that it is no longer in New York State. The effective date of a revised student location is the date the address change is recorded in the Student Information System (SIS).

This policy will not supersede other college policies that determine New York State residency for tuition assessment.

REQUIREMENTS

A student cannot be enrolled in and/or complete a licensure/certification program if the licensure/certification program does not meet the location requirements for the student's location as defined here UNLESS the student submits an [attestation](#) indicating their awareness of the licensure disclosure information.

PROCEDURES

As required, SUNY Fredonia's [Professional Licensure Disclosure](#) page provides information to the public regarding disclosures.

Prior to matriculation, the Admissions Office is responsible for communication with applicants residing outside of New York. That responsibility includes:

- 1) Directing any out-of-state applicant to a licensure or certification program to visit our Professional Licensure Disclosure webpage and review that information
- 2) Instructing them that they cannot continue the application and enrollment process unless they submit an [attestation](#) indicating that they understand the program may not meet educational licensure requirements in their location.
- 3) Directing applicants with specific questions to the chair or other representative from the academic department that houses the degree program.

A student who is in a licensure/certification program and updates their address such that their permanent address is out-of-state, will receive an automatic message (copied to the head of the academic unit, the Registrar, and the Provost). Within 14 days, the student must have completed required [attestation](#). If the student does not complete the attestation within 14 days, the Registrar's

Office will place a registration and graduation hold on the student's record to prevent future registration and/or the awarding of a degree until compliance is complete.

Before admitting an internal student who wishes to change their academic program (major) to any program requiring licensure/certification, the academic unit must check the student's permanent address. They will notify any student not located in New York State as defined by this policy that they must read the [Professional Licensure Disclosure](#) and, if they still wish to continue, they will be directed to submit the [attestation](#) form. If the form is not submitted within 14 days the same process described above will occur.

Prior to census day, the Registrar will identify students in licensure/certification programs whose reported location is outside of New York State and notify the relevant academic units to take appropriate action.

SUNY Fredonia will retain documentation supporting student location determinations, disclosures, and attestations in institutional systems sufficient to respond to U.S. Department of Education requests under 34 CFR 600.9(c)(2)(ii).

III. RELATED DOCUMENTS, FORMS AND TOOLS

[Student Attestation Form](#)

[Suggested Language](#) for catalog/webpage for any licensure/certification program

SUNY Fredonia's [Professional Licensure Disclosure](#) page

[SUNY Memorandum on Student Location Policy](#) (Professional Licensure Disclosures: Federal Regulation Amendment, Effective July 1, 2024)

IV. DEFINITIONS

Student Location: For purposes of this policy, the student location is the State that the student reports (physical location) when they are officially enrolled in classes at SUNY Fredonia during their first semester.

Initial Enrollment: Time of initial enrollment is the first day of class of the student's initial semester. If a student is approved to change their major or add a double major such that they are now pursuing a licensure/certification program, their location for reporting purposes is defined as their permanent address on the first day of class of their new academic program leading to licensure/certification.

Permanent Residence: The home or mailing address identified as the primary residence by the student at the time of application and maintained in SUNY Fredonia's SIS. Students are responsible for updating their permanent address when changes occur. This definition applies to the location policy only; it does not determine residency for tuition or other purposes. Tuition residency is governed by SUNY policy #7810.

Academic Program: Any area of study that leads to a degree/major, certificate, or other named option.

Licensure Program: Program in a professional licensure field as outlined by NYSED.

State Authorization in Federal Regulations: Refers to the legal authority which allows states to regulate institutions that offer education within their borders. This includes the ability to authorize institutions to offer out-of-state activities, such as online programs and programs that lead to professional licensure or certification. State authorization regulations are intended to protect students from investing time and money in programs that may not be recognized in their state.

V. AUTHORITY

34 CFR 668.43(a)(5)(v) and (c) require program disclosures regarding professional licensure/certification, including individualized disclosures within set timelines when a program does not meet educational requirements in the student's state of location.

State Authorization § 600.9(c)(1)(i) requires institutions to determine in which state a student is located while enrolled in a distance education program, make such determinations consistently, and apply them to all students.

State Authorization § 600.9(c)(2)(ii) requires institutions to provide the Secretary with written documentation of its determination of a student's location, including the basis for such determination, upon request.

State Authorization § 600.9(c)(2)(iii) requires institutions to decide on 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.

VI. CONTACT & ENFORCEMENT

ROLE	CONTACT	PHONE	EMAIL - Website
Responsible Office	Provost's Office	(716) 673-3335	provost@fredonia.edu
Enforcement	Provost's Office	(716) 673-3335	provost@fredonia.edu
Policy	University Policy Office	(716) 673-4828	policy@fredonia.edu