

Student Location Policy

I. Scope and Application

A. These Student Location Policy and Procedures ("Policy") apply to all Johnson & Wales University ("JWU") employees (including student employees, acting in their capacity as such), agents, officers, and persons directly under university control or acting on the university's behalf (collectively, "Covered Persons").

B. This Policy describes the processes used by JWU to comply with 34 C.F.R. § 668.14(b)(32) and 34 C.F.R. § 668.43, insofar as they outline institutional responsibilities for (1) determination of student Location (defined below) and (2) the use of Location information for disclosure and enrollment purposes.

II. Definitions

A. "Covered State" means any state (1) in which JWU has a campus, (2) in which students are Located at the time of their Initial Enrollment in Distance Education Program as determined by JWU, or (3) in which a student attests that they intend to seek post-graduation employment using a document in the form of Exhibit A ("Attestation") (pdf)(184 KB).

B. "Distance Education Program" means any program that includes any online or remote course during the first semester or term thereof.

C. "Educational Requirements" means, for any Covered State,

1. The applicable educational requirements for certification or licensure in the Covered State, so that a student who enrolls in the program and seeks employment in that state after completing the program qualifies to take any certification or licensure exam that is needed for the student to be employed in an occupation that the program prepares students to enter; and

2. The applicable accreditation requirements if a state or 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 applicable state or federal agency.

D. "Initial Enrollment" has the definition of "enrolled" in 34 C.F.R. § 668.2, meaning a student who has completed the registration requirements (except for the payment of tuition and fees).

E. "Location" means the address where a student is residing at the time of Initial Enrollment.

F. "Permanent Address" means a prospective or current student's home address at the time the prospective student applies to JWU.

III. Policy

A. All students will be asked on their application for admission their Location at Initial Enrollment. If a student identifies a state where any program involving Distance Education Program does not meet the Educational Requirements, the university shall apprise the student that they may not enroll in such program unless they provide an Attestation that they intend to seek employment in a state where the Distance Education Program meets the Educational Requirements.

B. After a student is admitted to the university, if the student chooses to accept the offer of admission, the student must again provide the university with the student's Location at the time of Initial Enrollment. If a student identifies a state where any program involving Distance Education Program does not meet the Educational Requirements, the university shall apprise the student that they may not enroll in such program unless they have provided or will provide an Attestation that they intend to seek employment in a state where the Distance Education Program meets the Educational Requirements.

C. All students and prospective students must notify the university within 10 days of any change in their Location, Permanent Address, or any address where they reside during any time after a student or prospective student submits a deposit for enrollment and at all times through a student's graduation or withdrawal. The notice should be made via the Personal Information Dashboard in jwuLink or via email if the student lacks access to jwuLink.

D. The university shall make all required disclosures about Educational Requirements as to Distance Education Program and non-Distance Education Program programs.