

**THE UNIVERSITY OF ALABAMA IN HUNTSVILLE
STUDENT LOCATION AND DISCLOSURES POLICY**

Number **02.01.70**

Division **Academic Affairs**

Date **July 1, 2020**

Purpose The purpose of this policy is to codify the university-wide process for collecting and reporting student location data in accordance with federal, state, and the National Council for State Authorization Reciprocity Agreements (NC-SARA) reporting requirements. The policy documents how disclosures are provided to students in educational programs that lead to professional licensure, including whether the University of Alabama in Huntsville’s academic programs meet licensure requirements in the state where the student is physically located (student’s residency).

Policy The University of Alabama in Huntsville (UAH) is committed to complying with all requirements issued by federal regulations 34 CFR 668.43(a)(5)(v), 34 CFR 668.43 (b) Institutional Information, 34 CR 668.43(c), 34 CFR 668.72 Nature of educational program, and states and U.S. territories and by NC-SARA regarding the offering of educational programs and activities to students located outside the State of Alabama. UAH complies with:

1. The requirement of federal state authorization regulations to develop a process to determine the location of its students’ educational activities. This includes determining the student’s state location upon initial enrollment in an educational program, and, if applicable, determining when UAH formally receives information from the student that their state location has changed;
2. The requirements by NC-SARA to report the number and location of UAH students engaged in distance education and all UAH students in out-of-state learning placements (clinical rotations, student teaching, internships, etc.);
3. The requirement by NC-SARA and federal regulations to make public disclosures for students enrolled in any educational program, no matter the method of delivery, designed to meet educational requirements for a specific professional license that is required for employment in an occupation, or is advertised as meeting such requirements advising whether their successful completion in that program will enable or qualify the student to take the exam and/or to practice in their chosen profession in the state where the student is located, and that require UAH to make individual disclosures to current and prospective students that a program leading to professional licensure does not meet educational requirements in states where students are located or that no determination has been made; and
4. The requirements by the Alabama Commission on Higher Education (ACHE) to identify educational programs designed to lead to licensure or certification required for employment in an occupation, to report educational programs offered through distance delivery, and to collect related enrollment data.

Procedures UAH is required to determine the states in which UAH students are located for the purpose of disclosing professional licensure information about educational programs to meet requirements for a state-specific professional license that is required for employment in an occupation, or is advertised as meeting such requirements, no matter the method of instructional delivery. NC-SARA provisions also require that UAH keep all students, applicants and potential students who have contacted UAH about a program leading to licensure or certification informed as to whether successful completion of the program meets state licensing or post-licensing requirements. NC-SARA provisions also require that UAH report the number and location of UAH students engaged in distance education and all UAH students in out-of-state learning placements (clinical rotations, student teaching, internships, etc.), no matter the method of delivery. To comply with these requirements, and similar requirements of the ACHE, relevant UAH faculty, staff, and students will adhere to the following procedures.

A. State of Residence (Permanent/Home Address)

A student's state of residence is self-reported during the admission process and prior to registering for courses. Undergraduate Admissions, Graduate Admissions, and Office of the Registrar will accurately capture the student's reported state of residence (Permanent/Home address) upon admission.

A UAH student's reported state of residence upon admission will be the student's location for the purpose of state authorization or professional licensure program disclosures prior to the student's enrollment in the program, unless UAH formally receives from the student written information to change the student's location different from their documented residence.

Formal receipt of information regarding a change in a student's state location may occur when

- the student changes/updates the state of their permanent or local mailing address through the Banner Self-Service tab in myUAH, or
- the director of a student's academic program is notified in writing of the state where a student's offsite learning placement occurs, or
- the director of a student's academic program is notified by the student, in writing, of the state in which the student intends to obtain professional licensure or of the fact that the student's location has changed to another state.

B. Student Responsibility for State of Residence

Once admitted to UAH, it is the student's responsibility to voluntarily verify/update their state of residence (Permanent/Home address) in the Banner Self-Service tab in myUAH any time that information changes. If a student changes their Permanent/Home address while enrolled in a program leading to professional licensure, the student must notify the academic department within seven (7) calendar days of that change to determine if they are still able to complete program requirements in the new residential location. If at all possible, the institution encourages the student to make this determination prior to a change of residence since all state requirements are different.

C. Individual Disclosure to Prospective UAH Students or Newly Admitted Students to Programs Leading to Licensure or Certification

Prospective or newly admitted students in a degree program that are eligible for and/or likely lead to a professional certification or licensure, no matter the method of delivery, will receive from UAH, prior to the student making a financial commitment to UAH, a written disclosure (via email or other electronic communication, or postal mail) stating whether the UAH degree program meets the educational requirements for licensure or certification based on the student's location. The disclosure will occur prior to the student being permitted to register for courses in the degree program.

This individual disclosure will state either that the program's curriculum:

- a) meets the state educational requirements for licensure in the state in which the prospective student or newly admitted student is located; or
- b) does not meet the state educational requirements for licensure in the state in which the prospective or newly admitted student is located; or
- c) that UAH has not made the determination (in which event, UAH will provide the current contact information for any applicable licensing boards and will advise the student to determine whether the program meets requirements for licensure in the state where the student is located).

Disclosure notification is included in Admission/Acceptance letters and email deployed after admission decisions. Academic departments that offer educational programs leading to professional licensure must submit updated licensure information to the Director of Institutional Research & Assessment prior to the beginning of each academic term. Periodic review of student location will be conducted by the University Registrar to make sure students in programs leading to professional licensure have not been impacted and if so documentation will need to go out to the student at that time notifying them of the impact of the change of residency to their degree program of study. Academic Departments that offer educational programs leading to professional licensure, no matter the method of instructional delivery, must notify the Director of Institutional Research and Assessment of any changes in information provided on its Professional Licensure website as well as contact information of the individual in the department responsible for maintaining this information.

D. Individual Disclosure to UAH Students Currently Enrolled in Programs Leading to Licensure or Certification

For students currently enrolled in a degree program that is eligible for or likely to lead to professional certification or licensure, if UAH determines at any time that the program's curriculum does **not** meet state educational requirements for licensure in the state in which the enrolled student is located, then UAH will notify the student in writing (via email or other electronic communication or postal mail) within fourteen (14) calendar days of UAH making such determination. In addition, UAH will send an individualized

disclosure to the student upon formal notice of the student's relocation (see Student's Responsibility to Update Address/Location above), within fourteen (14) calendar days of being officially notified of the student's relocation, if the student relocates to a state where the program either does not meet the educational requirements for licensure, or UAH has not made such a determination.

Academic departments that offer educational programs leading to professional licensure are responsible for determining if the program's curriculum meets or does not meet state educational requirements for licensure in the states in which its enrolled students are located and monitoring changes to those educational requirements. Academic departments are responsible for notifying students in writing within fourteen (14) calendar days if changes to requirements and/or student location impact the ability of students to obtain professional licensure. Any documentation should also be copied to the Director of Institutional Research & Assessment.

E. Out-of-State Learning Placements

For NC-SARA reporting, it is the responsibility of every academic department to accurately capture the location (state) of each student's out-of-state learning placement (OOSLP) for which the academic department is awarding credit.

Out-of-state learning placements are described as those that meet the following four criteria:

1. The placement is outside the State of Alabama;
2. The placement involves the physical presence of the student at the out-of-state location(s);
3. The placement is an activity required for degree completion or professional licensure; and
4. The placement is offered for credit and/or offered for a fee.

All academic departments with out-of-state placements meeting the above criteria must report the number of OOSLPs by program and state within the most recent calendar year to Director of Institutional Research and Assessment (or designee) by May 15 of each year. A template for reporting will be submitted to college Deans each year for completion to accurately report student data by degree program CIP code.

F. Areas Impacted

The Undergraduate and Graduate Admissions, Office of Financial Aid, Office of the Registrar, department chairs and deans, faculty/staff approving off-campus learning placements, and faculty with oversight in academic departments/colleges that offer educational programs leading to professional licensure or faculty or staff who advertise programs as meeting specific professional licensure or certification requirements and all students.

Employees who fail to comply with this policy are subject to The University of Alabama in Huntsville's discipline policies.

G. Other References

[34 CFR § 668.43\(c\)\(1\)](#)

[34 CFR § 668.43\(c\)\(2\)](#)

[34 CFR § 668.43\(a\)\(5\)\(v\)](#)

[34 CFR § 600.9\(c\)\(2\)](#)

NC-SARA Data Reporting Handbook

NC-SARA Manual

Review

The policy will be reviewed by the Office of the Provost for compliance each academic year as required for NC-SARA and Integrated Postsecondary Education Data System (IPEDS) reporting. The policy content will be reviewed every three years for consistency or as needed to comply with federal regulations.