**Academic Affairs Policy #14**
**Determination of Student Location**

**Date of Current Version: June 2020**
**Responsible Office: Provost and Senior Vice President for Academic Affairs**

## 1. PURPOSE

This policy is intended to comply with the Department of Education's requirements for Title IV, 34 CFR 668.43, Institutional Information, as amended, related to student location, which states:

> The institution must make a determination of the location of the student based on institution policies and procedures that are consistently applied to all students. Upon request, the institution must provide written documentation of the determination of location to the secretary. The time of determination of state location of the student will be upon initial enrollment and, if applicable, when a change of state location is obtained due to formal receipt of information from the student through institution procedures.[i]

## 2. AUTHORITY

The Board of Visitors is given the authority to establish policies for the university. This power is delegated to the President in areas in which the Board has not established policy. The establishment of policies and procedures concerning the Division of Academic Affairs has been delegated by the president to the Provost and Senior Vice President for Academic Affairs (Provost).

Additional Authority: Code of Federal Regulations, 34 CFR 600.2, 600.9, 668.43, 668.50.

## 3. DEFINITIONS

### Class
For the purposes of this policy, class includes any formal period and method of instruction, whether in person or online; for credit or not for credit. It includes laboratories, field trips, chat rooms, clinics, internship placements, and all other academic activities where instruction takes place.

### Distance Education
For the purposes of this policy, distance education that uses one or more of the technologies listed in paragraphs (1)(i) through (1)(iv) of this definition to deliver instruction to students who are separated from the instructor or instructors, and to support regular and substantive interaction between the students and the instructor or instructors, either synchronously or asynchronously. (1) The technologies that may be used to offer distance education include: (i) The internet; (ii) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; (iii) Audio conferencing; or (iv) Other media used in a course in conjunction with any of the technologies listed in paragraphs (1)(i) through (1)(iii) of this definition.

### Formal Receipt of Information
The process through which a student enrolled in a program of study notifies the program or academic unit of a change to their location; the institution must establish, maintain and document the change of address process.

### Initial Enrollment
For the purposes of this policy, the time at which an undergraduate student declares their major, as opposed to the time of a student's initial application to or enrollment at the institution or the time at which a graduate student accepts admission into their program of study, as opposed to the time of a student's initial application to the institution.

**Instructor**

The instructor of record in a class.

**Location**

For the purposes of this policy, the physical site is where the student is physically present when enrolled in educational activities; includes the student's full address while attending classes, as verified at the start of each semester for which the student is enrolled.

**Student**

For the purposes of this policy, the term "student" includes all persons who enroll or take courses at James Madison University, either full-time, part-time, dual-enrolled, and/or non-degree seeking. Student status will begin at the payment or waiver of the deposit for admission or at the payment of the application fee for admission to classes or programs through Professional and Continuing Education (PCE). Student status will continue through the verification of the completion of all academic requirements for a declared degree program(s) or the completion of classes or programs through PCE, and it will also continue through the completion of any pending conduct process.

## 4. APPLICABILITY

An institution that offers programs leading to professional licensure must identify and report, as requested, the location of all enrolled students to state and federal entities.

This policy applies to all students enrolled in all credit classes taught under the auspices of the university, on or off campus, and it includes distance learning, hybrid and online courses.

## 5. POLICY

This policy outlines JMU's process and procedure for determining the location of a student at the start of each semester for which the student is enrolled.

## 6. PROCEDURE

6.1. Determination of Student Location
- At the beginning of each semester, a student must log into MyMadison and confirm or change their location for that semester.

6.2. Use of Student Location Data
- Student location data is intended to be used for reporting to state and federal entities.
- Offices that need location data, including the Office of Institutional Research and University Programs, can request access through the Student Administration system.

## 7. RESPONSIBILITIES

**Office of the Registrar**

This office is the owner of the collected location data and is responsible for maintaining it.

This policy is subject to the requirements for data management as detailed in University Policy 1205, Data Stewardship.

## 8. SANCTIONS

Students who fail to follow this policy are subject to the appropriate disciplinary action.

## 9. EXCLUSIONS

The student's legal state of residence is not a factor in determining physical location for purposes of state authorization per 600.9(c).

## 10. INTERPRETATION

The authority to interpret this policy rests with the Provost and Senior Vice President for Academic Affairs.

Approved:

Dr. Heather J. Coltman, 6/10/20

Provost and Senior Vice President for Academic Affairs

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[i] [34 CFR 668.43](#)