

1 **2023 NYSAC Fall Seminar**  
2 **Standing Committee on Intergovernmental Affairs**  
3 **Resolution #2**

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5 **Resolution Encouraging SUNY to Consider Modifications to Their Proposed**  
6 **Rule Change on the Certificate of Residence Process for Community College**  
7 **Admissions**  
8

9 **WHEREAS**, SUNY has proposed updating regulations to streamline and clarify the  
10 Certificate of Residence (COR) process with a goal of reducing confusion for students  
11 and providing administrative relieve for county officials; and

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13 **WHEREAS**, the proposed rule would add clarifications to certain definitions,  
14 timelines, create uniform notifications to students across the system, standardize forms,  
15 and allow for electronic submissions; and

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17 **WHEREAS**, counties support a more streamlined and uniform COR process that is  
18 easily accessible to students and county officials; and

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20 **WHEREAS**, the proposed rule will also require community colleges to take additional  
21 steps to notify students of procedures necessary to procure a COR, including enhanced  
22 website features to inform students about the process; and

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24 **WHEREAS**, easing the application process for students includes not requiring a social  
25 security number, notarization of documents and at least one online-only method of  
26 applying.

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28 **NOW, THEREFORE, BE IT RESOLVED**, the New York State Association of  
29 Counties (NYSAC) is encouraged that SUNY is working to streamline administrative  
30 processes and it is our objective to partner SUNY throughout the process; and

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32 **BE IT FURTHER RESOLVED**, NYSAC has concerns about a county's legal recourse  
33 when the application requires no notarization and can be submitted completely  
34 electronically, as verifying an affidavit will become more difficult especially if it is later  
35 discovered fraud did occur. Counties want to ensure to their taxpayers that they can  
36 monitor the accuracy of the payments they make and hope SUNY can make  
37 accommodation in the rule to ensure counties have legal protections to correct, or  
38 pursue reimbursement, for invalid payments; and

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40 **BE IT FURTHER RESOLVED**, further clarification, or information, may be needed  
41 to assist counties regarding the language that the distribution of a valid certificate may  
42 be issued no earlier than two months prior to the student's registration date, including  
43 whether the valid certificate is physical (raised stamp) or electronic, and sharing the  
44 registration start dates for each college if they are not currently the same; and

45  
46 **BE IT FURTHER RESOLVED**, it is not clear under the proposed rule if CUNY  
47 schools will be subject to the single SUNY COR standard or will have a separate system.

1 The Regulatory Flexibility Analysis section refers to the 30 SUNY community colleges  
2 and all 62 counties, but the seven CUNY schools appear to be omitted from the text of  
3 the rule; and

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5 **BE IT FURTHER RESOLVED**, it is the goal of the counties that this transition to a  
6 more streamlined, accessible and online COR process for students will include options  
7 for counties to pay chargebacks directly through a secure online portal maintained by  
8 SUNY as student, campus and chargeback data can be centralized in one place; and

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10 **BE IT FURTHER RESOLVED**, copies of this resolution be sent to the counties of  
11 New York State and encourage them to enact similar resolutions; and

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13 **BE IT FURTHER RESOLVED**, that NYSAC shall forward copies of this resolution to  
14 SUNY Chancellor John B. King Jr., and all others deemed necessary and proper.