

## STUDENT LOCATION POLICY FOR CERTIFICATION OR PROFESSIONAL LICENSURE PROGRAMS

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**Division:** Academic Affairs  
**Responsible Office:**  
Instructional Design & Distance Learning

**Date Established:** 01/02/2025  
**Date Last Revised:** 05/13/2026  
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### **POLICY SUMMARY**

SUNY Buffalo State is committed to complying with federal and state rules and regulations regarding the operation of higher education institutions in every state in which it enrolls students in programs leading to certifications or professional licensure. This practice, known as State Authorization, relates to all out-of-state activities ranging from fully online programs to experiential learning activities in face-to-face courses. SUNY Buffalo State will review and complete authorizations for programs with out-of-state activities.

### **POLICY STATEMENT**

Student location is determined at the time of initial enrollment at the University. 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. For a prospective student, this is the State of the prospective student's residency at the time the student has applied for admission, intends to enroll, and is then entered into SUNY Buffalo State instance of the Customer Management System.

For students with a permanent address that does not include a U.S. State or territory (e.g., students living outside the United States), their location will be considered the State of New York.

Change of Address. The student location designation will remain in effect unless and until a student changes the U.S. State or territory listed in the student's permanent address using a change of address form with the Registrar's office. Once a new U.S. State or territory is registered into the Student Information System, for any enrolled student. SUNY Buffalo State will consider that date of submission as the effective date of a student's revised location for the purposes of this policy.

All other university policies that determine New York State residency for the purpose of tuition assessment will not be superseded by this policy.

### **DEFINITIONS**

- **Academic Program:** Any area of study that leads to a degree/major, certificate, minor, or named option.
- **Distance education student:** For this regulation, distance education is defined at the student level, not the program. If a student takes at least one course (including a general education course) via distance education in their first term of enrollment in an academic program that

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leads to professional licensure or certification, that student is a distance education student, and a location determination must be made about that student

- Initial Enrollment: Time of initial enrollment is the first day of class of the student's initial semester.
  - o If a student is enrolled in one (1) or more online courses (34 CFR 600.2 "Distance education") during their first semester at SUNY Buffalo State, the student is designated as a Distance Education Student for reporting purposes.
  - o If a student changes academic programs (major), the time of initial enrollment is the first day of class of the student's new academic program.
- "Meets educational requirements" - immediately upon program completion, candidates will be eligible to sit for the required occupational licensure/certification exam or seek employment in the occupation
- Student Location: For purposes of this policy, the student location is the State where the enrolled student resides (physical location) when they are officially enrolled in classes at SUNY Buffalo State during their first semester.
  - o If a student does not provide a physical location and is enrolled in at least one on-campus course, the student's physical location is determined to be New York State.
  - o If a student does not provide a physical location and is not enrolled in at least one on-campus course, the student's physical location is determined to be the state provided in the student's permanent address
- Licensure Program: Program in a professional licensure field as outlined by NYSED.

## **SCOPE & PURPOSE**

This policy is in relation to the university certification procedures for Title IV participation and consumer protection so that students do not expend their time and funds on a program that will not meet their occupational goals and, likewise, so that federal funds are not expended for such programs. Amendment to existing regulation 34 CFR 668.14(b)(32)(ii) 32, effective July 1, 2024, impacts Title IV eligible programs that lead to licensure or certification for an occupation, no matter program modality and no matter if the institution participates in NC-SARA, as professional licensure disclosures are reviewed during the SARA application approval process. State Authorization § 600.9(c)(2)(ii) requires a policy on Student Location that must be provided to the Secretary of Education upon request. Student locations will no longer correspond with the student's state of residence, but instead with the student's physical location. Institutions providing distance or correspondence education to students located outside of the state where the institution is physically located must meet the student's state's requirements for it to be legally offering distance or correspondence education in that state (State Authorization §600.9(c)(1)(i)). Institutions must determine 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 (State Authorization § 600.9(c)(2)(iii)).

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## **RESPONSIBILITIES**

Students may not be enrolled in any courses or program while in a location that is not authorized. Moreover, students may not be enrolled in and/or complete a licensure program while in a location where the licensure program does not meet educational licensure requirements. The only exception to this requirement is if a student submits an attestation stating they are aware the program does not meet the requirements but wishes to continue the program. This exception refers to the licensure program requirement only.

## **APPLICABILITY**

Academic Affairs

Academic Programs that lead to certification and licensure

Academic/Professional Advisors

Enrollment Management (Office of Admissions & Registrar's Office)

Out-of-State Students enrolled in an academic program that leads to certification and licensure

## **RELATED PROCEDURES**

To comply with Institutional Information § 668.43(c), Licensure Requirement Direct Disclosures, the Admissions Office is the first point of verification and contact with prospective students applying to programs leading to certification or professional licensure. If a prospective student is located outside of New York State, they will receive an indirect notice asking them to review the state authorization public disclosures webpage, which includes locations where the program is approved and meets educational licensure requirements.

They will also be required to complete an attestation form before being considered for admission to SUNY Buffalo State University. The Attestation form will be a part of their required application material. The student may not be considered for admission in the program unless they submit an attestation that they understand the program does not meet educational licensure requirements in their location. Students failing to complete the attestation form will not be considered for admission and could be dismissed from their program.

The applicable programs have been identified by the Academic Affairs Division and copies of the disclosures are available on the [SUNY Buffalo State Professional Licensure](#) website.

The Admissions Office will require the form to be complete as a part of the application process which will explain the policy and act as direct disclosure notification regarding the professional license disclosure to any student in one of the applicable programs before acceptance and acknowledgement.

The Admissions Office will send Direct Disclosure notification regarding the Professional Licensure Disclosures to any new or incoming student who changes their permanent (mailing) address to an out-of-state address or to students that have a permanent (mailing) address out-of-state and change their program of study to one of the applicable programs. The Registrar's Office will manage a Direct Disclosure notification regarding the Professional Licensure Disclosures to any current students who change their permanent (mailing) address to an out-of-

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state address or to students that have a permanent (mailing) address out-of-state and change their program of study to one of the applicable programs. The disclosures are sent within 14 calendar days of the change being made. Students in these situations are flagged by the Registrar's office after a change of address is submitted.

Academic Advisors of students within programs that lead to certification or professional licensure will follow up with students who complete the attestation form to ensure full understanding of the attestation form and strongly encourage students to contact their state's licensure entity to review all licensure and certification requirements imposed by their state(s) of choice.

APPLICATION: Prior to census day, the Registrar's Office will review locations of all students and will contact students to have them complete the attestation form as necessary on a monthly basis, if they have not yet done so. Students will have 14 days to complete the forms, and the Registrar will request drops from the departments for students in licensure programs or any other students in non-approved locations if they do not submit the attestation form.

## **RELATED INFORMATION**

### **Documents and Forms:**

Buffalo State Directory of Policy Statements [IV:07:03 Instructional Modalities](#)

### **Related Links:**

Federal Register: [Financial Responsibility, Administrative Capability, Certification Procedures, Ability To Benefit \(ATB\)](#)

Code of Federal Regulation

[Institutional Eligibility Under the Higher Education Act of 1965, as Amended Definitions](#) (34 CFR 600.2)

[State authorization](#) § 600.9(c)(1)(i)). & (b)(32)(i) and (ii)

[Standards for Participation in Title IV, HEA Programs](#) (34 CFR 668.14(b)(32)(ii) 32)

[National Council for State Authorization Reciprocity Agreements](#) (NC-SARA)

[NC-SARA for SUNY Institutions](#)

## **CONTACT INFORMATION**

Academic Affairs  
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Website: <https://academicaffairs.buffalostate.edu/>  
E-mail: [KINGAP@buffalostate.edu](mailto:KINGAP@buffalostate.edu)

Enrollment Management  
Moot Hall 110  
1300 Elmwood Avenue  
Buffalo, NY 14222

Phone: (716) 878-4017  
Website: <https://suny.buffalostate.edu/admission-aid>  
Emails:  
Undergraduate Students: [admissions@buffalostate.edu](mailto:admissions@buffalostate.edu)  
Graduate Students: [graduateadmissions@buffalostate.edu](mailto:graduateadmissions@buffalostate.edu)

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## **APPROVAL**

Administrative Policy Review Committee – November 2024

President's Cabinet – January 2025

## **REVISION HISTORY**

**Date of change:** 05/13/2026

**Brief description of edit:** Adapted to ADA compliant template