

Compliance Resource Manual June 2024

The 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.

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Introduction

Institutions seeking membership with TRACS, member institutions engaged in the Self-Study process, institutions participating in the Interim Fifth-Year Review process, or institutions responding to non-compliance or potential non-compliance issues utilizing a TRACS generated Compliance Report are required to provide documentary evidence demonstrating that the institution is in compliance with the Expectations for Accreditation that have been established by the Accreditation Commission of the Transnational Association of Christian Colleges and Schools (TRACS). These expectations are listed under sixteen **Accreditation Requirements** (Standards 1-16) and under specific **Federal Requirements** (Standard 17).

Recognizing the value of supplying developmental direction to institutions, this publication is intended to provide guidance to institutions in the production, gathering and presentation of documentary evidence demonstrating compliance. TRACS staff, peer evaluators and the Accreditation Commission may also use these guidelines when determining an institution's level of compliance with TRACS Accreditation Standards.

Guidance for Demonstrating Compliance

Presented in this manual, under each **Accreditation Requirement** (Standards 1-16) and under the specific **Federal Requirements** (Standard 17), is the following guidance:

- 1. A listing of **Evaluative Criteria** relevant to each area,
- 2. **Narrative Considerations** for institutional responses within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, and
- 3. A listing of **Typical Documentation** that institutions may submit in addressing compliance with these Standards.

This publication should not be viewed as an exhaustive listing of possible Evaluative Criteria, as other criteria may exist. Additionally, the Narrative Considerations presented and the list of Typical Documentation provided is not exhaustive. Institutions may submit narratives and provide documentation relevant to their specific context. Peer Evaluators should defer to the narratives and documentation presented by the institution if these narratives and documentation demonstrate compliance with the Standard under review. This manual is not intended to serve as a final checklist for determining compliance.

Accreditation Requirements (Standards 1-16)

The Accreditation Requirements are divided into sixteen categories:

- 1. Faith Statement
- 2. Mission and Name
- 3. Institutional Objectives
- 4. Institutional Integrity
- 5. Operational Authority
- 6. Organizational Structure
- 7. Publications and Policies
- 8. Educational Programs
- 9. Faculty
- 10. Student Services
- 11. Financial Operations

- 12. Institutional Assessment
- 13. Strategic Planning
- 14. Library and Learning Resources
- 15. Facilities and Equipment
- 16. Health and Security

1. Faith Statement

The Faith Statement of an institution defines its Christian nature by affirming those primary doctrinal matters that are held by the institution. Institutions are not required to duplicate the TRACS Faith Statement, but the institution's Faith Statement should identify it as part of the evangelical protestant tradition in higher education. It is to be written so as to conform to the historic creeds and statements of Christianity, and thus reflect a careful and precise theological statement, but also accurately state the current position of the institution as set forth by the institution's Board and administration. In addition, it should be written lucidly in order to inform prospective students, faculty, administrators, and Board members, as well as external constituencies, regarding the religious identity of the institution.

- 1.1 The institution has a Faith Statement which is readily available and included in appropriate official publications. (IER)
- **1.2** The institution's Board approves and periodically reviews the institution's Faith Statement.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The Faith Statement is consistent with evangelical protestant theology and with the Faith Statement of TRACS.
- The Faith Statement accurately defines the theological distinctives of the institution.
- The Faith Statement is reflected in the institution's key publications, including the website.
- The Faith Statement is regularly reviewed and approved by the institution's Board according to the processes outlined in the institution's *Assessment Plan*.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Affirm that the institution's Faith Statement is consistent with the TRACS Faith Statement,
- Identify institutional publications (including page numbers) containing the Faith Statement,
- Provide the specific URL where the Faith Statement may be found on the institution's website,
- Provide a statement noting the last review and approval date of the Faith Statement by the institution's Board

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- The Faith Statement of the institution
- A policy or procedural document concerning the institution's commitment to notify TRACS if the institution's Faith Statement is altered substantially such that alignment with the TRACS Faith Statement may be called into question
- Copies of all institutional publications that contain the Faith Statement
- Board meeting minutes indicating that the Faith Statement is reviewed and approved according to the institution's *Assessment Plan*
- Documents indicating that the Faith Statement is understood and respected by the institution's Board, Administration, Faculty, Staff and Students

The TRACS Faith Statement is as follows:

The Bible: The unique divine, plenary, verbal inspiration and absolute authority of all sixty-six canonical books of the Old and New Testaments as originally given. The Bible is the only infallible, authoritative Word of God and is free from error of any sort, in all matters with which it deals, scientific, historical, moral, and theological.

The Trinity: The triune, Godhead – one eternal, transcendent, omnipotent, personal God existing in three persons: Father, Son, and Holy Spirit.

The Father: God the Father, the first person of the Divine Trinity, is infinite Spirit – sovereign, eternal, and unchangeable in all His attributes. He is worthy of honor, adoration, and obedience.

The Son: The Perfect, sinless humanity and the absolute, full deity of the Lord Jesus Christ, indissolubly united in one divine-human person since His unique incarnation by miraculous conception and virgin birth.

The Holy Spirit: The Holy Spirit is the third person of the Godhead who convicts, regenerates, indwells, seals all believers in Christ, and fills those who yield to Him. The Holy Spirit gives spiritual gifts to all believers; however, the manifestation of any particular gift is not required as evidence of salvation.

Historicity: The full historicity and perspicuity of the biblical record of primeval history, including the literal existence of Adam and Eve as the progenitors of all people, the literal fall and resultant divine curse on the creation, the worldwide cataclysmic deluge, and the origin of nations and languages at the tower of Babel.

Redemption: The substitutionary and redemptive sacrifice of Jesus Christ for the sin of the world, through His literal physical death, burial, and resurrection, followed by His bodily ascension into heaven.

Salvation: Personal salvation from the eternal penalty of sin provided solely by the grace of God on the basis of the atoning death and resurrection of Christ, to be received only through personal faith in His person and work.

Last Things: The future, personal, bodily return of Jesus Christ to the earth to judge and purge sin, to establish His eternal Kingdom, and to consummate and fulfill His purposes in the works of creation and redemption with eternal rewards and punishments.

Biblical Creation: Special creation of the existing space-time universe and all its basic systems and kinds of organisms in the six literal days of the creation week.

Satan: The existence of a personal, malevolent being called Satan who acts as tempter and accuser, for whom the place of eternal punishment was prepared, where all who die outside of Christ shall be confined in conscious torment for eternity.

2. Mission and Name

The institution's mission is appropriate to Christian higher education, is consistent with its charter or other operating authority, and is implemented in a manner that complies with accreditation expectations. The institution's mission gives direction to its activities and provides a basis for the assessment and enhancement of the institution's effectiveness. The mission sets forth the specific educational role of the institution with regard to its intended audience.

The name of the institution is accurate, descriptive, and appropriate for its stated purpose. The use of "institute," "college," "university," "seminary," "theological school," "graduate school," et al., is in keeping with the general and national use of such nomenclature (and appropriate to the programs approved by TRACS) in order to enable a consumer to correctly understand the scope and nature of the institution.

- 2.1 The institution has a Mission Statement which is current and comprehensive, an accurate guide for the institution's operations, approved and periodically reviewed by the institution's Board, communicated to the institution's constituencies, and accurately reflective of its Faith Statement. (IER)
- **2.2** The name of the institution is appropriate to its mission and reflects national norms for programs offered.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The Mission Statement is appropriate to Christian higher education, is consistent with the institution's Faith Statement, and gives direction to the institution's various operations.
- The Mission Statement is reflected in the institution's key publications, including the website
- The Mission Statement is regularly reviewed and approved by the institution's Board according to the processes outlined in the institution's *Assessment Plan*.
- The institution's name accurately reflects the levels and types of programs offered.
- The Distance Education program supports the institution's Mission and objectives.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide the institution's mission statement and summarize its connection to the Faith Statement.
- Note the institution's publications (include page numbers) which include the mission statement.
- Provide the specific URL where the mission statement may be found on the institution's website.
- Provide a statement noting the last review and approval date of the mission statement by the institution's Board.
- Provide a statement regarding the appropriateness of the institution's name.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Copies of all institutional publications that contain the mission statement
- Board meeting minutes indicating that the mission statement is reviewed and approved according to the institution's *Assessment Plan*

3. Institutional Objectives

Institutional Objectives are formulated which are consistent with the institution's Mission, its scope of recognition with TRACS, and its Faith Statement.

3.1 The institution has adopted clearly defined written Institutional Objectives which are consistent with the institution's mission, stated in measurable terms, and approved and periodically reviewed by the institution's Board. (IER)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The Institutional Objectives are consistent with the Faith Statement, Mission and scope of recognition with TRACS.
- The Institutional Objectives are written in measurable terms.
- The Institutional Objectives are regularly reviewed and approved by the institution's Board according to the processes outlined in the *Assessment Plan*.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- List Institutional Objectives noting linkage to Faith Statement and Mission.
- Note the institution's publications (include page numbers) containing institutional objectives.
- Provide a statement noting the last review and approval date of the Institutional Objectives by the institution's Board.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Copies of all relevant institutional publications which demonstrate that the Institutional Objectives are appropriately published
- Board meeting minutes indicating that the Institutional Objectives are approved and reviewed according to the institution's *Assessment Plan*

4. Institutional Integrity

The institution defines itself by a set of values which are central to its mission and objectives. These values and standards result in institutional operations that exemplify integrity.

4.1 The institution operates with integrity and is represented accurately and honestly to students, the public, and to TRACS. (IER)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution's practices and publications, including promotional materials, accurately represent the institution in all matters and are consistent with the Faith Statement, Mission, and Institutional Objectives.
- The institution is truthful and provides all pertinent information, whether complimentary or otherwise, in all of its correspondence with TRACS and other appropriate entities.
- The institution responds, in a timely manner, to requests by TRACS for the submission of dues, fees, and reports, as well as other requests for information. The institution also responds in a timely manner to requests for information from other applicable entities.
- The institution cooperates with TRACS in preparation for staff or peer-review visits
- The institution appropriately applies for Institutional Changes that require TRACS approval and receives such approval before implementation in accordance with TRACS policy.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• Affirm and summarize the institution's commitment to operate with integrity by citing policies, public statements, actions, or other evidences.

- A policy or procedural document concerning the institution's commitment to operate with integrity in all matters
- Copies of institutional publications containing integrity and/or ethics statements demonstrating the institution's commitment
- Copies of institutional publications, including promotional materials that demonstrate accuracy in representation
- Copies, as applicable, of requests from TRACS or other applicably entities for information along with evidence that such requests were honored in a timely manner
- Copies, as applicable, of Institutional Change proposals submitted to TRACS, along with evidence of approval prior to implementation

5. Operational Authority

The institution has the legal authority to operate an institution of higher education and the programs offered. (See Note Following Standard 5.2)

- 5.1 The institution has legal authorization to operate from all appropriate governmental agencies (state, federal, territory, country) in which it is located and has filed copies of such authorizations with TRACS. If a governmental requirement conflicts with a TRACS Standard, the institution will be deemed in compliance with the TRACS Standard as long as it is in compliance with the governmental requirement. (IER)
- 5.2 If the institution offers courses and/or programs via Distance Education, the institution has legal authorization to offer such courses and/or programs in the locations wherever the Distance Education student declares his/her residency. Further, the institution's Distance Education offerings meet all applicable TRACS Accreditation and Federal Requirements. (IER)

Note: The institution's Distance Education programs and courses are required to meet, at a minimum, the expectations presented in the following TRACS Accreditation and Federal Requirements:

- Operational Authority
- Organizational Structure
- Publications and Policies
- Educational Programs
- Faculty
- Student Services
- Financial Operations
- Institutional Assessment
- Strategic Planning
- Library and Learning Resources
- Facilities and Equipment
- Federal Requirements (as applicable)

Other areas of Distance Education review may be considered and evaluated as deemed appropriate.

- The institution has legal authorization to operate from the appropriate
 governmental agencies where the institution enrolls or intends to enroll students,
 and has filed copies of such authorizations with TRACS, unless the institution is
 exempt from governmental authorization. In such cases, the institution should
 provide evidence of exemption.
- The institution complies with all federal and state requirements of the state in which the institution is located.
- An Institution not located in the United States or one of its territories has the legal authorization to operate from the appropriate governmental agency(ies) and demonstrates compliance with all applicable governmental requirements.
- The institution has received the approval of TRACS to offer courses and/or
 programs via Distance Education and is authorized by applicable governments or
 agencies to offer Distance Education in each state or location where at least one
 Distance Education student is enrolled in at least one Distance Education course.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide the name(s) of all governmental agencies granting authorization approval.
- Include the date of original authorization, and start and end dates of current period of authorization (if applicable).
- Note additional authorizations including SEVP, VA, etc.
- Describe authorization for Distance Education including level of offerings (course-level, program-level, etc.).
- For U.S. based institutions, indicate active affiliation with NC-SARA or list individual state-by-state authorizations/exemptions.

- Copies of all letters or other forms of notification from all relevant governmental agencies regarding the institution's authorization to operate a post-secondary institution wherever the institution maintains operations.
- Certificates of compliance and / or inspection certificates from any agency or company regarding any area of institutional operations, including but not limited to the following:
 - o Health / Safety Inspection Certificates
 - o Fire Inspection / Fire Extinguisher Inspections Certificates
 - o Elevator Inspection Certificates
 - o Occupancy Certificates

6. Organizational Structure

The institution has a system of governance that facilitates the accomplishment of its mission and objectives and supports institutional effectiveness and integrity. Through its organizational structure, the institution creates and sustains an environment that encourages teaching, learning, service, scholarship, and, where appropriate, research activity. Such governance assures provision of support adequate for the appropriate functioning of each organizational component. The institution has sufficient independence from any external entity, such that it is solely accountable for meeting accreditation requirements.

- 6.1 The institution's Board, of not less than 5 voting members, is the legally constituted body that exists without conflicts of interest, holds the institution in trust, exercises appropriate oversight in matters of policy, and evaluates sits own effectiveness.
 - At proprietary institutions, the Board provides a list of all shareholders and adopts a detailed succession plan regarding the holdings in the event of the death or incapacitation of any one shareholder who controls 33% or more of the shares. (IER)
- 6.2 The institution's Board appoints and periodically evaluates a full-time Chief Executive Officer (CEO) who is not the Chair of the institution's Board or a Chair of any of its sub-committees, and who is granted the legal authority to fulfill the tasks defined in the written job description for this position as the individual responsible for carrying out published Board policies and procedures. (IER)
- 6.3 A full-time Chief Academic Officer (CAO) is in place who has the credentials, experience, and competence to lead the institution's educational programs toward quality outcomes and the CAO is periodically evaluated. (IER)
- **6.4** Organizational structure is maintained which clearly depicts lines of administrative responsibility.
- 6.5 Administrative Leadership positions have written job descriptions which are used as a basis for performance evaluations.
- 6.6 Qualified administrative personnel and leadership team members are sufficient in number and competence to provide direction to the major operational areas of the institution and are periodically evaluated.
- 6.7 The institution's Board has a policy regarding conflicts of interest for Board members.
- **6.8** The institution's Board has appropriate autonomy.
- 6.9 The institution's Board is responsible for the financial stability of the institution and approves the annual operating budget.
- **6.10** The institution's Board is responsible for establishing and providing appropriate oversight of affiliated corporate entities and auxiliary services.

- **6.11** A clear distinction exists between the policy-making functions of the institution's Board and the role of the institution's CEO and administration to carry out such policies.
- 6.12 The support staff is sufficient in number and competence to adequately support the administrative, academic, and support functions of the institution. Members of the support staff are periodically evaluated in relation to a written job description.

- No more than one paid employee of the institution serves as a voting member of the Board.
- The Chief Executive Officer of the institution does not serve as the Chair of the Board.
- The Board regularly evaluates the effectiveness of its own function according to processes outlined in the institution's *Assessment Plan*.
- The Board regularly evaluates the effectiveness of the Chief Executive Officer against the job description according to the processes outlined in the *Assessment Plan*.
- The Board meets at least two times annually and maintains accurate minutes of all meetings.
- The Board appropriately reviews and approves the institution's Faith Statement, Mission, Institutional Objectives, institutional policies, and institutional publications according to the processes outlined in the *Assessment Plan* (unless a stipulated administrative review and approval process is followed).
- The Board approves appropriate proposed institutional changes before making application for such changes to TRACS.
- The Board provides an appropriate orientation for new members.
- Administrators, faculty and support staff have clearly defined job descriptions that are used as the basis for evaluations.
- The Distance Education program is fully integrated into the institution's governance and academic structures and operations.
- Proprietary institutions maintain a list of all shareholders and develop and adopt a detailed succession plan regarding the holdings in the event of the death or incapacitation of any one shareholder who controls 33% or more of the shares.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Discuss the composition of the Board, its scope and function, the conflict-of-interest policy, and the most recent board self-evaluation process.
- For proprietary institutions include a description of the distribution of ownership among shareholders and a summary of the Board approved succession plan including approval date.
- Provide a summary of the qualifications and role of CEO and the date of the last evaluation.

- Provide a summary of the qualifications of the CAO and the date of the last evaluation.
- Provide a summary of composition and sufficiency of administrative staffing.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the institution's *By-Laws*
- Listing of Board members including address, current occupation, and role, if any, on the board
- Organizational Chart that clearly depicts lines of administrative responsibility
- Job descriptions for administrators, faculty, and support staff
- *Board Manual,* or comparable document, that describes Board composition, criteria for membership, member selection process, orientation process for new members, conflict of interest policy, and all other Board duties and functions
- Proprietary institutions provide a list of all shareholders and a detailed succession plan regarding the holdings in the event of the death or incapacitation of any one shareholder who controls 33% or more of the shares.
- Evidence of the full-time status of the CEO including a signed contract or alternate evidence.
- Evidence of regular evaluations of the CEO according to the processes prescribed in the *Assessment Plan*.
- Evidence of the full-time status of CAO including a signed contract or alternate evidence.
- Transcripts of the CAO's highest earned degree

7. Publications and Policies

The institution produces and maintains current, accurate, and consistent publications (including its website) which appropriately reflect the institution's mission and operations.

The institution develops and implements policies which are comprehensive and provide the guidance necessary for the institution to function appropriately.

- 7.1 The institution's publications are approved by the board or administration, as appropriate, and include at least the following: Board Manual, Policies Manual, Catalog(s), Faculty Handbook, Student Handbook. (IER)
- 7.2 The institution's publications are current, clear, factually accurate, and consistent with each other.
- **7.3** Policies and procedures are comprehensive in scope and consistent with TRACS Standards.

7.4 Clear Due Process / Grievance policies and procedures have been established for all constituents of the institution. Documentation of any Due Process / Grievance proceedings are made available to TRACS upon request.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- Publications are current, clear, factually accurate (including the institution's status with TRACS), consistent and are made available, as appropriate, to constituents and the public in a clear easy-to-understand format.
- The *Board Manual* contains, at a minimum, the following:
 - o Board composition
 - o Criteria for membership
 - Member selection process
 - Orientation process for new members
 - o Organizational structure
 - Frequency of meetings
 - o Board self-evaluation processes
 - All other Board duties and functions
- The *Policies Manual* contains, at a minimum, the following:
 - o Institution-Wide policies
 - Public information (see Standard 17.8)
 - Advertising and recruitment materials (see Standard 17.9)
 - Fraud and abuse (see Standard 17.10)
 - o Academic policies
 - Definition of a credit hour (see Standard 17.1)
 - Program length and cost (see Standard 17.2)
 - Transfer of credit (see Standard 17.4)
 - Distance Education & Correspondence Education (see Standard 17.5)
 - Verification of student identification (see Standard 17.6)
 - Student privacy (see Standard 17.7)
 - Student achievement (see Standard 17.11)
 - Faculty policies
 - Student Services policies
 - Student complaints (see Standard 17.3)
 - Financial policies
 - Title IV participation as applicable (see Standard 17.12)
 - Board policies
- The *Catalog*(*s*) contains, at a minimum, the following:
 - o Faith Statement, Mission, Institutional Objectives and Program Objectives
 - o Academic calendar
 - o Admission requirements and procedures
 - o Definition of a credit hour
 - Transfer of credit information
 - o Program requirements including length and cost
 - Program scope and sequence
 - o Distance Education information (as applicable)
 - Grading system
 - o Graduation requirements and procedures

- o Procedures for adding or withdrawing from courses
- o Faculty listing
- Student complaint processes
- o Tuition and fees
- Refund policies/processes
- Financial aid information
- Information regarding Library / Learning Resources
- Overview of the Family Education Rights and Privacy Act (FERPA) including amendments
- Status with TRACS and any other accrediting agencies with which the institution and/or its programs is accredited
- The *Faculty Handbook* contains, at a minimum, the following:
 - Faculty rights and responsibilities
 - Faculty organization
 - Job descriptions
 - Academic advising procedures
 - o Procedures related to syllabi development and approval
 - Textbook selection and approval procedures
 - Student attendance requirements
 - Grading system
 - Faculty due process procedures
 - Intellectual property and copyright information
 - o Promotion and tenure information, as applicable
 - Equipment and supplies procurement procedures
 - Faculty development information
 - Employee benefits
 - Faculty workload requirements and restrictions
 - o Faculty evaluation procedures
 - o Procedures related to Distance Education
- The *Student Handbook* contains, at a minimum, the following:
 - Overview of the Family Education Rights and Privacy Act (FERPA) including amendments
 - Status with TRACS and any other accrediting agencies with which the institution and/or its programs is accredited
 - o Student conduct expectations and disciplinary procedures for violations
 - o Campus safety and emergency procedures
 - Student complaints and due process procedures
 - Opportunities (ministry related or otherwise) for community outreach and/or interaction
 - o Student government information including its purpose and function
 - o Information regarding student clubs and/or organizations, as applicable
 - o Residential life information, as applicable
 - o Information concerning automobiles and parking on campus
 - $\circ\quad$ Information concerning health services and insurance
 - o Administrative and other services provided
 - Distance Education description/procedures
- Policies are comprehensive in that they address all major operational areas of the institution.

- A policy exists regarding the evaluation of Board members and all employees.
- A policy exists which details due process procedures.
- Policies specific to Distance Education should include the definition of a credit hour, information on program length and costs, information regarding student complaints, transfer of credit, verification of student identity and student privacy

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- List official publications, including the institution's website.
- Describe the review and approval process (either Board or administrative) for publication and date of last review/approval.
- Affirm that publications are clear, current, comprehensive in scope, and consistent. (see list above).
- Summarize the due process/grievance procedures for major constituent groups.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the Board Manual, Policies Manual, Catalog(s), Faculty Handbook, and Student Handbook
- Copies of Board minutes or dated evidence of administrative review and approval demonstrating that the appropriate entity reviews and approves the *Board Manual*, *Policies Manual*, *Catalog(s)*, *Faculty Handbook*, *and Student Handbook* according to the procedures outlined in the *Assessment Plan*

8. Educational Programs

The institution's educational program(s), whether offered face-to-face, via Distance Education, or by hybrid modalities, have as their principle focus the education and academic preparation of students within a distinctly Christian context. Educational programs are derived from recognized fields of study normally found at the postsecondary level and require designated courses of study with clearly outlined procedures for completing the programs successfully.

- 8.1 The institution has at least one Certificate, Diploma, or Degree (Associate, Baccalaureate, Graduate, or Post-Graduate). All degree programs offered are based on at least 60 semester credit hours or equivalent at the associate level; at least 120 semester credit hours or the equivalent at the bachelor level, or at least 30 semester credit hours or the equivalent at the graduate or professional level. (IER)
- 8.2 The curriculum clearly relates to the mission and objectives of the institution. (IER)
- 8.3 Academic programs have adequate enrollment to facilitate student interaction appropriate to quality instruction and to financially sustain the program. (IER)

- 8.4 Undergraduate academic degree programs offered include an appropriate general education core. General education courses are not narrowly focused nor are they directed toward a specific occupation or profession. Undergraduate bachelor degree programs include a minimum of 30 semester hours in general education, with at least 3 semester hours, in each of the humanities/fine arts, behavioral/ social sciences, and natural science/math. Associate degree programs include a minimum of 15 semester hours in general education. (IER)
- 8.5 Clearly defined student learning outcomes are established at the course, program, and institutional levels, written in measurable terms and reflected in all aspects of academic and support services.
- 8.6 The institution's Branch Campuses are operated in compliance with TRACS requirements (see definition of a Branch Campus), all relevant laws, and provide comprehensive services to students according to the programs offered.
- 8.7 The institution's Instructional Sites, Extension Sites, and/or Teaching Sites are operated in compliance with TRACS requirements, all relevant laws, and provide appropriate services. (See definition of an Instructional Site, an Extension Site and/or a Teaching Site)
- **8.8** A process is established for faculty-led curriculum development, review, modification, and assessment of the educational program.
- 8.9 The academic programs offered by the institution impart a common core of knowledge, which enhances students educationally and/or vocationally. The programs are consistent with commonly accepted standards and are appropriate for their educational level.
- **8.10** A process is in place for the systematic and regular evaluation of all academic programs which includes an analysis of the accomplishments of program outcomes, retention rates, completion/graduation rates, job placement rates, the results of licensing or certification examinations (when appropriate), or other measures of evidence.
- **8.11** The institution uses information resources and technology as an integral part of student education, enabling levels of proficiency appropriate to their degree and program or professional field of study.
- **8.12** Students earn at least 25% of the credit hours required for a degree through the institution awarding the degree.
- **8.13** Graduate programs reflect post-baccalaureate level requirements and rigor and extend the intellectual maturity of the students and demonstrate a clear distinction between Bachelor-level, Master-level and Doctoral-level work.

- The institution documents the relationship of each of its educational programs to the institution's Mission and institutional level Objectives and reviews these relationships regularly as a part of its assessment processes.
- The institution's administration and faculty are actively involved in curriculum development. Such involvement is reflected in appropriate minutes and other applicable documentation.
- The curriculum (regardless of the mode of course delivery) has as its primary focus
 the education of students and leads to progressive student learning and
 competency.
- The curriculum exhibits a logical and appropriate scope and sequence.
- Graduate programs include a common core of courses appropriate to the discipline and include summative experiences such as capstone projects or theses in order to measure student achievement and competency.
- Students earn the majority of credits toward a graduate or professional degree at the institution awarding the degree.
- The institution publishes and consistently utilizes a grading system that is in keeping with the expected norms of higher education.
- Academic progress reports are made available to students in a timely manner.
- Distance Education:
 - If utilizing third-party providers in the offering of Distance Education courses and/or programs, the institution assumes responsibility for the actions of such third-party providers.
 - The institution appropriately notifies all Distance Education students whether programs that lead to licensure, or could be reasonably expected to do so, meet the requirements for licensure in the state or location in which the student resides.
 - o Distance Education curricula is coherent and comparable to on-campus curricula.

Branch Campus(es):

- The institution's Branch Campus(es) meet the TRACS definition in all aspects
- The institution has the authorization from the appropriate agency(ies) to operate, and if applicable, to offer degrees in the location where the Branch Campus is located.
- Branch Campuses located outside of the United States or one of its territories comply with stated expectations unless there is a legal requirement for a variation. If instruction at the Branch Campus is conducted in a language other than English, the institution must demonstrate compliance with the TRACS policy concerning such instruction.
- o Control of the Branch Campus, including its educational program policies, administrative policies and business policies, is vested in the home entity.
- The Branch Campus administrative team includes, but is not limited to, a director, an academic officer and a finance officer. These individuals may be employed full or part-time, have job descriptions and are noted on the institution's Organizational Chart.

- Employees of the Branch Campus are considered employees of the institution.
- Employee and student records are maintained in the designated offices of the institution's main campus with institutionally certified copies retained at the Branch Campus.
- The Branch Campus has its own Board-approved budget (which may be reflected in the institution's budget), is financially stable, and is included in the institution's annual external financial audit.
- Institutional policies apply, as appropriate, to the Branch Campus; any policies specific to the Branch campus are approved by the institution's Board and are included in the *Policy Manual*.
- o The Branch Campus is reflected in the institution's *Strategic Plan* and the related planning processes and documents.
- o The Branch Campus has its own *Academic Catalog* which is specific to the Branch Campus or clearly differentiated information concerning the Branch Campus is detailed in the institution's main campus *Academic Catalog*.
- The Branch Campus maintains sufficient faculty, student services personnel, and other staff, as necessary.
- The Branch Campus and its operation is appropriable reflected in the institution's *Assessment Plan* and related processes.
- o The institution makes available to Branch Campus students and personnel, through ownership or formal arrangements / agreements, library / learning resources necessary to fulfill the institution's Mission and Objectives and support the academic and research programs offered at the location.
- The institution employs an adequate number of professionally qualified staff who administer the Branch Campus library / learning resources and the related support functions.
- The Branch Campus facilities and equipment are sufficient to support all functions to be carried out at the location.
- Remote Locations: (Instructional Site(s)/Extension Site(s)/Teaching Site(s))
 - o The institution's Remote Locations meet the TRACS definition in all aspects.
 - The institution has legal authorization, if required, to operate Remote Locations from the state or foreign nation in which the Remote Location is operated and has provided TRACS with copies of all relevant authorizations.
 - o Remote Locations operate under the authority of the institution's Board.
 - o The institution's *Academic Catalog* is provided to all students at Remote Locations if the Remote Location does not have its own *Academic Catalog*.
 - o Policies of the institution apply, as appropriate, at all Remote Locations.
 - The institution employs an appropriate number of faculty at Remote Locations.
 - Long-range planning for Remote Locations is included in the institution's planning processes.
 - Student services are provided at Remote Locations, as appropriate, or are offered through the institution's main campus.
 - Assessments and evaluations identified in the institution's *Assessment Plan* are implemented at Remote Locations, as appropriate.

- Learning resources that support the courses offered at Remote Locations are accessible to students.
- Remote Locations located outside of the U.S. or its territories comply with U.S. standards and norms unless there is a legal requirement for a variation.
- Remote Locations that offer instruction in a language other than English demonstrate compliance with the TRACS policy addressing such instruction
- Students may earn at least 50% of any educational program at a Remote Location designated as a Teaching Site.
- Facilities at Remote Locations are sufficient to support the courses / programs offered.
- Before a student is registered to take a course at any Remote Location, students are provided written notification of the maximum academic credit which can be earned at the location and the options for earning the remaining credit needed to complete an educational program.
- Publications and marketing materials clearly state the maximum amount of academic credit that may be earned at a Remote Location and how the credit needed for completing an educational program may be earned.
- Non-degree granting programs, which may differ significantly from degreegranting programs, maintain program objectives and learning outcomes that are equivalent to those of degree-granting programs, so that courses and programs are transferrable to accredited institutions.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize programs by level affirming that minimum credit requirements are met.
- Provide a rationale demonstrating linkage between academic programs and the institution's mission and objectives.
- Affirm that all programs have adequate enrollment to demonstrate financial stability and appropriate student interaction.
- Affirm that undergraduate programs include appropriate general education requirements.
- Affirm the existence of student learning outcomes at all levels.
- If the institution has Branch Campuses or other Remote Locations, affirm compliance with TRACS expectations and indicate percentage of program that may be earned at each Branch Campus or Remote Location.
- If the institution does not operate any Branch Campuses or Remote Locations, indicate such.
- Describe the process for involving faculty in curriculum matters including assessment.
- Summarize the program evaluation process including an analysis of metrics.
- Affirm that students must earn at least 25% of program requirements from the institution.
- Describe and defend graduate program requirements and rigor (if applicable)

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Assessment and/or benchmarking data concerning the relationship of the institution's programs and/or courses to its Mission and Objectives
- Minutes of faculty and/or administrative meetings
- *Academic Catalog* containing the following information:
 - o Program and course listings
 - Scope and sequence listings for programs
 - Student Learning outcomes for programs
 - Published grading system

• Distance Education:

- Website content including links for information on library/learning resources, student orientation, financial aid, registration, course log-in, licensure notifications, etc.
- Contacts with third-party providers of on-line content and documentation demonstrating how the institution exercises oversight of these services and has incorporated such services into its assessment processes
- Documentation demonstrating comparability of Distance Education courses/programs with on-campus courses/programs as well as how Distance Education programs support the Mission.
- o Organizational Chart

Branch Campus(es):

- Letters and/or other documents demonstrating that the institution's Branch
 Campus is operating with the authorization of the appropriate entities
- Academic Catalog specific to the Branch Campus or copy of the institution's main campus Academic Catalog that clearly delineates information specific to the Branch Campus.
- o Promotional / Marketing materials related to the Branch Campus
- Listing of administrative team members for the Branch Campus and copies of employment contacts for each
- o Instructional Staff Listing (ISL) specific to the Branch Campus
- o Sample Branch Campus employee files
- o Sample Branch Campus student files
- Board approved Branch Campus budget
- Institutional organizational chart depicting the Branch Campus and its operations
- o Institutional Strategic Plan reflecting the Branch Campus
- Student Handbook or similar document detailing the student services that are offered at the Branch Campus
- Facilities Plan of the Branch Campus and a detailed listing of all facilities and equipment utilized at the Branch Campus
- Information concerning the learning resources available to Branch Campus students, how these resources may be accessed, and contact information for Branch Campus library personnel
- o Copies of contracts and transcripts for Branch Campus library personnel

 English translations of any and all documents (including website) related to the Branch Campus that may be written in a language other than English

• Remote Locations:

- Letters and/or other documents demonstrating that the institution's Remote Location(s) operate with the authorization of the appropriate entities
- Academic Catalog specific to the Remote Location(s) or a copy of the institution's main campus Academic Catalog that clearly delineates information specific to Remote Locations
- o Promotional/Marketing materials related to Remote Locations
- Listing of personnel for Remote Locations
- o Instructional Staff Listing (ISL) specific to Remote Locations
- Board-approved institutional budget reflecting the operations of Remote Locations
- Institutional organizational chart depicting any Remote Location and its operations
- o Institutional *Strategic Plan* reflecting Remote Locations
- Student Handbook or similar document detailing the student services that are offered to students at Remote Locations
- Facilities Plan of Remote Locations and a detailed listing of all facilities and equipment utilized at such locations
- Information concerning the learning resources available to students at Remote Locations, how these resources may be accessed, and contact information for library personnel
- English translations of any and all documents (including website) related to Remote Locations that may be written in a language other than English

9. Faculty

The institution employs dedicated and qualified faculty who possess the appropriate academic credentials and professional experience. The fundamental contribution of the faculty is to provide effective instruction and advice and to do so in a manner that makes the curriculum vital, with reference to the mission and objectives of the institution. An additional function of the faculty is to advise the administration and board in the formulation of academic policies involving such matters as curriculum, admissions, advising, student services, and faculty welfare.

- 9.1 The institution employs a sufficient number of full-time and part-time, academically, and spiritually qualified faculty for the programs it offers to teach and perform related duties. (IER)
- 9.2 The faculty the institution employs support the mission and objectives of the institution, perform all required faculty responsibilities (including the development and review of curriculum), ensure the quality and integrity of its academic programs, and fulfill their role in governance.
- **9.3** At least 25% of courses in each major at the undergraduate level are taught by faculty having a terminal degree.

- 9.4 The institution provides its faculty with on-going opportunities for professional and spiritual development for the growth of faculty as teachers, scholars, and practitioners.
- 9.5 The institution maintains a functioning faculty organization which is guided by a set of regulations, led by elected officers, meets regularly, and is involved in the formulation of curricular and academic matters, including faculty policies.
- **9.6** The institution regularly evaluates the effectiveness of each faculty member in accordance with published criteria.
- **9.7** The institution ensures academic freedom for faculty.

- Faculty Competence: The institution demonstrates that faculty members are qualified by training, earned degrees, scholarship, experience, and classroom performance and possess the appropriate academic credentials, requisite knowledge, skills, and experiences for teaching assignments.
 - o *Graduate:* Faculty members teaching post-baccalaureate, master's, or doctoral level courses have earned a terminal degree from an accredited institution in their teaching discipline.
 - Undergraduate: Faculty members teaching at the associate or bachelor's level have earned a master's degree or its equivalent from an accredited institution, including 18 graduate hours in the discipline of teaching assignment.
 - Pre-baccalaureate: Faculty members teaching developmental (pre-collegiate or zero-level) courses, certificate or associate degree courses not designed for transfer to any bachelor's degree have earned a bachelor's degree in the teaching discipline or an associate degree and have demonstrated competencies in the teaching discipline.
 - Qualified by Demonstrated Competence: Faculty members without the required degrees are employed only when they have demonstrated competencies that the institution has determined through a formally documented process to be equivalent to the required degree.
 - Institution makes a written determination of equivalence prior to issuing a contract to any of these faculty members.
 - Faculty members deemed qualified by demonstrated competencies will not be considered when determining compliance with Standard 9.1 or the required ratios of Standard 9.3 (In Lieu of Educational Credentials).

NOTE: Primary consideration should be given to a terminal degree within each discipline. Additional considerations would include competence, eminence, and (as appropriate) undergraduate and graduate degrees, related work experience in the field, professional licensure and certifications, honors and awards, continuous documented proficiency in teaching or research, or other demonstrated competencies and achievements that contribute to effective teaching and student learning outcomes.

• Teaching Assistants: Teaching assistants are only used on a limited basis.

- o Undergraduate teaching assistants who are enrolled in a graduate degree program in the teaching discipline may teach undergraduate courses.
- Graduate teaching assistants who hold a master's degree in the teaching discipline and are enrolled in a doctoral program in the teaching discipline may teach graduate courses.
- All teaching assistants will be under the direct supervision of an academically qualified, full-time faculty member in the teaching discipline, receive regular in-service training, and be evaluated on a regular cycle.
- Faculty Documentation: The institution maintains appropriate faculty documentation.
 - Includes official transcripts, contracts, evaluations, professional development data, and other pertinent materials in all faculty files.
 - Archives files of all faculty who cease to be employed for at least five years from the last date of employment.
 - O Documents that faculty contracts are clearly written and clearly specify assignments, compensation, and period of assignment.
- Distance Education faculty are trained, supported, and evaluated in the use of the technologies and methodologies utilized in the offering of Distance Education courses and/or programs.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide a description of faculty levels and justification of appropriate levels to perform all necessary faculty responsibilities.
- Provide a summary of faculty activities related to curriculum development and review.
- Include a statement indicating the percentage of undergraduate courses taught by terminally degreed faculty.
- Include a description of opportunities for faculty development.
- Give a description of faculty organization including frequency of meetings, leadership, and summary of activities.
- Provide a description of faculty evaluation procedures.
- Describe the academic freedom policy.

- The Instructional Staff Listing (ISL) provided by TRACS or other similar faculty listing
- Faculty portfolios containing official transcripts, contracts (detailing employment status), evaluations, professional and spiritual development data, and other pertinent materials
- Faculty Handbook

- Faculty meeting minutes indicating the existence of a functioning faculty organization, faculty involvement in curricular reviews, and other relevant faculty engagement matters
- Worksheets for determining the percentage of major course work being taught by faculty holding a terminal degree
- Examples of completed faculty evaluations
- Faculty journal articles and other publications
- Faculty books written
- Conference presentations
- Consulting assignments
- Professional peer testimonials and endorsements
- Student testimonials
- Professional awards, citations, and honors received
- The policy and process used to determine faculty qualification by competency / experience including the circumstances under which such faculty will be utilized
- Distance Education faculty training processes (workshops, videos, manuals, etc.)
- Distance Education faculty portfolios that document credentials, terms of employment, and evaluations

10. Student Services

The institution provides the services necessary to promote the spiritual, intellectual and personal development of its students. It recruits, admits, enrolls, and endeavors to ensure the success of its students and offers the resources and services that provide them the opportunity to achieve such success.

- 10.1 The institution offers an array of student services that are appropriate to its mission and objectives, and which address the needs of its students regardless of location or the mode of delivery of educational programs. (IER)
- 10.2 The institution maintains accurate and complete student records permanently, securely, and confidentially with provision for a secure backup of all records.
- 10.3 The institution maintains a sufficient number of qualified staff, with appropriate education and experience in the student services area, to accomplish the institution's mission.
- **10.4** The institution offers student academic advising and career counseling appropriate to its educational programs.
- **10.5** The institution provides appropriate student financial aid services directed by a qualified individual.
- **10.6** The institution's CEO exercises appropriate academic, administrative, fiscal, and health and safety controls over the institution's intercollegiate athletics program.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution's student services are overseen by a qualified individual and are carried out by a sufficient number of qualified staff.
- The institution provides a comprehensive orientation program for newly enrolled students.
- Students are provided opportunities for student leadership and participation in student government and other campus organizations as appropriate.
- Complete records of all student complaints, including their resolution, are maintained for at least five years.
- Academic and other expectations and services are the same for student athletes as for other students.
- Student services specific to Distance Education students include, at a minimum, admissions processes, financial aid services, registration, orientation, academic counseling, career counseling, information concerning the accessibility and use of the library and learning resources, technology support and student authentication
- The Distance Education program meets, as applicable, the requirements of the *American's With Disabilities Act*.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide a summary of student services.
- Provide a summary of student services and the availability of such services specific to Distance Education students.
- Include a description of how student records are maintained.
- Provide a summary of student services staff and their qualifications.
- Give a description of student advising (academic and career) processes and/or placement services.
- Provide a description of the financial aid services/advising available.
- A demonstration of how the CEO provides appropriate oversight of intercollegiate athletics.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the *Student Handbook* that contains all expected information
- A listing of all student services personnel detailing their qualifications and responsibilities
- A policy or procedural statement concerning student athletics, as applicable
- Student services polices related specifically to Distance Education

11. Financial Operations

The institution will exhibit financial stability and integrity as a means of demonstrating the viability of the institution. The institution's financial resources will be adequate to carry out its mission and support its programs and activities for the foreseeable future.

- 11.1 The institution's finances are adequate to support the staffing, facilities, equipment, materials, and support services for the approved programs. (IER)
- 11.2 A certified external audit of the institution's financial statements is conducted each year under the standards applicable to financial audits contained in the Government Auditing Standards and in accordance with auditing standards generally accepted in the United States of America or comparable auditing standards for institutions located in foreign jurisdictions. Final audit reports along with all management letters are submitted to the TRACS office annually within 5 months of the close of the institution's fiscal year. (See definition of Certified External Audit.) Audits demonstrate a recent history of financial stability. (See Definition of Financial Stability.) Institutions organized as non-profit or not-for-profit entities must have their audits prepared using the "net asset" model of accounting consistent with the policies and procedures provided by the American Institute of Certified Public Accountants (AICPA) in its document, Audit and Accounting Guide: Not-for-Profit Organizations: 2017, or any later enacted version, or comparable international guidance for such audits. (IER)
- 11.3 The institution demonstrates credit lines or other liquid reserves adequate to ensure operations at all times. Proprietary institutions demonstrate a pattern of cash distributions to shareholders of no more than 25% of net income. (IER)
- **11.4** The institution exercises complete control over all its financial resources.
- 11.5 The institution has sufficient, competent finance staff, led by a professionally qualified Chief Financial Officer (CFO).
- **11.6** Planning and budgeting support the institution's mission and objectives and are clearly connected.
- 11.7 The institution, at both the administrative and Board levels, regularly and systematically evaluates its fiscal condition and management of its financial operations including its use of appropriate internal and external mechanisms which ensure financial stability including enrollment management, diversification of revenue resources, and realistic budgeting.

- The institution's recent financial history indicates stability by operating within budget projections and generating operational surpluses.
- The institution has current, professionally prepared and complete audit reports and management letters.
- The institution's organizational chart shows adequate finance staff.
- The institution has liquid reserves adequate to ensure operations.
- The institution's CFO has the appropriate qualification and demonstrates competence.

- The institution's Board minutes indicate regular review of financial statements, appropriate budget discussion, commitment to funding the mission of the institution and independent control of the institution's resources.
- The institution's budgeting process is transparent, garners institution-wide support, incorporates short-term and long-term goals, includes provisions for strategic initiatives and is reviewed throughout the year.
- The Distance Education program is appropriately reflected in the institution's budgeting processes.
- At Proprietary institutions, shareholder distributions have not exceeded 25% of net income each year for at least three years.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide a summary statement demonstrating adequate finances for all necessary functions based on recent financial data including budgets.
- Affirm the existence of positive audit(s) and availability of adequate credit lines or liquid reserves.
- Present a summary of the CFO's qualifications.
- Provide a description of the Board's involvement in the formulation and approval of the budget and of regular reviews of finances.
- Provide a statement regarding the inclusion of Distance Education in budgeting processes (if applicable).
- Proprietary institutions should affirm a pattern of no more than 25% of net income in shareholder distributions for the past three years.

- Non-profit institutions: Completed audit reports for the last three fiscal years, with the most recent two fiscal years showing a positive change in Unrestricted Net Assets and Total Net Assets and no increase in Pledges Receivable or Contributions Receivable. Submission must include all management letters.
- For-profit institutions: Completed audit reports for the last three fiscal years, with the most recent two fiscal years showing a positive change in Retained Earnings and cash. Submission must include all management letters.
- Composite Score calculation based on the audit report from the most recently completed fiscal year. Analysis of most recent audit must result in a Composite Score of 1.5 to 3.0 in order to demonstrate financial stability. Composite Scores of less than 1.5 will require additional documentation of financial stability and sustainability.
- Utilizing the TRACS supplied Salary Worksheet, provide information indicating salaries of all full-time personnel required by TRACS Standards and indicate the line items in the audit report where the salary expenses are included. Required

- full-time personnel include: the CEO, the CAO, and one full-time faculty member for each program area.
- Institution's five-year financial plan indicating positive changes in Unrestricted Net Assets and Total Net Assets (nonprofit institutions) or Retained Earnings (forprofit institutions).
- Documentation (current bank statements, credit line agreements, etc.) that the institution has credit lines or other liquid reserves adequate to ensure operations at all times (An unused or available amount equal to 10% or more of institution's annual operating budget will be considered to demonstrate compliance. Amounts less than 10% will require a detailed explanation of how cash flow needs will be met, along with accompanying financial documentation.)
- Organizational Chart with finance staff detailed
- Resume of Chief Finance Officer (CFO)
- Budget policy and process narrative with substantiating documents and narrative.
- Board minutes with financial issues highlighted
- Budgets indicating inclusion of strategic initiatives and mission priorities including Distance Education.
- Proprietary institutions should submit documentation regarding cash distributions to shareholders.

12. Institutional Assessment

The institution has developed and implemented a comprehensive *Assessment Plan* as a means of evaluating its effectiveness in accomplishing its mission and objectives. The *Assessment Plan* describes the processes utilized in the evaluation of all foundational and operational areas of the institution. It includes the identification of outcomes and assessments to determine the extent to which these outcomes are achieved and leads to evidence of institutional improvement based on an analysis of assessment results.

- 12.1 The institution has developed and implemented a comprehensive *Assessment Plan* which includes all aspects of the institution. (IER)
- 12.2 The institution provides a systematic assessment of whether or not student learning outcomes at the institution, program and course levels are appropriate to its educational mission. (IER)
- 12.3 The institution utilizes multiple approaches (qualitative and quantitative methods and direct and indirect measures) for assessing student learning, including information both internal and external to the institution.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has a Board-approved *Assessment Plan* that is written and published appropriately.
- The *Assessment Plan* calls for the regular review and appropriate level of approval of the following:
 - o The Assessment Plan itself
 - o The institution's Faith Statement, Mission, and Objectives

- The Board and its function
- o Institutional polices
- Institutional publications
- Employee (including all administrators and faculty) performance relative to published job descriptions
- Student learning and program outcomes relative to the institution's Mission and Objectives (see Standard 17.11)
- Curriculum to ensure that content and requirements are consistent with anticipated norms in higher education
- o Distance Education
- Faculty
- Student Services
- o Financial Operations, including financial aid as applicable
- o The institution's *Strategic Plan* and the related planning processes
- The library and learning resources including, the personnel and services associated with the library and learning resources
- The facilities and equipment, including technology
- The health and safety measures utilized
- o Compliance with applicable Federal requirements
- Assessment results are provided to stakeholders and are made available to the public in an easy-to-understand format.
- Assessment results are reviewed, analyzed and utilized in the decision making processes regarding possible institutional changes.
- The Distance Education program is appropriately reflected in the institution's *Assessment Plan* and associated processes.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide a statement affirming that the Assessment Plan is comprehensive, includes assessment of learning outcomes at the institution, program and course level, and that multiple approaches are used in assessing student learning.
- Provide a statement affirming that Distance Education offerings are regularly assessed through the Assessment Plan and related processes.

- A copy of the institution's *Assessment Plan* containing areas to be assessed, processes, timelines, individuals responsible for specified tasks, and tools utilized in the various assessment processes
- A copy of Board minutes indicating approval of the Assessment Plan
- Completed assessment data, particularly those related to student learning outcomes
- Copies of assessment summary reports with information as to how such reports are distributed and to whom

- Copies of minutes of Board, administrative, faculty or committee meetings indicating that assessment data is utilized to promote institutional change
- Documentation of Distance Education course/program reviews.
- Completed course evaluations and any other assessment data related to Distance Education.

13. Strategic Planning

The institution's planning processes are all-inclusive in nature and lead to the development of a comprehensive institutional *Strategic Plan*. The *Strategic Plan* will address such factors as educational programs, student enrollment, staffing projections, finances, facilities, equipment, and policies and procedures for operation.

The strategic planning processes include both short-range (1-2 years) and long-range (3-5 years) projections and goal setting. These processes will identify priorities, set goals and timelines, and identify individuals responsible for implementation.

The institution utilizes the results of assessments in broad-based continuous planning and evaluation processes and incorporates them into overall strategic planning processes.

- 13.1 The institution has developed and implemented a comprehensive Board-approved *Strategic Plan* which is based on both internal and external factors. (IER)
- **13.2** The *Strategic Plan* aligns human and physical resources with the institution's mission, objectives, and budget.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has a written *Strategic Plan* that includes timetables, persons responsible for implementation and the financial resources for meeting the goals.
- The institution's *Strategic Plan* has been developed on sound research, based on an analysis of assessment data, and involves all appropriate constituencies of the institution.
- The institution's *Strategic Plan* is reviewed and approved annually by the institution's Board.
- The institution's *Strategic Plan* includes a facilities plan for maintaining and upgrading facilities.
- The institution's *Strategic Plan* lists goals in priority order for each area of the institution (such as academic, student services, financial operations, administrative, etc.).
- The institution has a planning process that takes into account both income and expenditures for at least five years.
- The institution maintains minutes of strategic planning committee meetings.
- The institution integrates strategic planning into the institution's on-going cycle of planning, budgeting, and assessment.
- The institution utilizes institution-wide assessment data to revise, update and reprioritize the institution's *Strategic Plan*.

• The Distance Education program is appropriately reflected in the institution's long-term planning.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Provide a summary of the Strategic Plan and associated processes including a brief description of factors considered in the development of the plan.
- Provide an overview of how the Strategic Plan accounts for needed resources.
- Summarize inclusion of Distance Education in the Strategic Plan.
- Indicate date of last Board review and approval of the Strategic Plan.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the institution's *Strategic Plan* with all evaluative criteria factors included
- Strategic Planning Committee minutes indicating review of current goals, recent assessment data and budget factors
- Board minutes indicating annual review and approval of the Strategic Plan
- Master Facilities plan
- Five-year projected budget with Strategic Plan expenses clearly indicated
- Documents indicating year-to-year *Strategic Plan* accomplishments and subsequent revisions to *Strategic Plan*
- Narrative indicating how assessment data drives changes to the *Strategic Plan*

14. Library and Learning Resources

The institution maintains library and learning resources (including physical as well as digital resources) which are adequate to support the mission of the institution, the educational programs offered, and to promote the intellectual, spiritual, and cultural development of faculty and students. Additionally, the institution provides appropriate access to these learning resources and to relevant facilities, equipment, supplies and services.

- 14.1 The institution furnishes library and learning resources and related services appropriate to support the institution's mission, academic programs, and administrative functions. These resources and services are made available to all students regardless of location or mode of course delivery. (IER)
- 14.2 The institution employs an adequate number of professionally qualified staff who oversee the institution's library and learning resources and related services. (IER)
- **14.3** The institution provides sufficient and consistent financial support to ensure the adequacy of its library and learning resources.

- The institution makes available, through ownership or formal agreements, library and learning resources necessary to fulfill the institution's Mission and Objectives. These resources should support the educational programs offered and for the intellectual development of students and faculty.
- The institution's library and learning resources include the utilization of instructional technology appropriate to the institution's academic objectives and appropriate to modes of course and program delivery.
- Sufficient library and learning resources are available and utilized by Distance Education students
- The institution provides appropriate training and support services to allow students and faculty to make effective use of the library and learning resources and for the use of instructional and information technology.
- The institution's primary library and learning resources staff hold at least a Master of Library Science degree or an equivalent degree. All other library staff are appropriately trained and are competent to provide library services as required.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize Library/Learning Resources available to students indicating mode (physical, digital, etc.).
- Provide a statement regarding the availability of Library/Learning Resources for Distance Education students.
- Provide a review of orientation procedures related to Library/Learning Resources.
- Summarize Library/Learning Resources staff including their credentials.
- Give a brief statement regarding financial support and budgetary considerations for Library/Learning Resources.

- A comprehensive listing of all library and learning resources provided or made available by the institution with specific documentation as to how these resources support the academic programs offered
- Listing of resources available to Distance Education students and a description of how these resources are accessed.
- Copies of executed agreements and/or invoices for external resources including other libraries and digital resources
- Manuals, handbooks or other similar documents that detail policies, hours of operation, appropriate usage, services, library personnel contact information, etc., specific to the institution's library and learning resources

- Copies of training materials and on-going support information which is made available to faculty and students concerning the effective use of the library and learning resources
- Copies of transcripts, certifications, training, experience, etc., for all library and learning resources personnel

15. Facilities and Equipment

The institution maintains physical facilities and necessary equipment which are adequate to serve the institution's mission and objectives. Facilities, regardless of location, meet all state and local requirements and provide an atmosphere for safe and effective learning.

- 15.1 The institution provides, maintains, and controls adequate facilities and equipment, (both on and off-campus) that appropriately serve the needs of the educational programs, support services, and other mission related activities. (IER)
- 15.2 Information technology is sufficient to provide appropriate support for administrative, management, staff, and student functions across the full scope of the institution's operations.

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has physical facilities adequate to serve the institutional purpose and programs, that meet all state and local requirements, and that provide an atmosphere for safe and effective learning.
- The institution controls the use of its facilities.
- The institution has realistic plans to meet the facility needs into the future.
- Distance Education only (100% on-line) institutions maintain a physical office space. (A Post Office Box does not meet this requirement).

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize classroom, office and support spaces and place in context of institutional activities.
- Describe generally available technology to support instruction and other activities.

- Facilities plan
- Inventory list
- List of technological resources both in the classroom and in support areas
- Budget with maintenance and facilities usage indicated
- Facility usage policy
- Copies of required occupancy documents including inspections

16. Health and Security

The institution provides a healthy, safe, and secure environment for the institution's personnel and students, regardless of location.

16.1 Appropriate health and security measures, including an Emergency Plan, are in place for all institutional facilities and activities. (IER)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has appropriately published emergency plans.
- The institution has appropriate security for all campus facilities and events.
- The institution has plans for emergency and urgent-care student health needs.
- The institution has a hazardous materials policy in place, as applicable.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize health measures including policies and available services for students and staff.
- Summarize the emergency plan including the location of full plan.
- Address specific emergency plans as appropriate (tornado, earthquake, hurricane, active shooter, etc.)

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- *Student Handbook* and other appropriate publications with emergency plans noted.
- Policies Manual with emergency and hazardous materials policies noted.
- Copies of posted Emergency Notices and Evacuation Routes.
- *Material Safety Data Sheets* (MSDS) files and hazardous material procedures, as applicable.

Federal Requirements (Standard 17)

17.1 Credit Hours: The institution's award of credit hours and length must meet national norms and federal requirements.

The institution is responsible to award credit hours in accordance with accepted practices in higher education and in compliance with the Federal definition of a credit hour which is as follows: "A credit hour for Federal purposes is an institutionally established equivalency that reasonably approximates some minimum amount of student work reflective of the amount of worked expected in a Carnegie unit: key phrases being 'institutionally established,' equivalency," "reasonable approximate," and "minimum amount."

The institution must have policies determining credit hours awarded for course and programs. Determining a credit hour should be equivalent to the following: (1) One hour of classroom or direct faculty instruction and a minimum of two hours of out-of-class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) at least an equivalent amount of work as required in paragraph (1) of this definition for other activities as established by an institution, including laboratory work, internships, practica, studio work, and other academic work leading toward to the award of credit hours.

The institution must demonstrate peer review of a credit hour for courses regardless of mode of delivery. TRACS staff, peer evaluators, and/or the TRACS Accreditation Commission will review the assignment of a credit hour to determine the reliability and accuracy of the assignment and process. (IER) - §600.2, §602.24(f)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has adopted a policy defining credit hour awards for all learning activities
- The institution has published the definition of credit hour
- The institution's definition of credit hour meets national norms and federal requirements
- The institution has a process for evaluating the reliability and accuracy of credit hour assignment.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- State the institution's policy for determining a credit hour in all learning situations (i.e. standard semesters, online coursework, practica, internships, clinicals, etc.)
- Describe the process for validating the award of credit.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Full definition of credit hour policy demonstrating comparability to national norms
- Publication of credit hour definition
- Description of review process
- Evidence of review/validation of credit awards
- 17.2 Program Length and Cost: The institution's programs must be appropriate to the institution's mission and objectives and must demonstrate that program lengths are comparable to accredited institutions of higher education.

Program-specific fees and tuition must be published and appropriate for the program length and objectives. (IER) - §602.16(a)(1)viii

- The institution's programs are clearly aligned with the mission and institutional objectives.
- Program lengths meet national norms
- The institution makes available to its constituency fees and tuition costs

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize program lengths and establish comparability with a minimum of three accredited institutions.
- Note location of published costs including any program specific fees and tuition.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Publications containing scope and sequence for all programs
- Studies demonstrating comparability with multiple accredited institutions of similar size and objectives
- 17.3 Student Complaints: Institutions must record student complaints. Records must be kept of student complaints received, the process for addressing the student complaints, and the manner in which the student complaint was handled in accordance with the institution's policies and procedures. The institution's student complaint policy must include, at a minimum: a method for receiving confidential student input, clear step-by-step procedures for due process, an appropriate office that securely maintains all information and records of complaints, appeals, proceedings, and instructions for filing a complaint with TRACS and any other relevant government agencies. (IER) §602.16(a)(1)ix

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution publishes a compliant complaint procedure
- The institution evidences adherence to the published complaint procedure

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

 Describe the student complaint process including the elements required by the Standard.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are

not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Publications containing the student complaint process
- Policies related to the receipt and handling of student complaints
- Publications providing information for filing complaints with TRACS and other governmental entities
- Copies of filed complaints including proof of appropriate processing
- 17.4 Transfer of Credit Policies: The institution has published policies and procedures for accepting transfer of credits. Published policies include criteria for evaluating, awarding, and accepting credit transfer, credit by examination, experiential learning, prior learning assessment, advanced placement, and professional certificates. Policies and practices must ensure that course work is at the collegiate level. The institution is responsible for the quality of course work and credit given on the transcript.

The policies and procedures must be published and communicated to those who administer the policies. Articulation agreements must be disclosed and the institution listed with which the agreement is made. (IER) - §602.24(e)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has adopted and published a transfer of credit policy
- The institution discloses articulation agreements

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Summarize the transfer of credit policy including processes for evaluating nonstandard credit transfer request.
- Present a description of any articulation agreements.

- Publications containing the transfer of credit policy
- Policy statements regarding the transfer of credit
- Copies of executed articulation agreements.
- Proof of appropriate disclosure of articulation agreements.
- 17.5 Distance Education and Correspondence Education: The institution demonstrates that programs and courses offered via Distance Education and Correspondence Education are in compliance with the Federal definition of Distance Education and Correspondence Education (Title IV funds are available for Distance Education only):

Distance Education Definition: 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. (see TRACS Accreditation Standard 5.2)

Correspondence Education Definition: 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. (IER) - §602.3

[NOTE: This definition for 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.]

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution's Distance Education program meets the definition provided in all aspects and operates in compliance with each Standard applicable to Distance Education.
- Coursework evidences regular and substantive interaction between the instructor and student and between the students.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

 Provide a description of the scope of the institution's Distance Education offerings and how the Distance Education program meets the definition provided in the Standard.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

• A copy of the *Academic Catalog*, Distance Education specific manual or handbooks, and any other documents or publications that provide specific and detailed information concerning the institution's Distance Education program.

- Sample Distance Education syllabi that clearly describe course requirements including regular and substantive interaction between students and faculty
- 17.6 Verification of Student Identity: An institution offering Distance Education as stated in Federal definitions must have a process to verify that the student who registers for a Distance Education program or course is the same student who participates in, completes, and receives credit. Methods to verify the student include but are not limited to: a secure login or passcode, proctored examinations, or new or other technologies and practices that are effective in verifying the identity of the student.

Institutions must notify the student at the time of registration of any additional charges associated with the verification of student identity. (IER) - §602.17(g)1

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

• The institution has appropriate measures in place to verify the identity of Distance Education students. Those measures meet the expectations of the applicable federal requirement.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

- Describe the process by which the institution verifies a Distance Education student's identity.
- Provide a summary of additional charges related to the verification of student identity for Distance Education students, if applicable.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the Academic Catalog, Distance Education specific manual or handbooks, and any other documents or publications that provide specific and detailed information concerning the institution's Distance Education program.
- 17.7 Student Privacy: The institution has a written procedure for protecting the privacy of students enrolled in Distance Education programs or courses. (IER) §602.17(g)2

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution has appropriate measures in place to safeguard the privacy of Distance Education students including related digital information.
- Those measures meet the expectations of the applicable federal requirement and are specific to the Distance Education student.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• Describe the institution's policy/procedure for protecting student privacy when involved in Distance Education coursework particularly noting the institution's privacy policy on digital information.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the Academic Catalog, Distance Education specific manual or handbooks, and any other documents or publications that provide specific and detailed information concerning the institution's Distance Education program.
- Policy related to the protection of digital information
- 17.8 Public Information: The institution makes the following information available to students and the public through the institution's Catalog(s), website and/or other methods: academic calendar, grading policies, refund policies, admission policies, program requirements, and information regarding tuition and fees. (IER) §602.16(a)(1)vii

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

• The institution makes all information mandated by federal requirements available to the public appropriately.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• Verify that the required information is readily available to constituency noting locations.

- Copies of publications indicating that the institution appropriately publishes information concerning the institution's academic calendar, grading policies, refund policies, admission policies, program requirements, and tuition and fees
- 17.9 Advertising and Recruitment Materials: The institution's advertising and recruitment materials must accurately represent the institution's practices and policies. (IER) §602.16(a)(1)vii

• The institution is forthright and honest in all of its publications, as well as in advertising and recruitment materials.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• Affirm the institution's commitment to accurate representation of practices and policies.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- Copies of publications, brochures, and other promotional materials indicating that the institution accurately represents itself to the public, including current and prospective students
- Policies related to integrity of representation in publications, advertising, and recruitment.
- 17.10 Fraud and Abuse: The institution must not engage in fraud or abuse and practices or procedures that are designed to deceive students or falsify information to students. (IER) §602.27(6)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

• The institution does not engage in fraudulent or abusive practices with the intent to deceive or mislead students or the public.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

 Affirm that the institution operates with integrity and has policies and practices in place to ensure it does not engage in fraud, abuse, or deceitful practices regarding students and the public.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

• Documented evidence (ex. policies, description of how complaints or lawsuits are handled, etc.) that the institution does not engage in practices that are fraudulent, abusive, deceptive or false

17.11 Student Achievement: The institution's assessment of student achievement includes, at a minimum, the collection and analysis of retention rates and graduation rates for Associate and Bachelor programs. Additionally, as appropriate to its mission and program specific expectations, the institution's assessment of student achievement includes the collection and analysis of course completion rates for Certificate programs, job placement rates, transfer rates, pass rates for state or other licensing examinations, and other appropriate measures. Student achievement information is made available to the public on the institution's website and/or via other appropriate means in an easily accessible and understood format. (IER) - §602.16(a)(1)

Evaluative Criteria: The Accreditation Commission will utilize the following evaluative criteria when determining institutional compliance in this area:

- The institution appropriately collects and publishes student achievement data including, at a minimum: retention rates, and graduation rates.
- The institution collects and assesses additional relevant metrics and makes them available to the public as appropriate

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• Summarize graduation and retention rates for Associates and Bachelor degree. Summarize other metrics collected and assessed. Affirm publication via the website within one click of the homepage.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are not required to use the examples presented and may instead choose to demonstrate compliance via other means.

- A copy of the *Assessment Plan* that appropriately calls for the collection of the information specified
- Documented evidence that the institution collects and compiles data relative to student achievement including the required components outlined
- URL to publicly available Student Achievement data available within one-click of institution's website homepage.
- Copies of recent IPEDS reports, as applicable
- 17.12 Title IV Participation: The institution maintains and demonstrates compliance with its program responsibilities under Title IV of the most recent *Higher Education Act* as amended.

In evaluating the institution's compliance with Title IV program responsibilities, the TRACS Accreditation Commission will rely on documentation forwarded to TRACS by the U.S. Secretary of Education supported by letters of authorization on file from relevant agencies indicating certification of eligibility and Federal Aid audits (IER) - §602.16(a)(1)x, §602.27(a)6,7

• Institutions participating in Title IV funding do so in compliance with federal expectations.

Narrative Considerations: When writing compliance narratives within an Application Compliance Checklist, Self-Study Report, Interim Fifth-Year Review Report, or Compliance Report, institutions should consider the following:

• State whether the institution participates in Title IV funding and if so, the current status of the institution's participation agreement.

Typical Documentation: This list of Typical Documentation is not exhaustive, and institutions may provide other documentation relevant to their specific context. The examples presented may not be applicable to all institutions. Additionally, institutions are

• Documented evidence, as applicable, that the institution maintains compliance with Title IV expectations including copies of any letters or findings from state and federal agencies as well as from TRACS and/or other accrediting agencies.