

# FAQ's – Certificate of Authorization Annual Compliance Report

## CAIP PORTAL DIFFICULTIES

**Q: My institution isn't listed in the drop down menu for an affiliation. What should I do if I need to register for a CB ID?**

A: Use "Texas Higher Education Coordinating Board" as the affiliation to register for a CB ID. After your institution has been approved, the name will appear in the affiliation list.

**Q: I am responsible for multiple campus reports. I want to register using the same email for multiple campuses. Can I do that?**

A: No. Unfortunately, the CB ID system will not allow registration of the same email address for multiple campuses. There are three solutions:

1. Use a different email address for each campus.
2. Register for one campus. Log into that campus and upload each report. Please label each report so THECB staff can determine which campus/institution is affiliated with each report. THECB staff will sort out the reports.
3. If you are preparing multiple campus reports under an educational system, with information that will be the same for all campuses (i.e., student catalog, student complaint policy, etc.), you may combine the reports into one report. If one report is used, specific information that differs between campuses must be clearly identified within the combined report.

**Q: I am having difficulty in uploading my institution's annual compliance report to the portal. Is there a size limit?**

A: To-date, files up to 65 MB have been successfully received through the portal. If your file is larger than this, please break it into two or more PDF files before uploading. Label the files with similar names, but add a sequential designation such as, ABC University ACRR 1; ABC University ACRR 2; ABC University ACRR 3.

**Q: I have doubts about whether I can scan all the report pages as one pdf document. My scanner can't scan in that many pages. Will it be acceptable to attach electronic files of certain documents, such as the field placement report and complaint report?**

A: For any of the requested information or documentation, if you have links to documents/information, links are preferable. This should limit the length of the report.

As long as THECB staff can click a link and find the info, your submission will be considered sufficient.

If documentation can't be found using links, you may include scanned attachments. While one PDF document is preferable, if necessary due to size or length constraints, electronic files or multiple PDF documents will be also be acceptable. Remember to label all files clearly so THECB staff can determine the institution source of the documents.

## **SCOPE AND SUBMISSION DATE OF ANNUAL COMPLIANCE REVIEW REPORT**

**Q: What is the **applicable time period** for the annual compliance review report? Is it a calendar year? Academic year? Fiscal year?**

A: All institutions should submit information that is current as of the day they submit their annual report. For example, submit a list of programs offered at the campus as of the date the annual report is being submitted or submit the catalog currently in use.

Institution are also asked to report some information based on activities within the past 12 months. If a question, such as complaint summaries, asks for a summary from the last 12 months, the institution will report information that falls within the last 12 months. For institutions reporting as of January 15<sup>th</sup> of the current year, they should include data from January 16 of the previous year to January 15 of the current year. For institution's reporting as of July 15<sup>th</sup> of the current year, they should include data from July 16<sup>th</sup> of the previous year to July 15<sup>th</sup> of the current year. Institutions have varying academic and fiscal years; however, by reporting current information or summarizing the previous 12 months' data, all institutions will be reporting similar information.

**Q: The **report due date** says "by" January/July 15th. Does this mean we can submit the report on the 15th and we will have made the deadline? Or does the report have to be filed on the 14th?**

A: Institutions will not be late in reporting if they submit reports on January 15<sup>th</sup>, or in the case of reports due in July, on July 15<sup>th</sup>.

**Q: Does my institution need to complete the annual compliance report if we have an **exemption**?**

A: All institutions under a Certificate of Authorization have exemption from some, but not all, THECB rules. If your institution is authorized in Texas under a Certificate of Authorization, it must complete the annual compliance report. This is one of the requirements from which your institution is not exempt.

**Q. My institution no longer has students completing clinicals/internships in Texas. Do we need to complete the annual compliance report?**

A. If your institution does not have current or scheduled clinicals/internships in Texas and does not wish to renew the Certificate of Authorization, please fill out:

- Page 3 (cover page)
- Page 6 (current degree programs, etc.)
  - Check “Institution does not currently offer degree programs at this campus/location. The Certificate of Authorization may be cancelled.)
- Page 16 (certification and attestations)
  - Check the following boxes:
    - I am an authorized official representative of the institution;
    - I check this box as endorsement of these acknowledgements and affirmations in lieu of my signature.
  - Provide authorized official’s name, title and date.

This abbreviated report will provide documentation that THECB may list your institution’s Certificate of Authorization as expired and not renewed by your institution.

## **I. COVER PAGE**

**Q: Our institution has multiple locations. However, we did not receive a memo requesting information for one of the locations. Should I report for an **unrequested campus location**?**

A: Yes. Please report for this additional location. Please label the uploaded file or section of a combined report to identify the additional location. THECB may have inadvertently combined information for two campuses in their files, assuming there was one campus when there were actually two campuses in a particular metropolitan area.

However, if a campus location received its first Certificate of Authorization for that particular location within the last six months, the location may be exempt for annual compliance reporting until the following year. If the Single Point of Contact has questions regarding whether or not to include the campus location, please contact THECB staff.

**Q: Regarding, “**physical address**,” we have a main campus and another location that oversee the online programs with clinicals and internships. Should I put both locations’ addresses on the report or just our main campus address?**

A: If both the main campus and another location oversee the online programs with clinicals and internships, using the main campus address would be sufficient. However, if the online programs are all administered from another campus or location, please use that address. THECB would like to identify the campus that is responsible for the online programs.

**Q: While I am responsible for keeping track of state authorization, I am not the single point of contact. That is one of our deans. Should the **authorized official representative** be the **same person as the single point of contact**?**

A: The authorized official representative and the single point of contact can be different people. The single point of contact should be the person who might not necessarily be the final decision-maker, but is the person who acts as the liaison between the institution and THECB, ensuring that communication and updates flow between the institution and THECB.

**Q: The Cover Page lists two choices for location, Texas-based campus or location, and Out-of-state institution: TX clinicals/internships only. We received a Certificate of Authorization several years ago to **recruit students**. How should we proceed?**

A: THECB rules changed and staff must not have realized that your institution still held a Certificate of Authorization based only on recruiters.

The rules currently require a Certificate of Authorization for institutions with recognized accreditation to offer degrees or courses leading to degrees in Texas. This authorization includes institutions which have students completing clinicals, internships or other field-based learning experiences in Texas. If your institution does not fall under these activities, THECB will cancel the Certificate of Authorization. In the future, if your institution begins to have students in field-based experiences, you would apply for another Certificate of Authorization once you knew where those students would be located. If an institution has a Certificate of Authorization, it does not need to register its agents separately.

The rules currently require a Certificate of Registration for all agents or recruiters from institutions which do not have either a Certificate of Authority or a Certificate of Authorization. If your institution's only contact with Texas is recruiting of students, this is the requirement the institution would fall under. If THECB cancels the Certificate of Authorization, you should have each of your recruiters complete the Certificate of Registration application which is attached to this email. The fee is \$100 for a five year period.

**Q: If there is **incorrect or missing information** in the report, will THECB contact the Single Point of Contact and give the institution an opportunity to correct it?**

A: THECB will definitely contact the Single Point of Contact if something is missing or clarification is needed. We hope this process helps both the institution and THECB. It is meant to be a spot-check to ensure THECB has all the info it needs and to help institutions ensure they have kept THECB updated on their activities in Texas.

While THECB staff will contact the Single Point of Contact in order to receive all necessary information, it is the institution's responsibility to timely file the report and respond to all follow-up requests for information. It is expected that the Single Point of Contact will ensure all follow-up information is sent to THECB staff within one week of the request for additional or missing information.

## **II. ACCREDITATION STATUS**

**Q: Our institution also has **programmatic accreditation**. Should we list our programmatic accreditor?**

A: Your institution does not need to list your programmatic accreditor. Your Certificate of Authorization is based on your institutional accreditor's approval; therefore, you don't need to list your programmatic accreditor unless the programmatic accreditor is also your institutional accreditor.

**Q: Would a **change in location** also refer to new online programs we were approved for in the last 12 months by our accreditor? These new programs have experiential learning requirements.**

A: The change in location refers to a physical location change. If the approval of new online programs also involved changing the physical location from which the online programs are provided or administered, then you should provide documentation for this change in location.

If your institution wishes to add new online programs because it has students scheduled to complete clinicals/internships in Texas, the documentation of approval for the new online programs would fall under the institution's current grant of accreditation.

## **III. CURRENT DEGREE PROGRAMS/CLINICALS/INTERNSHIPS**

**Q: What is a **CIP Code**?**

A: CIP Codes are defined in THECB Rule 7.3(18). The Classification of Instructional Programs (CIP) Code is the four (4) or six (6)-digit code assigned to an approved degree program in accordance with the CIP manual published by the U.S. Department of Education, National Center for Education Statistics. CIP codes define the authorized teaching field of the specified degree program, based upon the occupation(s) for which the program is designed to prepare its graduates.

**Q: Our accreditor's **statement of affiliation** doesn't include a list of specific programs approved. It only states the degree levels our institution is accredited to offer. How do we document accreditation status and current degree programs?**

A: THECB knows that some accreditors, particularly regional accreditors, do not list individual programs approved for a site. Therefore, we request you provide a link to the Statement of Affiliation or other type of documentation that shows your institution's current accreditation status under Section II and then attach a separate table for all degree programs currently approved and offered at the institution under Section III.

The table includes Program Name, CIP Code, and Degree Award Given. THECB requests this information so that our program inventory table is current and up-to-date and students or prospective students can search and find degree programs approved in Texas

**Q: We still only have the one degree program but it was revised earlier in the year – changed name of program and some of its credits – should we list the **new program name** on the degree programs table?**

A: Yes. THECB is seeking updated information. This is to ensure THECB has correct program names, degree designations and CIP Codes in the program inventory. To clarify the name change, you may indicate the program was "formerly known as \_\_\_\_\_."

The program inventory doesn't list number of credits, so while an institution could report that type of change, it wouldn't be in the program inventory or included in the annual compliance report.

**Q: We have several specializations (could be called emphases, focuses, tracks, or other similar terms) under a degree program. Should we list **each specialization as a separate program**?**

A: If each specialization is under the same CIP Code for the overall degree program, just list the overall degree program. If each specialization has a unique CIP Code, list each specialization separately.

Examples:

ABC University has six specializations for its MS-Nursing program. All specializations are listed under one CIP Code. Only the MS-Nursing program needs to be listed.

However, DEF College has three specializations under its MS-Nursing program. Each specialization is listed under a different CIP Code. The MS-Nursing program with each specialization and CIP Code should be listed separately, such as MS-Nursing (Family Nurse Practitioner) CIP Code xx.xxxx; MS-Nursing (Adult Gerontology) CIP Code xx.xxxx; MS-Nursing (Leadership and Management) CIP Code xx.xxxx.

**Q: We recently received approval from our accreditor for a **new program**, notified THECB of the new program and received approval to include the new program on our program inventory. Should we include information regarding this new program on the report?**

A: Yes. Please report the status of all programs as of the due date of the annual report (or the date you upload the report). Therefore, please include the new program. This will ensure that THECB has your institution's current and complete program inventory.

**Q: Our institution can provide a Statement of Affiliation [link or document] from its regional accreditor. However, the **Statement of Affiliation does not reflect a recently approved new program**. Should we include this approval in the documentation?**

A: Yes. Please include any accreditor's documentation showing approval of all current degree programs.

**Q: For out-of-state institutions: What would need to be done additionally for **authorization for other programs that required a clinical**? For example, what would we need to do if we wanted to include clinicals or internships for another of our online programs?**

A: You would need to provide information that the additional program is authorized by your accreditor and provide the current clinical or internship information for the students completing a field-based experience in Texas either at this time or that are scheduled to complete a clinical in Texas.

**Q: For out-of-state institutions: We have not updated our clinical or internship information since being issued a Certificate of Authorization to conduct clinicals or internships in Texas. Can we **update the information** in the annual compliance report?**

A: Yes, you may use the annual compliance report to update this information. A Certificate of Authorization based on clinicals or internships will expire after one year unless you update your program inventory and clinical/internship records to show a continued physical presence in Texas. If an institution has reported current clinicals or internships at the time its Certificate of Authorization expires, THECB can approve another Certificate of Authorization for another one year period.

Please let THECB know if the current Certificate of Authorization should be cancelled because there are no current field-based experiences and none scheduled to occur in Texas within the one year authorization period. You can do this in the annual compliance report. If you have no current physical presence, please indicate this status in the area for current clinical information.

**Q: For out-of-state institutions: If our institution **doesn't have current clinicals/internships scheduled, but wants to keep the Certificate of Authorization active for the future, could we do this without providing specific student/clinic information in the report?****

A: THECB can't continue a Certificate of Authorization without physical presence. While the Certificate of Authorization will remain in effect until the one year period expires, if your institution doesn't update its clinical/internship information before then, the Certificate of Authorization will expire.

**Q: For out-of-state institutions: The internships our institution has in Texas at this time require that each student identify a mentor or sponsor for the required program internship. This component is overseen by a local school district administrator or relevant entity in Texas who mentors the student to relate their learning specifically to Texas' educational practices or relative to the curriculum of their program; no university faculty will be present in the state. Do we include these internships?**

A: Yes, if the local school district administrator or entity provides any feedback to the institution that affects the student's grade or progress through the program.

**Q: For out-of-state institutions: We are an out-of-state institution, with students completing internships and clinicals in Texas for some of our out-of-state campus-based programs. Should we list all the degree programs of which our accreditor has approved us to offer?**

A: Only list degree programs that have a field-based experience component in Texas. THECB has no oversight of degree programs which have no physical presence component in Texas. If a program does not trigger physical presence in Texas, it does not need to be listed on the program inventory.

**Q: For out-of-state institutions: We are an out-of-state institution. Does THECB need a list of all of our online programs (including the CIP Code) or just the ones with Internship components?**

A: Your institution should only list the online programs, including CIP Codes, that have an internship, clinical, or other field-based experience component in Texas. We have allowed institutions to list in the program inventory either all the programs which have a potential field-based experience in Texas or just the programs that have a current clinical or internship in Texas. However, each degree program needs some field-based experience component within the program to be listed; otherwise, THECB would have no oversight.

In addition, your institution should provide an updated list of current clinical or internship locations using the Clinical/Internship table found under Section III. This would only include those field-based experiences that are currently being completed or are scheduled to be completed in Texas. THECB wants this information to ensure we still have reason to have oversight of your institution. As a reminder, THECB has no oversight of 100% online degree programs or courses leading to degrees. THECB oversight and the need for authorization is triggered by a physical presence, which includes having students complete internships or clinicals in Texas.

**Q: For out-of-state institutions: The report asks for “current” clinicals or internships. Should I leave the “End Date of field-based experience” column blank? If they are current there would be nothing to put in this column. Is this correct?**

A: No. You should not leave the end date blank. The end date is the date the current clinical or internship is scheduled to end. All field-based experiences should have a future end date.

**Q: For out-of-state institutions: Our institution has clinicals set up by the institution and clinicals set up individually by students. Should we include both types of clinicals?**

A: Yes. THECB wants to know all current clinicals which will trigger physical presence in Texas. Please note, “visiting students” as defined by THECB Rule 7.3(45) will not trigger physical presence. This may include medical students under the AAMC Visiting Student Application Service (VSAS) program.

**Q: For out-of-state institutions: Does “current” clinicals or internships mean current school year 2013-2014 (Fall and Spring terms) or does it mean as of today?**

A: “Current” means as of today. You should list all clinicals or internships that are either currently being completed or are already scheduled to start in the future. In order to maintain the Certificate of Authorization, the institution must have physical presence in Texas. The clinicals or internships are considered physical presence.

If an institution no longer has a physical presence because all field-based experiences have ended and no future field-based experiences are scheduled to begin during the current one year authorization period, the Certificate of Authorization should be cancelled. We will take appropriate action [either to update the Certificate of Authorization or to end it] after the annual reports are received. Remember to update THECB whenever new clinicals or internships are scheduled in Texas.

#### **IV. STUDENT CATALOG/HANDBOOK COPY OR LINKS AND ANNOTATIONS**

**Q: If the student catalog or handbook are housed on a public-facing website or within a learning management system, what is the best way to indicate this location?**

A: If the catalog or student handbook are located on a website, please include the link to the publication and note the page number. If the information is not publicly available, please explain how students can access the information and include a scanned printout of the information.

**Q: When I copy the links into the report template, they don’t appear to be live links. Is this OK?**

A: Yes. As long as THECB staff can copy the link into a web browser, the link in the report does not need to be live, or go directly to the site when clicked.

**Q: Regarding annotations to the student catalog or handbook, our institution is accredited by [a regional accreditor] that does not have a lot of the specific standards included in THECB Rule 7.4(20)(B). The accreditor's standards are much more general. What should we list?**

A: If there is no corresponding standard, just check the N/A box.

**Q: For HLC-accredited schools:** It appears that I am to fill in the publication page or link column mostly with regard to whether the information is made publicly available to students and the public, and where this information appears to the public. Does that mean that the standard that goes into the column "THECB-recognized Accreditor's Corresponding Standard" is *HLC 2.B. The institution presents itself clearly and completely to its students and to the public with regard to its programs, requirements, faculty and staff, costs to students, control, and accreditation relationships* for almost all the questions?

**Similar question: Our accreditor has only very broad or general standards. If a broad standard applies to many of the THECB-referenced standards, can our institution list the broad standard for each of the corresponding THECB standards?**

A: We want to know what information is disclosed to students and/or the public. If HLC's standard 2.B. [or another accreditor's general standard] is the best standard and there are no other specific HLC standards [or other accreditor's standards] regarding each of the requested information areas, then listing 2.B. [or the other accreditor's general standard] is sufficient. Your institution doesn't need to include the entire standard statement, just HLC Std. 2.B [or a similar shortened reference to the general standard] and any title or standard heading.

**Similar question: Is the "THECB-recognized Accreditor's Corresponding Standard" column asking if our accrediting agency has the same standards? If I answer yes, what should I provide for documentation of the actual standard? Can I just provide the standard number/section if there is one?**

A: The column entitled "THECB-recognized Accreditor's Corresponding Standard" is asking for identification of any similar standard required by your accreditor. For example, (i) asks for information regarding the institution's mission. If your institutional accreditor also has a standard that the institution's mission is published in a catalog or handbook, your institution would list the corresponding standard. You need to only list the standard number or section, such as: HLC Criterion One. Mission.

**Q: For HLC-accredited institutions under the Open Pathway program: Since our institution is in the HLC Open Pathway program for accreditation it is unclear to me whether the accreditor**

**has a corresponding criteria or standard for most of this information. How should we proceed?**

A: In review of the booklet describing the Open Pathway on HLC's website. It appears that what THECB is asking for is similar to an Assurance Argument and Evidence File under HLC's Open Pathway program. THECB is looking for the HLC Criterion that addresses each of the listed items of information. For example, if a Criterion asks the institution to publish a mission statement, you would list the HLC Criterion. You would then cite the institution's publication where the mission statement is found. If HLC has no corresponding Criterion, it is acceptable to check the N/A box. However, THECB would still like citation to any institution publication containing the information. Like the description under the HLC Evidence File [*To the extent possible, an institution is encouraged to use existing materials as evidence rather than create new materials exclusively for the accreditation process.*], the THECB annual report only asks your institution to provide cites to existing documentation, not create new documentation.

It does not appear that HLC's Open Pathway program, is exempting institutions under the program from meeting HLC's Criteria, but asking for reporting in a different manner and at different intervals. HLC's Criteria is found here:

<https://www.ncahlc.org/Information-for-Institutions/criteria-and-core-components.html>.

**Q: When the form asks about a complete listing of each employed **faculty member**, etc. (page 10 (ix)), we have an addendum that is published online and on paper with faculty and years of experience but not degrees or what school they graduated from. We can supply an additional list showing the faculty only that teach the degree program and what school they graduated from – is this sufficient?**

**Similar question: Our accreditor doesn't require all the information listed in the THECB's Rule 7.4 standard for faculty members. Do we need to add more to our catalog?**

A: For the annotation section, including the question regarding faculty, THECB is looking for where the information is located in your institution's publications and if your accreditor has a similar standard. You would identify your publication and the pages where the info is located if you include this type of information in a catalog or student handbook, and the accreditor's corresponding standard or criteria number. If there are no corresponding criteria, you may check the box to indicate that while you may supply the information, your accreditor doesn't require the information be published.

An institution doesn't need to create additional documentation for this question, but simply state in which publication to find any published information. If the information is on a website, give the web address. Under Section IV, your institution will provide a link to or copy of the student catalog or handbook referenced.

**Q: For the information requesting (ix) a complete listing of each regularly employed faculty member, showing: name; area of assignment; rank; and each earned degree held, including degree level, degree designation, and institution that awarded the degree, can you please define a “regularly employed faculty member.” Is there a definition of who this is?**

A: The description is out of THECB administrative rules. There is no further definition. THECB is looking for if and where an institution publishes info regarding faculty members and if its accreditor has a similar standard. For example: If your institution includes a list of faculty members in the student catalog, please provide the publication name and page numbers. Then, give a cross-reference to the accreditor’s standard or criteria if the accreditor has such a standard or criteria. If not, N/A is appropriate. Your institution will be providing a copy of the student catalog, so THECB can review the reference and the specific information your institution provides to students.

**Q: We only have online student catalogs and handbooks. How do we note where to find the information requested?**

A: Please give the name of the publication where the information is found. In the publication cell or the page cell, include a link to the online publication.

**Q: Our catalogs contain many pages. We may have difficulty scanning and uploading them with the annual compliance report. What should we do?**

A: A link to an online publication is preferable. THECB wishes to receive the entire report as one document via the CAIP portal. If links to documents accessible to the public can be given, please do so. This is especially preferable if the documents are very long or bulky.

THECB has determined that some catalogs, handbooks or publications, especially if they contain photographs, can result in large files. If a link to a publication is available, please provide the link in lieu of uploading the actual document.

**Q: We only have online publications. How do we provide a link?**

A: You may include, within the report, links or hyperlinks to online publications.

## **V. SUMMARY OF STUDENT COMPLAINTS FOR CAMPUS OR LOCATION**

**Q: In regards to the grievance policy, I think THECB requires that the last grievance from students should go to THECB, but SACS also requires that students contact SACS. Who should we put as the last contact for grievances, THECB or SACS?**

A: We will defer to SACS. If SACS can resolve the student grievance, THECB does not need to be involved. We also want the student to exhaust the institution's grievance policy before moving on to other grievance or complaint venues.

When you are doing your annual compliance reporting, if the institution or SACS has satisfactorily resolved a grievance, you will only need to indicate the resolution on the report. The grievance does not have to have been brought to THECB for investigation.

**Q: You do not want **complaints filed with TWC**, correct?**

A: We hadn't contemplated whether a student would file a complaint with Texas Workforce Commission (TWC) for a school over which THECB has authority and has issued a Certificate of Authorization. In general, it is expected that TWC would transfer any complaints to THECB if the Coordinating Board had oversight. Therefore, if TWC resolved the complaint without forwarding to THECB, you do not need to send it. We will assume they have oversight, not THECB.

**Q: Should an institution include complaints about **non-degree programs**?**

A: No. If THECB does not have oversight of a program, such as a non-degree program, your institution does not need to report the student complaint regarding the non-degree program.

**Q: You do want any complaints that went to THECB or **to our accreditors**, correct?**

A: Yes.

**Q: Do you want any others that were raised and we dealt with that **don't fit in the exceptions**?**

A: Yes. If a complaint was filed with one entity, but not filed with other entities (institution or accreditor or THECB-whichever wasn't included in complaint filing), just put N/A in the report box. For example, if the complaint was only filed with and resolved by the institution, put N/A in the boxes for the THECB-recognized accreditor and THECB.

**Q: Should an institution include student complaints that did not result in a written response, i.e. **resolved informally**?**

A: No. THECB will only require reporting student complaints that required a written response. If no documentation of the complaint and resolution was generated, the institution does not need to report it.

**Q: Should my institution include student complaints from Texas residents taking classes at its **non-Texas location (outside of Texas)****

A: THECB would not expect your institution to report any complaints that originate on an out-of-state physical campus. Only list complaints regarding Texas-based activities. Include any complaints for online education if a Texas student has a complaint.

## **VI. TEXAS STUDENT COMPLAINT POLICY**

**Q: Our accreditor doesn't require that we reference THECB policy. The accreditor has its own requirements with which our institution complies. Should we just provide the complaint policy required by our accreditor, or do we also need to comply with THECB's rule, since we are an exempt institution?**

A: THECB Rule 7.3(13) defines a Certification of Authorization as the Board's acknowledgment that an institution is qualified for an exemption from certain identified regulations. Institutions under a Certificate of Authorization are not exempt from all THECB rules. Institutions operating under a Certificate of Authorization are not exempt from providing information regarding the Board's student complaint policy. THECB Rule 1.110 defines an "institution" to include a public or private (non-profit, not-for-profit, or for-profit) institution of higher education that the legislature or the Agency has authorized to operate in Texas. Institutions under a Certificate of Authorization fall within this definition.

All institutions are required by THECB Rule 1.112 to post information regarding the complaint procedure outlined in the THECB rules regarding its student complaint procedure on the institution's website. This is the information requested under #11. Attachment – Student Complaint Policy. Therefore, while an institution must follow its accreditor's standards for providing a student complaint policy or procedure, the institution must also, at a minimum, include the information regarding the THECB student complaint procedure and website links as described under #11.

Please provide all student complaint policies provided to the institution's students, including those required by your institutional accreditor and THECB. If changes are needed to an institution's website, please provide an explanation of how that change will be implemented.

**Q: What information must be provided to Texas residents or students completing clinicals/internships in Texas regarding student complaints?**

A: Texas Higher Education Coordinating Board rules require institutions authorized to operate in Texas provide certain information to students regarding the student complaint procedure. In general Chapter 1 ([http://info.sos.state.tx.us/pls/pub/readtac\\$ext.ViewTAC?tac\\_view=5&ti=19&pt=1&ch=1&sch=E&rl=Y](http://info.sos.state.tx.us/pls/pub/readtac$ext.ViewTAC?tac_view=5&ti=19&pt=1&ch=1&sch=E&rl=Y)) explains the requirements. Specifically, Rule 1.112 provides the posting requirements.

Institutions with students in multiple states have listed the THECB web address and Texas administrative code links under a section specifically for Texas students in their catalog or handbook and on the institution's website.

**Q: Our institution **no longer publishes school catalogs**. Is it sufficient to add the links to the Texas Administrative Code and THECB Complaint Policy on our website?**

A: Yes. If your institution does not have a hard copy student catalog, providing information on the institution's website will be sufficient.

**Q: Our institution has only a few students completing clinicals or internships in Texas. We don't publish the Texas student complaint policy in our catalog or website since there are so few students affected. We send **individual letters** explaining the complaint process and giving links to all Texas-based students. Is this sufficient?**

A: Yes. If you send individual letters, this will be sufficient. Please include information about the letters in your annual compliance report and keep documentation of the letters sent.

**Q: Our institution is currently working on getting our website more compliant with the complaint steps necessary for Texas. Can we state what **steps we are taking** to reflect the required complaint process and a due date for which this will be completed, in order to submit the annual compliance report?**

A: Yes. Describe the steps being taken and an estimated date of compliance. While institutions should already be in compliance with this requirement, explaining the steps your institution is taking to be compliant within a reasonable time frame will be acceptable.

## **VII. FINANCIAL STATEMENTS**

**Q: With regard to **public institutions** located outside of Texas, do we just need to provide documentation that the institution is publically funded by the state in which the institution is located, or should we also link to our most recent financial statements?**

A: Just provide the documentation that your institution is publically funded. THECB doesn't need financial statements. We will assume the state adequately funds you.

**Q: Regarding requirements for private institutions – located outside of Texas or within Texas: *Attach a copy of the institution's latest closure of audit report from the US Department of Education.***

**Does this refer to our FSA annual audit? We have independent auditors that audit our Financial Aid.**

A: This section does refer to an institution's annual FSA audit. If available, please supply documentation that the US DOE has notified your institution that your latest FYE annual submission is complete and acceptable. Typically, once an institution files their audit, via EZ Audit on the US DOE website, they wait to receive a Notice of Closing or "closed audit report" from the US DOE that their reports have been accepted. Please provide this type of documentation for the latest report. You may find this notice on the notifications section of your institution's FSA home page.

**Q: What documentation is acceptable for showing our institution's Financial Responsibility Composite Score?**

A: Acceptable documentation includes a copy of the institution's EZ-Audit form that they have used to calculate the FRCS and submitted to the US Department of Education; inclusion of the FRCS within the institution's audited financial documents [Please highlight or note the page on which the FRCS score is listed.]; or highlighting the FRCS in the latest FRCS report found on the US Department of Education's website at: <http://studentaid.ed.gov/about/data-center/school/composite-scores>.

**Q. Our institution has recently begun to receive Title IV funding. We have not received a Notice of Closing or a "closed audit report" from the US DOE. What documentation should we provide?**

A. You should provide your latest audited financial statements and a copy of the EZ Audit if you have already filed it with the US DOE. The EZ Audit should include your institution's calculation of your FRCS.

**Q. We are owned by a publicly-traded corporation, which is required to file audited financial statements with the SEC. With regard to our latest audited financial reports, will it be permissible to attach a file of this statement, or a link to where it appears on our investors' website?**

A: A link is preferred; an electronic file is acceptable too.

**Q: Can the financial statements be sent under separate cover?**

A: Although not preferred, if it is not feasible to PDF and include the financial statements within the annual compliance report, your institution may send the documents separately. Please note within the report that the financial statements will be a separate document.

## **VIII. CERTIFICATION & ATTESTATIONS**

**Q: I am completing the report, but someone else will be the **authorized official representative** of the institution. Is that OK?**

A: Yes. The institution may have multiple people contribute to the report. However, one person needs to certify that they are authorized on behalf of the institution and that the statements under Section VIII are true. This will include acknowledging the truth and correctness of documents and information provided in the report.

**Q. The Attestation page has a statement regarding **maintaining all advertising for five years**. Does this include web marketing? How is “advertising” defined?**

A: THECB does not have a separate definition for advertising. However, in THECB Rule 7.3, regarding physical presence, the types of advertising to Texas students are listed as “print, billboard, internet, radio, television, or other medium.” While advertising alone doesn’t trigger physical presence, THECB does define it broadly in this list.

In giving the parameters for the annual compliance report, THECB Rule 7.7(1)(C)(i)(II) states, [t]he institution shall further certify that it is maintaining any [emphasis added] advertising used in Texas for a minimum of five years and shall make any such advertisements available to the Board for inspection upon request. Again, advertising is viewed broadly. Therefore, if web marketing is being directed at Texas students, your institution should be able to produce a copy from the last five years upon request.