

Student Location Policy

Purpose

The College of Westchester (CW) is committed to complying with federal and state regulations related to state authorization, distance education, and professional licensure disclosures. This Student Location Policy establishes the process by which CW determines, records, and monitors a student's location for regulatory and disclosure purposes.

Definition of Student Location

For purposes of state authorization and licensure disclosure compliance, a student's location is defined as the state in which the student is physically located while enrolled in and participating in coursework, regardless of residency or permanent address.

Determination of Student Location

CW determines a student's location using the following sources:

- Address provided by the student at the time of application and admission
- Address confirmed during registration or orientation
- Updates submitted by the student through official College records
- Information maintained in the College's Student Information System (SIS)

Students enrolled in online or hybrid courses are responsible for ensuring that their current physical location is accurately reflected in College records.

In support of state authorization and compliance requirements, the College maintains technical controls related to system access. International IP addresses are restricted from accessing institutional systems. Because access to the Learning Management System (D2L Brightspace) is provided through the College's single sign-on (SSO) authentication, these restrictions also limit LMS access from international locations. While certain technical exceptions (such as proxy servers or VPNs) may exist, the College actively monitors system access and conducts periodic testing to verify that location-based controls are functioning as intended.

Responsibility for Reporting Location Changes

Students are required to notify the College promptly if their physical location changes while enrolled. Location updates must be submitted through Student Services or the Registrar's Office using the institution's official change-of-address or student information update process.

Failure to update location information may impact the accuracy of disclosures required under federal or state regulations.

Use of Student Location Information

Student location information is used by CW for the following purposes:

- State authorization and SARA compliance
- Federal disclosure requirements related to professional licensure, where applicable
- Institutional reporting and regulatory oversight
- Determining whether additional disclosures or notifications are required if academic offerings change

At this time, The College of Westchester does not offer academic programs that lead to professional licensure or certification required for employment. However, this policy ensures that CW is prepared to provide accurate disclosures should program offerings change in the future.

Professional Licensure Disclosures

If CW develops or offers programs that lead to professional licensure or certification in the future, the College will provide students with required direct and public disclosures based on the student's location, in accordance with federal regulations effective July 1, 2024.

This policy is reviewed periodically and updated as needed to ensure ongoing compliance with federal and state regulations.