



New York College of Traditional Chinese Medicine

200 Old Country Road, Suite 500, Mineola, NY 11501

Phone: (516) 739-1545 Fax: (516) 873-9622

Student Location Policy

Approval Authority: Executive Committee

Responsible Offices: Student Services Coordinator; Records Manager

1. Purpose

The purpose of this Student Location Policy is to establish clear institutional procedures for identifying, collecting, maintaining, and reporting the physical location of students, in compliance with the requirements of the National Council for State Authorization Reciprocity Agreements (NC-SARA) and the New York State Education Department (NYSED). This policy supports regulatory compliance, consumer protection, transparency, and institutional accountability for distance education and related instructional activities.

2. Scope

This policy applies to all prospective and enrolled students of NYCTCM, regardless of citizenship or residency status, who participate in:

- Distance education and online learning programs
- Hybrid or blended learning programs

3. Definitions

- **Student Location:** The U.S. state, territory, or foreign country in which a student is physically located at the time they participate in an educational activity or receive instruction.
- **Distance Education:** Instruction in which students and instructors are separated by time and/or place and interact through one or more forms of technology.
- **NC-SARA:** The National Council for State Authorization Reciprocity Agreements, which establishes national standards for interstate offering of postsecondary distance education.
- **NYSED:** The New York State Education Department, the state regulatory authority for NYCTCM.

4. Determination of Student Location

4.1 Initial Determination

NYCTCM determines a student's location at the time of application and enrollment based on the physical address provided by the student in official institutional records. This address is considered the student's official location for state authorization, disclosure, and complaint-resolution purposes.

4.2 Distance Education Students

For students enrolled in distance education programs, the student location is defined as the state or country in which the student is physically present while engaging in coursework, regardless of the institution's physical location.

4.3 Experiential or Clinical Activities

For programs requiring clinical rotations, externships, internships, or other supervised experiential learning, the physical location of the approved training site is also considered a student location for authorization, disclosure, and professional licensure purposes.

5. Student Responsibility to Report Location Changes

5.1 Students are responsible for providing accurate and current physical address information to NYCTCM at all times.

5.2 Students must notify the Records Manager within ten (10) business days of any change in their physical location that results in relocation to a different U.S. state or a foreign country.

5.3 Relocation is defined as a change in a student's **state or jurisdiction of physical presence** from which the student **participates in distance education**, occurring after initial enrollment, and that is **not temporary in nature**.

Consistent with SARA guidance, the following situations **do not constitute relocation** and do not establish physical presence:

- Temporary travel, vacation, or short-term stays
- Brief presence in another state for personal reasons
- Short-term emergency or family visits
- Transient presence that does **not represent establishment of physical presence**
- Travel that does not involve a sustained period of distance education participation

5.4 Failure to report a change in location may affect a student's eligibility to continue enrollment in certain programs if authorization is not available in the new location.

6. Institutional Responsibilities

6.1 Monitoring and Recordkeeping

NYCTCM maintains records of student locations in the student information system and periodically reviews this information to ensure compliance with NC-SARA and NYSED requirements.

6.2 State Authorization Compliance

NYCTCM will determine whether it is authorized to offer distance education or other regulated activities in the student's reported location. If authorization is not available, the institution will take appropriate action, which may include:

- Providing required disclosures
- Assisting the student in identifying alternative options
- Limiting or discontinuing enrollment as required by law

6.3 Disclosures

NYCTCM will provide prospective and enrolled students with clear and timely disclosures regarding:

- Program availability by state or country
- Professional licensure limitations, where applicable
- Complaint processes available through NC-SARA and NYSED

7. Complaints and Consumer Protection

Students residing outside New York State who have a complaint that cannot be resolved through the institution's internal grievance process may file a complaint with the appropriate state authority or through the NC-SARA complaint process, in accordance with published institutional disclosures.

8. Data Accuracy and Privacy

Student location data will be collected and maintained in accordance with applicable federal and state privacy laws, including the Family Educational Rights and Privacy Act (FERPA). Access to such data is limited to authorized institutional personnel.

9. Policy Review and Updates

This policy will be reviewed periodically and updated as necessary to reflect changes in NC-SARA policies, NYSED regulations, or other applicable laws and regulations.

10. Effective Date

This policy becomes effective upon approval by the Executive Committee on January 12, 2026 and applies to all students enrolled on or after the effective date.

This policy is intended to ensure institutional compliance with NC-SARA and New York State Education Department requirements while protecting students and supporting transparency in distance education.