

## FAQ's – Certificate of Authorization Annual Compliance Report

### CAIP Portal Difficulties:

**Q: My institution isn't listed 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 has not been updated yet and you may not register for multiple campuses using the same email address. There are two 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.

**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. While one PDF document is preferable, if necessary, electronic files will be acceptable. For any of the requested information or documentation, if you have links to documents/information, please include links. As long as we can click a link and find the info, your submission will be considered sufficient.

### Scope 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. Institutions 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 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>.

### **#1: Name of Campus or Location**

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

A: Yes. Please report for this additional location as a separate report. Please label the uploaded file to identify the additional location. THECB will review the separate report and notify your Single Point of Contact if more information is needed. 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.

### **#2: Physical Address**

**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.

### **#3: Single Point of Contact**

**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.

**Q: If something in the report is not done correctly, will THECB be contacting me and giving me 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.

### **#4: Has the institution's THECB-recognized accreditor made public any pending or final actions which have negatively changed the institution's accreditation status or require additional reporting?**

No FAQ at this time.

### **#5: Has the institution made changes to its degree levels or degree programs offered?**

**Q: The question asks about changes to our degree programs offered – 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 – is that what change you are looking for?**

A: Yes. That's exactly the type of changes THECB is seeking. This is to ensure THECB has correct program names, degree designations and CIP Codes in the program inventory. 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. Under #6, an institution will provide a list to ensure program info is up-to-date in THECB's records.

**Q: Regarding the question, "Has the institution made changes to its degree levels or degree programs offered?" 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: 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: 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. 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. 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: On the annual compliance review report, a question is asked about changes to degree levels or degree programs. Does this apply to only the degrees involved with clinicals/internships or to any degree program we have? For example we have a new online program starting this spring.**

A: Your institution would only need to provide information for the programs currently on your program inventory as listed on the THECB website. However, if your institution needs to add programs to the inventory based on Texas-located clinicals, internships or other field-based experiences, you could do so through the annual report. Remember, your institution does not need to report any 100% online degree programs or courses leading to degrees.

#### **#6: Attachment – Accreditation Status & Current Degree Programs**

**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 the Statement of Affiliation or other type of documentation that shows your institution's current accreditation status and then attach a separate table for all degree programs currently approved and offered at the institution. The format is in the report and 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 so that students can search and find degree programs approved in Texas.

**Q: Our institution has the current Statement of Affiliation from its regional accreditor. However, since we received the Statement of Affiliation, we have also received approval for a 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: 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: 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 format shown under #6. 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.

Finally, THECB asks for updated information from your institution's accreditor to ensure they have approved offering the programs listed under #6. The accreditor's approval would be for the out-of-state location that is offering the program with the clinical or internship component in Texas.

**Q: 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: 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: 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, 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.

**Q: With regard to the following paragraph, is Texas concerned only with those programs that have a ground component, such as counseling and student teaching, or all programs offered by the University?**

***If the accreditor’s statement does not break down information by CIP code, degree and degree program name for the THECB-authorized institutional campus or location, attach a separate table, using the following format for all degree programs currently approved and offered at the institution:***

**I know it says “all programs” but it also says: *For out-of-state institutions authorized solely to provide clinicals or internships in Texas: Provide a notation indicating the degrees/programs with a clinical or internship component.***

A: For out-of-state institutions holding a Certificate of Authorization based on field-based experiences (clinicals/internships) only, the following info is needed:

- Information regarding the out-of-state location from which the program with the field-based experiences are offered. For example: If a program with a clinical is offered at Campus X of Out-of-State University, we want to identification of that campus.
- Information regarding the program or programs that have a field-based experience in Texas. You do not need to include any other programs offered at Campus X.
- Information regarding the field-based experiences locations for the above programs.

We are distilling down to the non-Texas location of the institution offering the clinical or internship, only the programs with a field-based component, and then the locations for clinicals/internships in Texas associated with those programs.

#### **#7: Attachment – Other Accreditor Actions, Requirements or Approvals**

No FAQ at this time.

#### **#8: Catalog or Student Handbook Annotations – Compliance with Principles Addressed in THECB Rule 7.4(20)(B)**

**Q: 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 first chart, 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 column 4 in the table in question 8 asking if our accrediting agency has the same standards? If I answer yes what should I provide for documentation the actual standard or just 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: Our institution also has some programmatic accreditation. Should we list corresponding standards for our programmatic accreditor?**

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

**Q: When the form asks about a complete listing of each employed faculty member, etc. (page 5 (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 question #8, 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 question #9, your institution will attach the publication(s) referenced in question #8.

**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.

#### **#9: Attachment – Current Catalog and/or Student Handbook**

**Q: Attachment 9. states "attach a copy" of our catalogs and student handbook. Can I send the link to them or burn them on to a CD?**

**Similar question: 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 is fine. 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.

#### **#10: Student Complaint Summary – In Accordance with THECB Rules 1.110-112**

**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.

#### **#11: Attachment – 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.

#### **#12: Attachment – Financial Statements**

**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. 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. 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.

### **#13: Certification Statements and Digital Signature – Authorized Official Representative of Institution**

**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 #13 are true. This will include acknowledging the truth and correctness of documents and information provided in the report.