Transnational Association of Christian Colleges and Schools

Policies and Procedures Manual
as of January 2021

Transnational Association of Christian Colleges and Schools (TRACS) is recognized by the United States Department of Education (ED), the Council for Higher Education Accreditation (CHEA), and International Network for Quality Assurance Agencies in Higher Education (INQAAHE) as a national accrediting agency for Christian postsecondary institutions that offer certificates, diplomas, associate, baccalaureate, and graduate degrees, including distance education.
Categories of Board Policies

Board Policies Concerning the Accreditation Commission (BP101-BP121)

BP101  Board Policies
BP102  Definitions
BP103  Use of TRACS Logo
BP104  Complaints Against Member Institutions or TRACS
BP105  Disclosure of Information
BP106  Information Provided to Other Entities
BP107  Documents Provided to the Accreditation Commission
BP108  Budget and Financial Reports
BP109  Financial Support
BP110  Reliability / Validity Study
BP111  Annual Operational Report Summary
BP112  Institutional Misrepresentation
BP113  Conflicts of Interest
BP114  New Commissioner Training and Commissioner Continuing Education
BP115  Travel and Related Expenses
BP116  Anti-Discrimination
BP117  Anti-Harassment
BP118  Unannounced Visits
BP119  Records Management, Retention, and Disposal
BP120  TRACS Responsibility for Institutional Title IV Compliance
BP121  Investment Policy

Board Policies Concerning Institutions (BP201-BP239)

BP201  Institutional Responsibilities in Accreditation
BP202  Institutional Liaison to TRACS
BP203  Annual Operational Report
BP204  (Eliminated by Previous Commission Action)
BP205  Monitoring Institutional Growth
BP206  Monitoring Student Achievement
BP207  Institutional Staff Reviews
BP208  Title IV Participation
BP209  Student Refunds
BP210  Credit Hour
BP211  Sanctions and Adverse Action
BP212  Request for Withdrawal
BP213  Failure to Pay
BP214  Lapse of Candidacy or Accreditation
BP215  Decisions of State Agencies or other Accrediting Agencies
BP216  Investigation of Allegations of Fraud
BP217  Unethical Conduct
BP218  Reapplication After Withdrawal or Termination
BP219  Appeals
BP220  Choice of Law and Venue
BP221  Institutional Obligations Related to Litigation
BP222  Closure of an Institution, a Branch Campus, or Teaching Site
BP223  Dual Enrollment
BP224  Teach-Out Plan
BP225  Teach Out Agreement
BP226  Institutional Changes
BP227  Branch Campus
BP228  Teaching Site
BP229  Distance Education
BP230  Agreement Between Institutions
BP231  Using the Facilities of Another Organization
BP232  Using the Services of Another Organization
BP234  Records of Student Complaints
BP236  Best Practices in Advertising
BP237  Best Practices in Student Recruiting
BP238  Best Practices in Representing TRACS Status
BP239  Use of Consultants

**Board Policies Concerning Accreditation (BP301-BP311)**

BP301  Institutional Accreditation
BP302  Accreditation Standards and Institutional Eligibility Requirements
BP303  Changes to Accreditation Standards, Institutional Eligibility Requirements, and Board Policies
BP304  The Application Process
BP305  The Accreditation Process
BP306  Peer Evaluators
BP307  Third Party Comments
BP308  Posting of Institutional Review Dates
BP309  Professional Programs
BP310  Interim Fifth-Year Review
BP311  Annual Dues
INTRODUCTION

This Policies and Procedures Manual serves as the comprehensive collection of policies and procedures for the Transnational Association of Christian Colleges and Schools (TRACS) and is intended to provide guidance to institutions (those seeking membership with TRACS and those already holding membership with TRACS), the TRACS Accreditation Commission, TRACS staff, peer evaluators and any interested parties regarding the policies and procedures that pertain to accreditation with TRACS and its related processes.

Specific questions regarding the accreditation process should be addressed to TRACS staff.
BP102

Definitions

These definitions apply to both the TRACS Accreditation Standards and Policies and Procedures.

**Ability-to-Benefit Student**: A student who does not meet the regular admissions criteria for the institution or program, who is admitted on a provisional basis and is provided the opportunity and assistance to succeed.

**Accredited Institution**: An institution accredited by an accrediting agency approved by the U.S. Department of Education or an equivalent foreign government agency.

**Adverse Action**: TRACs considers Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation of an institution to be synonymous Adverse Actions in that these actions all result in the loss of Candidacy or Accreditation. Adverse Actions are public actions which may be appealed according to TRACS policy BP219 - Appeals. (see TRACS policy BP211)

** Applicant Institution**: An institution whose application has been approved by the TRACS Applicant Review Committee (ARC).

**Basic Compliance**: A determination of full compliance with all Standards related to the Institutional Eligibility Requirements (IERs) and the ability to demonstrate compliance with all Standards within the period of candidacy.

**Branch Campus**: An additional location geographically apart from the main campus at which the institution offers at least 50% of an educational program.

**Candidate Institution**: An institution which has been granted pre-accredited status by action of the Accreditation Commission indicating that the institution has been found in Basic Compliance.

**Certified External Audit**: An audit performed in conformity with generally accepted accounting principles (GAAP) and federal guidelines by auditors who are not inappropriately involved with the institution (e.g., auditors are not members of the governing board, not employees of the institution, not under contract to the institution for services other than the audit, or not involved in the decision-making activity, etc.).

**Contingency Reserve**: The TRACS Accreditation Commission requires that institutions demonstrating compliance with TRACS expectations regarding the use of a contingency reserve provide evidence of the following: Board action establishing a contingency reserve and directing the deposit of the required funds into a separate account, bank statement(s) indicating required deposit, Board approved policies directing the use of and repayment of the contingency reserve and Board approved investment policy directing the investing of the contingency reserve funds.
Correspondence Education: Education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor; interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; correspondence courses are typically self-paced; and correspondence education is not distance education. [NOTE: This definition of Correspondence Education is provided to ensure that the institution’s Distance Education meets the definition of Distance Education and does not fall to the level of Correspondence Education. Correspondence Education is not reviewed by TRACS and is not included in an institution’s scope of recognition with TRACS.]

Corresponding Institution: An institution which has made initial contact with TRACS.

Distance Education: Education that uses one or more of the technologies listed to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs, and CD-ROMs, if used in a course in conjunction with any of the technologies listed above.

Financial Stability: Institutions are able to evidence a history of finances adequate to support the existing programs and to assure the continuity of the essential operations beyond the date when current students would complete their degree programs. Events which indicate a lack of financial stability include negative Change(s) in Total Net Assets or Retained Earnings, enrollment decline of 20% or more, notification from the Department of Education of composite score below 1.5, the use of pledges to achieve a positive change in Net Assets without Donor Restrictions or the required liquidity is substantially depleted.

Focus Visit: The visiting of an institution by either a small team or staff required for the review of a specific issue.

Full-Time Chief Academic Officer: An individual who has a full-time contract with the institution; whose possesses the professional experience and competence for the assigned position, whose earned degrees from accredited institutions are appropriate to the assigned responsibilities; whose salary is fixed and not contingent; whose job responsibilities are specifically spelled out in a board approved job description; whose primary professional employment is with the institution; and whose outside professional activities do not detract from the specified job responsibilities.

Full-Time Chief Executive Officer: An individual who has a full-time contract with the institution; whose possesses the professional experience and competence for the assigned position, whose salary is fixed and not contingent; whose job responsibilities are specifically spelled out in a board approved job description; whose primary professional employment is with the institution; and whose outside professional activities do not detract from the specified job responsibilities.

Full-Time Faculty: A faculty member who has a full-time contract with the institution; whose earned degrees from accredited institutions are directly related to courses to be taught; whose salary is fixed and not contingent; whose job responsibilities are specifically spelled out in a board approved job description; whose primary professional employment is with the institution; and whose outside professional activities do not detract from the specified job responsibilities.
**Full-Time Faculty Sufficiency:** Adherence to best practices would generally lead the institution to employ at least one full-time faculty member for each program area offered. Ultimately, compliance with the requirement for the institution to employ a “sufficient number of full-time faculty” (Standard 9.1) is demonstrated when the institution employs an adequate number of qualified full-time faculty to carry out the following duties: design, develop, and evaluate the curriculum required for the educational programs offered; offer instruction for the courses required for completion of the programs within the timeframes prescribed; identify and assess appropriate learning outcomes at the program and course levels; and offer appropriate academic advising.

**Institutional Independence:** The Board of the institution has sufficient independence from any external entity (including financial independence), such that it is solely accountable for meeting the TRACS Standards.

**Institutional Eligibility Requirements:** The Standards associated with the TRACS Accreditation Requirements and the Standards noted as Federal Requirements with which an institution must demonstrate compliance in order to be accepted as an Applicant and subsequently authorized to begin the Self-Study process for consideration by the Accreditation Commission for Candidate level recognition.

**Monitoring:** A requirement imposed on an institution by the President of TRACS to submit compliance information (e.g., monthly financial reports) as requested by staff.

**National Norms:** A reference to practices, terms, or policies which are common in American higher education.

**Part-Time/Adjunct Faculty:** A faculty member who has a contract with the institution to teach one or more specifically identified courses for one or more specified academic terms; whose earned degrees from accredited institutions are directly related to the courses to be taught; and whose job responsibilities are specifically spelled out in a board approved job description. The institution may designate these faculty members as part-time or adjunct; however, only those contracted to teach in the current or most recently completed academic year may be included in any published faculty listing.

**Program Area:** A general group of academic disciplines in which one or more degree programs, certificates, or diplomas may be offered.

**Professionally Qualified Librarian:** An individual who has earned a Master's in Library Science, or its equivalent, from an accredited institution and who is capable of leading library development and operations.

**Sanctions** – TRACS considers Warning, Probation, and Show Cause (listed in order of degree of non-compliance) to be Sanctions. Sanctions are public actions which may not be appealed. (see TRACS policy BP211)

**Teaching Site:** A location geographically apart from the main campus at which the institution offers less than 50% of any educational program. No student can earn 50% or more of any educational program at any degree level at a teaching site.
To ensure operational integrity and fairness in the accreditation process, the TRACS Policies and Procedures Manual will contain all policies (Board Policies) and procedures which have been established and approved by the TRACS Accreditation Commission.

Modifications, to Board Policies, including the addition of new Board Policies may be made only by official action of the Accreditation Commission.

The process for the addition of new Board Policies or the modification of current Board Policies will follow the procedures outlined in BP303.
Use of TRACS Logo

Reference: None
Adoption Date: June 2013
Last Revision Date: June 2013

Use of the TRACS logo by any individual, organization, or institution is forbidden without written prior approval from TRACS.
The Transnational Association of Christian Colleges and Schools (TRACS) values the role of information provided by students, employees, and others in performing its role of monitoring institutional compliance with TRACS Accreditation Standards. TRACS is also interested in assuring that member institutions maintain appropriate grievance and due process procedures, provide procedural fairness, and consistently apply their policies and procedures.

**COMPLAINTS AGAINST INSTITUTIONS**

The TRACS procedures for the review of complaints involving member institutions are designed to enable TRACS to address possible violations of the TRACS Standards and the proper and uniform application by institutions of their own policies and procedures, as they relate to the TRACS Accreditation Standards.

TRACS only considers complaints which are in accordance with the following:

- The complaint or allegation contains no defamatory statements.
- All attempts have been taken to resolve the issue through all formal means available to the complainant, including the institution’s published grievance and due process procedures, before the complaint is submitted to TRACS.
- The complaint is not currently in an institution’s formal proceedings or in litigation. TRACS may, at its discretion, choose to proceed with the review in such cases if there is substantial, credible evidence that indicates systemic problems with the institution against which a complaint has been filed or if a delay would harm the complainant.
- Complaints are submitted in writing on the TRACS Complaint Processing Form and in accordance with the provisions detailed on the TRACS Complaint Information Sheet. (Complaints made verbally, sent electronically, or sent through facsimile transmission will not be accepted.)
- Two hard copies of all materials are sent to: President, Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest VA 24551.
- TRACS will not act on complaints submitted on behalf of another individual, are anonymous, or complaints sent through channels other than those provided.

The TRACS complaint procedures are for the purpose of addressing any significant noncompliance by member institutions with the TRACS Accreditation Standards, policies, or procedures. The TRACS complaint policy is not designed to involve TRACS either as an arbiter in disputes between individuals and member institutions, or as a reviewing authority in individual matters concerning an institution’s normal role in the daily functioning of the institution including disciplinary matters or contractual rights. TRACS does not act as a grievance panel for cases where the outcome of a grievance is unsatisfactory to a complainant.
Responsibilities of Institutions

1. The institution has adequate policies and procedures for addressing written student and employee complaints and is responsible for demonstrating that it follows those procedures when resolving complaints. Institutions are expected to be in compliance with the appropriate TRACS Standards regarding processes for handling complaints by students and employees.

2. The record of all complaints is maintained in a designated office, is made available to TRACS upon request and is made available for review by Evaluation Team members as part of the institution's scheduled reviews for Candidate, Accredited and / or Reaffirmation status.

Procedures for Filing a Complaint against an Institution

1. Individuals making an inquiry to TRACS regarding complaint procedures or about issues and concerns that could be considered complaints will be directed to the TRACS website with instructions for downloading the packet containing the Policies and Procedures for Complaints Against Member Institutions, the TRACS Complaint Information Sheet, and the TRACS Complaint Processing Form. TRACS response and its obligations to meet the specific timetables outlined in these procedures will begin only after the complainant has submitted all required documents.

2. A formal complaint is one that is:
   a. Submitted in writing using the TRACS Complaint Processing Form (including all required supporting documentation);
   b. Signed; and
   c. Sent to the attention of the President of TRACS by the complainant(s). Complaints which are not in writing, anonymous, or sent electronically or through facsimile transmission will not be considered.

3. Once the complainant has filed a complaint, the following procedures will be followed for review and consideration of the complaint:
   a. TRACS will acknowledge receipt of the complaint within 15 working days.
   b. Within 30 working days of receipt of the complaint, TRACS staff will review the complaint and its documentation and determine:
      i. Whether the issue(s) raised in the complaint fall within the jurisdiction of TRACS and if the issues(s) are related to one or more of the TRACS Standards;
      ii. If there is adequate documentation in support of the complaint; and
      iii. Whether the complaint raises questions regarding the institution’s compliance with the TRACS Standards sufficient to require the institution to submit information and documentation regarding the complaint.

4. By the end of the 30 working days review, TRACS will inform the complainant regarding one of the following dispositions of the complaint:
   a. The complaint will not be processed further because the issues raised in the complaint do not fall within the jurisdiction of TRACS (not related to a TRACS Standard) or because there is inadequate documentation to raise questions concerning the institution’s compliance with TRACS Standards.
   b. Documentation is inadequate and additional documentation may be necessary from the complainant.
   c. The institution will be required to submit information and documentation regarding the complaint.
5. If the institution is required to submit information and documentation regarding the complaint, TRACS will forward a copy of the complaint to the institution’s Chief Executive Officer who will be required to respond and provide all documentation to TRACS within 30 working days of receipt of the notification from TRACS.

6. Within 20 working days of receipt of the institution’s response, the President of TRACS will make one of the following determinations regarding the complaint and will notify the institution and complainant accordingly:
   a. There is insufficient evidence of significant non-compliance on the part of the institution and the complaint will not be processed further. The decision of the President of TRACS is final.
   b. TRACS is unable to determine compliance at that time and the case will either be included in any already scheduled visits to the institution or a Focus Team will be sent to the institution to examine documents, interview appropriate individuals, make a determination regarding the compliance of the institution, and prepare a report with recommendations for the institution to bring areas of non-compliance into compliance.
   c. No response was received from the institution or evidence suggests the institution is in significant non-compliance with one or more TRACS Standards and what steps will be taken to correct the non-compliance issues, up to and including possible adverse action.

7. If the President of TRACS determines that either b. or c. above is applicable, by the end of the 20 working days, the President of TRACS will notify the complainant and the institution that a determination regarding the complaint has been made and which of the above options TRACS will pursue.

8. As appropriate, the President of TRACS will present the findings of any Focus Team report to the Commission along with a recommendation for specific action at the next scheduled meeting; at which time the Commission will make a decision regarding the disposition of the complaint and any determinations of non-compliance. The decision of the Commission is final.

9. Following the Commission meeting, the complainant and institution will be notified of the final decision of the Commission.

TRACS BP211. B. stipulates the following:

When the President of TRACS determines from an institution’s annual report, the findings of an Evaluation Team, the findings of a staff visit, findings resulting from a complaint against an institution, or any other source available that an institution may not to be in compliance with one or more of the Accreditation Standards, the President of TRACS will initiate a review of that institution.

The findings of non-compliance from that review may lead to an action against the institution.

COMPLAINTS AGAINST TRACS

Complaints against TRACS are limited, in that individuals may file a complaint against TRACS and/or its staff on matters on which they believe they have been personally aggrieved. This type of complaint covers those situations in which an individual believes that TRACS and/or its staff did not follow its policies and procedures in the handling of a complaint against a member institution. Institutions may file a complaint against TRACS for failure to follow a policy or procedure, against a TRACS staff member's alleged failure to follow a TRACS policy or
procedure, against a peer evaluator’s alleged bias against the institution or an alleged conflict of interest in working with an institution. In order to be considered a formal complaint against TRACS, a complaint must involve issues broader than a concern about a specific institutional action.

**Procedures for Filing a Complaint against TRACS**

1. If the complaint is against a TRACS staff member or an agency representative, such as a peer evaluator, the following procedures apply:
   a. The individual (or institution) should submit the written complaint including a description of the specific issue accompanied by supporting documentation.
   b. The complaint is to be sent to: President, Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   c. The President will acknowledge receipt of the complaint within 15 working days of its receipt.
   d. Within 30 working days of receipt of the complaint, the President of TRACS will review the complaint and its documentation and determine:
      i. If there is adequate documentation in support of the complaint.
      ii. Whether the complaint raises questions regarding a failure of TRACS and/or its staff or any peer evaluator serving on behalf of TRACS in following TRACS policies and procedures in the matter(s) noted in the complaint.
   e. The President will inform the complainant of the disposition of the complaint within 30 working days of receipt of the complaint.

2. If the complaint is against the President of TRACS, the following procedure applies:
   a. The individual should submit a written complaint to the Chair of the TRACS Commission that includes a description of the complaint and all supporting documentation. The complaint should be sent to: Commission Chair (For Chair Only), Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   b. The Chair will acknowledge the complaint within 30 working days of receipt and will designate a committee composed of members of the Executive Committee of the Accreditation Commission to review the complaint (including all documents submitted by the complainant), request and review information submitted in writing from the President of TRACS, and recommend actions to the Chair within 30 working days of the beginning of the Executive Committee’s review.
   c. The Chair will review the Executive Committee recommendation and inform the complainant and the President of TRACS of action to be taken within 30 days of receipt of the Executive Committee’s recommendation.
   d. Concern that a TRACS action was not in accord with the complainant’s expectations is not in and of itself cause for review of the complaint.

3. If the complaint is against a member of the TRACS Commission (such as that a Commissioner failed to recuse him or herself from the discussion and vote where an alleged conflict of interest existed or evidence that the Commission failed in the application of a policy or procedure), the following procedures apply:
   a. The individual should submit a written complaint to the Chair of the TRACS Commission that includes a description of the complaint and all supporting documentation. The complaint should be sent to: Commission Chair (For Chair Only), Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
b. The Chair will acknowledge the complaint within 30 working days of its receipt and will designate a committee composed of members of the Executive Committee of the Accreditation Commission to review the complaint (including all documents submitted by the complainant), request and review information in writing from the Commissioner named in the complaint, and recommend action to the Chair within 30 working days of the beginning of the Executive Committee’s review.

c. The Chair will review the Executive Committee’s recommendation and inform the complainant and the Commission member and the President of TRACS of the action within 30 days of receipt of the Executive Committee’s recommendation.

d. Concern that a Commission action was not in accord with the complainant’s expectations is not in and of itself cause for review of the complaint.

4. If the complaint is against the Chair of the Commission, the Vice Chair will assume the role detailed above.

**THIRD-PARTY COMMENTS REGARDING INSTITUTIONS OR ACTIONS OF THE TRACS ACCREDITATION COMMISSION**

TRACS recognizes the value of information provided by members of the public in determining whether a member institution is maintaining compliance with all TRACS Standards and is maintaining appropriate procedures, exhibiting procedural fairness and applying policies consistently. Therefore, TRACS invites the public to submit comments designed to enable TRACS to address an institution’s possible significant non-compliance with TRACS Standards and assure the proper and uniform application of their own policies and procedures, as they relate to the TRACS Standards. All TRACS Standards are provided in the TRACS Accreditation Manual.

Unsolicited third-party comments regarding the TRACS Commission are limited, in that individuals may only submit comments regarding the TRACS Commission and/or its staff on any Commission action where they believe they have been personally aggrieved. This type of comment covers those situations in which an individual believes that the TRACS Commission and/or its staff did not follow its policies and/or procedures in the handling of an issue under consideration.

**Procedures for Filing a Third-Party Comment**

Any individual may file a third-party comment regarding an accredited or candidate institution or the TRACS Commission. The names of all institutions holding candidacy or accredited status with TRACS are posted on the TRACS website, www.tracs.org. TRACS has established procedures for filing a third-party comment.

1. Third-party comments should be filed in accordance with the following procedures:
   a. The individual should submit the third-party comment in written form including the commenter’s name, mailing address, e-mail address, phone number, and a clear statement describing the performance of the institution in relation to compliance with the TRACS Standard with which the institution is allegedly not compliant or the policy or procedure which TRACS has not properly followed.
   b. All third-party comments are to be sent to: President, Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   c. The President will acknowledge receipt of the complaint within 15 working days of its receipt.
d. If the commenter indicates that his or her identity may not be shared, TRACS will make every effort to preserve the confidentiality of the commenter. However, depending on the nature of the comment and the circumstances, it may not be possible to determine the validity of the comment unless this information is shared. For this reason, TRACS staff may choose to disregard any comment that indicates that the commenter wishes not to have his or her identity shared.

e. All third-party comments should be accompanied by appropriate supporting documentation. TRACS will not consider unsupported comments.

f. Within 30 working days of receipt of the third-party comment, the President of TRACS will review the third-party comment and its documentation and determine:
   i. If there is adequate documentation in support of the allegations.
   ii. Whether the issues raise questions regarding the institution’s compliance with the TRACS Standards sufficient to require the institution to submit information and documentation regarding those issues.
   iii. Whether the TRACS Commission or Staff has failed to follow a TRACS Policy or Procedure.

g. Normally, no additional response is made to the individual filing a third-party comment. If appropriate, staff may contact the commenter for clarification or additional information.

h. For comments regarding an institution, the President of TRACS will determine the appropriate handling of the comment which may include, but is not limited to:
   i. Sending the information to the institution for its input and follow up.
   ii. Referring the information or a summary of issues to a future Evaluation or Focus Team with instructions to verify information contained in the comment with other sources in order to determine its validity.
   iii. Holding the information in a file for future reference.
   iv. Dismissing the comment for lack of evidence of non-compliance.
   v. Proceeding to the Commission Actions Against Institutions policy and procedures.

i. For comments regarding the TRACS Commission or Staff, the President of TRACS will prepare a report for the next scheduled meeting of the Accreditation Commission which includes recommendations for resolving the issues identified in the third-party comment.

FIELDING INQUIRIES FROM THE MEDIA

TRACS believes that it is in the best interest of TRACS, complainants, member institutions and those offering third-party comments to deal with members of the news media in a consistent and timely manner. TRACS has the responsibility to protect the integrity and privacy of both the complainant or commenter and the institution. All telephone calls or e-mails from members of the media shall be forwarded to the President of TRACS. Neither the President of TRACS nor any staff member shall comment on specific situations involving member institutions or offer responses to hypothetical situations.

Media shall be directed by the President of TRACS to the appropriate location on the TRACS website for information regarding the Complaint Policy and Procedures and TRACS Standards.
MEANS OF COMMUNICATION

After the receipt of the initial hard-copy complaint or third-party comment; correspondence may be in writing, through e-mail, or by any reasonable means which helps to facilitate a solution to the issues at the lowest possible level.

RETENTION OF RECORDS

Individual complaints will be retained in the TRACS Office. Should a number of individual complaints suggest a pattern of concern which may evidence a significant lack of compliance with TRACS Standards that was not evident from any individual complaint, TRACS may renew its consideration of the matter for whatever action may be appropriate. All records regarding complaints shall be retained for a minimum of 5 years.
Disclosure of Information

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

Public Disclosure of Information

TRACS posts its publications and public notices on its website. These documents are available for downloading or printing. Any person who wants a printed copy of any information or document publicly disclosed should request that copy from the TRACS office.

TRACS urges member institutions to make available to the public, information regarding their accreditation status and pertinent documents related to the accreditation process, including Evaluation Team Reports. Although this information may be requested from TRACS, the request will be forwarded to the institution and the institution is not required to disclose any such documents. (These documents are made available only upon the written consent of the institution).

Information Made Available from TRACS

1. The accreditation actions granted by the Accreditation Commission.
2. The procedures that institutions must follow in applying for pre-accreditation or accreditation.
3. The TRACS Accreditations Standards and procedures utilized in the accreditation process and the basis for the Accreditation Commission’s determinations to grant, reaffirm, reinstate, deny, terminate, or take any other action related to each type of pre-accreditation and accreditation that the agency grants.
4. The institutions (including the programs offered by these institutions) that hold Candidate or Accredited status with TRACS, and for each institution, the year TRACS will next review or reconsider the institution for accreditation action.
5. The names, academic and professional qualifications, and relevant employment and organizational affiliation of:
   a. The members of TRACS policy and decision-making bodies.
   b. TRACS principal administrative staff.
6. All final decisions of the Accreditation Commission regarding accreditation will be reported to the public (including the basis of the decision) no more than 30 days after such decisions are made, including:
   a. A decision to award pre-accreditation or accreditation to an institution.
   b. A decision to renew an institution’s accreditation.
   c. A decision to accept an institution’s withdrawal from membership.
   d. A final decision to take an adverse action placing an institution on probation or show cause. Decisions involving such adverse action will be reported to the public within 24 hours of notifying the institution affected.
   e. A final decision to deny or terminate the pre-accreditation or accreditation of an institution. Decisions involving denial or termination of pre-accreditation or accreditation will be reported to the public within 24 hours of notifying the institution affected. Notice with respect to any of these final decisions shall also:
      i. Include the specific reasons for the Accreditation Commission’s decision.
II. Include any official response provided by the affected institution with regard
to the decision or evidence that the institution had the opportunity to provide
official comments.

7. A list of scheduled dates for meetings of the Accreditation Commission.

**Information Not Available for Dissemination**

TRACS does not publish information regarding the withdrawal of an application for initial membership.

The following information is confidential. However, such information will be provided to the U.S. Department of Education and/or State Agencies within 30 days of receiving the request in writing.

1. Peer reviewer and staff reports, including any determinations regarding institutional compliance with Accreditation Standards.
2. Minutes of the Accreditation Commission discussions with regard to applicant or member institutions.

Certain relationships yield information which legally cannot be disclosed without the consent of the individual providing the information. If such information or other similar information that is protected under law is disclosed to TRACS or peer reviewers, the information will not be disclosed without written consent of the party legally entitled to disclose the information.
Notice of the following decisions of the Accreditation Commission regarding the accreditation of institutions will be provided in writing to the U.S. Secretary of Education, and to appropriate state and accrediting agencies, no more than 30 days after the Accreditation Commission makes the decisions.

1. A decision to award Candidacy (pre-accreditation) or initial Accreditation to an institution.
2. A decision to renew an institution’s Accreditation.
3. A decision to accept an institution’s withdrawal from membership.

Notice of the following decisions of the Accreditation Commission regarding the accreditation of institutions will be provided in writing to the U.S. Secretary of Education, and to appropriate state and accrediting agencies, at the same time notice is sent to the institution, but no more than 30 days after the Accreditation Commission makes the decisions. Decisions involving adverse action such as placing an institution on Probation or Show Cause or the denial or termination of Candidacy or Accreditation will be reported to the public within 24 hours of notifying the institution affected.

1. A final decision to take any adverse action against an institution, including placing an institution on Probation or Show Cause.
2. A final decision to deny or terminate the Accreditation status or Candidate status of an institution. Notice with respect to any of these final decisions shall also:
   a. Include the specific reasons for its decision;
   b. Include any official response provided by the affected institution or program with regard to the decision or evidence that the institution had the opportunity to provide official comments; and
   c. Be disclosed no later than 30 days after the decision is made.

Notice of the following actions will be provided in writing to the U.S. Secretary of Education and to appropriate state and accrediting agencies.

1. TRACS receipt of a request from a member institution to withdraw voluntarily from Accreditation or Candidacy. This notice shall be provided no more than 30 days from the date TRACS receives the written request which appears to have been authorized by the institution’s governing board.
2. TRACS determination that an institution has allowed its Accreditation or Candidacy to lapse. This notice shall be provided no more than 30 days from the date TRACS determines that the institution’s Accreditation or Candidacy has lapsed.
The following information will be provided to the U.S. Department of Education:

1. A copy of any annual report prepared by TRACS.
2. A copy, updated annually, of its Directory of Accredited and Candidate institutions and the programs offered by these institutions.
3. A summary of the agency’s major accrediting activities during the previous year (an annual data summary), if requested by the Secretary of Education to carry out the Secretary’s responsibilities related to accrediting agency monitoring.
4. Any proposed change in the agency’s policies, procedures, or Accreditation Standards that might alter its scope of recognition and/or its compliance with the criteria for recognition.
5. Any institution approved for the offering of Distance Education which experiences an increase in headcount enrollment of 50 percent or more within one institutional fiscal year.
6. The name of any institution or program TRACS accredits that the agency has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse, along with the agency’s reasons for concern about the institution.
7. If the Secretary requests, information that may bear upon an accredited or pre-accredited institution’s compliance with its Title IV, HEA program responsibilities, including the eligibility of the institution or program to participate in Title IV, HEA programs.

Upon request, TRACS will share with other appropriate recognized accrediting agencies and recognized state approved agencies, information about the Accreditation or Candidate status of an institution and any adverse actions the agency has taken against such institutions or programs.

TRACS will respond to requests for information from the U.S. Department of Education, other recognized accrediting agencies, and state agencies no more than 30 days from the receipt of the request and earlier if required by state or federal laws or regulations. Requests should be addressed to the President of TRACS.
All necessary materials pertaining to (1) the accreditation of institutions (including compliance with Institutional Eligibility Requirements [IERs]) (2) information concerning possible adverse actions against institutions, (3) proposed Institutional Changes requiring Commission action, and (4) any and all other materials that require Commission action and/or acknowledgement, are prepared and compiled in advance of each meeting of the Accreditation Commission meeting by the TRACS staff. Materials are forwarded to each Commissioner at least one month in advance of regularly scheduled meetings to provide the Commissioners ample time for review.

The TRACS staff also prepares and provides copies of all documentation for review by Commissioners and places these materials in a reading room prior to each scheduled semi-annual Accreditation Commission meeting. Commissioners are expected to review all documents in the reading room prior to engaging in discussions about any actions being considered and before making any decisions regarding those actions. Commissioners should note their review of all relevant materials on the appropriate forms in the reading room.

The President of TRACS and the Chair of the Accreditation Commission develop the agenda for all Commission meetings. Based on the agenda, the President of TRACS and staff prepare materials to send to each Commissioner. The materials to be provided to the Commissioners will normally include, but may not be limited to the following:

- Meeting Agenda
- Minutes of previous Commission and/or committee meeting(s)
- Report of the TRACS President
- Executive Committee Report which may include committee recommendations for Commission action
- Standards Review Committee Report which may include committee recommendations for Commission action
- Nominating Committee Report which may include committee recommendations for Commission action
- Special Committee Reports which may include committee recommendations for Commission action
- All relevant materials for each institution under review (accreditation status, adverse action, proposed Institutional Changes, etc.)
- Financial reports including budget projections
The TRACS staff submits the annual budget to the Accreditation Commission at the spring meeting, and the Commission approves or modifies it as necessary. The budget is not subject to consideration or review by another entity or organization. The staff submits the Financial Reports and the audits to the Accreditation Commission at the fall meeting and any adjustments to the budget that are necessary are approved by the Accreditation Commission.
Financial Support

Reference: None
Adoption Date: January 2011
Last Revision Date: January 2011

TRACS is supported primarily through the dues and fees of its member institutions. Although TRACS does not solicit donations, it does solicit grants for projects related to its mission and its institutions. All donations to TRACS will be noted in the reports of the President of TRACS with the sources noted. All financial reports are approved by the Accreditation Commission.
To assure that the TRACS Accreditation Standards and any evaluative criteria associated with these Standards are reliable and valid, the Accreditation Commission is committed to an on-going Reliability/Validity Study process.

This process involves the regular and systematic collection of data on reliability and validity for all member institutions. Data relating to the reliability and validity of the Accreditation Standards and any associated evaluative criteria will be collected from each institutional Evaluation Team and each institution being evaluated.

In addition, a session on the Study which seeks comments from member institutions will be conducted at least once every two years at any of the regularly scheduled meetings of the Accreditation Commission.

Data Reports will be published at regular intervals for Accreditation Commission review. Other studies essential for maintaining quality control will be initiated as part of this continuing process. The Study will be conducted in five-year cycles with summary reports published at the end of each cycle. Reports will be provided to the U.S. Department of Education and state agencies as appropriate.
Annual Operational Report Summary

Reference:  None
Adoption Date:  January 2011
Last Revision Date:  April 2019

Each year, TRACS compiles data provided by each institution’s Annual Operational Report to create an Annual Operational Report Summary.

The Annual Operational Report Summary identifies institutional strengths and potential problem areas for Candidate and Accredited institutions. TRACS uses the Annual Operational Report Summary as part of its annual institutional review process.
BP112

Institutional Misrepresentation

Reference:  None
Adoption Date:  January 2011
Last Revision Date:  April 2019

If a TRACS member institution releases incorrect or unclear information regarding its Candidate (pre-accredited) or Accredited status, the contents of staff and/or peer evaluator reports, or any action of the Accreditation Commission with respect to the institution, the President of TRACS will notify the Chief Executive Officer of the institution that corrective action must be taken immediately. Failure by the institution to correct the misrepresentation identified may result in action against the institution.

Any non-member institution falsely claiming affiliation with TRACS is subject to legal action by TRACS.
For TRACS purposes, a conflict of interest includes, but is not limited to, having served for compensation during the prior three years as an employee or consultant to an institution under consideration; being a stockholder or board member of the institution during the prior five years; or any other association or activity, including the appearance of a conflict of interest that an impartial person might reasonably conclude would compromise a person’s capacity for objectively dealing with an issue concerning a particular institution.

This Conflicts of Interest policy applies appropriately to the following entities: (A) the Accreditation Commission (Board of Directors), (B) Appeals Pool and Appeal Committee Members, (C) Peer Evaluators (Evaluation Team Members, Focus Team Members and IFYR Peer Reviewers), (D) TRACS Staff and other TRACS Representatives, and (E) Institutions. In the event of any unresolved issues regarding conflicts of interest involving any of the above entities, the matter will be settled by a majority vote of the Accreditation Commission using secret ballot.

A. Accreditation Commission

The TRACS Accreditation Commission serves not only as the primary decision-making body regarding policy and accreditation matters, but also as the TRACS Board of Directors.

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied to the Accreditation Commission when determining what constitutes a conflict of interest:

It is a conflict of interest for a member of the Accreditation Commission to have served as a Peer Evaluator, for an institution which is under consideration by the Accreditation Commission if the visit or review took place within five years of the Accreditation Commission meeting when the institution will be considered.

A member of the Accreditation Commission with a conflict of interest related to any institution or action being considered must decline an assignment as a reader, declare the conflict to the Chair of the Accreditation Commission, and recuse himself or herself from any discussion, deliberation, and vote concerning the institution or action under consideration.

If it is discovered after an Accreditation Commission action, that a situation involving a conflict of interest has significantly affected the action, the Chair of the Accreditation Commission may place the action on the Accreditation Commission agenda for reconsideration.

When an Accreditation Commission member is employed by, an appointee of, or a consultant to a member institution which is in any way involved in litigation with TRACS, the Accreditation Commission or both, it shall be a conflict of interest for that member to attend any meeting of the Accreditation Commission or the committees of the Accreditation Commission until the litigation is concluded, including all appeals.
New members of the Accreditation Commission receive training concerning conflicts of interest as a part of the overall training provided to new Commissioners and are required to sign a “Conflict of Interest Form” upon their election to the Commission. Additionally, all members of the Accreditation Commission are required to sign a “Conflict of Interest Form” annually.

A member of the Accreditation Commission may be removed from the Accreditation Commission by vote of that body if he or she knowingly violates this policy.

B. Appeal Committee Members

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied to Appeal Committee members:

Individuals with a conflict of interest related to any institution or action being appealed must decline an assignment as a member of an Appeal Committee.

When an individual is or has been employed by, an appointee of (e.g. a Board Member) or a consultant to a member institution which is in any way involved in litigation with TRACS or the Accreditation Commission or both, it shall be a conflict of interest for that individual to accept an assignment as an Appeal Committee member for the institution in question until the litigation is concluded, including all appeals.

It is a conflict of interest for a member of an Appeal Committee to have served as a Peer Evaluator, for an institution whose appeal will be considered by the Appeal Committee if the Peer Evaluator’s review took place within five years of the Accreditation Commission meeting when the institution was placed on Adverse Action.

Upon agreement to serve as a member of an Appeal Committee which will hear the appeal of a specific institution, members receive training concerning conflicts of interest and are required to sign a “Conflict of Interest Form” specific to the appeal.

When institutions that are appealing an Adverse Action by the Accreditation Commission are informed of the proposed Appeal Committee members assigned to hear the institution’s appeal, the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS in accordance with TRACS Board Policy - BP219.

If it is discovered after a decision by an Appeal Committee, that a situation involving a conflict of interest has significantly affected the decision, the Chair of the Accreditation Commission may place the matter on the Accreditation Commission agenda for consideration.

C. Peer Evaluators

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied to Peer Evaluators when determining what constitutes a conflict of interest and whether or not a member of the Peer Evaluator Pool is eligible to serve as an Evaluation Team Member, Focus Team Member or as an IFYR Peer Reviewer:

TRACS staff shall not knowingly assign a person to serve as a Peer Evaluator if that person:

1. Within the last five years has been an appointee (e.g., a board member) or employee of the institution, or has been recently a candidate for employment at the institution.
2. Is a graduate of the institution.
3. Has any other impediment (such as serving as an employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or pre-accredited by the agency or has applied for accreditation or pre-accreditation) to rendering an impartial, objective professional judgment regarding the institution, such as a close personal or familial relationship with persons at the institution or a strong bias regarding the institution.
TRACS staff relies on the personal and professional integrity of Peer Evaluators, expects them to be sensitive to potential conflicts of interests in the peer review process, and assumes they will act accordingly.

Peer Evaluators must not have served the institution undergoing review as a paid consultant within three years of the review.

A Peer Evaluator must not seek or accept employment from the institution undergoing review or serve it as a consultant for a period of one year following the review.

If it is discovered that a conflict of interest may have significantly affected the evaluation of an institution by a Peer Evaluator, either the TRACS President or the Chair of the Accreditation Commission (whichever is appropriate) may ask that a further evaluation of the institution be initiated to ensure an objective review.

As a part of the training required for inclusion in the Peer Evaluator Pool, individuals receive training concerning conflicts of interest. Upon agreement to serve as a member of either an Evaluation Team, a Focus Team or as an IFYR Peer Reviewer, individuals sign a “Conflict of Interest Form” specific to the institution to be reviewed.

Any Peer Reviewer who knowingly violates this policy will be removed from the Peer Evaluator Pool.

D. TRACS Staff and Other TRACS Representatives

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied specifically to TRACS staff and other TRACS representatives with regards to conflicts of interest:

All TRACS staff members are committed to full disclosure and restraint in any institutional considerations involving a conflict of interest or the appearance of a conflict of interest. Staff members will not accept assignments to institutions and will recuse themselves from deliberations on decisions regarding institutions when they have a conflict of interest or when the appearance of a conflict of interest warrants such non-acceptance or recusal. Current staff members may not participate in private consultation with or engage in any other employment arrangement with any institution that maintains or is seeking candidate, accredited, or reaffirmation status from the Accreditation Commission.

Notice of any conflicts of interest, or situation that might be perceived as a conflict of interest, shall be provided to the President of TRACS. In the case where the conflict involves the President of TRACS, notice shall be given to the Chair of the Accreditation Commission.

TRACS staff receive training in matters concerning conflicts of interest as a part of their ongoing review of federal regulations, TRACS Standards, TRACS Policies and Procedures and in preparing conflict of interest training materials for other entities.

Any TRACS staff member who knowingly violates this policy is subject to disciplinary action deemed appropriate by the President of TRACS and/or the Accreditation Commission.

TRACS staff sign a “Conflict of Interest Form” annually.

The expectations outlined in this section apply to all TRACS staff as well as to any and all TRACS representatives.

E. Institutions

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied specifically to TRACS institutions with regards to conflicts of interest:

If in the course of any of its interactions with TRACS, an institution becomes aware of any potential conflicts of interest, it is the responsibility of the institution to report such potential conflicts to the President of TRACS.
When institutions are informed of any proposed Peer Evaluators assigned to the review of an institution (Evaluation Team members, Focus Team members or IFYR Peer Evaluators) the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS.

When institutions that are appealing an action by the Accreditation Commission are informed of the proposed Appeals Committee members assigned to hear the institution’s appeal, the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS in accordance with TRACS Board Policy - BP219.
New Commissioner Training and Commissioner Continuing Education

Reference: None
Adoption Date: January 2000
Last Revision Date: April 2019

New Commissioner Training

Upon election to the Accreditation Commission, a fellow Commissioner is appointed to serve the newly elected Commissioner as a mentor. This mentor will make himself/herself available to the new Commissioner as needed and will work side-by-side with the new Commissioner before and at the new member’s first meeting of the Accreditation Commission to ensure clarity on all matters related to the various responsibilities of Commissioners.

In addition to the orientation efforts detailed above, new Accreditation Commission members receive face-to-face orientation and training prior to the new member’s first official meeting of the Accreditation Commission. This training is generally conducted by the Chair of the Accreditation Commission, the Chair of the Nominating Committee of the Accreditation Commission and the President of TRACS.

The following publications will be provided to the new Commissioner and will be referenced as a part of the new Commissioner training process:

- Bylaws
- Policies and Procedures Manual
- Accreditation Manual
- Resource Manual
- Accreditation Commission Handbook
- Evaluation Team Procedures Manual

Commission Continuing Education

At each meeting of the Accreditation Commission, a continuing education training session shall be scheduled. The purpose of the training is the continuing education of the Commissioners concerning such topics as TRACS Accreditation Standards, policies and procedures, changes in Federal Regulations, Distance Education, peer evaluator functions, Reliability/Validity Study outcomes, legal issues, annual institutional reporting and all effectiveness issues related to TRACS accreditation and evaluation of TRACS institutions that may affect the Commission in its work.
TRACS Staff, Peer Evaluators (Focus Team Members and or Evaluation Team Members), and others representing TRACS and / or the Accreditation Commission should be prudent in their use of TRACS and institutional funds when traveling on official TRACS business.

The general expectation of fiscal prudence is reflected in the following guidelines for travel and visit related expenses.

**Air Travel**

Peer evaluators who are required to travel in fulfillment of their responsibilities will be reimbursed for the most economical mode of transportation unless previous arrangements are approved by TRACS staff. Every effort should be made to purchase airline tickets far enough in advance of an institutional visit in an effort to secure the lowest possible airfare. Individuals choosing to fly first or business class must assume the responsibility of paying the difference in rates between the same flights in economy class. Persons on official business for TRACS will be reimbursed at the current designated per mile rate for travel to and from the airport. Those making approved international visits may be permitted to fly business class at the discretion of the TRACS President and only with prior approval. Peer evaluators may make their own travel arrangements or may contact the TRACS office for assistance in making travel arrangements.

**Ground Transportation**

Institutions hosting a visit from TRACS staff or peer evaluators have the option of providing ground transportation from the airport to the institution and to the location where staff and visiting peer evaluators are being housed during the visit. If visiting peer evaluators need to rent automobiles, they should receive prior approval from the appropriate TRACS staff member in advance of the visit. Persons representing TRACS on official business using their personal vehicle will be reimbursed at the current designated per mile amount with prior approval from the appropriate TRACS staff member.

**Hotel Accommodations**

Whether hotel reservations are made by the institution or by TRACS staff, the following factors should be considered: (1) access to the institution. (2) the reasonableness of the per night rates and (3) the adequacy and cleanliness of the facilities.

**Meals**

TRACS staff and visiting peer evaluators should be prudent in their use of TRACS and institutional funds when dining while on official TRACS business.
TRACS does not discriminate in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the basis of race, sex, age, color, national origin, handicap, disability, marital status, or veteran status. As an organization with a well-founded religious mission, TRACS limits employment to those who agree with its doctrinal positions.

Discrimination is unfair or unequal treatment of an individual or a group based on one or more characteristics listed in the preceding paragraph.

1. Actions to Take if a Person is the Subject of Discrimination

Discrimination should be reported to the President of TRACS, unless he is the one accused of discrimination, in which case it should be reported to the Chairman of the Board.

2. Response to Allegations of Discrimination

TRACS takes allegations of discrimination seriously and will respond promptly to complaints. Managers and supervisors are expected to halt immediately any discrimination which comes to their attention and to report violations to the President of TRACS as soon as practicable.

The President of TRACS (or the Chairman of the Commission) will promptly initiate an investigation of all complaints. The investigation will maintain confidentiality to the extent practicable under the circumstances and as permitted by law. The investigation will evaluate the nature of the violation or behavior, whether the conduct is isolated or part of a pattern, and factors which may be relevant to a specific complaint.

TRACS will inform the person filing the complaint and the person alleged to have committed the conduct, to the extent appropriate, of the results of the investigation.

When it is determined that discrimination has occurred, TRACS will promptly eliminate the conduct and take appropriate disciplinary action against the person found in violation of this policy.

Retaliation against a person who has complained about discrimination is a violation of TRACS policy and will not be tolerated.

3. Filing a complaint with the U.S. Equal Employment Opportunity Commission (EEOC)

If an individual believes they have been a victim of discrimination by an employer when applying for a job or while on the job because of race, color, sex, national origin, age, or disability, or believe that they have been a victim of discrimination because of opposing a prohibited practice or participating in an equal employment opportunity matter, the
individual may file a charge of discrimination with the EEOC.

Charges may be filed in person, by mail or by telephone by contacting the nearest EEOC office. If there is not an EEOC office in the immediate area, call toll free 800-669-4000 or 800-669-6820 (TDD) for more information.

There are strict time frames in which charges of employment discrimination must be filed. To preserve the ability of EEOC to act and to protect the right to file a private lawsuit, should it be necessary, the filing individual should adhere to the EEOC guidelines when filing a charge.
TRACS does not permit harassment. All employees should be able to enjoy a work environment free of harassment. This includes all areas protected by federal and state law such as race, sex, age, color, national origin, handicap, marital status, and veteran status.

Harassment can assume many forms, including the display or circulation of written or electronic materials or pictures degrading to men or women or to racial or ethnic groups as well as verbal abuse or insults directed at a member of a group who could reasonably be expected to take offense or consider the abuse or comments as harassment.

1. Sexual Harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. Making offensive comments about women or men in general is harassment. The harassment can be by a person of the same or other sex.

Harassment is not simple teasing, offhand comments, or isolated incidents determined to be not serious. These actions become harassment when they are so frequent or severe that it creates a hostile or offensive work environment or when they result in an adverse employment decision such as the victim being fired or demoted. The person harassed is always a victim; anyone affected by the offensive conduct can also be a victim.

The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer. Harassment does not have to cause economic injury or result in a person being fired.

2. Actions to be Taken if a Person Believes They are a Victim of Harassment:

The victim should directly inform the harasser that the conduct is unwelcome and must stop.

If the harassment does not stop after the victim first informs the harasser that the conduct is unwelcome and must stop, or if the victim believes he or she cannot confront the harasser, the victim should report the harassment as soon as practicable.

Harassment should be reported to the President of TRACS, unless he is the accused harasser, in which case it should be reported to the Chairman of the Board.
3. Response to Allegations of Harassment

TRACS takes allegations of harassment seriously and will respond promptly to complaints. Managers and supervisors are expected to halt immediately any harassment which comes to their attention and to report violations to the President of TRACS as soon as practicable.

The President of TRACS (or the Chairman of the Commission) will promptly initiate an investigation of all complaints. The investigation will maintain confidentiality to the extent practicable under the circumstances and as permitted by law. The investigation will evaluate the nature of the violation or behavior, whether the conduct is isolated or part of a pattern, and factors which may be relevant to a specific complaint.

TRACS will inform the person filing the complaint and the person alleged to have committed the conduct, to the extent appropriate, of the results of the investigation.

When it is determined that harassment has occurred, TRACS will promptly eliminate the conduct and take appropriate disciplinary action against the person found in violation of this policy.

Retaliation against a person who has complained about harassment is a violation of TRACS policy and will not be tolerated.

4. Sexual Harassment Prevention Training

All employees are required to complete training designed to prevent sexual harassment. The training must be repeated at least every two years. The President of TRACS will arrange for the training.

5. Filing a complaint with the U.S. Equal Employment Opportunity Commission (EEOC)

If an individual believes they have been a victim of harassment or believe that they have been a victim of harassment because of opposing a prohibited practice or participating in an equal employment opportunity matter, the individual may file a charge of harassment with the EEOC.

Charges may be filed in person, by mail or by telephone by contacting the nearest EEOC office. If there is not an EEOC office in the immediate area, call toll free 800-669-4000 or 800-669-6820 (TDD) for more information.

There are strict time frames in which charges of employment discrimination must be filed. To preserve the ability of EEOC to act and to protect the right to file a private lawsuit, should it be necessary, the filing individual should adhere to the EEOC guidelines when filing a charge.
**BP118**

**Unannounced Visits**

Reference: None
Adoption Date: January 2000
Last Revision Date: April 2019

TRACS reserves the right to conduct unannounced visits to member institutions. Unannounced visits will be conducted at the discretion of the Accreditation Commission or the President of TRACS. Such visits may be made for cause, to verify that the institution maintains the personnel, facilities, and resources reported by the institution in its Annual Operational Report, or to verify institutional compliance in any area.

The costs of unannounced visits shall be paid by the institution visited.
1. Statement of Purpose

TRACS is committed to establishing and advancing quality education to Christian universities, colleges, and seminaries. The purpose of this policy statement is to allow the Accrediting Commission of the Transnational Association of Christian Colleges and Schools (TRACS) to identify, retain, store, and dispose of records in an appropriate, legally sound, and orderly manner. This policy will enhance the obligation of TRACS in facilitating daily operations and promote efficiency. This policy conforms to all applicable laws and regulations.

The purpose of the policy is to provide a framework and assign responsibilities for ensuring that full and accurate records are being maintained by TRACS. Implementation of this policy will assist TRACS in meeting its operational and legal obligations and in preserving its historical records electronically. For purposes of this policy, the management of records includes appropriate practices for organizing and archiving those records determined to have permanent or enduring value.

2. Applicability

This policy applies to all staff who work with, compile, and manage TRACS records. This policy also applies to all Commissioners, volunteers, and temporary employees, as appropriate.

3. File Integrity

All documentation shall be stored electronically and should be maintained in TRACS Network with access limited to only to those individuals or groups who are approved and with limited outside access. Records will be entered into TRACS Network in a portable document format (pdf) in “read only” format to protect the authenticity and integrity of the document.

4. Records Definition
   a. Official Records:

   Official records are recognized as those records submitted to TRACS in accordance with the Standards of Accreditation, produced by TRACS to establish a critical fact, evidence an institution’s actions, or document a business transaction by TRACS. Official records are the property of TRACS and will be maintained and electronically preserved in accordance with this policy. Official records include, but are not limited to:
   - Initial Applications
   - Requests for Reaffirmation
   - Self-Study Reports
   - Visiting Team Reports
   - Financial Statements
Accreditation Commission Action Letters
Program Approval Letters
Complaints and Institutions and Institutional Responses
Complaints and TRACS and Responses
Records of Appeals of Accreditation Commission Actions
Documentation Related to Closures of Institutions
Requests for Withdrawal of TRACS Approval by an Institution
Governmental or Third-Party Correspondence Regarding an Institution
Approved Institutional Changes
Documents in Support of Good Cause Decisions by the Accreditation Commission
General Correspondence that Requires Action by TRACS

Pursuant to the TRACS Board Policy 105, an institution’s Official Records are confidential and may only be shared as required by law or regulation.

b. Unofficial Records:
Unofficial records include general correspondence that is not considered to be part of an official record of a TRACS action or business transaction. Unofficial records are also records created or received in the course of staff research or professional activity as well as private or personal documents that are not created or received in the course of TRACS business.

c. Active Records:
Active records are official records that continue to be used by the creating party while conducting regular business and are not retained on the TRACS Network until the document is in its final form.

d. Historical Records:
Historical records are official records that are of permanent historic value but are not used regularly by TRACS.

e. Accounting/Financial Records:
Accounting and Financial records are records pertaining to financial transaction between TRACS and the accredited institutions as well as records that support TRACS’s operations and financial statements. These records include but are not limited to invoices, checks, financial statements, supporting records for financial statements, and those accounting and financial records required to be maintained by applicable law or regulation.

f. Personal Records:
Documents that are personal in nature do not belong in either TRACS or an institution’s files and should not be maintained on TRACS equipment or premises.

5. Record Retention Responsibilities

The President of TRACS, Vice President of Business Services, the Vice President of Administrative Services, and any other specifically designated personnel have responsibility for and oversight of specific portions of the TRACS record retention and destruction program. Questions pertaining to this policy should be directed to the aforementioned individuals.

All departments and committees of TRACS are responsible for properly managing their records and complying with this Policy.
Employees and volunteers are responsible for being familiar with this Policy and for managing records in their possession, custody, or control in accordance with this Policy.

6. Records Retention Requirements Set Forth by Federal Regulations

TRACS is an accrediting agency recognized by the U.S. Department of Education (ED) and as a condition of that recognition is required to adhere to the federal regulations set forth in 34 CFR §602. The regulations that specifically address record retention are found in §602.15 (b), (1-2) Administration and Fiscal Responsibilities and state the following:

(b) The agency maintains complete and accurate record of—

(1) its last full accreditation or pre-accreditation reviews of each institution or program including on-site evaluation team reports, the institution’s or program’s responses to on-site reports, periodic review reports, any reports of special reviews conducted by the agency between regular reviews, and a copy of the institution’s or program’s most recent study; and

(2) All decisions made throughout an institution’s or program’s affiliation with the agency regarding the accreditation and pre-accreditation and any institution of program and substantive changes, including all correspondence that is significantly related to those decisions.

This Policy has been established to adhere to these requirements.

7. General Records Requirements

Maintenance and disposal of records, as determined by the content, is the responsibility of those identified in section 5. Record Retention Responsibilities.

8. Disposition of Records

Working drafts of records, documents, work papers, notes, and fragmented data will not be retained beyond their active use (Active records) and will not be retained on the TRACS Network, TRACS servers, users’ hard drive, or on TRACS’s secure intranet site.

Once a record has been uploaded to TRACS Network, hard copies of official records can be destroyed at any time. Duplicates of official records should not be retained on the shared server, a user’s individual server or hard drive, or any secure intranet site beyond the timeframe for which the duplicate record’s purpose served except as may be necessary for the use of the material for working purposes of individuals.
BP120

TRACS Responsibilities for Institutional Title IV Compliance

Reference: 34 CFR § 668
Adoption Date: June 2015
Last Revision Date: April 2019

Response to Secretary Regarding Title IV Compliance

Upon request of the Secretary of Education for the purpose of assisting the Secretary in resolving problems with an institution’s participation in Title IV programs, TRACS will provide information it has available germane to a Candidate (pre-accredited) or Accredited institution’s program responsibilities or eligibility to participate under Title IV of the Higher Education Act (HEA).

Notification to the Secretary of Fraud or Abuse

TRACS will provide the Secretary of Education notice of the name of any institution it has reason to believe is engaged in fraud or abuse or is failing to meet its responsibilities under Title IV of the HEA, and the reasons for such concern. TRACS shall notify the institution if its name is submitted to the Secretary under this provision.

Default Rates

Institutions participating in the Title IV programs under the HEA and designating TRACS as their gate-keeping agency should demonstrate diligence in keeping loan default rates at an acceptably low level and must also comply with program responsibilities defined by the Department of Education. Institutions having a default rate requiring a default reduction plan will provide a copy of their plan to TRACS. TRACS staff will review the plan to determine its appropriateness, and to determine if any follow-up action is needed in accordance with the TRACS Board Policy BP207. Excessive default rates in the student loan program may be cause for an Institutional Staff Review - Financial (ISR-F) evaluation.

Compliance with Title IV

During the course of the ISR-F, along with other factors, there will be a review of loan default rates and negative actions taken by the Department of Education regarding compliance of the institution with the requirements of Title IV. In addition, TRACS will include in the ISR-F information provided by the Secretary of Education when notified of negative action taken by the Department regarding responsibilities under Title IV. TRACS will determine if the information calls into question compliance with applicable TRACS Standards and whether an adverse action is required.
The financial funds of the organization serve both as a reserve to address unexpected financial events and as a resource to provide a financial base for future needs. As such, it is necessary to assure that the investments of the organization’s funds provide growth potential within a conservative environment. This policy serves to direct the administrators of the funds of the organization in these investments.

1. **Short-Term Investments**

   Unencumbered cash will primarily be deposited in interest-bearing checking accounts on a day-to-day basis. Funds that are expected to be available for three months or longer may be invested in Certificates of Deposit (CDs). Any funds that are expected to be available for more than six months but no more than one year will be invested in appropriate CDs at the primary banking facility currently utilized by TRACS.

2. **Long-Term Investments**

   Funds expected to be available for more than one year may be deposited into a brokerage account. Advised by the brokers and in consultation with the President of TRACS, the Vice President for Business Services will pursue a course of equity investments that will allow for buying indexed fund securities with hedged protection against market fluctuations. Only 80% of the monies available may be invested in the described securities at any one time and no amount may be invested in a single corporate stock. The investment goals of TRACS are to maximize return while limiting exposure and to realize a target, annualized return-on-investment of 5% at the minimum.

3. **Donated Securities**

   At times, donors may contribute corporate stock, mutual funds, or other marketable securities to TRACS. These securities will be transferred directly to the primary investment account(s) of TRACS and liquidated at the discretion of the Vice President for Business Services after consultation with the President of TRACS. Any amounts invested in a single corporate stock must be liquidated within six months and becomes subject to the long-term investment policy described above.

4. **Cycle of Review**

   The investments of TRACS will be evaluated annually in conjunction with audit preparations and presented along with the Proposed Budget at the spring meeting to the Executive Committee. The discretionary authority given to the Vice President for Business Services will be re-evaluated each time a new Vice President for Business Services is hired.
Institutional Responsibilities in Accreditation

Reference: None
Adoption Date: January 2013
Last Revision Date: April 2019

The key element of the accreditation process is the concept of peer review which involves professional individuals from one institution reviewing another institution with regard to that institution’s Self-Study Report and the level of compliance with TRACS Accreditation Standards in the areas of expertise of the reviewer.

In agreeing to pursue and hold accreditation with TRACS, each institution also agrees to participate in this peer review process. As an institution being reviewed, the institution also accepts the responsibility for providing professional individuals to participate in the review of other institutions. Each institution is to submit the names of professional individuals to the TRACS office for training as peer evaluators. The President of TRACS will periodically review the participation of institutions in this process and may contact institutions which need to provide peer evaluators.

An additional concept of accreditation is that it is voluntary and focused on institutional improvement. This concept includes the idea of the self-reporting by an institution in instances when it becomes aware that it is potentially non-compliant with one or more of the TRACS Standards. Each institution is responsible for notifying TRACS within 30 days of any instance of non-compliance and of its plan for coming into compliance. This includes notification of changes in the status of any administrative and / or faculty position which is mandated by TRACS Accreditation Standards.
At the time of application, an institution will identify the person(s) who will serve as the institutional liaison(s) concerning its dealings and communication with TRACS. Often, the institution’s Chief Executive Officer or Chief Academic Officer will fill this role. The institution will notify TRACS of any change of its designated liaison(s).
All member institutions are evaluated each year using data submitted in the required Annual Operational Report (AOR) and the institution’s certified external audit. The Annual Operational Report provides statistical data related to such matters as enrollment, finances, student learning and any significant developments at the institution in the year since the prior report. Member institution must complete and submit its report on-line by October 31 each year. The following items must also be included:

1. A letter from the governing board that includes detailed explanations for any changes in the institution not included in the content of the AOR pertaining to government authorization, constitution and bylaws, location of administrative office, administrative officers, and compliance with TRACS Accreditation Standards. If no changes have occurred, other than those reported in the AOR, the institution should note this.
2. The institution’s most recent certified external audit.
3. The institution’s current budget.
4. The institution’s current Catalog(s) or similar document, with all changes in administrative officers, faculty, and courses appropriately noted.
5. A statement, signed by the institution’s Chief Executive Officer, asserting that all the information included in or with the AOR is accurate and current.
6. Any other documents requested in the AOR.

Failure to include the institution’s certified annual audit at the time of the submission of the AOR puts the institution in violation of TRACS expectations, introduces the possibility of administrative action by the U.S. Department of Education regarding the institution’s Title IV eligibility, and makes the institution subject to a possible adverse action at the next Commission meeting. Additionally, failure to submit the institution’s certified annual audit within 5 months of the close of the institution’s fiscal year may result in the imposing of an administrative fee of $500.00 per month for each month or portion of month that the audit is late.

Upon receipt of all Annual Operational Reports and supporting documents, TRACS staff compiles and prepares an Annual Operational Report Summary with critical data from the reports of the individual institutions. The Annual Operational Report Summary includes both quantitative and qualitative data and is organized around the compliance of institutions with the Accreditation Standards. The Annual Operational Report Review Factors form is used in evaluating each institution to identify any areas of potential non-compliance with specific critical Standards.

Data gathered is used to:
- Monitor increases of 20% or more (minimum increase of 20 students) in any program or by any institution.
- Verify the appropriate number of full-time faculty contracted for each approved program.
• Verify the adequacy of learning resource materials for all new programs approved.
• Monitor success of institutions in student achievement (both undergraduate and graduate).
• Verify that all off-campus locations have been properly approved and are still operating.
• Monitor approval of all distance education and correspondence education programs.
• Monitor approved Branch Campus and Teaching Sites.
• Review the Annual Audit and other financial documents to verify continued Financial Stability of each institution and as the basis for initiating an Institutional Staff Review - Financial.
• Identify other accreditations held by TRACS accredited institutions.

In addition, institutions are required to submit various institutional documents which are required by TRACS throughout the year in verifying that institutions are publishing appropriate information required by the TRACS Accreditation Standards and/or Policies and Procedures.

All compiled data are confidential and are used by TRACS staff and, when appropriate, by the Accreditation Commission for consideration of recommendations and decisions.
By means of the Annual Operational Reports submitted by member institutions, TRACS monitors institutional growth in overall enrollment, program enrollment, number of Teaching Sites, and number of Branch Campuses.

Any member institution which reports total student enrollment growth individual program of more than 20 students which is at least 20% greater than it reported in the prior year may be required to provide documentation of the actions taken by the institution to accommodate the increase. The President of TRACS may require a staff visit to the institution to verify that it is in compliance with TRACS Accreditation Standards.

Any member institution which receives permission from the Accreditation Commission to open 2 or more Branch Campuses or 3 or more Teaching Sites in one year may be required to host a staff visit, which may be conducted in conjunction with any visit(s) required after Commission approval, to all locations of the institution to verify that the institution is providing all of the resources claimed and that it is in compliance with TRACS Accreditation Standards.
Rationale for Monitoring Student Achievement

This policy provides a framework for monitoring assessment as it relates to undergraduate retention rates, completion rates, and graduation rates. Establishment of the thresholds listed below and the use of monitoring as a follow-up are founded on the following rationales:

1. The benchmarks noted below are based on nationally recognized norms including those used by regional accreditors (C-RAC) and other agencies.
2. Remediation of completion, retention, and graduation rates necessitates a period of time (generally three to six years) for the effect of implemented changes to demonstrate clear results.

Monitoring Thresholds

Monitoring will be initiated based on institutional data submitted as part of institutionally submitted Annual Operational Reports. Rates should be calculated using the standard cohort definition provided in the report (which will be (or approximate) IPEDS definitions). Staff monitoring in these areas will be triggered by the following rates:

1. Less than a 25% completion rate in Certificate programs
2. Less than a 15% completion rate in Associate degree programs
3. Less than a 25% graduation rate in Bachelor’s degree programs
4. Less than a 35% retention rate in Associate degree programs
5. Less than a 50% retention rate in Bachelor’s degree programs

Required Institutional Action Plan Submitted to TRACS Staff

TRACS staff will work with institutions that fail to meet the above benchmarks to ensure that the institution develops and implements a plan to address the rate under review. The plan should be based on research and adhere to best practices and may consider the following components:

1. The relationship of the rate in question to the mission of the institution and in particular to the profile of the student cohort in question,
2. Programmatic data,
3. A three-year average of rates,
4. Comparison studies with peer institutions,
5. Demonstration that a quantifiable plan has been implemented including intermediate goals,
6. Demonstration that internal results are reviewed by the reporting institution and result in action,
7. Evidence that progress has been made including but not limited to,
   a. Enrollment management plan
   b. Student Success Services
   c. Suspension and warning trends
   d. Departmental Action plans
   e. Academic Advising policies and procedures
   f. Student Surveys
   g. Retention Rates

8. Evidence that an alternate definition of the retention, completion, or graduation rate is significant for the institution (for example, inclusion of transfer students or separation of a unique program from the institutional rate)

Once a plan for remediation has been submitted, the institution will be allowed adequate time for the plan to prove effective. Generally, adequate time will be based on the degree category in question and will normally be three to six years to allow for a full student cohort to complete a plan cycle.

However, failure to submit a satisfactory remediation plan or failure to demonstrate progress in meeting plan goals will result in the President of TRACS initiating an Institutional Staff Review (ISR) as detailed in BP207. The ISR procedure is used when there is evidence that an institution may be out of compliance with a TRACS Accreditation Standard and/or policy requirement.
BP207

Institutional Staff Reviews

Reference: 34 CFR § 602.19(b)
Adoption Date: June 2013
Last Revision Date: January 2021

When the President of TRACS determines from the determinations of a staff visit, determinations resulting from an official complaint filed against an institution, or from any other source available, that an institution may not be in compliance with one or more of the Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations, the President of TRACS may initiate (1) an Institutional Staff Review (ISR), if the alleged deficiencies are non-financial in nature, or (2) an Institutional Staff Review Financial (ISRF) if the alleged deficiencies are financial in nature. In addition, if the Accreditation Commission determines from any sources available that an institution may not be in compliance with any Accreditation Standard, it may direct the President of TRACS to initiate an ISR / ISRF of that institution.

Upon receiving information concerning possible non-compliance, the President of TRACS will send written notice of the initiation of an ISR / ISRF to the institution within 30 days of the start of the review. This notification may be sent later than 30 days after the initiation of the ISR / ISRF if additional information which requires further investigation becomes available during the first 30 days of the ISR / ISRF. The notice will identify any Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations with which the institution may be in non-compliance.

The institution must send to the TRACS office a written response to the notification of the ISR / ISRF within 30 days of the date that the institution received the notification. At the discretion of the President of TRACS, a staff visit may be required within the 30 days allowed for the institution’s response.

The institution’s response must separately and fully address each area of possible non-compliance identified in the notification. The institution’s response must either demonstrate compliance with the issue(s) in question, or if the institution is in non-compliance, supply the anticipated time frame for bringing the issue(s) in question into compliance.

After receiving and reviewing the institution’s response to the notification of an ISR / ISRF, the President of TRACS will make one of the determinations described in TRACS Policy BP211 Section C.

Information Specific to the Institutional Staff Review Financial

The specific purposes of the Institutional Staff Review Financial (ISRF) are to (1) ascertain the current financial condition of the institution relative to the financial Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations related to financial matters, (2) review the institution’s plan to maintain financial stability into the future, (3) determine if the institution is able to demonstrate compliance with financial Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations or if
monitoring (see definition for Monitoring) or other actions are merited and/or to offer such support and advice as may be helpful to the institution.

The ISRF will be conducted whenever, after the normal on-going review of an institution’s financial documents and all events which may impact the institution financially, TRACS Staff determines that the financial stability of an institution is or may be in question. Specific events that may precipitate an ISRF include but are not limited to:

1. An institution reporting a negative change in Net Assets without Donor Restrictions or Total Net Assets for two out of five years.
2. A negative change in Total Net Assets.
3. An enrollment decline of 20% or more.
4. An institution receiving notification from the Department of Education that their composite score has fallen below 1.5 and they are not in compliance.
5. An institution’s annual audit indicates that credit lines or other liquid reserves have been substantially depleted.
6. The recording of Pledges in revenue or Pledges Receivable in assets.
8. Any combination of 1-7 above.

The ISRF will usually necessitate a staff visit to the institution with the understanding that a virtual “visit” may be conducted via either written or electronic communication. The staff visit and review will include all financial aspects of the institution.

After receiving and reviewing the institution’s response to the notification of an ISRF, the President of TRACS will make one of determinations described in TRACS Policy BP211 Section C.
Title IV Participation

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

Institutions approved for participation in programs under the Higher Education Act, and the Federal student financial assistance program (Title IV, HEA programs); must have a copy of the Program Participation Agreement (PPA) available for review by peer evaluators during Evaluation Team visits for Accreditation Status or Reaffirmation.

An institution which is accredited by another nationally recognized accrediting agency must inform TRACS which of the accrediting agencies is designated as the primary accrediting agency (gatekeeper) for monitoring its compliance with Title IV programs.

Each institution participating in Title IV programs must be in compliance with the program responsibilities of the Higher Education Act. In evaluating an institution’s compliance with its Title IV program responsibilities, the Accreditation Commission will rely on documentation forwarded to it by the Secretary of Education.

Institutions approved for participation in Title IV programs must submit to the TRACS office, along with the required Annual Operational Report documentation, an annual audit which includes an OMB Circular A-133 Report. The annual audit will be reviewed along with other financial documentation.
The institution must develop and publish a refund policy and the procedures for changes in or withdrawals from a degree program. The refund policy must provide for a clear, fair, and equitable refund of at least the larger of the following guidelines:

A. The requirements of applicable state law.
B. The specific refund standards established by any other accreditation agency with which the institution may be accredited.
C. A prorated refund amount for those whose withdrawal date is on or before the 40% point in the period of enrollment.
All Candidate and Accredited institutions must clearly state how the institution defines a credit hour. TRACS considers a credit hour as one hour of classroom or direct faculty instruction with a minimum of two hours of out-of-class work for each week of an academic term. Institutions on the semester or trimester system must have a minimum of 15 weeks of class (or its equivalent for module or intensive courses). Institutions on the quarter system must have a minimum of 10 weeks of class (or its equivalent for module or intensive courses).

Institutions must clearly explain how credit hours for other academic activities for which credit is awarded such as laboratory work, practica, studio work, or Distance Education are determined. Course syllabus must include learning outcomes which are appropriate for the number of credit hours awarded for successful completion of the course and how student achievement will be measured.

If the institution does not adopt TRACS definition of a credit hour, the institution must provide evidence that its definition is equivalent to the TRACS definition.

TRACS will evaluate the reliability and accuracy of an institution’s assignment of credit hours before granting Candidacy, Accreditation, or before reaffirming Accreditation.

TRACS evaluation will include a review of:

1. the institution’s published definition for a credit hour;
2. whether qualified faculty determine the number of credit hours that are appropriate for individual courses; and
3. whether the institution’s practice conforms to commonly accepted practices in higher education.

If the institution offers Distance Education, the evaluation will include the manner in which credit hours are assigned to Distance Education courses. Normally, TRACS will review a sampling of course syllabi in its evaluation; however, TRACS may conduct a more extensive review if irregularities are discovered. If TRACS determines that an institution is in systematic non-compliance with this policy, in accord with federal regulations, TRACS will notify the U.S. Secretary of Education.
The Transnational Association of Christian Colleges and Schools (TRACS) requires its member institutions to remain in and demonstrate compliance with the Accreditation Standards as detailed in the TRACS Accreditation Manual. Additionally, member institutions must comply with TRACS policies and procedures and with all applicable Federal Regulations. Institutions must provide compliance information, as requested, by TRACS staff and/or the Accreditation Commission in order to maintain membership. When an institution fails to comply with these requirements within the maximum allowable time period, the Accreditation Commission is required to take action against the institution in one of the ways defined in Section A of this policy.

A. Definitions

**Sanctions** - TRACS considers Warning, Probation, and Show Cause (listed in order of degree of non-compliance) to be Sanctions. Sanctions are public actions which may not be appealed.

**Adverse Action** - TRACS considers Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation of an institution to be synonymous Adverse Actions in that these actions all result in the loss of Candidacy or Accreditation. Adverse Actions are public actions which may be appealed according to TRACS policy BP219 - Appeals.

B. Methods for Determining Institutional Non-Compliance

1. **Evaluation Team or Focus Team Visit** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an Evaluation Team or Focus Team visit, are normally addressed according to the review and response processes described in TRACS policy BP305 - The Accreditation Process. The process described in BP305 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP305 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy (BP211) as deemed appropriate.

2. **Interim Fifth-Year Review** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an institution’s participation in the Interim Fifth-Year Review (IFYR) process are normally addressed according to the review and response processes described in
TRACS policy BP310 – Interim Fifth-Year Review. The process described in BP310 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP310 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy (BP211) as deemed appropriate.

3. **Annual Operational Report** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an institution’s submission of an Annual Operational Report (AOR) are normally addressed according to the review and response processes described in TRACS policy BP203 – Annual Operational Report. The process described in BP203 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP203 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy (BP211) as deemed appropriate.

Institutions addressing non-compliance with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations via the processes prescribed in BP305, BP310 or BP203 are not normally considered to be under Sanction, unless so designated by the Accreditation Commission. If the institution fails to demonstrate compliance with the matters in question within the allowable timeframe, the institution shall be considered for immediate Adverse Action upon the expiration of the allowable timeframe for demonstrating compliance.

4. **Institutional Staff Review / Institutional Staff Review Financial** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of a completed Institutional Staff Review (ISR) or Institutional Staff Review Financial (ISRF) shall require the Accreditation Commission to take appropriate action (Sanctions or Adverse Action) against the non-compliant institution. The review, response, and determination processes for an ISR / ISRF are described in TRACS policy BP207 – Institutional Staff Reviews.

C. Recommendations for Sanctions or Adverse Action

**Sanctions** - After receiving and reviewing the institution’s response associated with the ISR / ISRF process, the President of TRACS will make one of the following determinations:

1. If the President determines that the institution is in compliance with the issues in question and that no follow-up action is required, within 30 days of this determination, the President of TRACS will send a written notice to the institution’s Chief Executive Officer indicating the review has been completed and that no follow-up action is required. The President of TRACS will report on the review and determinations to the Accreditation Commission; however, the review and determinations will remain confidential. Should compliance be considered marginal, the President may require continued staff monitoring to ensure on-going compliance. Such monitoring may require additional reporting.

2. If the President determines that the institution is in non-compliance with one or more of the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations, the President of TRACS shall recommend that the Accreditation Commission, at its next regularly scheduled meeting, place the institution under the appropriate
Sanction and thus require the institution to take necessary action to bring itself into compliance with the agency’s Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed. Institutions to be considered for Sanction by the Accreditation Commission shall be notified by the President of TRACS at least 30 days prior to the meeting where the action will be considered.

If the Accreditation Commission places an institution under Sanction (Warning, Probation, or Show Cause), it must limit the timeframe for the institution to demonstrate compliance to the following:

(i) Twelve months, if the program, or the longest program offered by the institution, is less than one year in length.

(ii) Eighteen months, if the program, or the longest program offered by the institution, is at least one year, but less than two years, in length.

(iii) Two years, if the program, or the longest program offered by the institution, is at least two years in length.

Institutions placed under Sanction by the Accreditation Commission will receive notification within 30 days of the action, detailing the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations with which the institution is in non-compliance, the process to be utilized for monitoring the institution’s progress towards demonstrating compliance, and the timeframe allowed for the institution to demonstrate compliance.

**Adverse Action** – For institutions addressing non-compliances according to the processes outlined in Section B. 1, 2, and 3 of this policy (BP305, BP310 or BP203) or for institutions addressing non-compliances while under Sanction, if the institution fails to bring itself into compliance within the specified timeframe, the President of TRACS shall recommend that the Accreditation Commission, at its next regularly scheduled meeting, take Adverse Action against the institution. [34 CFR § 602.20(b)] Institutions to be considered for Adverse Action by the Accreditation Commission shall be notified by the President of TRACS at least 30 days prior to the meeting where the action will be considered. At that meeting, the Accreditation Commission will take one of the following actions:

1. If the Accreditation Commission takes Adverse Action (Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation) against an institution, the institution will receive notification within 30 days of the action, detailing the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations with which the institution is in non-compliance and will be informed of the option to file an appeal of the action according to TRACS policy BP219 - Appeals.

2. The Accreditation Commission may “… for good cause, extend the period for achieving compliance.” [34 CFR § 602.20(b)] Extensions granted under this provision will not be the normal procedure and will not be used repeatedly. If the Accreditation Commission grants an extension, the institution will receive notification within 30 days of the action, detailing the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations with which the institution remains in non-compliance and
will be informed regarding the timeframe for the extension and the processes to be utilized by the institution for demonstrating compliance.

Additionally, if an extension is granted, the institution will remain under the Sanction that was in place at the time of the Accreditation Commission’s consideration of Adverse Action until the end of the extension period. At the conclusion of the extension period the institution will be required to demonstrate compliance with the issues in question or face Adverse Action.

3. The Accreditation Commission may limit the Adverse Action to a particular program or to a particular Remote Instructional location (Branch Campus or Teaching Site) if it concludes that the noncompliance is limited to that particular program or location.

4. In imposing an Adverse Action, the Accreditation Commission may maintain the institution, program, or location’s status long enough to enable the institution, program, or location to fulfill any Teach-Out Plan or Teach-Out Agreements in order to assist the current students in transferring or completing their course of study.

The processes and general progression of actions described above do not prevent the Accreditation Commission from taking any of the actions (Sanctions or Adverse Action) detailed in this policy (BP211) as deemed appropriate and without consideration of previously imposed actions.

D. Degrees of Non-Compliance Leading to Sanctions or Adverse Action

The determined degree of non-compliance will serve as the general basis for the specific action (Sanctions or Adverse Action) to be considered by the Accreditation Commission:

1. The institution’s non-compliance with the Accreditation Standards, or TRACS policies and procedures is relatively insignificant, does not involve any of the Accreditation Standards associated with an Institutional Eligibility Requirement, and does not rise to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.

This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution will be able to correct within the timeframe allowable by federal regulations and which the institution has, or can reasonably obtain, the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on **Warning**.

2. The institution’s non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is significant and/or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and rises to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.
This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution has, or can reasonably obtain, the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on Probation.

3. The institution's non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is serious and/or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and immediately threatens the institution's ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution.

This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution may not have the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on Show Cause.

4. The institution fails to demonstrate compliance with Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed for demonstrating compliance and the non-compliance is convincingly significant and/or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and the institution's inability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is clear.

This determination reflects a level of non-compliance which usually requires the imposition of Adverse Action by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution does not have the resources needed to correct.

E. Accreditation Commission Action

The Accreditation Commission may only act on a recommendation for a Sanction or Adverse Action when notification of the recommendation is received by the relevant institution at least 30 days prior to the Accreditation Commission’s consideration of the recommendation. An exception to this 30 day requirement may occur when (1) the President of TRACS determines that an institution’s non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution; or (2) the ISR/ISRF could not be completed in time to make the recommendation at least 30 days before the Accreditation Commission’s meeting; and (3) the President of TRACS notifies the institution of the possibility of such a recommendation at least 30 days before the Accreditation Commission’s meeting, and the President of TRACS makes the recommendation for adverse action at least 5 days before the Accreditation Commission’s meeting.
When recommending that either a Sanction or Adverse Action be taken, the President of TRACS will provide all relevant information on the institution to the Accreditation Commission at least 30 days in advance of the meeting where the recommended action is to be considered. The Accreditation Commissions will review the information related to the recommended action to determine if the recommendation of the President of TRACS is appropriate. The President of TRACS may require a staff visit to the institution to gather additional information which may be needed to prepare the report for the Accreditation Commission’s review.

In all instances where the Accreditation Commission will consider either a Sanction or Adverse Action, the institution will be given an opportunity to respond in writing to the President’s recommendation and to appear before the Accreditation Commission to answer questions or to provide any information which became available only after the President of TRACS prepared the recommendation to the Accreditation Commission. The opportunity to appear applies to all meetings where the Accreditation Commission is scheduled to consider taking action against the institution. During the institution’s appearance, the Accreditation Commission will allow the institution an appropriate amount of time for the presentation of relevant information and to answer questions posed by the Commissioners. The Accreditation Commission will determine whether Sanction or Adverse Action is warranted after the institutional representatives have been excused from the meeting.

If no institutional representative is present to provide information or answer questions from the Accreditation Commission and hear the Commission’s final decision regarding the action taken by the Accreditation Commission, the President of TRACS will communicate the decision of the Accreditation Commission to the institution following the conclusion of the meeting. In all cases, the President of TRACS will send written notice of the decision of the Accreditation Commission to the institution within 30 days of the decision. This notification will specify the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations with which the institution is not in compliance.

The various actions which may be taken by the Accreditation Commission are not necessarily sequential. Where circumstances warrant, the President of TRACS may recommend that the Accreditation Commission consider any appropriate action as the first action taken against an institution.

The Accreditation Commission can only impose a Sanction or Adverse Action against a member institution when a quorum of Commissioners is present and when at least fifty-one percent of the members present at the meeting affirmatively vote to take the action.

The Accreditation Commission or the President of TRACS may require staff, Focus Team, or Evaluation Team visits to any institution against which the Accreditation Commission has imposed either a Sanction or Adverse Action.

At each regular meeting of the Accreditation Commission, the President of TRACS will report on each institution against which the Accreditation Commission has previously taken action in cases where that action has not been removed. The report will include a summary of any actions the institution has taken to correct its deficiencies and come into compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations. The President of TRACS may include any other relevant information, including a recommendation that the Accreditation Commission remove the previously imposed action against the institution. If the Accreditation Commission determines, at any time, that an
institution is in compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations the Accreditation Commission, on its own initiative and without a recommendation from the President of TRACS, may remove the institution from previously imposed action.

F. Institutions Seeking Accreditation or Reaffirmation of Accreditation

Candidate institutions seeking Accreditation or Accredited institutions seeking Reaffirmation of Accreditation that are determined by the Accreditation Commission to be in non-compliance with one or more Institutional Eligibility Requirements, or in significant non-compliance with any other Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations at the time of their appearance before the Commission may be denied Accreditation or Reaffirmation of Accreditation. Such denial of Accreditation or Reaffirmation is, by definition, the imposing of an Adverse Action.

Institutional accreditation may not be granted or reaffirmed while an institution is under Sanction, but the institution’s current status of recognition will be maintained. Denial of accreditation or reaffirmation of accreditation is appealable and will not affect the normal accreditation review cycle for that institution. Denial is a public action.

G. Implications of Sanctions and Adverse Action

Institutions placed on Sanction or Adverse Action will be so identified on the TRACS website. In addition, any person inquiring about the accreditation status of an institution on Sanction or Adverse Action will be informed of the status. Further, the institution must accurately present this status in all publications and communications including the institution’s website. Such institutional notification must occur no more than 30 days after the action becomes final.

1. Warning
   a. In addition to its Annual Operational Report, an institution under Warning must submit regular reports to TRACS specifically detailing its progress toward demonstrating compliance with the specified Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations including the anticipated timeframe for bringing deficient areas into compliance.
   b. If the institution demonstrates compliance with the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed, the Accreditation Commission will remove the institution from Warning.
   c. If the institution has not corrected its deficiencies and demonstrated compliance with the issues in question within the timeframe allowed, the Accreditation Commission will either:
      i. Grant an extension of Warning for no more than six months. An extension may only be granted one time and is not granted as a matter of right and with the total time allowed for demonstrating compliance not to exceed the maximum timeframe allowed;
      ii. Place the institution under a more severe Sanction (Probation or Show Cause) as deemed appropriate, with the total time allowed for demonstrating compliance not to exceed the maximum timeframe allowed; or
      iii. Take Adverse Action against the institution.
2. **Probation**
   a. In addition to its Annual Operational Report, an institution on Probation must submit regular reports to TRACS specifically detailing its progress toward demonstrating compliance with the specified Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations including the anticipated timeframe for bringing deficient areas into compliance.
   b. If the institution demonstrates compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed, the Accreditation Commission will remove the institution from Probation.
   c. If the institution has not corrected its deficiencies and demonstrated compliance with the issues in question within the timeframe allowed, the Accreditation Commission will either:
      i. Grant an extension of Probation for no more than six months. An extension may only be granted one time and is not granted as a matter of right and with the total time allowed for demonstrating compliance not to exceed the maximum timeframe allowed; or
      ii. Place the institution under a more severe Sanction (Show Cause) or under a less severe Sanction (Warning) as deemed appropriate, with the total time for demonstrating compliance not to exceed the maximum timeframe allowed; or
      iii. Take Adverse Action against the institution.

3. **Show Cause**
   a. Institution’s required to Show Cause must submit a written report to the TRACS office which provides all of the institution’s reasons that the Accreditation Commission should not take Adverse Action resulting in the termination of its accreditation. This report is required in addition to any other report(s) specifically required by the Accreditation Commission. The Accreditation Commission may interpret a failure to submit this report on time as an indication that the institution acknowledges its non-compliance with the issues in question. The report must:
      i. Address all of the actions it has taken to remedy its deficiencies and demonstrate compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations;
      ii. Include a Teach-Out Plan which meets the requirements of TRACS Policies BP222 and BP224; and
      iii. Be received within 60 days of the day the official notice of the Show Cause action is received by the institution.
   b. If, after staff review of the report and supporting documentation, it is determined that the institution has demonstrated compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to place the institution under Show Cause, the Accreditation Commission shall remove all action against the institution.
   c. If, after staff review of the report and supporting documentation, it is determined that the institution has not demonstrated compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission will either:
i. Take Adverse Action against the institution; or
ii. Place the institution under the appropriate level of Sanction in extenuating cases where significant progress has been made toward correcting the identified deficiencies.
   1) This can only be granted one time.
   2) The total amount of time granted to the institution for demonstrating compliance may not exceed the maximum timeframe allowed.

4. **Adverse Action**

In the event that an institution’s Candidacy or Accreditation is terminated, through Adverse Action, by the Accreditation Commission, the status held by the institution before the Adverse Action was taken will remain intact through the period allowable for the institution to file an appeal of the Adverse Action. If the institution does not appeal the Adverse Action within the allowable timeframe, the termination action will be effective as of the first business day after the appeal period has expired.

Institutions whose membership with TRACS is ultimately terminated, either by an unappealed Adverse Action of the Accreditation Commission or by a final decision of an Appeal Committee to uphold the Adverse Action imposed by the Accreditation Commission, shall ensure that the TRACS office receives the following documents/information within 60 days of the date of a finalized termination action:

- A Teach-Out Plan which meets the requirements of TRACS Policies BP222 and BP224.
- Copies of any approved and signed Teach-Out Agreements with other institutions that meet the requirements of TRACS Policy BP225
- A narrative which details the following: (1) the number of students enrolled in all programs at the institution at the time its membership with TRACS was terminated, (2) the number of students who completed their course of study at the institution, and (3) the number of students who either transferred to other institutions or choose not to continue their study.
- Information regarding the name and contact information of the State agency, institution, or other entity which has agreed to act as the custodian of the institution’s academic records in accordance with TRACS Policy BP222.

If it is deemed in the best interest of the students involved, the Accreditation Commission may, at its discretion, extend the effective date for a termination action beyond the allowable appeal period. If granted, such an extension may not exceed the end of the academic term in which the termination action is imposed.

H. **Notification of Commission Action**

No more than 30 days after a decision of the Accreditation Commission to impose either a Sanction or Adverse Action occurs, the President of TRACS shall notify the institution of that decision. In addition to notifying the institution of the decision, TRACS will also notify the U.S. Secretary of Education, appropriate state agencies, the appropriate accrediting agencies, and the public, all within the 30-day notification period. In the case of Adverse Actions, the public notice will be accompanied by a statement that the action will not take effect until the time period for filing an appeal of the action has expired or, if an appeal is filed, until the final decision of an Appeal Committee has been made concerning the appeal.
In all notifications, TRACS will specify the basis for the decision to impose the action.

I. Appeals
Adverse Actions (as defined in Section A of this policy) are appealable. Institutional appeals must follow the guidelines specified in TRACS policy BP219 – Appeals.

J. Final Disposition
If an institution does not appeal a decision of the Accreditation Commission to impose an Adverse Action, the decision of the Accreditation Commission becomes final one day after the last day allowed for filing an appeal. If an institution files a timely appeal, the disposition of the institution relative to the Adverse Action will be determined by the processes outlined in BP219 - Appeals.

K. Final Notification of Disposition
If no appeal to an Adverse Action is filed by the institution, the original notification of Adverse Action shall serve as the final notification.

If a decision of the Accreditation Commission is appealed by the institution and after the appeal process has been completed, the President of TRACS shall notify the institution, the U.S. Secretary of Education, appropriate state agencies, the appropriate accrediting agencies, and the public of the final decision of the Appeal Committee.

In all notifications, TRACS will specify the basis for the final disposition.

L. Institutional Comments Regarding an Adverse Action
An institution which has been the subject of an Adverse Action may provide the President of TRACS with any official written comments it wishes to make with regard to the action. The President of TRACS must receive these comments no later than 30 days after the Adverse Action has become final. TRACS will provide these comments to the U.S. Secretary of Education, the appropriate state agencies, the appropriate accrediting agencies, and the public no later than 30 days after receipt of the comments.

M. Time Allowed for Notifications and / or Responses
If the last day allowed for a notification by TRACS and / or responses or comments by the institution is a Saturday, Sunday, or legal holiday, the next business day will be deemed the last day.

N. Means of Notification, Responses, and Comments
The President of TRACS may notify an institution on any matter noted in this policy by either electronic or hard copy means. Any hard copy notice that the President of TRACS sends to an institution shall be sent by any service which requires a signature at the time of delivery. The earlier of the dates of the electronic notification or when any representative of the institution signs accepting delivery of the written notice is deemed to be the date of notification.
The institution may submit responses and/or comments by either electronic or hard copy means. Any hard copy notice that the institution sends to TRACS shall be sent by any service which requires a signature at the time of delivery. The earlier of the dates of the electronic notification or when any representative of TRACS signs accepting delivery of the written notice is deemed to be the date of submission.
1. Institutions voluntarily withdrawing from membership with TRACS must send written notification of their intent to withdraw to the President of TRACS. Upon receipt of the notification, the TRACS office shall send written confirmation of receipt of the notification.

2. The notification of intent to withdraw must provide evidence that the withdrawal has been authorized by the institution’s Board. It is not required that withdrawing institutions provide a specific reason for the withdrawal.

3. The President of TRACS shall provide the Accreditation Commission with notice of the institution’s intent to withdraw at the next scheduled meeting of the Accreditation Commission.

4. The Accreditation Commission shall honor the intent to withdraw from TRACS membership when it finds that the action has been authorized by the institution’s Board. The withdrawal becomes final either on the last day of the academic term during which the notification was received by TRACS, an earlier date if so requested by the institution, or on an earlier date as determined appropriate by the Accreditation Commission. The President of TRACS shall inform the institution that TRACS has honored its request within 30 days of the date of Accreditation Commission action.

5. The withdrawal of membership from TRACS is a public action and as such, notification of the withdrawal of any member institution shall be published on the TRACS website and shall be provided to the appropriate governmental agencies. Following the withdrawal, the institution must accurately present this status in all of its publications and communications including the institution’s website.

6. A member institution that withdraws from membership with TRACS may reapply for TRACS recognition through the normal application process no earlier than one year after the date on which the Accreditation Commission determined the withdrawal became final.

7. An institution which has any unpaid invoices due to TRACS at the time of the withdrawal remains liable for those obligations.

8. Once the Accreditation Commission has taken action regarding an institution’s intent to withdraw, the withdrawing institution may not rescind its notification nor may the institution appeal the Accreditation Commission’s decision to honor the withdrawal except by specific action of the Accreditation Commission.
An institution which is recognized as an accredited or candidate institution is presumed to have the fiscal ability to pay in full any fee or reimbursement for expenses assessed by TRACS by the date the fee or reimbursement is due.

When an institution has not paid any fee or reimbursement assessed by TRACS 60 days after the date the fee or reimbursement was due, TRACS shall send a notice that payment in full is required within 14 days of the date the letter is received by the institution.

If the institution does not make full payment in the time allotted, the President of TRACS shall inform the Accreditation Commission that the institution has failed to fulfill a principal obligation to TRACS. In the notice to the Accreditation Commission, the President of TRACS shall request that the Accreditation Commission take a specific adverse action. The president of the institution is to receive a copy of the notice.

If the Accreditation Commission finds that the institution has not paid its fee or reimbursement in full, the Accreditation Commission shall:

1. Grant the institution a specified additional amount of time to pay in full the fee or reimbursement; or
2. Immediately terminate recognition of the institution's accreditation or candidacy.

If the Accreditation Commission grants an institution an additional amount of time to make payment in full, and if the institution, for any reason, fails to make its payment in full by the revised due date, the institution's accreditation or candidacy will immediately terminate without recourse upon receipt of the notice of the non-payment and termination of recognition from the President of TRACS.

If the Accreditation Commission terminates recognition of the institution's accreditation or candidacy, that institution remains liable to TRACS for the fee or reimbursement.

Any institution which has its candidacy or accreditation terminated for failure to pay a fee or reimbursement to TRACS may only reapply for candidacy after

1. The fee or reimbursement is paid in full,
2. 6 months from the termination of status have passed, and
3. A full, written explanation for the non-payment is provided to the President of TRACS.
An institution which is recognized as a Candidate or Accredited institution must actively pursue accreditation or reaffirmation of accreditation at specified intervals. If an institution so recognized (1) does not act in a timely manner to complete the tasks required for pursuing accreditation or reaffirmation of its accreditation, or (2) is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution’s period of recognition expires; the President of TRACS shall inform the Accreditation Commission that the institution has either chosen not to pursue accreditation or reaffirmation of its accreditation or that the institution is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution’s period of recognition expires.

In the notice to the Accreditation Commission, the President of TRACS shall request that the Accreditation Commission take a specific action.

If the Accreditation Commission finds that the institution has not pursued the tasks required for a reaffirmation of its recognition or that the institution is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution’s period of recognition expires, the Accreditation Commission shall take one of the following actions:

1. Grant the institution a specified additional amount of time to complete the tasks necessary to actively pursue accreditation or reaffirmation of accreditation. The Accreditation Commission may only take this action if the institution provides a full explanation concerning its inability to move forward in the accreditation or reaffirmation process in the timeframe required.

2. Terminate the institution’s candidacy or accreditation as of the date the institution’s recognition is scheduled to expire.

If the Accreditation Commission grants an institution an additional amount of time to complete the tasks required for obtaining accreditation or reaffirmation of its accreditation, and if the institution, for any reason, fails to complete the tasks according to the revised timetable, the institution’s Candidacy or Accreditation will terminate without recourse on the date the Candidacy or Accreditation is scheduled to expire.

If the Accreditation Commission terminates the institution’s Candidacy or Accreditation, or if the institution’s status expires for any reason, the institution remains liable to TRACS for any unpaid fees, reimbursements, and outstanding balances.

Any institution which allows its Candidacy or Accreditation to lapse may reapply to TRACS after all outstanding invoices owed to TRACS have been paid in full and only after six months from the time the termination occurred.
Decisions of State Agencies and Other Accrediting Agencies

Reference:  34 CFR §602.28
Adoption Date:  June 2000
Last Revision Date:  June 2015

1. The Accreditation Commission will not consider an institution for candidacy, accreditation, or reaffirmation if that institution:
   a. Is the subject of a pending or final action by a state agency to suspend, revoke, withdraw, or terminate the institution’s legal authority to provide postsecondary education;
   b. Is the subject of a pending or final action by a recognized accrediting agency to terminate the institution’s accreditation or pre-accreditation;
   c. Has been denied accreditation or pre-accreditation by a recognized accrediting agency; or
   d. Has been placed on probation or an equivalent status by a recognized accrediting agency.

2. For any situation in Item 1, the Accreditation Commission shall:
   a. Grant an extension of time for its regularly scheduled action to consider awarding candidacy or reaffirmation for a period of time not to exceed the first regular meeting of the Accreditation Commission following notice of the finality of the relevant decision, even if the extension means that the institution’s accreditation is maintained for a longer period than would otherwise be allowed;
   b. Grant an extension of time for its regularly scheduled action to consider awarding accreditation for a period of time not to exceed the first regular meeting of the Accreditation Commission following notice of the finality of the relevant decision, unless the extension would extend the period of candidacy for more than 5 years;
   c. Grant an institution that was accredited by another recognized agency, and whose accreditation has been terminated by that agency, opportunity to apply to TRACS one year after the adverse action has been completed;
   d. Terminate the institution’s candidacy or accreditation;
   e. Grant accreditation, reaffirmation, or pre-accreditation, but only if it provides to the U.S. Secretary of Education, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards, why the action of the other recognized accrediting agency does not preclude TRACS from granting accreditation, reaffirmation, or pre-accreditation; or
   f. Accept any alternate recommendation presented by the President of TRACS.

3. If TRACS learns that a member institution is the subject of an adverse action by another recognized accrediting agency or has been placed on probation or an equivalent status by another recognized agency, TRACS will promptly review its accreditation or pre-accreditation of the institution or program.
4. For any situation in Item 3, the Accreditation Commission shall:
   a. Place the institution on probation;
   b. Require the institution to show cause why its accreditation should not be terminated;
   c. Continue the institution’s candidacy or accreditation (the written rationale for this option will be provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified); or
   d. Accept any alternate recommendation presented by the President of TRACS (the written rationale for this option will be provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified).

5. If a state agency revokes the license of an institution to grant a certificate, diploma, or degree for work completed, the President of TRACS shall immediately recommend that the Accreditation Commission terminate the institution’s candidacy or accreditation.

6. For any situation in Item 5, the Accreditation Commission shall:
   a. Terminate the institution’s candidacy or accreditation, which is a public action; or
   b. Continue the institution’s candidacy or accreditation (the written rationale for this option will be provided to the U.S. Secretary of Education and the relevant state agency at the same time the institution is notified).

7. Institutions which are pre-accredited or accredited by another recognized accrediting agency will submit, within 60 days of receipt, copies of the final visiting team report and any findings of non-compliance identified by the other agency. Institutions will be considered out of compliance with any TRACS standard which is equivalent to the other agency’s standards with which the institution was found out of compliance.
Investigation of Allegations of Fraud

Reference: None
Adoption Date: June 2000
Last Revision Date: June 2014

1. When an allegation that an institution has committed fraud is made known to TRACS, the President of TRACS shall determine if the allegation appears to be based in fact. If it does appear to be based in fact, the President of TRACS shall immediately notify the president of the institution and the U.S. Department of Education of the allegation and begin an investigation.
   a. An anonymous allegation that an institution has committed fraud will be reviewed only if it includes verifiable documentation supporting the allegation.
   b. The identity of a person alleging fraud will not be presented to the institution only if the President of TRACS believes there is a compelling reason not to disclose that person’s identity.
   c. The President of TRACS will review contacts from the U.S. Department of Education regarding allegations of fraud on a case by case basis to determine if there is a need for confidentiality of the contact. Upon a specific request by the Department, TRACS will consider that contact confidential.

2. Because a public allegation of fraud from TRACS could inappropriately and substantially harm an institution if the institution is found not to have committed fraud, the investigation will be a private action. In the limited instance where a legitimate law enforcement agency is conducting a criminal investigation concurrent with TRACS’ investigation, the President of TRACS will provide any information which it has that is relevant to the allegation of fraud to any officer or prosecutor involved in the criminal investigation who requests it.

3. A staff visit will be required as a part of the investigation. The President of TRACS may also require an Evaluation Team to visit the institution to assist in the investigation.

4. All costs related to the investigation shall be paid by the institution being investigated.

5. The investigation shall determine answers to these questions:
   a. Did the institution commit fraud?
   b. Was the fraud intentional?
   c. Did the institution take an appropriate corrective action before being notified of the allegation?
   d. Did the institution take an appropriate corrective action after being notified of the allegation?
   e. Did the fraudulent action violate any of the Accreditation Standards?

6. At the conclusion of the investigation, the President of TRACS shall prepare a written report for the Accreditation Commission. This report will include a recommendation for a specific action by the Accreditation Commission. A copy of the report will be sent to the president of the institution.

7. Because of the serious nature of fraudulent acts by an institution, the Accreditation Commission can consider taking an adverse action against an institution at any meeting where the report of the TRACS investigation and recommendation for specific action is received by the institution at least 5 calendar days before the meeting of the Accreditation Commission begins.
8. If the Accreditation Commission finds that the institution did not commit a fraudulent act, the Accreditation Commission shall direct the President of TRACS to inform the president of its findings. No adverse action will be taken.

9. If the Accreditation Commission determines that there is an active criminal investigation into the allegation of fraud, it may, in its sole discretion, defer its action until the criminal investigation is completed.

10. If the Accreditation Commission finds that the institution did commit a fraudulent act, the Accreditation Commission shall:
   a. Place an accredited institution on Probation;
   b. Place a candidate institution on Show Cause; or
   c. Terminate the institution's accreditation or candidacy.

11. If the Accreditation Commission takes an adverse action against an institution for a fraudulent act, that action shall be made public.

12. If the Accreditation Commission takes an adverse action against an institution for a fraudulent act, based upon a finding from a court of competent jurisdiction that a fraudulent act was committed by the institution or one of its officers or employees, the adverse action may be appealed in accordance with TRACS Board Policy 219.
Accrediting agencies have an obligation to assure themselves that any institution that seeks initial or continued accredited or candidacy status conducts its affairs with honesty and frankness. When the Accreditation Commission has cause to believe that any institution with which it is concerned is acting in an unethical manner or is deliberately misrepresenting itself to students or the public, it will investigate the matter and provide the institution an opportunity to explain the alleged abuse. If, on the basis of such investigation and after notice to the institution and opportunity for institutional response, the Accreditation Commission finds that an institution has engaged in unethical conduct or that its integrity has been seriously undermined, the Accreditation Commission will:

1. Discontinue relations with the institution if that institution is neither accredited nor a candidate for accreditation.
2. Require the institution to Show Cause why the institution’s accreditation should not be terminated if that institution is accredited or a candidate for accreditation. The guidelines for Show Cause in the Commission Action Against Institutions Policy will be followed.

The institution may appeal the decision of the Accreditation Commission in accordance with the TRACS established Appeals Policy.
A member institution that withdraws its membership or had its membership terminated may reapply through the normal application process one year after the withdrawal or termination of its accreditation became final.
An appeal is defined as a request for an independent reconsideration of an Adverse Action (as defined in TRACS Policy BP211) of the Accreditation Commission. An institution may make only one appeal to such Adverse Actions. Sanctions (as defined in TRACS Policy BP211) are not appealable. When the Accreditation Commission takes an Adverse Action against an institution, the President of TRACS shall include a copy of this policy with the written notification of the Accreditation Commission’s action. Throughout the appeal process, the institution filing the appeal bears the burden of proof.

A. Grounds for an Appeal

1. An institution may base its appeal on grounds that the action of the Accreditation Commission was:
   a. Based on misinformation;
   b. Based on factual error;
   c. Based on bias;
   d. Arbitrary;
   e. The result of the Accreditation Commission’s failure to follow its published procedures; or
   f. Based solely on financial information and the institution is able to produce verified information that the financial problems which led to the adverse action have been corrected

2. An appeal based on a ground not identified under item 1 above will not be considered.

B. Filing an Appeal

1. An institution’s appeal must be authorized by its governing board as demonstrated in board minutes.
2. The request must be received by the President of TRACS within fourteen days of the date the institution received official notification of the adverse action.
3. The request for an appeal must include payment in full for all outstanding fees and reimbursements due to TRACS and a non-refundable fee in the amount of $15,000.
   a. A request for an appeal without payment in full for all outstanding fees and reimbursements due to TRACS and a check for $15,000 will be considered insufficient and will not be processed unless such payment is received within the fourteen-day deadline.
b. If payment in full for all outstanding fees and reimbursements due to TRACS and a check for $15,000 is not received within the fourteen-day deadline, the institution will be deemed to have waived its right to an appeal and the Adverse Action taken by the Accreditation Commission will become final.

4. The request for an appeal must state specifically the action which is being appealed and the specific grounds (A., 1. a. - f.) for the appeal. The request for an appeal may not be amended after the deadline for its receipt by TRACS.

5. The institution must identify any dates when its Chief Executive Officer or his/her designee would not be available to appear before an Appeal Committee.

The appeal process will follow the steps outlined below (C. through M.).

C. The Appeal Committee

Upon the receipt of an appropriately filed appeal, the President of TRACS shall assemble an Appeal Committee to hear and render a decision regarding the appeal. An Appeal Committee shall consist of five members, with at least one member of the Committee from each of the following categories: a representative of the public, a faculty member from either a member or non-member institution, and an administrator from either a member or non-member institution.

TRACS defines a representative of the public as an individual who is not (1) an employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or pre-accredited by TRACS or has applied for accreditation or pre-accreditation with TRACS, (2) a member of any trade association or membership organization related to, affiliated with, or associated with TRACS; or (3) a spouse, parent, child, or sibling of an individual identified in section (1) or (2) of this definition. Current members of the Accreditation Commission may not serve on an Appeal Committee.

Appeal Committee members must be free from Conflicts of Interest, as defined by the TRACS Conflict of Interest Policy (BP113), in order to qualify for service on an Appeal Committee.

1. Within fourteen days of the date TRACS receives a notice of appeal, the President of TRACS shall provide to the institution the names and affiliations of nine potential Appeal Committee members (including two public representatives, two who are faculty members, and two who are administrators).

2. If the institution has reason to believe that any of the proposed members of the Appeal Committee would be unable to render an unbiased decision, the institution will have seven days from the date it receives the names of the potential Appeal Committee members to request that any of the potential members be excluded from the Appeal Committee. The request for exclusion must state the specific reason(s) for the belief that the identified individual(s) would be unable to render an unbiased decision and must meet the criteria detailed in the TRACS Conflict of Interest Policy. (BP113)

3. Once chosen to serve on an Appeal Committee, the members shall receive detailed training specific to the appeal before the appeal process begins. This training includes information regarding TRACS appeals policies, procedures, Accreditation Standards,
conflicts of interest, and the role of a member of an Appeal Committee. All members of an Appeal Committee will sign a “Conflict of Interest Form” before hearing the appeal. Conflicts of Interest for Appeal Committee members are defined in the TRACS Conflict of Interest Policy. (BP113)

4. The President of TRACS shall review any request to exclude a proposed member of the Appeal Committee and evaluate that request against the TRACS conflict of interest policy, BP113 - Conflicts of Interest.
   a. If the President of TRACS accepts the institution’s request to exclude a potential member, that person will not serve on the Appeal Committee.
   b. If at least five potential members remain, the President of TRACS shall select the five who will serve on the Appeal Committee and appoint a Chair from among those members.
   c. If fewer than five potential members remain, the President of TRACS shall identify additional potential members of the Appeal Committee and present those potential members to the institution for consideration.
   d. The procedures detailed above will be used with additional potential members of the Appeal Committee.
   e. The President of TRACS shall follow the procedures in this section until there are five members of the Appeal Committee, including at least one member who represents the public, one member who is a faculty member, and one who is an administrator.
   f. If the President of TRACS does not honor an institution’s request to exclude a potential member of the Appeal Committee, the President of TRACS shall provide a written explanation for that decision to the institution. Such a decision is not appealable.

D. Institutional Documentation

1. All supporting documentation which the institution wishes to have considered by the Appeal Committee must be submitted within sixty days of the date the institution received notice from the President of TRACS of the Adverse Action. The documentation must clearly show its relevance to the specific grounds for the appeal.
2. Only documentation of actions completed by this deadline will be presented for consideration in the appeal. Actions which are proposed to occur or will be completed after this deadline will not be considered in the appeal.
3. The documentation for each action completed must clearly state whether the institution’s actions occurred before or after the Adverse Action was imposed.

E. Time and Location of Meeting with the Appeal Committee

1. The President of TRACS will select a date for the meeting that is at least thirty days, but no more than sixty days from the last day the institution has to submit its documentation.
2. The date selected for the meeting shall not be a date identified in the notice of appeal as one when the Chief Executive Officer of the institution or his/her designee cannot be present, unless there is no alternative available within the required timeframe.
3. The meeting will be scheduled for one day, with the members scheduled to arrive the day before the meeting and leave the day after the meeting.
4. The President of TRACS shall select a venue for the meeting which minimizes the institution’s expenses.
5. At the discretion of TRACS, the institution involved in the appeal, and the members of the Appeal Committee, appeals may be conducted via teleconference or other similar technology.

F. Procedures of Appeal Committees

1. The Chair of the Appeal Committee shall preside at the meeting of the Appeal Committee and make rulings regarding time limits, admissibility of evidence, and procedural matters.
2. Appeal Committee meetings are closed to the public.
3. The institution may have no more than six individuals present, one of whom is the Chief Executive Officer or his/her designee, and all who are present must be able to speak to the grounds for the appeal. No consultants may be present.
4. The institution may be represented by counsel and counsel may participate in the institution’s presentation.
5. TRACS may have no more than six individuals present, other than the members of the Appeal Committee, and all who are present must be able to speak to the grounds for the adverse action.
6. TRACS may be represented by counsel and counsel may participate in TRACS presentation.
7. Presentations:
   a. The institution will make a presentation of no more than one hour and will be heard first followed by questions from the Appeal Committee.
   b. TRACS will make a presentation of no more than one hour followed by questions from the Appeal Committee.
   c. Counsel for the institution or TRACS may present or assist in the presentations.
   d. Only the representatives of the institution are to be present in the hearing during the institution’s presentation and only TRACS representatives are to be present in the hearing during the presentation by TRACS.
8. Appeals are administrative hearings and thus not subject to the rules of evidence and procedure.
9. The institution may not challenge the competency of members of the Appeal Committee.
10. Only members of the Appeal Committee may ask questions.
11. The Appeal Committee will record the proceedings when the institution is present before the Appeal Committee, but not when TRACS is present before the Appeal Committee or during its consideration and discussions regarding evidence and not when voting on a decision regarding the appeal. TRACS will provide a copy of this recording to the institution upon request.

G. Decision of the Appeal Committee

1. The Appeal Committee shall consider the evidence presented after the representatives of the institution and TRACS have been excused.
2. The Appeal Committee shall review the evidence of the institution’s compliance with TRACS Standards as of the time the Accreditation Commission imposed the Adverse
Action and any evidence that the institution has come into compliance TRACS Standards up to the deadline for submission of institutional documentation.

3. The Appeal Committee shall give no weight to evidence which demonstrates partial compliance with TRACS Standards or which indicates that compliance may occur after the deadline for submission of institutional documentation.

4. All decisions made by the Appeal Committee shall be reached by majority vote of its members.

5. The Appeal Committee shall affirm the decision of the Accreditation Commission if it finds the institution has not demonstrated, as appropriate to the appeal that the action of the Accreditation Commission was:
   a. Based on misinformation;
   b. Based on factual error;
   c. Based on bias;
   d. Arbitrary;
   e. The result of the Accreditation Commission’s failure to follow its published procedures; or
   f. Based solely on financial information and the institution is able to produce verified information that the financial problems which led to the adverse action have been corrected.

6. If the Appeal Committee finds the institution has demonstrated, as appropriate to the appeal, that the action of the Accreditation Commission was based on one of the factors noted in G, 5, a-f above, and in the case of a decision based solely on financial information (f), the Accreditation Commission would not have issued an Adverse Action if the subsequently produced information had been available to the Accreditation Commission; the Appeal Committee shall amend or reverse the decision of the Accreditation Commission. In such cases, an applicant institution which was denied Candid status by the Accreditation Commission must be found to be in compliance with all Institutional Eligibility Requirements (IERs) if the Appeal Committee chooses to amend or reverse the decision of the Accreditation Commission.

7. If the Appeal Committee, based on the information available, determines that it is unable to affirm, amend, or reverse the decision of the Accreditation Commission or that an Applicant institution is not in compliance with all IERs, it shall remand the decision to the Accreditation Commission for further consideration. In doing so, the Appeal Committee shall identify specific issues that the Accreditation Commission must address.

8. The Appeal Committee shall forward its findings and final decision regarding the appeal to the President of TRACS, the institution’s Chief Executive Officer, and the Chair of the institution’s governing board within fourteen days of the date of the hearing. This notice shall be sent by electronic means, Express Mail or its equivalent.

H. Effect of the Appeal Committee’s Decision

1. The decision of the Appeal Committee is final and not subject to further appeal.
2. The Accreditation Commission shall act in a manner which is consistent with the decision of the Appeal Committee.
3. If the Appeal Committee affirms the decision of the Accreditation Commission, the Adverse Action imposed by the Accreditation Commission is in effect as of the date of the Appeal Committee’s notice to the institution.
4. If the Appeal Committee reverses the decision of the Accreditation Commission, the institution shall maintain the accreditation status held by the institution before the Adverse Action was imposed by the Accreditation Commission.

5. If the Appeal Committee amends the decision of the Accreditation Commission, the Accreditation Commission shall act on the decision at its first meeting following the notice of amendment and apply the amended adverse action as of the date of that meeting.

6. If the Appeal Committee remands the decision of the Accreditation Commission back to the Accreditation Commission for further consideration, the Accreditation Commission shall consider the specific issues identified by the Appeal Committee at its first meeting following the notice of remand. The Accreditation Commission shall then appropriately notify the institution of its final decision regarding the institution’s status.

I. Costs of an Appeal

1. If TRACS costs of the appeal exceed the $15,000 fee paid by the institution, TRACS shall provide the institution with a statement of the amount of the additional costs. The institution is to pay these costs within thirty days of receiving the statement.

2. The institution shall be responsible for its own costs associated with the appeal.

J. Withdrawal of Appeal.

1. An institution may withdraw its request for an appeal at any time up to the start of the appeal hearing.

2. The institution’s governing board must authorize such a request.

3. If the institution withdraws its request after the fourteen-day limit for filing an appeal has passed, the institution will not be able to refile the appeal and the Adverse Action being appealed will continue in force as a final decision with the effective date being the date of the written notice withdrawing the appeal.

4. If the institution withdraws its appeal it will be liable for any expenses already incurred by TRACS for the process to that point.

K. Computation of Time

1. The counting of days begins on the day after the triggering event.

2. If the last day allowed for a response is a Saturday, Sunday, or legal holiday, the next business day will be deemed to be the last day.

L. Notifications

1. Any notice that the TRACS President sends to an institution regarding an appeal shall be sent either electronically with response requested or by any delivery method that requires a signature upon delivery.

2. The date any representative of the institution signs accepting delivery of the notice is deemed to be the date of notification.

3. Institutional replies should be sent either electronically with response requested or by any delivery method that requires a signature upon delivery.
4. The date a representative of TRACS signs the return receipt shall be deemed the date of notification.

M. Institutional Status During Appeal and Public Notice

1. During the appeal, the appealing institution shall maintain the status it held with TRACS prior to the Adverse Action.
2. Inquiries regarding the accreditation status of an institution which has filed an appeal shall be answered by explaining the Adverse Action the Accreditation Commission took against the institution and that the institution is appealing that action.
3. Public notice of an Adverse Action, in accord with TRACS policy, shall be made once an appeal is withdrawn or the Appeal Committee has issued its decision.
As a condition of receiving any status with TRACS, each institution concedes that all agreements shall be deemed to have been entered into in Bedford County, Virginia, and shall be interpreted in accordance with the laws of the Commonwealth of Virginia. Also, each institution agrees that jurisdiction and venue for any action that might arise from any membership agreement between the institution and TRACS, regardless of which party initiates the action, will be exclusively in the United States District Court for the Western District of Virginia or the state courts of Bedford County, Virginia, whichever of these courts has proper subject matter jurisdiction.
Institutional Financial Obligations Related to Litigation

Reference: None
Adoption Date: April 2010
Last Revision Date: April 2011

An institution that takes legal action against TRACS regarding an accreditation decision and withdraws or loses its case is responsible for all costs incurred by TRACS in defending its position, including reasonable attorney fees.

An institution which does not pay TRACS required fees or reimburse TRACS for site visits or other services is responsible for all costs incurred by TRACS in collecting those debts, including reasonable attorney fees.
BP222

Closure of an Institution, a Branch Campus or a Teaching Site

Reference: None
Adoption Date: June 2000
Last Revision Date: January 2021

A decision to close an educational institution or one of its Teaching Sites or Branch Campuses requires thoughtful planning and careful consultation with all affected constituencies. Every effort must be devoted to informing each constituency as fully as possible about the conditions compelling consideration of a decision of such importance, and all available information must be shared. As much as possible, the determination to close an institution or one of its Teaching Sites or Branch Campuses must be made through a consultative process and only after alternatives have been considered, but responsibility for the final decision to close rests with the institution’s Board. Since the immediate interests of current students and faculty are most directly affected, their present and future prospects require especially sensitive attention and involvement.

Institutions proposing to close entirely or to close a Teaching Site or Branch Campus must submit a Proposed Institutional Change Form which addresses all of the required checklist items and which includes all supporting documentation noted on the form.

Note: Institutions which close as a result of having the institution’s Candidacy or Accreditation terminated by way of an Adverse Action (as defined in TRACS Board Policy BP211 – Sanctions and Adverse Action) imposed by the Accreditation Commission must meet the requirements outlined in Section G.4. of BP211.

A. Closing an Institution or a Branch Campus or Teaching Site

A decision to close requires specific plans for providing in appropriate ways for the affected students, faculty, administration, and support staff, and for the disposition of the institution’s assets. The following factors must be considered by the institution’s Board in this process:

1. Students - Students who have not completed their degrees must be provided for according to their needs. Arrangements for transfer to other institutions will require complete academic records and all other related information to be compiled in such a way that these records can be transmitted promptly to receiving institutions. Teach Out Agreements (see BP225) made with other institutions to receive transferring students and to accept student records must be in writing. In cases where students have held institutional scholarships or grants, if there are available funds that can be legally used to support students while completing degrees at other institutions, appropriate agreements must be negotiated.

2. Academic Records and Financial Aid Transcripts - The institution must adhere to state and federal regulations in regard to maintaining academic and financial records of its students. This must be completed prior to the liquidation of real assets. Arrangements must be made with the relevant state agency for the filing and maintenance of student records. If there is no state agency which can receive records, arrangements must be made with a state university, with state archives, or
with a private organization to preserve the records. Notification must be sent to every current and past student indicating where the records are being stored and what the accessibility to those records will be. When possible, a copy of a student’s record should also be forwarded to the individual student.

3. Completion of Instructional Obligations - When a student has completed approximately 75% or more of the required hours for an academic degree from the closing institution, arrangements should be made to permit that student to complete the requirements for a degree elsewhere but to receive it from the closed institution. This may require special action by an appropriate state agency. Arrangements must include provision for continuation of the institution’s accreditation only for this purpose. To receive this consideration from TRACS, the Chief Executive Officer of the institution must inform TRACS of the intent to close the institution as soon as the institution’s Board begins discussing the closure. Further, the Chief Executive Officer of the institution must provide TRACS with copies of the plans and notices required in this section as they are developed and disseminated to the relevant parties. This may require the institution to continue as a legal corporate entity for some appropriate period of time beyond the closing date (usually not longer than 18 months), but any such arrangement must be established beyond which students cannot take advantage of such arrangements. Affected students must be made aware of all deadlines and written agreements must be established between the student and the institution whenever such arrangements are to be used.

B. The Teach-Out Plan and Teach Out Agreements

The institution must comply with the appropriate Teach-Out Plan and Teach Out Agreement Policies (BP224 and BP225).

C. Provision for Faculty and Staff

In every case, the institution must arrange for continuation of those faculty and staff who will be necessary for the completion of the institution’s work pending the closing date. In those cases, where faculty and staff will no longer be needed, the institution must make every effort to assist them in finding other employment. It should be understood that the institution can make no guarantees, but every effort should be made to assist in relocation and reassignment. In the event that faculty or staff members find new positions, early resignations should be accepted.

D. The Final Determinations

Determinations must be made to allocate whatever financial resources and assets remain after the basic needs of the current students, faculty, and staff are provided for. When the financial resources of the institution are inadequate to honor commitments, the institution’s Board must investigate, prior to its decision to close, what alternatives and protections are available under applicable bankruptcy laws. If bankruptcy can be avoided, but funds are insufficient to maintain normal operations through the end of the closing process, the institution should not overlook the possibility of soliciting one-time gifts and donations to assist in fulfilling its final obligations.

Every effort must be made to develop defensible policies for dividing the resources equitably among those with claims against the institution. It is impossible to anticipate all of the claims that might be made against the remaining resources of an institution, but the following three principles may help to sort out possible claims and to set priorities:
1. Students have the right to expect basic minimal services during the final semester not only in the academic division, but also in the Business Office, Financial Aid Office, Registrar’s Office, Counseling, and other essential support services. Staff should be retained long enough to provide these services.

2. Staff must be willing to accept the possibility of early termination of their contracts, provided that reasonable notice is given to all employees, and that the reasons for retaining some personnel longer than others are based on satisfying the minimal needs of students and the legal requirements for closing.

3. Every effort must be made to honor long-term financial obligations even though the parties holding such claims may choose not to press them.

E. The Closing Date

The final action of the institution’s Board must be a formal vote to close the institution or a Teaching Site or Branch Campus on a specified date. That date will depend on a number of factors including the decision to file or not to file for bankruptcy. The most important factor is whether or not all obligations to students will have been satisfactorily discharged. This is particularly important if the decision is made to allow seniors to graduate from the institution by completing their degree requirements elsewhere. If such arrangements are made, the Board must be sure to take the legal action necessary to permit awarding degrees after the institution otherwise ceases to function. Normally, the formal vote to award a degree is made after all requirements have been met, but it is legally possible to make arrangements for a student to complete the requirements for a degree at another institution and to receive the degree from the closed institution. These requirements must be clearly specified along with a deadline for completion.

Also, the Board must identify the person or persons authorized to determine whether or not these requirements have been satisfied. Arrangements must be completed with the appropriate state and accrediting agencies in advance to assure that the degree is awarded by a legally authorized and accredited institution.

F. Disposition of Assets

In the case of a not-for-profit institution, the legal requirements of the state where it is incorporated must be carefully examined and meticulously followed with respect to the disposition of institutional assets. Arrangements for the sale of the physical plant, equipment, the library, special collections, art, or other essential holdings, and for the disposition of any endowments or special funds must be explored. In the case of wills, endowments, or special grants, the institution should discuss with the donors, grantors, executors of estates, and other providers of special funds, arrangements to accommodate their wishes. State laws regarding the disposition of funds from a not-for-profit institution must be meticulously followed. All pertinent Federal and State agencies must be apprised of the institution’s situation and any obligations relating to state or federal funds need to be discussed with the proper authorities.

G. Other Considerations

The institution must establish a clear understanding with its creditors and all other agencies involved with its activities to assure that their claims and interests will be properly processed. Insofar as possible, the institution must assure that its final arrangements will not be subject to later legal proceedings that might jeopardize the records of its students or faculty.
H. Conclusion

The closing of an educational institution or Teaching Site or Branch Campus may be rendered less traumatic by careful attention to the details of the legal and ethical obligations to assure that the institution’s students, faculty, and staff will be optimally provided for, and that assets will be used in a way that will honor the intentions of the original donors.
BP223

Dual Enrollment

Reference: None
Adoption Date: November 2019
Last Revision Date: November 2019

For TRACS purposes, “Dual Enrollment” refers to courses taught to high school students for which the students receive both high school credit and college credit, regardless of location or mode of delivery. This would include courses and programs that may be offered under different names such as “Early College,” “Dual Credit,” or “Concurrent Enrollment.” Students may earn less than 25% of any program offered at the institution via dual enrollment.

The academic rigor of such coursework must match the quality of other institutional coursework, regardless of location or mode of delivery. Institutions must ensure that their dual enrollment courses and programs comply with TRACS Accreditation Standards. This expectation applies to all such educational programs and services, wherever located or however delivered. Institutions offering dual enrollment courses and programs must demonstrate clear institutional control over these courses and programs.

With the understanding that the TRACS Accreditation Standards apply to all courses and programs of the institution, regardless of mode of delivery, institutions, peer evaluators, TRACS staff and the Accreditation Commission should consider the following expectations when implementing, reporting on, evaluating, and / or approving of dual enrollment courses and programs.

1. Notification
   Institutions offering dual enrollment courses and programs must notify TRACS of the dual enrollment instructional locations utilizing the “Notification of Changes Not Requiring Approval” form (Appendix A) from the TRACS Institutional Change Form. The institution must demonstrate compliance with state and/or other applicable requirements for such offerings.

2. Faculty
   The institution must ensure appropriate faculty qualifications for those who provide instruction for dual enrollment courses. These faculty members must possess the same academic credentials and/or documented professional experience required by the institution of all of its faculty. Graduate teaching assistants, if they are the instructor of record and providing direct instruction, should meet the same academic and/or professional criteria. In all cases, the institution bears responsibility for documenting and justifying the qualifications of its dual enrollment instructors, and these faculty members should be included on the institution’s Instructional Staff Listing.
3. Curriculum and Instruction
   For all dual enrollment courses offered, the institution must employ sound and acceptable practices for determining the amount and level of credit awarded. Course content and rigor of dual enrollment courses must be comparable to that of the same courses taught to the institution's other students. Dual enrollment courses that are delivered via Distance Education, as defined by TRACS, may only be offered by institutions already approved to offer Distance Education courses / programs by TRACS or by another accrediting agency recognized by the U.S. Department of Education.

4. Institutional Effectiveness
   Dual enrollment students must be included in all applicable assessment processes used to ensure the effectiveness of campus-based courses and programs.

5. Library and Learning Resources
   Dual enrollment students must have access to appropriate library / learning resources, and the institution must demonstrate that students are able to use such resources effectively. If the high school is the provider of these resources, the institution must determine the appropriateness of the collections for the courses and programs offered. The institution must ensure that its students have access to regular and timely instruction in the use of library / learning resources.

6. Academic and Student Support Services
   Academic support services must prove appropriate for the courses and programs offered. Institutions must ensure that dual enrollment students are appropriately advised regarding the collegiate curriculum. Student support services must be appropriate for dual enrollment students.

   Institutions must have an adequate and published procedure for resolving written student complaints, and the institution must follow its policies and procedures. The institution must ensure that its dual enrolled students are appropriately oriented regarding their rights and responsibilities. Documented procedures assure that security of personal information is protected.

7. Admissions and Transparency
   The institution must implement appropriate eligibility and placement procedures to ensure that potential dual enrollment students are prepared for college-level courses. Dual enrollment students are usually admitted under exceptions to an institution’s published admissions policies, and the institution must follow commonly accepted practices in making such exceptions.

   Advertising, recruiting, and admissions information must adequately and accurately represent the programs, requirements, and services available to students. Statements and other representations regarding the ability to transfer credit earned in dual enrollment programs and courses must be accurate and complete. The institution must ensure that its registration and transcription practices for dual enrollment students are consistent with those in effect for all other students.
8. Facilities

Dual enrollment courses must be offered in adequate physical facilities, whether under the control of the institution or under the control of the high school where dual enrollment courses are taken.

NOTE: High schools partnering with institutions for dual enrollment courses are not considered Teaching Sites (as defined in BP228 - Teaching Site), however the physical location of such high schools is to be reported to TRACS as a part of the reporting and compliance requirements for items 1-8 above.
A Teach-Out Plan is Required When:

1. The U.S. Secretary of Education notifies TRACS that the U.S. Secretary of Education has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required.
2. TRACS requires an institution to Show Cause why its accreditation or pre-accreditation should not be terminated.
3. TRACS takes any action against the institution which has the effect of suspending its accreditation or pre-accreditation.
4. The institution notifies TRACS that it intends to cease operations entirely or close a remote instructional site (Teaching Site or Branch Campus).
5. The institution notifies TRACS that it intends to close a program.
6. A State licensing or authorizing agency notifies TRACS that an institution’s license or legal authorization to provide an educational program has been or will be terminated.

B. Guidelines for the Teach-Out Plan

1. The plan must be approved by the institution’s governing board.
2. The plan must be detailed and consistent with applicable federal regulations. It must include how the institution will provide for all its instructional, student, financial, faculty, and operational obligations.
3. The plan must provide for the equitable treatment of all students.
   a. Students are provided, without an increase in tuition or fees, all instruction promised by the institution, prior to its closing or the closure of a remote instructional site, but not delivered to the students because of the closing.
   b. The proposed teach-out institution is geographically proximate to the closed institution or remote instructional site, is accredited by an accrediting body recognized by the U.S. Secretary of Education, and can demonstrate compatibility of its program structure and scheduling to that of the closed institution.
   c. Should the plan require students to pay additional charges, those charges must be identified and the institution must provide notice of those charges to the students.
4. The plan must be backed by demonstrated adequate financing by the closing institution.
5. Although the institution does not have to submit a Teach-Out Agreement, it must demonstrate that it has identified other institutions which may enter into such an agreement.
6. The Teach-Out Plan must be submitted to TRACS for approval.

C. TRACS Review of the Teach-Out Plan

If TRACS approves a teach-out plan that includes a program that is accredited by another recognized accrediting agency, TRACS will notify that accrediting agency of its approval.

TRACS may require an institution to enter into a Teach-Out Agreement before approving the Teach-Out Plan.
A Teach-Out Agreement is a formal written agreement with another institution of higher education which is accredited or pre-accredited by an agency recognized by the U.S. Secretary of Education.

A. When a Teach-Out Agreement is required
   1. An institution may submit a Teach-Out Agreement for approval as part of its Teach-Out Plan.
   2. TRACS may require an institution to submit a Teach-Out Agreement for approval as part of its review of the institution’s Teach-Out Plan.

B. Guidelines for the Teach-Out Agreement
   1. Requirements of the institution which is ceasing to operate or is closing a remote instructional site (Teaching Site or Branch Campus).
      a. The agreement must be approved by the institution’s Board.
      b. The institution must devote sufficient resources to implement the agreement and provide for equitable treatment of all affected students.
   2. Requirements of the teach-out institution.
      a. The agreement must be approved by the institution’s Board.
      b. The institution must demonstrate that it has the necessary experience, resources, and support services to:
         i. Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and
         ii. Remain stable, carry out its mission, and meet all obligations to existing students; and
         iii. Provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.
   3. Required form and content of the agreement.
      a. The agreement must be detailed.
      b. The agreement must be consistent with applicable federal regulations.
   4. The Teach-Out Agreement must be submitted to TRACS for approval.

C. TRACS Review of the Teach-Out Agreement
   TRACS will approve a teach-out agreement only after reviewing the following and concluding that the agreement provides for the equitable treatment of students:
1. A comparison of the courses the students would need to take at the institution which is closing and the equivalent courses at the teach-out institution;
2. A comparison of the requirements the students would need to satisfy at the institution which is closing and what they will be required to satisfy at the teach-out institution;
3. If the institutions are not on the same system, e.g., semester, an explanation of any effect the change would have on students; and
4. Documentation that the teach-out institution has sufficient faculty, facilities, support staff, learning resources, and student support services to support the teach-out.

D. TRACS Action when an Accredited Institution Ceases to Operate or Closes a Remote Instructional Site without a Teach-Out Plan or Teach-Out Agreement

TRACS will work with the U.S. Department of Education and the appropriate State agencies, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charge.
**BP226**

**Institutional Changes**

Reference: 34 CFR §602.22(a)(1)

Adoption Date: June 2000

Last Revision Date: January 2021

Institutional changes are differences in the institution from when it was last approved by the TRACS Accreditation Commission for accreditation or reaffirmation of accreditation and any substantive changes approved subsequent to that review. TRACS classifies institutional changes as Substantive or Non-Substantive. Substantive changes require the TRACS Accreditation Commission’s approval before they are implemented by the institution. Non-Substantive require the approval of TRACS prior to implementation by the institution. Additionally, institutions may make certain changes that do not require approval but must be reported to TRACS not later than 30 days after institutional approval (See Appendix B of TRACS Proposed Institutional Change Form).

All requests for institutional changes (Substantive or Non-Substantive) as well as the reporting of changes not requiring approval should be submitted to the TRACS office on the appropriate form. Only one request or notification per form will be accepted. Only proposed changes submitted with the required fee will be processed.

Only Accredited institutions may request approval for institutional changes. Candidate institutions may only make changes which do not require approval.

Requests for approval of both Substantive and Non-Substantive changes can be submitted at any time. A request for a Substantive Change will be considered by the Accreditation Commission at its first regularly scheduled meeting following TRACS’ receipt of the proposal with all required documentation, any required team or staff visits, and the opportunity for staff to review materials and make a recommendation to the Accreditation Commission. A request for Non-Substantive will be considered as soon as practical following the receipt of the proposal, all required documentation, any required team or staff visits, and the opportunity for staff to review all documentation.

**SUBSTANTIVE CHANGES**

A. Categories

Only the Accreditation Commission may approve a Substantive Change. All Substantive Changes require approval prior to implementation or any public notification of the proposed change.

Definition of a Substantive Change: When compared to the scope approved by the TRACS Accreditation Commission for the institution in its most recent review for Accreditation or Reaffirmation of Accreditation and any Substantive Changes approved subsequent to that review, a Substantive Change is:

1. Any change in the established mission or objectives of the institution including a name change resulting from such changes. Such changes may require a Comprehensive Evaluation (C1) – See Note 1
2. Any change in the legal status, form of control, or ownership of the institution including a name change relating to changes. Such changes may require a Comprehensive Evaluation (C2) - See Note 1
3. The addition of courses or programs that represent a significant departure from existing offerings of educational programs or method of delivery, from those that were offered when TRACS last evaluated the institution. (C3)
   a. The offering of courses or programs that represent a significant departure from existing offerings of educational programs.
   b. The addition of Distance Education for courses or programs. (Beyond an approved pilot project period if applicable) - See Note 2
4. The addition of programs of study at a degree or credential level different from that which is included in the institution’s current accreditation. (C4)
5. A change from clock hours to credit hours or from credit hours to clock hours. (C5)
6. A substantial increase (10% or more) in the number of clock hours or credit hours awarded for successful completion of a program. (C6)
7. The entering into a contract (written agreement) with another institution or organization which is either unaccredited, accredited by an accrediting agency not recognized by the U.S. Secretary of Education or accredited by an accrediting agency which is recognized by the U.S. Secretary of Education but not certified to participate in the Title IV, HEA programs where the students at the TRACS accredited institution can earn more than 25 percent of the credit hours required for their academic program at the contracted institution. (C7)
8. The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50% of an education program (See the TRACS Definition of a Branch Campus) (C8) - See Note 3

Even though 34 CFR § 602.22(a)(2)(viii) allows an abbreviated procedure for an institution which meets specified criteria. TRACS will only approve an accredited institution to add a Branch Campus after a full review of the institution’s application to add a Branch Campus which is submitted in accordance with the TRACS Procedures for establishing a Branch Campus regardless of the number of Branch Campuses the institution has previously been approved to operate.
9. The acquisition of any other institution or any program or location of another institution. (C9)
10. The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study. (C10)
11. The reinstatement of an academic program, including Distance Education, which had previously been placed in abeyance / inactive status. (C11)

B. Procedures
1. Once the Proposed Institutional Change Form is received in the TRACS office, the following verifications are completed:
   a. The institution holds Accredited status. (Candidate institutions may not make Substantive Changes)
   b. The Proposed Institutional Change Form has been fully completed.
   c. The Proposed Institutional Change Form contains all required signatures.
   d. A copy of the minutes of the Board meeting at which the Substantive Change was approved by the institution’s Board is included with the proposal.
   e. Materials were received addressing all the Prospectus Checklist items identified for the particular type of Substantive Change proposed.
f. Determine if the Substantive Change proposal requires a Comprehensive Evaluation.
g. Determine if a staff visit or Focus Team visit is required.
h. Receipt of the required fee.

2. TRACS Staff will complete a review of all documentation and communicate with the institution regarding any areas needing clarification.

3. If a staff visit or Focus Team visit is required:
   a. The institution will be notified of what will be reviewed during the visit
   b. If a Focus Team visit is required, the selection of the members will follow the procedures for team member selection outlined in the current Policies and Procedures Manual.
   c. The staff visit or Focus Team visit will be scheduled as soon as practical.
   d. A draft staff or Focus Team report will be prepared regarding the areas reviewed during the visit.
   e. The visit may conclude with an exit interview with selected members of the institution.
   f. The institution will be provided with a draft copy of the staff or Focus Team report and an explanation of how to correct errors of fact in the report at the end of the exit interview or as soon thereafter as practical.
   g. An official copy of the final staff or Focus Team report will be sent to the institution as soon as practical following the visit.
   h. The institution will have an opportunity to prepare a formal response to the determinations noted in the report.

4. TRACS Staff will prepare a recommendation to the Accreditation Commission regarding the proposed Substantive Change once the review is complete.
   a. The recommendation will be for one of the options identified below.
   b. If the proposed substantive change requires a Comprehensive Evaluation of the institution. Staff will include in the recommendation whether the Substantive Change should be approved prior to the Comprehensive Evaluation.

5. Staff will provide the Commission with all documentation regarding the proposed Substantive Change.

6. If deemed necessary or if so requested by the institution, the institution will be provided with the opportunity to make a presentation to the Commission when its proposal is considered. The institution’s presentation will be limited to 10 minutes and should only address issues identified in the team or Focus Team Report or the staff recommendation to the Commission. If the institution provides the Commission with written materials which cannot be considered fully during the Commission’s deliberations, the Commission may defer action on the proposal until the next Commission meeting.

7. The Accreditation Commission will consider the Substantive Change proposal at the first regular meeting following the completion of the staff review and recommendation.
   a. If the documentation provided by the institution fully addresses the proposed Substantive Change and, if after implementing the proposed change, the institution would remain in compliance with TRACS Standards, the Commission will approve the proposed Substantive Change;
   b. If the documentation provided by the institution does not fully address the proposed Substantive Change or, if after implementing the proposed change, it is not clear that the institution would remain in compliance with TRACS Standards, the Commission may defer action on the proposed Substantive Change until such time as the institution is able to document that implementation of the proposed change would not place the institution out of compliance with TRACS Standards, or;
c. If the Commission determines that if the institution were to be approved to implement the proposed Substantive Change, the institution would not remain in compliance with TRACS Standards, the Commission will deny the proposed Substantive Change. The institution will be informed of the denial as well as the basis of the Commission’s decision to deny.
   i. An institution may file a new Application for a Substantive Change which has been denied, but only after it has addressed fully the reasons for the denial.
   ii. An institution may appeal a decision to deny a proposed Substantive Change to the Commission at its next regular meeting. The institution may only appeal if it can demonstrate that the Commission’s decision to deny was:
       a) Based on misinformation;
       b) Based on factual error;
       c) Based on bias;
       d) Arbitrary; or
       e) The result of the Accreditation Commission’s failure to follow its published procedures.
   iii. The Commission will only consider documentation provided by the institution during or prior to the meeting where the proposal was denied.
   iv. There is no charge to the institution for appeals to denial of a Substantive Change.

8. TRACS Standards require approval of a Substantive Change before it is implemented. If the initiative proposed in a Substantive Change is implemented by the institution before Accreditation Commission approval is granted, the Commission may consider whether or not to take an adverse action against the institution without the requirement to follow the TRACS policy regarding actions against an institution and without advance notice from the President of TRACS of such consideration.

9. The institution must be prepared to explain why the initiative proposed in a Substantive Change was implemented without prior approval from the Accreditation Commission and should be prepared to respond to the Commission’s possible consideration of adverse action.

10. If the Commission takes an adverse action against the institution, the institution retains all of its rights under the TRACS appeals procedure

**NON-SUBSTANTIVE CHANGES**

A. Categories

Changes requiring the approval of the President of TRACS must receive this approval prior to implementation of the proposed change

Definition of a Non-Substantive Change: When compared to what an institution reported to TRACS for its most recent review for Accreditation or Reaffirmation of Accreditation by the Accreditation Commission, a Non-Substantive change is:

1. The addition of courses or programs at a degree or credential level which is included in the institution’s current accreditation that do not represent a significant departure from existing offerings of educational programs or method of delivery, from those that were offered when TRACS last evaluated the institution. (T1)
2. Any change to programs or courses of a degree or credential which is included in the institution’s current Accreditation including the deletion of an approved program or the addition or deletion of areas of emphasis / concentration within a program. (T2)
3. The change of the name of the institution not related to a Substantive Change requiring Accreditation Commission approval. (T3)
4. The establishment of an additional location geographically apart from the main campus at which the institution offers less than 50% of an academic program (See the TRACS Definition of a Teaching Site and BP 225 G.) (T4) – See Note 4
5. The change of the location of an institution, Branch Campus, or Teaching Site. (T5)
6. The closure of an institution, Branch Campus, or Teaching Site (T6)
7. The initiation of a Pilot Project (T7) – See Note 5

The President of TRACS is the official designated to approve Changes Requiring Approval of TRACS.

B. Procedures
1. Once the Proposed Institutional Change Form is received in the TRACS office, the following verifications are completed:
   a. The institution holds Accredited status.
   b. The Proposed Institutional Change Form has been fully completed.
   c. The Proposed Institutional Change Form contains all required signatures.
   d. A copy of the minutes of the Board meeting at which the Non-Substantive Change was approved by the institution’s Board is included with the proposal.
   e. Materials were received addressing all the Prospectus Checklist items identified for the particular type of change proposed
   f. Determine if a staff or Focus Team visit is required.
   g. Receipt of the required fee.
2. TRACS Staff will complete a review of all documentation and communicate with the institution regarding any areas needing clarification.
3. If a staff or Focus Team visit is required:
   a. The institution will be notified of what will be reviewed during the visit.
   b. If a Focus Team visit is required, the selection of the members will follow the procedures for team member selection outlined in the current Policies and Procedures Manual.
   c. The staff or Focus Team visit will be scheduled as soon as practical.
   d. A draft of the staff or Focus Team report will be prepared regarding the areas reviewed during the visit.
   e. The Focus Team visit may conclude with an exit interview with selected members of the institution.
   f. The institution will be provided with a draft copy of the staff or Focus Team report and an explanation of how to correct errors of fact in the Report at the end of the exit interview or as soon thereafter as practical.
   g. An official copy of the final staff or Focus Team report will be sent to the institution for comment from the TRACS office as soon as practical following the visit.
   h. The institution will have an opportunity to prepare a formal response to the determinations noted in the staff or Focus Team report.
4. TRACS Staff will prepare a recommendation to the President of TRACS regarding the proposed change once the review is complete.
5. Staff will provide the President of TRACS with all documentation regarding the request for change.
6. The President of TRACS may request additional clarifying documentation from the institution.
7. If a proposal is denied, the institution may file a new proposal, after having addressed the reasons for the denial identified in the official notice of denial.
8. TRACS Standards require approval of a Non-Substantive Change before it is implemented. If the initiative proposed in a Non-Substantive Change is implemented by the institution before TRACS approval is granted, the Commission may consider whether or not to take an adverse action against the institution without the
requirement to follow the TRACS policy regarding actions against an institution and without advance notice from the President of TRACS of such consideration.

9. The institution must be prepared to explain why the initiative proposed in a Substantive Change was implemented without prior approval from TRACS and should be prepared to respond to the Commission’s possible consideration of adverse action.

10. If the Commission takes an adverse action against the institution, the institution retains all its rights under the TRACS Appeals Procedure.

**CHANGES NOT REQUIRING APPROVAL**

1. Changes not requiring the approval of TRACS include, but are not limited to, the following:
   a. The addition of new courses not related to the addition of an area of emphasis / concentration.
   b. The deletion of courses no longer offered.
   c. Changes to existing courses.
   d. Changes to graduation requirements.
   e. Changes to general education.
   f. The addition or deletion of a minor.
   g. Changes to requirements for a minor.
   h. The addition of new facilities on campus.
   i. The removal or sale of facilities no longer being used by the institution.
   j. The addition of non-degree granting programs.
   k. The occasional (not regular) offering of individual courses at locations that are not a part of the main campus or any approved Teaching Site or Branch Campus. (If ongoing / regular instruction is to be offered at any one location, the institution must submit a proposal and receive TRACS approval to add a Teaching Site or Branch Campus)
   l. The addition of a remote instructional location that is located within a 30-mile radius of the institution’s main campus. TRACS reserves the right to require a staff visit to such locations to verify compliance with TRACS Standards.
   m. Other as specified.

2. While the above changes do not require the approval from TRACS, the institution should complete the Notice of Change Not Requiring Approval form. (Appendix A of the Proposed Institutional Change Form)

**EFFECTIVE DATE OF AN APPROVED INSTITUTIONAL CHANGE**

1. The approval date of a Substantive Change will be the date of the Commission’s decision concerning the proposal. TRACS will mail a notification letter to the institution.

2. The approval date for a Non-Substantive Change will be the date on the letter of notification of approval that will be sent to the institution.

No institutional change will be approved retroactively, except that the effective date for a change in ownership will be the date the actual change occurs.

Any approved institutional change, whether approved by the Accreditation Commission or by the President of TRACS Staff, is subject to follow-up review by TRACS at any time subsequent to approval.

**Note 1: Substantive Changes Requiring a Comprehensive Evaluation**

The following Substantive Changes or proposed Substantive Changes may require a Comprehensive Evaluation of the institution. A Comprehensive Evaluation consists of a focused Self-Study, the hosting of an Evaluation Team or Focus Team, and institutional responses to any determinations noted in a report from the Evaluation Team or Focus Team.
1. Any change in the established mission or objectives of the institution.
2. A change in ownership that results in a change of control.
3. Any change from an undergraduate only institution (Levels I and II) or graduate only institution (Level III) to an institution offering both undergraduate and graduate programs (Levels I, II, and III) or the addition of doctoral programs for the first time (Level IV).
4. A series of changes that would result in the institution becoming what is essentially a new and different institution than it was when the Accreditation Commission last acted on its accreditation.

   a. Each request for a Substantive Change will be evaluated in conjunction with all of the Substantive Changes that have been approved for the institution since the last action of the Accreditation Commission (e.g., Accreditation granted, removal from probation, or Accreditation reaffirmed) on that institution’s accreditation.

   b. If the Accrediting Commission determines that the proposed Substantive Change and the prior approved Substantive Changes taken together appear to transform the institution to the extent that the institution is essentially a new institution from what it was at the last action of the Accreditation Commission, the institution must undergo a Comprehensive Evaluation.

   c. After the Accreditation Commission determines that a Comprehensive Evaluation is required, the institution must complete the evaluation even if the institution withdraws its request for the proposed change.

   d. In the institution’s Self-Study as a part of the Comprehensive Evaluation, the institution must address specifically each of the Substantive Changes which have been approved since the last action of the Accreditation Commission on the institution’s accreditation. The institution must include a narrative concerning the proposed Substantive Change which led to the decision to require a Comprehensive Evaluation, even if the proposal was not approved.

At its discretion, the Accreditation Commission may approve the proposed Substantive Change at the time it requires the Comprehensive Evaluation.

If a Comprehensive Evaluation is required, the institution must submit its plan for engaging in the process no later than three months after the date of TRACS written notice of the required evaluation.

**Note 2: Substantive Change proposal for the addition of Distance Education**

Definition of Distance Education: Distance Education means education that uses one or more of the technologies listed to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs, and CD-ROMs, if used in a course in conjunction with any of the technologies listed above. Institutions will be required to document regular and substantive interaction between the students and the instructor.

Institutions desiring to initiate course and/or program delivery via Distance Education are required to complete and submit the Proposed Institutional Change Form. The institution’s proposal will follow the procedures below.

1. The institution must address all specified prospectus checklist items.
2. Upon submission of the Proposed Institutional Change Form along with appropriate responses, supporting documents, and the appropriate fee, the Substantive Change proposal will be reviewed by TRACS staff for completeness.
3. Once the Proposed Institutional Change Form is complete and all documentation is received, a Focus Team visit to the institution will be conducted. The Focus Team will consist
of TRACS staff and at least one peer reviewer well versed and experienced in Distance Education.

4. Following the Focus Team visit, a Focus Team report will be prepared including an analysis of the institution’s proposal and Focus Team observations during the visit. The institution will have the opportunity to correct any errors of fact which may be contained in the report.

5. Once finalized, a copy of the Focus Team report, along with a response matrix containing the Focus Team’s Findings, Recommendations and/or Suggestions, will be submitted to the institution. The institution must respond to all Findings, Recommendations and/or Suggestions, utilizing the response matrix, by the date specified. Once the institution has submitted its responses to the Findings, Recommendations and/or Suggestions, all materials related to the proposal to add Distance Education will be forwarded to the Accreditation Commission for consideration at the next regularly scheduled meeting.

6. In its review, the Accreditation Commission will consider the institution’s proposal, the Focus Team report, the institution’s written responses to the Findings, Recommendations and/or Suggestions, and the staff recommendation regarding the proposal.

7. If the Accreditation Commission grants approval for the institution to initiate Distance Education, such approval will allow the institution to begin such instruction within a time specified by the Accreditation Commission.

Note 3: Substantive Change proposal for the addition of a Branch Campus

A Branch Campus is an additional location geographically apart from an institution’s main campus at which the institution offers at least 50% of an educational program.

An institution’s request for addition of a Branch Campus will follow the procedures below without regard to the number of Branch Campuses the institution has been approved to operate.

1. An institution which is subject to any adverse action will not be authorized to open a Branch Campus until the adverse action has been removed.

2. An institution which undergoes a change in ownership resulting in a change of control as defined in 34 CFR 600.31 will not be authorized to open a Branch Campus until the institution’s business plan demonstrates that it will be in compliance with the Standards related to a Branch Campus.

3. When submitting a Proposed Institutional Change Form to add a Branch Campus, the proposal must contain all appropriate signatures, provide evidence of Board approval of the proposal, and address all prospectus checklist items designated.

4. Upon submission of the Proposed Institutional Change Form, required documents, and appropriate fee, the proposal will be reviewed by TRACS staff for completeness.

5. Once the Proposed Institutional Change Form is complete and all documentation is received, a Focus Team visit to the proposed Branch Campus will be conducted. The Focus Team will consist of TRACS staff and at least one peer reviewer well versed and experienced in matters related to the area(s) of review.

6. Following the Focus Team visit, a Focus Team Report will be prepared including an analysis of the institution’s proposal and the Focus Team’s observations during the visit. The institution will have the opportunity to correct any errors of fact which may be contained in the report.

7. Once finalized, a copy of the Focus Team Report, along with a response matrix containing the team’s Findings, Recommendations and/or Suggestions, will be submitted to the institution. The institution must respond to all Findings, Recommendations and/or Suggestions, utilizing the response matrix, by the date specified. Once the institution has submitted its responses to the Findings, Recommendations and/or Suggestions, all materials
related to the proposal to add a Branch Campus will be forwarded to the Accreditation Commission for consideration at the next regularly scheduled meeting.

8. If the Accreditation Commission grants approval for the institution to open a Branch Campus, such approval will allow the institution to begin instruction at the Branch Campus within a time specified by the Accreditation Commission (not to exceed five years).

9. Within six months of courses commencing at the Branch Campus, TRACS will conduct a follow-up staff visit to the Branch Campus to verify that the Branch Campus maintains all of the required personnel, facilities, and resources. If the Branch Campus received approval with conditions, staff will confirm that these conditions have been met at the follow-up visit. The institution will receive a draft copy of a follow-up staff report which may contain Findings, Recommendations and/or Suggestions. The institution will have the opportunity to correct any errors of fact which may be contained in the follow-up report before the report is finalized.

10. The institution will be required to submit Progress Reports addressing any outstanding determinations by staff, utilizing a staff supplied matrix until any outstanding areas of non-compliance have been satisfactorily addressed.

11. As long as the Branch Campus remains in operation, it will be included in the institution’s annual reporting data as well as in all subsequent reaffirmation processes.

Note 4: Non-Substantive Change proposal for the addition of a Teaching Site

A Teaching Site is a location geographically apart from the main campus at which the institution offers less than 50% of any educational program. No student may earn 50% or more of any educational program at any degree level at a Teaching Site. Proposals for the addition of Teaching Sites within 30 miles of the institution’s main campus may not require TRACS approval. Such determinations remain the prerogative of the President of TRACS.

An institution’s request for a Teaching Site will follow the procedures below without regard to the number of Teaching Sites the institution has been approved to operate.

1. An institution which is subject to any adverse action will not be authorized to open a Teaching Site until the adverse action has been removed.

2. An institution which undergoes a change in ownership resulting in a change of control as defined in 34 CFR 600.31 will not be authorized to open a Teaching Site until the institution’s business plan demonstrates that it will be in compliance with the Standards related to a Teaching Site.

3. When submitting a Proposed Institutional Change Form to add a Teaching Site, the proposal must contain all appropriate signatures, provide evidence of Board approval of the proposal, and address all prospectus checklist items designated.

4. Upon submission of the Proposed Institutional Change Form, required documents, and appropriate fee, the proposal will be reviewed by TRACS staff for completeness.

5. After TRACS receives a completed Proposed Institutional Change Form requesting approval for a Teaching Site, a staff visit to the proposed Teaching Site may be conducted. The staff visit may also include time at the main campus. The institution will receive a copy of the report of the staff visit, which will include an analysis of the institution’s proposal.

6. If TRACS approves the request to operate a Teaching Site, that approval will allow the institution to begin instruction at the Teaching Site within a specified time which is not to exceed 1 year. A letter of notification of approval of the proposed Teaching Site will be mailed to the institution.

7. As long as the Teaching Site remains in operation, it will be included in the institution’s annual reporting data as well as in all subsequent reaffirmation processes.
Note 5: Non-Substantive Change proposal for the initiation of a Pilot Project

Institutions seeking to initiate any institutional change where such a change would be considered temporary and limited (relative to the scope of approval) in nature, may apply for approval of the proposed change as a Pilot Project. Approvals for such Pilot Projects may be granted by the President of TRACS with the understanding that if granted, the approval will specify the scope of approval, including the date of expiration for the approval and any other limitations imposed by the President of TRACS.

1. When submitting a Proposed Institutional Change Form to initiate a Pilot Project, the proposal must contain all appropriate signatures, provide evidence of Board approval of the proposal, and address all prospectus checklist items designated.

2. Upon submission of the Proposed Institutional Change Form, required documents, and appropriate fee, the proposal will be reviewed by TRACS staff for completeness.

3. After TRACS receives a completed Proposed Institutional Change Form requesting approval for a Pilot Project, TRACS will determine if a staff visit to the institution should be conducted. If a staff visit is required, the institution will receive a copy of the report of the staff visit, which will include an analysis of the institution’s proposal.

4. If TRACS approves the request to initiate a Pilot Project, that approval will allow the institution to initiate the Pilot Project within the parameter specified in the approval. A letter of notification of approval of the proposed Pilot Project will be mailed to the institution.

In the event that the institution desires to make permanent the action authorized by the approval of a Pilot Project, the institution will be required to apply for the appropriate approval via the established processes for that particular initiative.
A Branch Campus is an additional location geographically apart from an institution’s main campus at which the institution offers at least 50% of an educational program.

Although a Branch Campus may have its own Advisory Board, it remains fully subject to the institution’s Board and is accountable to comply with all policies of the institution.

Accreditation is granted only to an institution (a specific corporation), and applies to all approved Branch Campuses of that institution.

1. Approval of a Branch Campus will be:
   a. Part of an institution’s consideration for Candidacy and subsequent consideration for Accreditation, or
   b. Part of an Accredited institution’s request for a Substantive Change for the addition of a Branch Campus.

2. A Branch Campus will:
   a. Have its own Catalog, or
   b. Be referenced clearly in the institution’s Catalog for its main campus.

3. All faculty and staff of a Branch Campus must be employees of the institution with the same rights and responsibilities as those working on the main campus.

4. A Branch Campus will be financially stable and have no adverse impact on the institution’s ability to comply with the financial Standards of TRACS.

5. A Branch Campus will be fully integrated into the administration of the institution.

6. All appropriate institutional polices apply to a Branch Campus.

7. A Branch Campus must have a Director who reports within the administrative structure of the main campus.

8. A Branch Campus located outside of the U.S. or its territories will comply with U.S. norms and TRACS Standards, unless there is a legal requirement and/or national norms in the country which require a variation, or to do so would jeopardize the health or safety of the employees.

Although instruction may be in a language other than English, all communications with TRACS will be in English. Any document submitted to TRACS as part of a Substantive Change request, Self-Study Report, or other required reports will be prepared in English. The institution will certify that any document which has been translated is accurate, identify the person who made the translation, and identify that person’s qualifications for translating the documents. If a submitted document is not translated or if the qualifications of the translator are inadequate, TRACS may have the document translated and the institution will bear the cost of the translation.

On any Branch Campus where the mode of education is in a language other than English, appropriate documents and websites will be provided in that language for staff, faculty and students.
After final approval, a Branch Campus will be evaluated as part of the institution’s schedule of review for Reaffirmation of Accreditation or any considerations for adverse action. An institution with a Branch Campus will include that Branch Campus in all Annual Reports and Self-Study Reports. Evaluation Team visits following an institutional Self-Study will include visits to the Branch Campus(es).

TRACS will conduct a staff visit to each Branch Campus at least once every 5 years.
A Teaching Site is an additional location geographically apart from an institution’s main campus at which the institution offers less than 50% of any educational program. No student may earn 50% or more of any educational program at any degree level at a Teaching Site.

If an institution is confirmed to have offered 50% or more of any educational program at a Teaching Site, the institution will be: 1) considered for an adverse action at the first meeting of the Accreditation Commission following such confirmation and, 2) immediately required to reduce its offerings so that no student can earn 50% or more of any educational program at any degree level at the Teaching Site.

Approval of a Teaching site must be:

1. as part of an institution’s consideration for Candidacy or,
2. as a part of an Accredited institution’s request for a Non-Substantive change.

The institution’s Catalog for its main campus must be provided to all students at the Teaching Site. All faculty and staff of a Teaching Site must be employees of the institution with the same rights and responsibilities as if they were working on the main campus.

A Teaching Site must be financially secure and cannot have an adverse impact on the institution’s ability to comply with TRACS Standards. The Teaching Site must be fully integrated into the administration of the institution. All institutional policies must apply to a Teaching Site.

A Teaching Site located outside of the U.S. or its territories must comply with U.S. Standards and norms, unless there is a legal requirement for a variation.

Teaching Sites that are located in foreign countries or where the mode of education is in a language other than English, must provide appropriate documents such as board manuals, catalog, various handbooks, policies and procedures, course syllabi, library collections, websites in that language for their staff, faculty and students. All documents that are submitted to the TRACS Office for review or for peer evaluators must be in the English language.

After approval, a Teaching Site will be evaluated as part of the institution’s schedule of review for reaffirmation of accreditation or any considerations for adverse action. An institution with a Teaching Site must include it in all reports and Self-Studies. Evaluation Team visits following a Self-Study will include visits to the Teaching Site(s).

An institution with a Teaching Site will include all of the data from that teaching site in its Annual Operational Report to TRACS.
Distance Education

Reference: 34 CFR §600.9, §602.3, and §602.17
Adoption Date: April 2011
Last Revision Date: January 2021

TRACS defines Distance Education as follows:

Distance Education: Education that uses one or more of the technologies listed to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include the internet; one-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or video cassettes, DVDs, and CD-ROMs, if used in a course in conjunction with any of the technologies listed above.

An institution which offers Distance Education (DE) must be able to provide documentation that it has approval to offer its DE programs/courses in each state and/or location where it has enrolled students. If the institution is determined by a state or locale to be exempt from registration or licensure, it must provide a copy of the written notice from that state or locale. If the institution is prohibited from offering DE courses to students in a state or locale, it must provide a copy of the written notice.

The institution must identify the states and/or locations where it has been approved to offer DE programs/courses or has been exempted from such approval; where it has not sought to be approved; and where it has not been approved. This information must be on a single webpage which is accessed by a link from the primary webpage describing the institution’s DE offerings.

This requirement is based on 34 CFR §600.9. The U.S. Department of Education has provided guidance to institutions regarding compliance with the regulation. In particular, the guidance indicates that “the Department will not initiate any action to establish repayment liabilities or limit student eligibility for distance education activities undertaken before July 1, 2014, so long as the institution is making good faith efforts to identify and obtain necessary State authorizations before that date.” TRACS will apply this policy in accord with the Department’s guidance to institutions, including any modifications which the Department issues.

Additionally, institutions approved to offer DE must verify and protect the identity of students enrolled in any courses offered through DE.

1. The institution uses a method of verifying the identity of students which reasonably assures that the student is the same person who registered for the course. (Among the most common methods are a secure login and password for electronic access and proctored examinations.),

2. The institution provides students with a written rationale for the method or methods it employs,
3. Students are notified of any charge related to the method of verification, at the time of registration or enrollment, and
4. The institution provides a written statement of how it will protect the privacy of students enrolled in alternative delivery method programs/courses.
5. Institutions are required to demonstrate compliance with all TRACS Standards and Federal regulations related to Distance Education.

Additionally, courses and/or programs offered via Distance Education must meet all applicable Federal Requirements and all applicable TRACS Accreditation Requirements (such as, but not limited to, those associated with Publications and Policies, Educational Programs, Faculty, Student Services, Financial Operations, Institutional Assessment, Strategic Planning, Library and Learning Resources, and Facilities and Equipment, etc.)
BP230

Agreement Between Institutions

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2011

An institution must provide TRACS with a copy of each written agreement it has with any other institution or consortium where the other institution or consortium provides part of the educational program for the institution’s students. The institution must notify TRACS each time it modifies or terminates any of its written agreements. The copy or notice must be provided to TRACS as soon as practicable, but no later than 30 days, after the agreement is final, is modified, or is terminated.

If the agreement is with an institution which is accredited by an accrediting agency recognized by the U.S. Secretary of Education, it will not be considered a substantive change if students at the TRACS accredited institution can earn no more than 50% of the credit hours required for their academic program at the contracted institution. In all other cases, the agreement will be considered a substantive change which requires approval from TRACS in accord with the Substantive Change Policy.

The institution must include a copy of the information about the agreement that it will provide to students in accord with federal regulations.

For an agreement that is treated as a substantive change, The Accreditation Commission will consider the reasons for the agreement; ensure that all statements or information specified in applicable federal regulations are included, and that it is consistent with national norms.
An institution that uses facilities owned by another organization must have a written lease detailing the institution’s right to use those facilities. The contract must ensure that the institution cannot be stopped from using those facilities without adequate time to secure alternate facilities which are acceptable to TRACS. Such a change in facilities would require the institution to request a substantive change.
An institution that has services supplied by another organization must have a written contract detailing the extent of the institution’s access to those services and the costs of those services. The costs should be no more than fair market value. If the institution and the organization are related, the costs should be reasonable under applicable transfer pricing policies and regulations.
BP234

Records of Student Complaints

Reference: None
Adoption Date: April 2011
Last Revision Date: April 2011

All TRACS member institutions are to keep copies of student complaints which are presented to the institution in compliance with its policy on student complaints as well as documentation of how it resolved those complaints. Evaluation Teams will review all student complaints presented to the institution in the five years immediately before the visit. The Evaluation Team will determine if the institution has addressed each complaint in compliance with the institution’s policy. The Evaluation Team will determine if the complaints reflect any systematic issues relating to the Accreditation Standards. The analysis and conclusions of the Evaluation Team will be included in the Team’s Report.
All member institutions are expected to give rigorous attention to the principles of good practice as part of its responsible self-regulation. The principles below are based on the Council on Higher Education Accreditation’s (CHEA) Principles of Good Practice in Institutional Advertising and are intended to assist institutions in developing policies and practices in accordance with such principles.

1. Advertising, Publications, and Promotional Literature
   a. The educational programs and services offered by the institution are the primary emphasis of all advertisements, publications, promotional literature, and recruitment activities.
   b. All statements and representations are clear, factually accurate, and current. Supporting information must be kept on file and readily available for review.
   c. Catalogs and other official publications are readily available and accurately depict:
      i. Institutional mission and objectives.
      ii. Academic calendars.
      iii. Entrance requirements and procedures.
      iv. Comprehensive grading policies.
      v. Basic information on programs and courses, with required sequences and frequency of course offerings explicitly stated. The scope shall include, where appropriate, required general education.
      vi. Degree and program completion requirements, including length of time required to obtain a degree or certificate of completion and the minimum and maximum number of credit hours required.
      vii. Faculty (full-time and part-time listed separately) with degrees held, the conferring institution and the subject area(s) in which he or she teaches.
      viii. Administrators with their degrees and conferring institutions.
      ix. Members of the governing board including city and state of residence.
      x. Institutional facilities readily available for educational use, with a campus map.
      xi. Rules and regulations for conduct.
      xii. Tuition, fees, and other program costs.
      xiii. Opportunities and requirements for financial aid.
      xiv. Policies and procedures for refunding fees and charges to students who withdraw from enrollment.
      xv. Clear statement of accreditation status.
      xvi. Statement on nondiscrimination.
      xvii. Other information appropriate about the institution.
   d. College catalogs or other official publications clearly and accurately describe career opportunities and information is provided regarding:
      i. National or state legal requirements for eligibility for licensure or entry into an occupation or profession for which education and training are offered.
ii. Any unique requirements for career paths or for employment and advancement opportunities in the profession or occupation described.

Institutions maintain copies of its advertising and marketing materials. These materials are provided for review as requested during staff and team visits. These materials are regularly reviewed for consistency with TRACS Policies, Procedures, and Standards.

2. Responsibility

Each member institution assumes responsibility for informing the TRACS office of improper or misleading advertising or unethical practices that come to their attention in connection with any TRACS member institution including the institution’s own improper or misleading advertising or unethical practices. When making such a self-report, the institution will identify what occurred, what steps have been – and will be – taken to correct it, and what the institution is doing to ensure it is not repeated.
The principles below are based on the Council on Higher Education Accreditation’s (CHEA) Principles of Good Practice in Institutional Student Recruitment, and Representation of Accredited Status and are intended to assist institutions in developing policies and practices regarding the institution’s student recruitment.

1. Student recruitment is conducted by well-qualified admissions officers and trained volunteers whose credentials, purposes, and position or affiliations with the institutions are clearly specified.
2. The policies and procedures for admission are clearly stated in all recruiting materials.
3. Independent contractors or agents used by the institution for recruiting purposes shall be governed by the same principles as institutional admission officers and volunteers.
4. The following practices in student recruitment are to be scrupulously avoided:
   a. Assuring employment unless employment arrangements have been made and can be verified.
   b. Misrepresenting job placement and employment opportunities for graduates.
   c. Misrepresenting program costs.
   d. Misrepresenting abilities required to complete programs.
   e. Offering money or inducements other than educational services of the institution to agencies or individuals in exchange for student enrollment. (Except for awards of privately endowed restricted funds, grants or scholarships are to be offered only on the basis of specific criteria related to merit or financial need.)
The principles below are based on the Council on Higher Education Accreditation’s (CHEA) Principles of Good Practice in Institutional Student Recruitment, and Representation of Accredited Status and are intended to assist institutions in developing policies and practices regarding the institution’s representation of its status with TRACS.

1. No statement is made regarding possible future accreditation status or qualification not yet conferred by the Accreditation Commission. For example, an institution will not state that it has applied for candidacy with TRACS or is being evaluated by TRACS and it is anticipated that accreditation will be granted in the near future.”

2. Any reference to state approval is limited to a brief statement concerning the actual charter, incorporation, license, or regulation given.

3. When accredited status is printed in institutional catalogs and other official publications, it states accurately and fully the institution is a member of the Transnational Association of Christian Colleges and Schools (TRACS) [15935 Forest Road, Forest, VA 24551; Telephone: 434.525.9539; e-mail: info@tracs.org] having been awarded (Candidate, Accredited or Reaffirmation Status) status as a Category I, II, III or IV institution by the TRACS Accreditation Commission on (month, day and year of Commission action); this status is effective for a period of (number of years indicated in Commission Action Letter). TRACS is recognized by the United States Department of Education, the Council for Higher Education Accreditation and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

4. Accredited status is not to be misrepresented. The accreditation granted by TRACS has reference to the quality of the institution as a whole. Since institutional accreditation does not imply specific accreditation of any particular program in the institution, statements such as “this program/degree is accredited” are incorrect and misleading.

5. Institutions should not use the phrase fully accredited.
TRACS Accreditation Standards emphasize that institutions evaluate their own educational effectiveness. The Accreditation Commission recognizes that this is a difficult task which requires careful analysis, research, data gathering, and professional judgment. Because of the complexity of the task, the Accreditation Commission acknowledges that some institutions may decide to use consultants or purchase materials to use in meeting planning, evaluation, and institutional research requirements found in the Standards.

Institutions will consider the following when using consultants or purchasing materials:

1. The use of services and products of consultants and organizations in the assessment field should not diminish the broad based involvement of faculty and administration.

2. TRACS does not endorse possible consultants, but does make opportunity for such consultants to present their services at the TRACS Annual Conference. This is provided merely as a service to the TRACS member institutions and should not be interpreted as an endorsement by TRACS of any organization. It is up to an institution to decide if they will use a consultant and, if so, which consultant to use.

3. Any questions regarding interpretation of the requirements of the Standards for accreditation, or the accreditation process, should be directed to TRACS staff before deciding to use a consultant or purchasing materials.

4. Consultants may not represent the institution officially as a third party in matters relating to accreditation and reaffirmation.
TRACS is an institutional accrediting agency. As such, it evaluates all aspects of the institution by means of the peer evaluation process, guided by the TRACS Accreditation Standards approved by the Accreditation Commission.

Accreditation is a voluntary process to promote and uphold high standards in higher education. The process is guided within the individual agencies by standards of quality and excellence. The primary purpose of institutional accreditation is peer evaluation of the total institution to determine the institution's integrity and general competence in providing higher education within accordance with its mission statement, and objectives.

The Accreditation Commission is solely responsible for all accreditation activities and has final authority regarding all accreditation actions. It formulates and implements all policies, procedures, and Accreditation Standards used in the accreditation process. The Accreditation Commission consists of up to eighteen elected Commissioners, including institutional representatives, two faculty representatives, and at least three but not more than six public representatives as defined by 34CFR 602.3 and the TRACS Bylaws. The Accreditation Commission is elected according to provisions of the TRACS Bylaws.

Though the U.S. has no centralized authority which exercises national control over higher education, the U.S. Secretary of Education recognizes accrediting agencies which meet prescribed criteria and are deemed to be reliable certifiers of quality in the institutions which they accredit. The National Advisory Committee on Institutional Quality and Integrity (NACIQI) is an appointed committee which acts as an advisory to the U.S. Secretary of Education and recommends accrediting agencies for recognition. Institutions accredited by an agency recognized by the U.S. Department of Education are eligible to participate in federal student financial assistance programs after completing the federal application process.
BP302

Accreditation Standards and Institutional Eligibility Requirements

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

TRACS Accreditation Standards and Institutional Eligibility Requirements (IERs) are established to guide the accreditation process and are specified in the Accreditation Manual. The Accreditation Standards, and IERs have been developed to represent expectations of good practice and serve as the basis for analysis by the Accreditation Commission, TRACS Staff and Peer Evaluators (Focus Teams, Evaluation Teams, Interim Fifth-Year Review evaluators) of an institution’s compliance with the quality required of an accredited institution.

Modifications to Accreditation Standards and IERs may be made only by official action of the Accreditation Commission.

The process for the modification of Accreditation Standards and IERs will follow the procedures outlined in BP303.
BP303

Changes to Accreditation Standards, Institutional Eligibility Requirements, and Board Policies

Reference: 34 CFR §602.16, §602.20, and §602.21
Adoption Date: June 2000
Last Revision Date: April 2019

1. Accreditation Standards and Institutional Eligibility Requirements

The Accreditation Commission, through its standing Standards Review Committee, regularly reviews the TRACS Accreditation Standards and Institutional Eligibility Requirements (IERs). This review assures that these areas remain in line with commonly accepted practices in higher education as well as with federal, state, and professional organizational requirements. This review includes a detailed analysis of the requirements of the various entities, as well as the policies and standards of other recognized accrediting agencies.

The Standards Review Committee’s examination is systematic, with all Accreditation Standards and IERs being reviewed at least once every 5 years. The Standards Review Committee recommends to the Accreditation Commission any action to modify Accreditation Standards and IERs as soon as it determines changes are merited, even if an item is being considered out of its regular sequence of review.

TRACS recognizes the value of receiving input from institutions and peers as a part of the process for the review and revision of Accreditation Standards and IERs. Comments, including suggestions for modifications from those involved directly in the accreditation process, are always welcome and are given careful and serious consideration as part of the review process.

Additionally, the Standards Review Committee considers changes to Accreditation Standards and IERs received from member institutions, the TRACS Staff, or in response to changes in federal regulations, state regulations, or the requirements of organizations to which TRACS belongs, along with changes which arise as a result of the 5-year review.

TRACS utilizes the expertise of member institutions, peers and other recognized higher education institutions to assess the validity and reliability of the TRACS review elements and their relevance to the educational and training needs of students at member institutions.

Once the Accreditation Commission has reviewed the recommendations of the Standards Review Committee and made any modifications, it approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Chief Executive Officers of all member institutions, all other ED recognized accrediting agencies, other accredited Christian colleges selected at random, and all State Secretary of Higher Education offices, for a 30-day period of request for comments.

After receipt of and consideration of all public comments, the item is placed on the agenda of the next Accreditation Commission meeting, where the Commission approves the final changes to the Accreditation Standards and / or IERs.
Changes to the Accreditation Standards and/or IERs become effective as soon as practical, but no more than 12 months, after the Accreditation Commission approval.

Immediately after Accreditation Commission approval, the changes are posted to the TRACS website, sent to the Chief Executive Officers of all member institutions, and to the U.S. Department of Education and any state or organization requiring notification.

2. Board Policies

The Executive Committee of the Accreditation Commission considers changes to TRACS Board Policies received from member institutions, the TRACS Staff, or in response to changes in federal regulations, state regulations, or the requirements of organizations to which TRACS belongs, along with changes which arise as a result of the 3-year review.

The Executive Committee makes recommendations for consideration by the Accreditation Commission as proposed policy additions or revisions arise. Once the Accreditation Commission has reviewed the recommendations and made any additions or modifications, it approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Chief Executive Officers of all member institutions for a 30-day period of request for comments.

After receipt of and consideration of all public comments, the Accreditation Commission, the proposed changes to Board Policies are added to the agenda for the next Accreditation Commission meeting for final approval of the changes. The changes to the Board Policies become effective on the date of the Accreditation Commission’s final approval.

Immediately after Accreditation Commission final approval, the changes are posted to the TRACS website, sent to the Chief Executive Officers of all member institutions, and to the U.S. Department of Education and any state or organization requiring notification.
The process whereby interested institutions may seek Applicant Status with TRACS is outlined in the TRACS publication, Steps Toward Accreditation. The steps in the application process are as follows:

1. **Initial Communication and Orientation**
   a. Institutions interested in submitting an application with TRACS should contact the TRACS Office and express such interest. (Call: 434-525-9539 or email us at info@tracs.org).
   b. TRACS staff will respond to the institution by sending the Initial Contact Data Form which is to be completed and returned to the TRACS Office.
   c. TRACS staff will review the Initial Contact Data Form to determine the institution’s eligibility for membership.
   d. If the institution appears to be eligible for membership, it is assigned a TRACS Staff representative. At this point the institution is considered a “Corresponding” institution.
   e. The institution and assigned TRACS staff representative will schedule the institution for the required Application Orientation. The Application Orientation can take place at either the institution’s campus, at the TRACS office, or at the Application Workshop at the TRACS Annual Conference. If the Orientation takes place at the institution’s campus, the institution will be expected to cover the Staff representative’s travel expenses. There is no additional fee associated with the Application Orientation meeting.
   f. After completing the Application Orientation, the institution is provided access to all documents relevant to the application process.

2. **Institutional Submissions**
   a. Once the applying institution has determined that it is able to demonstrate compliance with all of the Institutional Eligibility Requirements (IERs) and is ready to submit an application to TRACS, the following items will be submitted:
      - The Applicant Institutional Profile
      - The Institutional Eligibility Requirements (IER) Checklist along with all required supporting documentation in a three-ring binder with exhibit numbers clearly noted.
      - The Instructional Staff Listing (ISL)
      - The Applicant Salary Worksheet
      - The non-refundable Application Fee according to the current fee schedule
   b. The Application Fee must be submitted by check drawn on an institutional account.
   c. When submitting the Application to the TRACS office, institutions must send one printed copy and one electronic copy (on a flash drive) of all documents.
3. Applicant Review Committee Procedures and Determination
   a. The Applicant Review Committee (ARC) will conduct an initial review of the Application materials. Financial documentation is reviewed by the TRACS Vice President of Finance.
   b. The ARC makes one of the following determinations regarding the institution’s application and notifies the institution accordingly:
      i. **Approve the institution’s application** - If the institution’s application is approved, TRACS staff notifies the institution that it may begin the Self-Study process. At this point, the institution is considered an “Applicant” institution.
      ii. **Defer the institution’s application** - If the institution’s application is deferred, TRACS staff notifies the institution of the clarifying documents that should be submitted in order for the ARC to reconsider the application. If the application is initially deferred by the Application Review Committee, the institution will be allowed no more than two additional opportunities to submit clarifying documentation. If the application is not approved after two subsequent submissions of requested additional documentation, the application will be denied.
      iii. **Deny the institution’s application** - If the institution’s application is denied, TRACS staff notifies the institution of the reason(s) for the denial as well as information concerning the timeline for re-applying. If the application is denied, the institution may reapply after one year.

NOTE: Submitting an application does not guarantee the institution will achieve “Applicant” institution status and be permitted to move toward Candidacy.
Accreditation in the United States (US) is voluntary and non-governmental in nature. TRACS provides accreditation for Christian liberal arts colleges, universities, graduate schools, seminaries, Bible colleges and institutes that offer certificates, diplomas, associate degrees, bachelor degrees, and/or graduate degrees. TRACS provides Institutional Accreditation which means the institution as a whole is accredited rather than just the programs offered by the institution. TRACS' geographic scope is international.

Compliance with TRACS Standards and the accreditation status associated with this compliance is based on peer review. Evaluation Teams conduct on-site visits to institutions seeking candidacy, accreditation or reaffirmation.

Institutions located outside of the US or its territories will comply with US norms and TRACS Standards, unless there is a legal requirement for a variation, national norms in the country in which the institution is located requiring a variation, or if to do so would jeopardize the health or safety of the employees.

There are four major steps included in the process of seeking accreditation at its various levels:

1. **Self-Study and Self-Study Report**
   
   A comprehensive institutional Self-Study serves as a basis for the Evaluation Team Visit. The institution conducts their Self-Study following the procedures detailed in the TRACS publications Self-Study Guidelines, Resource Manual, and Steps Toward Accreditation. The institution’s Self-Study Report addresses the level of compliance with each of the TRACS Standards. The Self-Study serves as the basis of the on-site Evaluation Team’s review.

   The TRACS Standards as presented in the Accreditation Manual are the basis of the Self-Study and the analysis of the Evaluation Team.

2. **Evaluation Team Visit and Evaluation Team Report**
   
   The goals of the Evaluation Team are to determine if the institution is in compliance with the TRACS Standards, to identify areas in need of improvement, to validate the Self-Study Report, and to make a recommendation concerning the institution’s accreditation status to the Accreditation Commission.

   The Evaluation Team members evaluate the adequacy and accuracy of the Self-Study Report and serve as collegial consultants to the institution by presenting Findings,
Recommendations and Suggestions for improving its operations and programs. These Findings, Recommendations and Suggestions are found within the Evaluation Team Report that is prepared during the visit and provided to the institution at the conclusion of the visit.

Complete information concerning the activities and processes involved in Evaluation Team Visits and the writing of Evaluation Team Reports is found in the TRACS publication, Evaluation Team Procedures Manual.

3. Accreditation Commission Review and Action

At its next meeting, the Accreditation Commission will review the following documents when considering and determining the status of the institution: the institution’s Self-Study Report, the Evaluation Team Report, the Evaluation Team’s recommendation concerning the status sought, the institution’s Institutional Response Matrix, and the recommendation of TRACS staff concerning the status sought.

Two Commissioners are assigned as readers for each institution being considered. These readers review all relevant materials in detail and prepare questions to ask the institutional representative during the institution’s appearance before the Commission. All Commissioners certify by signature that they have reviewed the relevant documents for each of the institutions under consideration. The assigned Commission readers lead the discussion with the institution during the Commission’s deliberations. The institution is invited to have representatives present for the Accreditation Commission’s decision-making meeting. These representatives are allowed five to ten minutes, or as much time as may be needed, to address the Accreditation Commission and answer questions prior to the Accreditation Commission making a determination on the institution.

The Accreditation Commission is the sole determining body as to whether the institution is in compliance with TRACS Standards and whether that compliance is sufficient for the status being sought.

The various categories of recognition in the accreditation process are:

- **Corresponding Institution**: an institution which has made initial contact with TRACS and is actively pursuing the process toward accreditation. This status does not require Commission consideration and action.

- **Applicant Status**: an institution which has submitted an Application to TRACS which has been approved by the Applicant Review Committee (ARC). This status does not require Commission consideration and action.

- **Candidate (Pre-Accredited) Status**: this status is granted by the Accreditation Commission when an institution has demonstrated compliance with all of the TRACS Standards related to the Institutional Eligibility Requirements (IERs), has completed a comprehensive institutional Self-Study, and has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution provides the basic level of quality in instruction and student services required of a pre-accredited institution of higher education. The maximum time period allowed for an institution to progress from Candidate Status to Accredited Status is five years.
Accredited Status: this status is granted by the Accreditation Commission when an institution has demonstrated that it is in compliance with all the IER related Standards, has completed a comprehensive institutional Self-Study, and has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution demonstrates financial stability and provides the level of quality in instruction and student services required of an accredited institution of higher education. Initial accreditation may be granted for a period of up to five years.

Reaffirmation Status: this status is granted by the Accreditation Commission when an institution has demonstrated that it remains in substantive compliance since the last review for Accredited Status, has completed a comprehensive institutional Self-Study, and has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution maintains financial stability and continues to provide the level of quality in instruction and student services required of an accredited institution of higher education. Beginning with the institution’s first Reaffirmation (Reaffirmation I), accreditation will be granted for a maximum of ten years with a required Interim Fifth-Year Review (IFYR) to be conducted in the fifth year of the period of recognition. This Reaffirmation process will be repeated every tenth year.

Applicant institutions holding Accredited status with another U.S. Department of Education recognized accrediting agency may obtain Accredited status with TRACS without having first obtained Candidate status. Factors to be considered in such cases may include but may not be limited to the following:

- Determinations of the other agency regarding the institution’s compliance with the standards of that agency that are comparable to TRACS Accreditation Standards. Such standards will include, but may not be limited to, those related to financial stability and sustainability.
- The institution’s compliance with the Accreditation Standards that are unique to TRACS and are thus not required by the other agency.
- A Focus Team and/or Evaluation Team visit to the institution will be required to verify the institution’s compliance with TRACS Accreditation Standards.
- The institution will have the opportunity to respond to the determinations detailed in the report that is generated as a part of the visit, prior to the consideration by the Accreditation Commission.
- At a minimum, after a complete application is submitted, the Application Review Committee must approve any request by the institution to seek immediate Accredited status prior to the applicant institution’s appearing before the Accreditation Commission for consideration. The Commission may grant the request for Accredited status with or without requirements as it would any other accreditation request, grant Candidate status, or Defer the institution. The granting of Candidate status shall not work as an appealable “denial of accreditation”.
- If Accredited status is granted to an institution under this provision, the status would be considered initial accreditation and would be for a period of up to five years. Reaffirmations of accredited status granted in this manner would follow the normal procedures for reaffirmation of accredited institutions.
Institutions that are deferred in their bid for Candidate status, after having made an initial appearance before the Accreditation Commission, may make one subsequent appearance before the Commission for consideration of Candidate status. The subsequent appearance before the Commission must take place within twelve (12) months of the Commission’s original deferral.

After having appeared before the Accreditation Commission, institutions that are denied their bid for Candidate status and that wish to continue their pursuit of membership with TRACS may submit new application materials no sooner than twelve (12) months from the date of the Commission’s denial.

Regarding the effective date for accreditation actions by the Accreditation Commission, per July 25, 2018 US Department of Education guidelines:

The Department will now permit agencies to establish a retroactive accreditation date that goes back no farther than the beginning of the initial accreditation review process to ensure that credits and credentials awarded to students who were enrolled or completed a program during the formal initial accreditation review, or a review following a change in ownership or control, are from an accredited program.

The initial accreditation review process begins on the date on which the accreditor completes its review of the program’s initial application for accreditation or change of ownership or control review and places the program on the pathway for accreditation or reinstatement of accreditation. Some accreditors use the term applicant status, candidacy status or pre-accreditation status to describe the point at which the program is officially recognized as being on the pathway to accreditation, but this terminology is not required as long as the accreditor has a process in place to receive, review and approve initial or change of ownership or control applications, and upon an affirmative application review decision (which can be made by agency staff, an agency decision body or a subcommittee of an agency decision body), consider the program to be in the process of seeking accreditation or reinstatement of accreditation. The initial accreditation review process does not begin the day an application is submitted by the program or the date on which the application was received by the accreditor, but instead on the date on which the application was approved and the program was permitted to pursue accredited status, or on the date on which ownership or control changed.

In the event that the initial application review is extended by the accreditor, including to provide additional time for the program to graduate an initial cohort or come into full compliance based on a good cause determination by the accreditor, then the initial review period extends to the date agreed to by the program and the accreditor. All students enrolled during that time period, including the extension, may be considered to have enrolled in or graduated from an accredited program. However, if the initial application results in denial and a new application must be submitted to initiate a new review process, the students who enrolled in or completed the program during the initial application process would not be eligible to benefit from a retroactive effective date based on an affirmative award resulting from the second initial application for accreditation, except that if accreditation was granted prior to that student’s graduation, the student would then be considered to have graduated from an accredited program.
Accreditors that utilize retroactive establishment dates to serve students enrolled in programs that receive an affirmative accreditation decision may elect to establish the effective date based on their standards and criteria and the approval of the agency's appropriate decision-making body.

Our original guidance suggested that the date of accreditation had to coincide with an affirmative decision of the agency's relevant body. However, none of the regulations cited in our prior guidance specify that accreditation can only be granted on a prospective basis. See 34 C.F.R. §§ 602.15, 602.18, 602.22. Indeed, the fact that one of the regulations contains an express prohibition on retroactive accreditation in one specific context (when there has been a substantive change) strongly suggests that there is not a general rule prohibiting retroactive accreditation, since such a general rule would make a specific prohibition unnecessary. See 34 C.F.R. § 602.22(b). And although it is true that the decision-making body is distinct from the evaluation body, and that the evaluation body that conducts the on-site review does not have decision-making authority, it does not follow that the decision-making body is prohibited from giving retroactive effect to an accreditation decision, either specifically back to the date of on-site review or back to any other prior date. We now recognize that the agency's decision-making body, though potentially not involved directly in an event that establishes the retroactive date, will be making a decision about the program's accreditation status and should be able to determine a retroactive date of accreditation based on the agency's standards and criteria and the program's demonstrated ability to meet certain milestones. The effective date may go back as far as, but cannot be prior to, the date on which the agency completed the review of the program's application and officially recognized the program as being in the accreditation review process.

This means, in most cases:

If an institution is granted status (Candidacy, Accreditation or Reaffirmation) at the spring meeting of the Accreditation Commission, the institution’s status is retroactive to the beginning of the term (semester or quarter) in which the status is granted. For most of our schools on the semester system, this would mean that their status would be retroactive to the beginning of the spring semester.

If an institution is granted status at the fall meeting of the Accreditation Commission, the institution’s status is retroactive to the beginning of the term (semester or quarter) in which the status is granted. For most of our schools on the semester system, this would mean that their status would be retroactive to the beginning of the fall semester.

The Accreditation Commission may determine to set a specific retroactive date for the status granted (Candidacy, Accreditation or Reaffirmation). The effective date may go back as far as, but cannot be prior to, the date on which the agency completed the review of the program's application and officially recognized the program as being in the accreditation review process.

4. Follow-up to the Action of the Accreditation Commission

In accordance with Federal regulations, the Accreditation Commission establishes the deadline by which an institution must demonstrate compliance with all TRACS Standards. Following the meeting of the Accreditation Commission wherein a decision regarding an institution's accreditation status is made, a letter is sent from the TRACS office to the
institution. This letter contains (1) the Accreditation Commission decision, (2) the deadline by which an institution must demonstrate compliance with all TRACS Standards and any outstanding Findings, Recommendations and/or Suggestions contained in the Evaluation Team Report, and (3) a Progress Report matrix for monitoring the institution’s progress toward full compliance with Findings, Recommendations and/or Suggestions. The institution is required to submit regular Progress Reports utilizing the matrix. These Progress Reports are submitted to the Accreditation Commission for review at each subsequent meeting until the institution demonstrates compliance with all TRACS Standards.
To ensure objective assessment of institutional compliance in various situations, TRACS utilizes peer evaluators (A) on Evaluation Teams, (B) on Focus Teams, and (C) as Peer Reviewers for Institutions participating in the Interim Fifth-Year Review (IFYR) process. Evaluation Team members, Focus Team members and/or IFYR Peer Reviewers are selected and appropriately assigned areas of review from a pool (Peer Evaluator Pool) of carefully screened individuals.

Before being placed in the Peer Evaluator Pool and thus be eligible to serve as a member of an Evaluation Team, a member of a Focus Team, or as an IFYR Peer Reviewer, individuals are required to either attend a Peer Evaluator Training workshop or complete the Peer Evaluator Training workshop available on the TRACS website. Additionally, workshops are conducted at each TRACS Annual Conference. TRACS staff may provide other training workshops as needed.

As part of the training, each participant becomes thoroughly familiar with the contents of the Accreditation Manual, Benchmarks for Excellence, Resource Manual, and the Evaluation Team Procedures Manual. After completing training, the individual submits to the TRACS office all required documentation (Peer Evaluator Information Form and Resume/CV) which serves as the criteria for determining the level of expertise for each of the Standards/areas to be reviewed. TRACS staff review the qualifications for each individual who participates in the training and submits the required documentation to identify the areas for which education and experience is documented and to approve the individual for inclusion in the Peer Evaluator Pool.

Individuals found to have education, experience, and/or expertise in Distance Education (DE) and who desire to serve as evaluators in these areas are required to complete the TRACS training for Distance Education evaluators in addition to the general training referenced above.

Individuals who desire to serve as IFYR Peer Reviewers are required to participate in training specific to the review of IFYR materials via the TRACS Publication, Interim Fifth-Year Review: Peer Reviewer Training Manual in addition to the general training referenced above.

A. Evaluation Teams

Evaluation Teams are utilized in the review of an institution’s level of compliance with TRACS Standards as a part of the institution’s involvement in the Self-Study process and in conjunction with a certain accreditation status being sought by the institution.

At the appropriate time in the process, the Evaluation Team is formed. The team will vary in size depending on the institution to be evaluated and the type of visit to be conducted. Evaluation Teams generally include at least five peer evaluators (made up of professionals, administrative personnel, academic personnel, educators, and faculty members), including a team chair. If the institution to be reviewed offers Distance Education, an individual with
expertise in this area and who has participated in the specific training will be assigned to the
team to provide evaluation specific to this area. A staff representative acts as a resource to the
team for each visit. TRACS Accreditation Commission members may not serve on Evaluation Teams.

Each Evaluation Team member and the institution must indicate that there are no known conflicts of interest that exist between the team members and the institution before the team roster is finalized. This is accomplished by the submission of forms supplied to all parties by TRACS.

Complete details regarding Evaluation Teams and the process in which they are involved, can be found in the TRACS publication, Evaluation Team Procedures Manual.

B. Focus Teams

Focus Teams are utilized in the review of an institution’s level of compliance with TRACS Standards when an institution files an Institutional Change Proposal with TRACS and when the proposed change requires not only the review of TRACS staff, but also that of a Peer Evaluator(s) with expertise in the area(s) to be reviewed. As required, Focus Teams may be utilized to evaluate institutional compliance with TRACS Standards in matters that do not necessarily relate to an Institutional Change Proposal, but may involve situations where institutional compliance in specific areas needs to be verified. Generally, Focus Teams are smaller in number than Evaluation Teams and will be made up of professionals, administrative personnel, academic personnel, educators, and faculty members as appropriate. Focus Teams will maintain specific focus, based upon the particular area(s) to be reviewed. A staff representative acts as a resource to the team for each visit. TRACS Accreditation Commission members may not serve on Focus Teams.

Each Focus Team member and the institution must indicate that there are no known conflicts of interest that exist between the team members and the institution before the team roster is finalized. This is accomplished by the submission of forms supplied to all parties by TRACS.

C. IFYR Peer Reviewers

IFYR Peer Reviewers are utilized as independent assessors of documentation submitted to TRACS by institutions that are participating in the IFYR process. IFYR Peer Reviewers will be professionals, administrative personnel, academic personnel, educators, or faculty members. Accreditation Commission members may not serve as IFYR Peer Reviewers.

TRACS institutions that have been granted a ten-year reaffirmation status are required to participate in the IFYR process which includes the submission of an Interim Fifth-Year Review Report (IFYRR). This process occurs during the fifth year of the institution’s ten-year reaffirmation status. The following components constitute the IFYRR: (1) the completed Interim Fifth-Year Review Form, and (2) documentation in support of the data reported by the institution on the Interim Fifth-Year Review Form. The IFYRR focuses on data compiled from the outcomes of assessment procedures which demonstrates the institution is accomplishing its stated mission. The accreditation status of the institution continues during this process.

The IFYR includes four phases 1) Self-evaluation and self-rating by the institution using the Interim Fifth-Year Review Form, 2) Submission of documentation by the institution in support of each self-rating on the Interim Fifth-Year Review Form, 3) A review of the institution’s IFYR by two independent IFYR Peer Reviewers, and 4) A staff visit to the institution for staff review and discussion of concerns raised by the Peer Reviewers and clarification on ways that the institution can address areas of concern prior to their preparation for the next reaffirmation cycle.
Each IFYR Peer Reviewer and the institution must indicate that there are no known conflicts of interest that exist between the reviewer and the institution before the details of the review are finalized. This is accomplished by the submission of forms supplied to all parties by TRACS.

Complete details regarding IFYR Peer Reviewers and the processes in which they are involved, can be found in the TRACS publication, Interim Fifth-Year Review: Peer Reviewer Training Manual.

D. Criteria for the Selection of Peer Evaluator Pool Members

The following factors are considered when determining the suitability of an individual to be placed in the Peer Evaluator Pool and are utilized when selecting and assigning specific areas of review to Evaluation Team members, Focus Team Members and/or IFYR Peer Reviewers.

1. **Governance / Administrative Evaluator:** Minimum of three years of experience in program or institutional leadership as a senior administrator (CEO, executive vice president, chief academic officer, division director, institutional effectiveness/assessment director, or other cabinet-level administrator) in a postsecondary institution, master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators), completion of applicable TRACS training.

2. **Academic Evaluator:** Minimum of three years of experience as an educator engaged in academic leadership (provost, academic dean, assistant provost/dean, academic division director, program director, registrar) in a postsecondary institution, master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators), completion of applicable TRACS training.

3. **Student Services Evaluator:** Minimum of three years of experience in student affairs, student life, student services, or student ministry leadership in a postsecondary institution, master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators), completion of applicable TRACS training.

4. **Finance/Business Evaluator:** Minimum of three years of experience in institutional finance or business affairs (CFO, vice president of finance, director of business affairs) in a postsecondary institution or corporation, business degree, completion of applicable TRACS training.

5. **Library / Learning Resources Evaluator:** Minimum of three years of experience in librarianship in a postsecondary institution, library science degree (MLS/MLIS), completion of applicable TRACS training.

6. **Faculty Evaluator:** Minimum of three years of teaching or research experience in a postsecondary institution, master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators), completion of applicable TRACS training.

7. **Distance Education Evaluator:** Minimum of three years of experience teaching distance education courses, developing distance education curriculum, and/or administrating a distance education program in a postsecondary institution; master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators); completion of applicable TRACS training.

8. **Assessment / Institutional Effectiveness Evaluator:** Minimum of three years of experience in assessment of student learning, institutional effectiveness, and planning in a postsecondary institution; master’s degree in an appropriate academic or professional discipline (doctorate preferred); completion of applicable TRACS training.
Third Party Comments

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

TRACS encourages and solicits third-party comments regarding institutions under consideration for Candidate Status, Accredited Status, or Reaffirmation of Accreditation. In addition to the solicitation of written comments from interested parties, TRACS may solicit comments at a public hearing or at any relevant public hearing sponsored by a third-party. Comments may be submitted in any of the following ways:

1. A letter or email to the President of TRACS sent in response to a list of institutions under consideration for Candidate Status, Accredited Status, or Reaffirmation of Accreditation.
2. A letter or email to the President of TRACS regarding the institutionally required public announcement of a pending Evaluation Team visit.
3. A personal appearance at the time of the Evaluation Team visit, provided the third party gives written notice of the desire to present comments regarding the institution and the notice is provided to the President of TRACS or the team chair in advance of the visit.
BP308

Posting of Institutional Review Dates

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

TRACS and institutions will make publicly available a notice regarding the year and month when the institution will be considered for Candidate status, Accredited status, or the next Reaffirmation of Accreditation. This information should be published in the following types of documents:

1. By TRACS, in the current Directory of Institutions,
2. By institutions, in a local newspaper or by other appropriate means, before an Evaluation Team Visit*, and
3. Both TRACS and the institution, on their websites.

* Institutions scheduled to host an Evaluation Team Visit are required to inform the public via an advertisement in a local newspaper or by other appropriate means in advance of the visit, concerning the dates of the visit and the TRACS telephone number. A copy of this notification must be provided to the TRACS office and/or the Chair of the Evaluation Team at least 7 days before the start of the visit.

TRACS notifies the appropriate state educational agency of any institutional visits scheduled to take place within its jurisdiction.
Institutions offering professional programs which require state or professional licensure must look to state and professional or specialized licensing agencies to permit graduates to practice their professions once they meet academic requirements. If the program is intended to lead to licensure or certification, the program curriculum should be guided by licensure or certification requirements. The quality of the professional preparation of students and meeting licensure or certification requirements are the focal points of professional accrediting agencies.

Institutions offering professional programs such as counseling or teacher education which do not meet state licensure or certification requirements must clearly state this in their Catalog and other official publications.

NOTE: Programs leading to licensure/ordination for the ministry do not meet this definition.
The following components constitute the IFYRR: (1) the completed Interim Fifth-Year Review Form (IFYRF), and (2) documentation in support of the data reported by the institution on the IFYRF.

The IFYRR focuses on data compiled from the outcomes of assessment procedures included in the institution’s required institutional assessment plan which demonstrates the institution is accomplishing its stated mission. The accreditation status of the institution continues during this process.

The deadline for the submission of the IFYRR is July 1st (or by the first business day of the month if July 1st falls on a Saturday or Sunday)

The IFYR process involves these general steps

General:
1. The institution submits to the TRACS office:
   a. Digital copy of the completed Interim Fifth-Year Review Form
   b. Digital copy of supporting documentation (including completed assessment materials which have been “sanitized” of personal information
   c. Payment of appropriate Interim Fifth-Year Status Review Fee (according to the current Fee Schedule

2. Once the IFYRR materials are submitted, the TRACS Office will assign two peer reviewers from the TRACS Peer Evaluator Pool. These individuals will have participated in the initial training required to become a member of the Peer Evaluator Pool as well as training specific to IFYR Peer Reviewers. TRACS will provide an IFYR Conflict of Interest Form to each of the proposed peer reviewers and to the institution. These forms must be returned to the TRACS Office before the selection of the peer reviewers is finalized. Once the IFYR Peer Reviewers are finalized, the institution will be expected to provide digital copies of all IFYRR materials to these reviewers. These individuals review all the materials and submit their findings to TRACS.

Staff Review:

3. Once peer reviewers have returned their findings to the TRACS Office, TRACS Staff reviews the documentation and then conducts a visit to the institution to verify the documentation. This visit takes place before the end of the calendar year.
4. The TRACS Staff summarizes the institution’s submissions, the peer review, and staff findings and writes a draft report. A copy of the draft report is provided to the institution. The institution is provided the opportunity to report “Errors of Fact” within the draft report. Once appropriate changes have been made, a final version of the report, along with an IFYR Matrix containing any Recommendations and Suggestions is sent to the institution.

5. The institution responds to the Recommendations and Suggestions on the IFYR Matrix and submits the responses to the TRACS Office by February 15th of the year following the Staff Visit.

Accreditation Commission Review and Approval:

6. A copy of all IFYRR materials, including the peer reviews, staff report, completed IFYR Matrix, and staff recommendation are sent to the Accreditation Commission for consideration at the April meeting following the staff visit to the institution.

7. The institution is notified of the actions of the Accreditation Commission and is expected to continue to respond, on their matrix, to Recommendations and Suggestions until such issues are resolved. Subsequent responses will be due, as required, in the TRACS Office by August 15th and February 15th of each year.

Once provided with the contact information for the peer reviewers, the institution that is undergoing the IFYR will submit to the peer reviewers the following materials that constitute their IFYRR:

1. The IFYRF that has been completed by the institution
2. Documentation which support the rational of the institution in assessing its level of compliance in the various areas and which substantiate all assertions made on the IFYRF

The IFYRR is submitted to the reviewers in digital format. If printed copies of any portion of the IFYRR are needed, the peer reviewers request such documents directly from the institution. The reviewers review the assertions of the institution regarding its level of compliance as reflected on the Interim Fifth-Year Review Form and should seek to verify or refute the assertions through a review of the supporting documentation. Utilizing the institution’s completed digital Interim Fifth-Year Review Form; reviewers should record their own findings.

Once reviewers have completed their review of materials and have documented their findings, they should complete the Peer Review Report. Upon completion, the IFYR and the Peer Review Report should be returned to the TRACS Office by the established date.
BP311

Annual Dues

Reference: None
Adoption Date: January 2018
Last Revision Date: January 2018

TRACS is a voluntary association supported by the annual dues of its member institutions.

1. Annual Dues are assessed on a sliding scale established by the Accreditation Commission each year at the April meeting.
2. Annual Dues are based on total institutional headcount (not FTE) at the end of the drop/add period for the fall semester (or quarter).
3. Annual Dues are for the period of the TRACS fiscal year: July 1 through June 30.
4. Annual Dues are due in the TRACS office no later than October 31 each year.
5. Late fees of 5% will be assessed for each month or partial month after October 31 if Annual Dues payment is not received. When Annual Dues are more than 60 days late, BP 213 – Failure to Pay will be applied.
6. Institutions achieving initial candidacy are assessed a pro-rated amount of Annual Dues calculated from the first day of the month of the effective date of the Accreditation Commission vote granting candidate status through the next June 30th. These Annual Dues are to be paid upon receipt of the notification letter.
7. Institutions achieving Accredited Status will pay the accredited rate the year subsequent to achieving status.
8. Institutional requests for withdrawal cannot be brought to the Accreditation Commission until all invoices and fees, including current year Annual Dues, are paid in full.
9. Institutional withdrawals or the loss of accreditation will not create a partial refund of Annual Dues.
10. Only the Accreditation Commission can grant a reduction or refund of Annual Dues.