

Implementation Exercise - Location

1. Development of Tracking Practices that meet Federal Regulations and Will Provide Appropriate SARA Data Reporting

Motivation: New 2019 State Authorization Federal Regulations indicate that the location of the student for Federal compliance is where the student is located at the time of enrollment or if there is a change of location, the change is to be noted by the institution based on formal receipt of information from the student. NC-SARA Data Reporting is to be submitted each spring to report the location of the student for online learning based on IPEDS reporting and location of the student for learning placements. Institutions that do not participate in SARA must know where the student is located to determine if there is oversight of the activity in another state.

The Context to Your Institution: Your institution had been using the student's billing address as the address of record for the student. Your institution has not been tracking location of the student when participating in a learning placement for students in face to face programs (internship/clinical/etc.) The registrar expresses concern that they will only report change of location if the student brings the change to their attention.

The Charge: Your president has appointed you determine a plan that meets Federal compliance for determining location as well as provides for state/SARA compliance?

The Questions: What do you do to move this policy forward? Who needs to hear and understand this information? How will you address people about the issue? Who should be involved in developing a plan of action? How will a plan be implemented? Who do you need to provide continuous interaction?