It must be "a public or nonprofit educational institution in any State which-(a) admits as regular students only persons having a certificate of graduation from a secondary school, or the recognized equivalent of such certificate;

(b) is legally authorized to provide, and provides within the State, an educational program for which it awards a bachelor's degree, or provides not less that a two-year program which is acceptable for full credit toward such a degree, or offers a two-year program in engineering, mathematics, or the physical or biological sciences which is designed to prepare the student to work as a technician and at a semiprofessional level in engineering, scientific, or other technological fields which require the understanding and application of basic engineering, scientific, or mathematical principles of knowledge;

(c) is accredited by a nationally recognized accrediting agency or association determined by the Commissioner to be reliable authority as to the quality of training offered or is, according to such an agency or association, making

reasonable progress toward accreditation;

(d) has met the requirements of clauses (a) and (b) during the five academic years preceding the academic year for which it seeks assistance under this title:

(e) is making a reasonable effort to improve the quality of its teaching and administrative staffs and of its student services;

(f) is, for financial or other reasons, struggling for survival and is isolated from the main currents of academic life:

(g) meets such other requirements as the Commissioner may prescribe

by regulation; and

(h) is not an institution, or department or branch of an institution, whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation or to prepare them to teach theological subjects."

A majority of these items are clear-cut and may be readily applied to applicant institutions. However, such requirements as "is making a reasonable effort to improve the quality of its teaching and administrative staffs and of its students services" and "is, for financial or other reasons, struggling for survival and is isolated from the main currents of academic life" are less tangible, requiring a degree of subjective analysis and judgment.

In its first two years of operation, the division of College Support has relied heavily upon the advice and assistance of its Advisory Council. The Council has

provided guidance in the establishment of guidelines.

It has seemed wise to avoid a strict definition of developing institutions which might preclude assistance to a number of institutions defining themselves as developing. The data accumulating from this source have proved to be invaluable in establishing more objective characteristics for the judgmental aspects of the law. As our experience develops, we see emerging a profile which begins to distinguish a developing institution from all others. For example, these institutions bear the following range of characteristics within the categories utilized by accrediting associations as indices to quality.

- 1. Enrollment _____ 2. Endowment income or annual State appropriations.
- Tuition . 4. Educational and general expenditures.
- Educational and general expenditures for student.
- 6. Faculty 7. Percent of faculty holding the
- doctorate.
- Student-faculty ratio_____ 9. Library volumes_____

- Mean average, 1,089. Moving toward the acceptable 1,500 level.
- Mean average, \$125,000. Moving toward \$900,000.
- Mean average, \$556. Moving toward \$1,500. Mean average, \$1,141,000. Moving toward \$2,107,400.
- Mean average, \$1,048. Moving toward \$1,740.
- Mean average, 66. Moving toward 98. Mean average, 26 percent. Moving toward
- 52 percent. Mean average, 20. Moving toward 12.
- Mean average, 51,000. Moving toward 157,000.

This profile could be interpreted, on the other hand, by stating what appears to be the emerging criteria for determining eligibility as a developing institution.