



Student Location Determination Policy

Policy Title: Student Location Determination Policy

Issued By: The Executive Director of Accreditation & Authorization

Responsible Office: Accreditation & Authorization

Responsible Personnel: Executive Director of Accreditation & Authorization; Director of Accreditation & Authorization; Assistant Director of Accreditation & Authorization; Senior Accreditation Specialist

Effective: Spring 2025

Last Revised: September 2024

Next Scheduled Review: Fall 2025 or as needed based on regulatory changes

Policy Statement: Federal and state regulations related to state authorization require institutions of higher education to determine where their students are located. This policy must be applied consistently to all students.

Purpose: This policy defines how Franklin University determines student location for the purpose of state authorization compliance. Other offices at the University (such as Financial Aid) may define and report student location differently than what is outlined in this policy.

Scope: This policy applies to applicants for enrollment at Franklin University and students who are enrolled as a Franklin University student in courses delivered by Franklin University

Definitions: Time of Initial Enrollment: When a person a) submits a completed application to enroll at Franklin University and is fully or conditionally accepted, b) re-enrolls after withdrawing/being withdrawn from the University, or c) when a currently enrolled student officially changes their program/major.

Location: A U.S. state/district, U.S. territory, or country outside of the U.S.

Location of Record: The student address on file in the University's student information system

Experiential Learning: Learning that takes place through "hands-on" activities. At Franklin University, experiential learning activities include internships, externships, field experience, clinical, practicum, student teaching, apprenticeship, cooperative education, and service learning.

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Policy Details: Due to federal and individual state regulations related to state authorization, Franklin University is prohibited or limited in providing courses and programs to students located in certain states, territories, and countries. A potential, current, or returning student's admittance to the University or enrollment in a program or course depends, in part, upon where the student is physically located while engaged in their educational activities. A student's ability to participate in some in-person educational activities, such as clinical and internship experiences, is also subject to these regulations. Students who do not accurately report or timely update their location to the University may be subject to sanction under the Dishonest Conduct provision of the Student Code of Conduct. When a student changes location during enrollment, the University determines if the student's new location impacts their continued enrollment.

Determination of Student Location at the Time of Initial Enrollment

For the purpose of compliance with state authorization regulations, Franklin University considers the student address ("location of record") on file in its student information system as the state, military address, territory, or district reported by the applicant as their primary location while enrolled at Franklin and receiving instruction. An applicant's address is recorded in the University's student information system as reported on their application to Franklin University.

If an applicant is accepted and enrolls at Franklin, the University considers the location of record in its student information system as where the student will primarily be located when engaging in their educational activities. Dependent on the location of record, Franklin may not be permitted to admit the applicant to the University or change their enrollment to some programs/majors.

Determination of Student Location for Experiential Learning Activities

Sites selected for experiential learning experiences must be in locations where the University is permitted to allow students to engage in such activities. Students are expected to communicate the location where they intend to engage in experiential learning prior to starting their assignment. This communication should be made in accordance with the processes established by the University department responsible for overseeing the experiential learning activity.

For the purpose of determining students' eligibility to engage in experiential learning by location, Franklin University uses the student's location of record in its student information system unless the student has communicated a different location for their experiential learning activity in accordance with the site selection process.



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Students who attempt to engage in experiential learning in a location closed for such activities should be aware that while the University will make every effort to assist them in finding an alternative placement, they may be required to end their experiential learning activity before it has been successfully completed.

Determination of Student Location for Professional Licensure Eligibility

Some academic programs offered by Franklin University are designed to prepare students to apply for a license (or certification or registration) that is required to work in a professional field in certain states, territories, and countries. Federal law requires institutions to determine whether or not their academic programs meet the educational requirements for such licenses in the locations where they enroll students. For the purpose of making this determination, Franklin University uses the student location of record listed in its student information system. Should a student in a professional licensure program wish to obtain licensure in a state/territory/country that is different than their location of record, they should contact the University's Office of Accreditation and Authorization by emailing accreditationauthorization@franklin.edu.

Change in Location

The location of record for applicants and enrolled students remains in effect until the student provides official notification to the University of a change in accordance with University procedures.

Franklin's applicants and students must notify the University at least 10 days before they change the location where they will primarily receive instruction.

If an applicant or enrolled student is considering relocating, it is important that they contact an advisor in advance to discuss potential impacts on their ability to complete their program of study. Dependent on the new location, Franklin University may not be able to allow the student to continue enrollment in a program or course, and/or engage in in-person activities such as clinical or internship experiences.

Policy Communication

This policy is published on the University's website. In addition, students are notified of the policy via a targeted email announcement distributed at least once each academic year.

References:

U.S. Department of Education

34 CFR §600.9 State authorization.

(c)(2)(i) For purposes of this section, an institution must make a determination, in accordance with the institution's policies or procedures, regarding the State in which a student is located, which must be applied consistently to all students.



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(ii) The institution must, upon request, provide the Secretary with written documentation of its determination of a student's location, including the basis for such determination.

(iii) 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, in accordance with the institution's procedures, that the student's location has changed to another State.

34 CFR §668.14 Program participation agreement.

(b)(32) In each State in which: the institution is located; students enrolled by the institution in distance education or correspondence courses are located, as determined at the time of initial enrollment in accordance with 34 CFR 600.9(c)(2); or for the purposes of paragraphs (b)(32)(i) and (ii) of this section, each student who enrolls in a program on or after July 1, 2024, and attests that they intend to seek employment, the institution must determine that each program eligible for title IV, HEA program funds—

(i) Is programmatically accredited if the State or a Federal agency requires such accreditation, including as a condition for employment in the occupation for which the program prepares the student, or is programmatically pre-accredited when programmatic pre-accreditation is sufficient according to the State or Federal agency;

(ii) Satisfies the applicable educational requirements for professional licensure or certification requirements in the State so that a student who enrolls in the program, and seeks employment in that State after completing the program, qualifies to take any licensure or certification exam that is needed for the student to practice or find employment in an occupation that the program prepares students to enter

Associated Policies & Procedures:

N/A

Contacts:

Accreditation & Authorization

Review/Evaluation

Timeline:

Annually or as needed based on federal and/or state regulatory changes.

Revision History:

2022; September 2023; September 2025

SharePoint:

<https://franklinu.sharepoint.com/sites/Community/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2FCommunity%2FShared%20Documents%2FDocuments%20and%20Resources%2FUniversity%20Policies&FolderCTID=0x012000231CB60493109243886D25DAF347B7A0>