

TRACS Board Policy Addition and Revisions

Approved for 30-day comment period
at the October 2025 TRACS Accreditation Commission Meeting

Proposed New Policy

- **BP313 – Good Cause Extensions / Extenuating Circumstances**
Rationale: Provides an option for TRACS to grant good cause extensions for institutions to demonstrate compliance when non-compliance is as a result of circumstances beyond the institution's control - §602.18(d) This proposed revision arose out of our ED petition review process.

Proposed Policy Revisions

- **BP101 – Board Policies**
Rationale: Clarifies the Executive Committee review and approval processes for changes to policy to include the consideration of any comments received. This proposed revision arose out of our ED petition review process.
- **BP102 – Definitions**
Rationale: Revises certain definitions and adds new definitions to ensure TRACS definitions are in alignment with ED requirements. This proposed revision arose out of our ED petition review process.
- **BP104 – Complaints**
Rationale: Revised to state that the TRACS website allows for the submission of on-line complaints by individuals with disabilities. This proposed revision arose out of our ED petition review process.
- **BP105 – Disclosure of Information**
Rationale: This proposed revision arose out of a request for documentation / records related to a TRACS institution.
- **BP106 – Information Provided to Other Entities**
Rationale: This proposed revision arose out of a request for documentation / records related to a TRACS institution.
- **BP207 – Institutional Staff Reviews**
Rationale: This proposed revision seeks to provide clarity regarding the ISRF process and Financial Monitoring.
- **BP211 – Sanctions and Adverse Actions**
Rationale: This proposed revision arose out of our ED petition review process.

- **BP214 – Lapse of Accreditation**

Rationale: Provides information concerning proposed new policy BP313. This proposed revision arose out of our ED petition review process.

- **BP215 – Decisions of Governmental or Other Accrediting Agencies**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP219 – Appeals**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP221 – Arbitration**

Rationale: Provides institutions an arbitration option other than through CHEA.

- **BP224 – Teach Out Plans**

Rationale: Clarifies the items required / essential elements of a Teach Out Plan. This proposed revision arose out of our ED petition review process.

- **BP225 – Teach Out Agreements**

Rationale: Clarifies the items required / essential elements of Teach Out Agreements. This proposed revision arose out of our ED petition review process.

- **BP226 – Institutional Changes**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP227 – Branch Campuses**

Rationale: Clarifies the Branch Campus approval process, specifically regarding the timing of the approval / recognition by the Secretary of Education. The final wording of this policy will be determined once clarification on this matter is received from the Department. This proposed revision arose out of our ED petition review process.

- **BP228 – Teaching Sites**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP229 – Distance Education**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP230 – Agreements Between Institutions**

Rationale: This proposed revision arose out of our ED petition review process.

- **BP303 – Changes to Accreditation Standards and Institutional Eligibility Requirements**

Rationale: Clarifies the Standards Review Committee review and approval processes for changes to Accreditation Standards to include the consideration of any comments received. This proposed revision arose out of our ED petition review process.

- **BP304 – The Application Process**

Rationale: Provides a deadline for the submission of initiated and unsubmitted Application Compliance Checklists (application documents).

- **BP305 – The Accreditation Process**

Rationale: Allows for, under certain circumstances, the application of “Alternative Means for Demonstrating Compliance”. This proposed revision arose out of our ED petition review process.- §602.18(c)

- **BP310 – Interim Fifth-Year Review**

Rationale: Provides for a more robust IFYR process. This proposed revision arose out of our ED petition review process.

- **BP312 – Multiple Accreditors**

Rationale: This proposed revision arose out of our ED petition review process.

BP313 – Good Cause Extensions / Extenuating Circumstances

Reference: § 602.18(d)

Adoption Date:

Last Revision Date:

Under extenuating circumstances, TRACS may permit an institution to be out of compliance with one or more of its Accreditation Standards, policies, and procedures for a period of time, as determined by the Accreditation Commission annually, not to exceed three years unless the Commission determines there is good cause to extend the period of time, and if:

1. TRACS and the institution can show that the circumstances requiring the period of noncompliance are beyond the institution's control, such as —
 - a. A natural disaster or other catastrophic event significantly impacting the institution's operations;
 - b. Accepting students from another institution that is implementing a teach-out or closing;
 - c. Significant and documented local or national economic changes, such as an economic recession or closure of a large local employer;
 - d. Changes relating to State licensure requirements;
 - e. The normal application of TRACS' Standards creates an undue hardship on students; or
 - f. Instructors who do not meet TRACS' typical faculty Standards, but who are otherwise qualified by education or work experience, to teach courses within a dual or concurrent enrollment program, as defined in 20 U.S.C. 7801, or career and technical education courses;
2. The grant of the period of noncompliance is approved by the Accreditation Commission;
3. TRACS projects that the institution has the resources necessary to achieve compliance with the Standard(s), policy(ies), or procedure(s) postponed within the time allotted; and
4. The institution or program demonstrates to the satisfaction of TRACS that the period of noncompliance will not —
 - a. Contribute to the cost of the program to the student without the student's consent;
 - b. Create any undue hardship on, or harm to, students; or
 - c. Compromise the program's academic quality.

BP101 - Board Policies

Reference:	None
Adoption Date:	June 2000
Last Revision Date:	February 2024

The TRACS Policies and Procedures Manual contains all policies (Board Policies) and procedures which govern the operation of TRACS and its dealings with its member institutions. These policies have been established and approved by the TRACS Accreditation Commission to ensure operational integrity and fairness in the accreditation process.

Changes to existing Board Policies, and the addition of new Board Policies may be made only by official action of the Accreditation Commission.

Changes to TRACS Board Policies may be prompted by information received from members of the Accreditation Commission, the comments of TRACS Staff, feedback from member institutions, input from the public, in response to changes in Federal and/or state regulations, or based on any change in the requirements of organizations to which TRACS belongs.

When a new Board Policy or a change in an existing Board Policy is proposed, the Executive Committee of the Accreditation Commission reviews the proposal and, if deemed appropriate, presents the proposal to the Accreditation Commission for **initial** consideration at its next scheduled meeting. Once the Accreditation Commission has reviewed and, as appropriate, made modifications to the new or revised Board Policy, the Accreditation Commission grants initial approval of the new or revised policy and authorizes its release for public comment. Within 30 days of the Accreditation Commission action to release the proposed new or revised Board Policy, the proposal is forwarded to the Chief Executive Officers of all TRACS member institutions for a 30-day comment period.

After receipt of and consideration of all comments received, consideration of the proposed new or revised Board Policy is placed on the agenda for consideration **by the Executive Committee at its next scheduled meeting. After review and consideration of the comments received on the proposed new or revised Board Policy, and after making any appropriate adjustments to the wording of the proposed new or revised Board Policy, based on the comments received, the Executive Committee shall forward the proposal to the Accreditation Committee for consideration and final approval at its next scheduled meeting.** ~~of final approval at the next Accreditation Commission meeting.~~ If final approval is granted, the new or revised Board Policy becomes effective on the date of the Accreditation Commission's final approval.

Immediately after Accreditation Commission final approval, the new or revised Board Policy is included in the TRACS Policies and Procedures Manual, is posted on the TRACS website,

is sent to the Chief Executive Officers of all member institutions, and is provided to the U.S. Department of Education and any state agency or organization requiring notification.

Editorial only revisions to Board Policies which do not impact the expectations or requirements of the policy may be made by TRACS staff at the discretion of the President of TRACS in consultation with the Executive Committee. Such editorial revisions may be made to reflect TRACS office procedures that have changed since the policy was last approved, to provide clarity on any matter, or to bring the policy into alignment with Federal and/or state regulations in a timely manner.

BP102 - Definitions

Reference: 34 CFR §600.2

Adoption Date: June 2013

Last Revision Date: February 2024

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

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

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

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

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

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

Branch Campus: An additional location of an institution that is geographically apart from and independent of the main campus of the institution. TRACS considers a location of an institution to be independent of the main campus if the location (a) is approved by the Secretary as a Branch Campus; (b) is permanent in nature; (c) offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (d) has its own faculty and administrative or supervisory organization; and (e) has its own budgetary and hiring authority. (34 CFR §600.2)

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

Certified External Audit: An audit performed in conformity with generally accepted accounting principles (GAAP) or Government Auditing Standards (GAGAS) and federal guidelines (or appropriate standards for those institutions located outside the United States) by auditors who are:

- Licensed
- Approved or authorized to conduct audit services in the locale where the audited institution is domiciled

- Not sanctioned or under investigation
- Independent with respect to the institution (e.g., auditors are not members of the governing board, not employees of the institution, and not involved in the decision making activity, etc.).

Concentration /Area of Emphasis: 10 or more semester credit hours / 15 or more quarter hours where all the courses are within the same or a related field.

Contingency Reserve: The TRACS Accreditation Commission requires that institutions demonstrating compliance with TRACS expectations regarding the use of a contingency reserve provide evidence of the following: Board action establishing a contingency reserve and directing the deposit of the required funds into a separate account, bank statement(s) indicating required deposit, Board approved policies directing the use of and repayment of the contingency reserve and Board approved investment policy directing the investing of the contingency reserve funds.

Correspondence Education: Education that is 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 necessarily regular and substantive, and is primarily initiated by the student; eCorrespondence Education courses are typically self-paced; and eCorrespondence eEducation is not dDistance eEducation. ~~[NOTE:~~

This definition of Correspondence Education is provided to ensure that ~~the an~~ institution's Distance Education meets the definition of Distance Education and does not fall to the level of Correspondence Education. Correspondence Education is not reviewed by TRACS and is not included in an institution's scope of recognition with TRACS.

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

Direct Assessment Program: An instructional program that, in lieu of credit hours or clock hours as a measure of student learning, uses direct assessment of student learning, or recognizes the direct assessment of student learning by others.

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

Dually Accredited: An institution holding active accreditation, either institutional or programmatic, by more than one ED-recognized agency.

Extension Site: A location separate from the main campus of the institution which requires specific authority to operate where courses offered on-site comprise less than 50 percent of all educational programs offered by the institution.

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

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

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

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

Full-Time Faculty: A faculty member who has a full-time contract with the institution; whose earned degrees from accredited institutions are directly related to courses to be taught; whose salary is fixed and not contingent; whose job responsibilities are specifically spelled out in a board approved job description; whose primary professional employment is with the institution; and whose outside professional activities do not detract from the specified job responsibilities.

Institutional Change: Any modification (academic or non-academic) that has either been implemented (those requiring notification but not approval) or is being proposed for implementation (those requiring the approval of either the President of TRACS or the Accreditation Commission) by the institution that differs from the institution's current scope of recognition with TRACS.

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

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

Instructional Site: A location separate from the main campus of the institution which does not require specific authority to operate where courses offered on-site comprise less than 50 percent of all educational programs offered by the institution.

Major: Minimum 30% percent of a program's total credit hours, all within the same or a related field of study.

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

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

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

Primary Accreditor: The ED-recognized accrediting agency that provides institutional accreditation and is designated by the institution as its primary accreditor. The primary accreditor is the main accreditor responsible for initial/on-going institutional recognition including, if applicable, certification of eligibility for Federal Financial Aid programs.

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

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

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

Regular Interaction: With regards to Distance Education, the institution ensures regular interaction by providing opportunity for substantive interaction with the student on a predictable and scheduled basis commensurate with the length and content of the course; and monitors academic engagement/success and ensures the instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed. Interactions should be mostly instructor-initiated. (see Substantive Interaction)

Remote Location - Any location apart from an institution's main campus where on-site instruction is offered. Remote Locations are classified as either an Instructional Site, an Extension Site, a Teaching Site, or a Branch Campus. (see applicable definitions)

Secondary Accreditor: An ED-recognized accrediting agency providing either institutional or programmatic accreditation for an institution which holds institutional accreditation from a primary accreditor.

Substantive Interaction: With regards to Distance Education, engaging students in teaching, learning, and assessment, consistent with the content under discussion, and includes are least two of the following: 1) direct instruction 2) assessing or providing feedback on a student's coursework; 3) providing information or responding to questions about the content of a course or competency; 4) facilitating a group discussing regarding the content of a course or competency; 5) other instructional activities approved by the accrediting agency. (See Regular Interaction)

Sufficient Faculty: Compliance with the requirement for the institution to employ a "sufficient number of full-time and part-time faculty" (Standard 9.1) is demonstrated when the institution employs an adequate number of qualified faculty to carry out the following duties: design, develop, and evaluate the curriculum required for the educational programs offered; offer instruction for the courses required for completion of the programs within the timeframes prescribed; identify and assess appropriate learning outcomes at the program and course levels and; offer appropriate academic advising.

Teaching Site: TRACS defines a Teaching Site as either (a) an additional location of an institution that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of any educational program and may qualify as a Branch Campus, or (b) a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional facility where instruction is offered regardless of the percentage of instruction delivered on-site or through Distance Education. (34 CFR §600.2)

Vocational Technical Education (VoTech): A structured educational pathway designed for direct entry into skilled occupations culminating in a sub-baccalaureate credential (certificate, diploma, or associate's degree) and delivering practical, job-ready skills and knowledge that prepare learners for both current and emerging roles.

BP104 - Complaints

Reference: 34 CFR 602.16(a)(1)(ix); 34 CFR 602.23(c)

Adoption Date: June 2000

Last Revision Date: June 2024

The Transnational Association of Christian Colleges and Schools (TRACS) values the role of information provided by students, employees, and others in performing its role of monitoring institutional compliance with TRACS Accreditation Standards and policies and in ensuring that TRACS staff and Accreditation Commission members follow the policies of TRACS in their dealings with institutions and related constituencies. TRACS is also interested in ensuring that member institutions maintain appropriate complaint/grievance and due process policies and procedures, and that institutions consistently apply these policies and procedures, and provide procedural fairness.

Complaints Against A Member Institution

The TRACS procedures for receiving and processing complaints involving member institutions are designed to enable TRACS to address possible non-compliance with the TRACS Accreditation Standards, and policies, or procedures and to ensure the proper and uniform application by institutions of their own policies and procedures.

TRACS only considers complaints against member institutions which meet the following criteria:

- The complaint or allegation contains no defamatory statements.
- Reasonable attempts have been taken to resolve the issue through all formal means available to the complainant, including the institution's published complaint/grievance and due process procedures before the complaint is submitted to TRACS.
- The matter regarding the complaint is not currently in an institution's formal proceedings or in litigation. (TRACS may, at its discretion, choose to proceed with the review of a complaint in such cases if there is substantial, credible evidence that indicates systemic problems with the institution against which a complaint has been filed or if a delay would harm the complainant.)
- The *Complaint Processing Form* and supporting documents are submitted either in hard copy or via the on-line complaint submission process and in accordance with the provisions detailed in this policy. Complaints made verbally, or by any method not prescribed in this policy will not be considered.
- TRACS will not act on complaints submitted on behalf of another party unless there is a compelling reason to do so.

The TRACS complaint procedures are for the purpose of addressing any significant non-compliance or potential non-compliance by member institutions with the TRACS Accreditation Standards, policies, or procedures.

The TRACS complaint procedures are not designed to involve TRACS either as an arbiter in irrelevant disputes between individuals and member institutions, or as a

reviewing authority in individual matters concerning an institution's normal role in the daily functioning of the institution including disciplinary matters or contractual rights. TRACS does not act as an appeal panel for cases where the outcome of an institutional complaint/grievance process is unsatisfactory to a complainant.

Thus, TRACS will not interpose itself as an adjudicatory or grievance-resolving body in matters including:

- Admission
- Granting or transfer of academic credit
- Grades
- Fees
- Student financial aid
- Student discipline
- Transcripts
- Collective bargaining, faculty or staff appointments, promotion, tenure, contractual rights and obligations, and dismissals or similar matters.

Responsibilities of Institutions

1. The institution must have adequate policies and procedures for addressing student and employee complaints/grievances and is responsible for demonstrating that it follows those policies and procedures when resolving complaints.
2. A record of all complaints must be maintained in a designated office, made available to TRACS upon request, and made available for review by Evaluation Team members as part of the institution's scheduled reviews for Candidate, Accredited and/or Reaffirmation of Accreditation status, or by TRACS staff as a part of the complaint review process.

Procedures for Filing a Complaint Against a Member Institution

1. Individuals making an inquiry to TRACS regarding complaint procedures or about issues and concerns that could be considered complaints against a member institution will be directed to the appropriate page of the TRACS website. This webpage will provide a link to this policy (BP104) and access to the TRACS *Complaint Processing Form*. The *Complaint Processing Form* may be completed and submitted on-line or may be downloaded, completed, and mailed to the TRACS office. TRACS' response and its obligations to meet the specific timetables outlined in this policy will begin only after the complainant has submitted by either of the methods prescribed in this policy.
2. A formal complaint against a member institution is one that:
 - a. Is submitted by either of the methods prescribed in this policy
 - b. Includes all required supporting documentation.
 - c. If mailed, is addressed to:
TRACS President
Transnational Association of Christian Colleges and Schools
15935 Forest Road
Forest, VA, 24551

3. Once a complaint has been received, TRACS will acknowledge receipt of the complaint within 15 working days
4. If the complaint was not submitted according to one of the methods prescribed in this policy, or if any relevant information is missing from the complaint, TRACS will contact the complainant with guidance that will allow the complainant to either refile the complaint or provide the necessary information.
5. Once an official complaint which meets all prescribed criteria has been received, by the end of 30 working days, TRACS will inform the complainant regarding one of the following initial determinations regarding the complaint:
 - a. The complaint will not be processed further because the issue(s) raised in the complaint do not fall within the purview of TRACS (are not related to a TRACS Standard and/or TRACS policies and procedures) or because there is inadequate documentation to raise questions concerning the institution's compliance with TRACS Standards and/or TRACS policies and procedures.
 - b. The issue(s) raised in the complaint fall within the purview of TRACS (are related to a TRACS Standard and/or TRACS policies and procedures) and the institution will be required to respond to the issue(s) raised in the complaint.
6. If the institution is required to respond to the issues raised in the complaint, TRACS will initiate a Compliance Report on the TRACS portal. The institution will be notified when the Compliance Report has been initiated. The Compliance Report will provide the mechanism by which the institution will respond to the issue(s) raised in the complaint and will allow the institution to submit supporting documentation in support of the response. The Compliance Report will be due within 30 working days of the initiation of the Compliance Report. A copy of the complaint and supporting documentation will be attached to the Compliance Report. If the complaint was filed anonymously, the name of the complainant and all information related to the complainant will be redacted in the copy of the complaint that is provided to the institution.
7. Within 30 working days of receipt of the institution's Compliance Report response, TRACS staff, in consultation with the President of TRACS, will make one of the following final determinations regarding the complaint and will notify the institution and complainant accordingly:
 - a. There is insufficient evidence of significant non-compliance with TRACS Accreditation Standards and/or TRACS policies and procedures on the part of the institution and the complaint will not be processed further.
 - b. TRACS is unable to determine the institution's compliance with TRACS Accreditation Standards and/or TRACS policies and procedures based on the information available and the matter will either be included in any already scheduled visits to the institution or a Focus Team will be sent to the institution to make a determination regarding the institution's compliance with the matters in question.
 - c. If no response was received from the institution or if evidence suggests

the institution is in non-compliance with one or more TRACS Standards and/or TRACS policies and procedures, the institution will be required to present the actions that will be taken to correct the non-compliance issues, or face possible sanction or adverse action.

8. Once a final determination is made, the President of TRACS will notify the complainant and the institution that a final determination regarding the complaint has been made and which determination was made.
9. As appropriate, the President of TRACS will present the totality of the documentation concerning the complaint to the Commission along with a recommendation for specific action at the next scheduled meeting; at which time the Commission will make a decision regarding the ultimate disposition of the complaint and any determinations of non-compliance. In such cases, the decision of the Commission is considered final, unless the decision of the Commission is Termination. Termination is an appealable action according to TRACS Policy BP211.
10. Following the Commission meeting, the complainant and institution will be notified of the final decision of the Commission.

Complaints Against TRACS

Complaints against TRACS are limited, in that:

- Individuals may file a complaint against TRACS on matters on which they believe they have been personally aggrieved. This type of complaint covers those situations in which an individual believes that a member of the TRACS staff or a member of the Accreditation Commission failed to follow TRACS policies and procedures in the handling of a previously filed complaint against a member institution.
- Institutions may file a complaint against a TRACS staff member, an agency representative, or TRACS Commissioner for an alleged failure to follow TRACS policy or procedure, for an alleged bias against the institution, or if there is an alleged conflict of interest with a TRACS staff member or TRACS Commissioner in dealing with an institution.

In order to be considered a formal complaint against TRACS, a complaint must involve issues broader than a concern about a specific institutional action.

Procedures for Filing a Complaint Against TRACS

1. Individuals making an inquiry to TRACS regarding complaint procedures or about issues and concerns that could be considered complaints against a member of the TRACS staff or Accreditation Commission will be directed to the appropriate page of the TRACS website. This webpage will provide a link to this policy (BP104) and access to the TRACS *Complaint Processing Form*. The *Complaint Processing Form* may be completed and submitted online or may be downloaded, completed, and mailed to the TRACS office. TRACS' response and its obligations to meet the specific timetables outlined in this policy will begin only after the complainant has submitted all required documents.
2. A formal complaint is one that:
 - a. Is submitted by either of the methods prescribed in this policy

- b. Includes all required supporting documentation.
 - c. If mailed, is addressed to: (as appropriate)
TRACS President/Commission Chair/Commission Vice-Chair
Transnational Association of Christian Colleges and Schools
15935 Forest Road
Forest, VA, 24551
3. Once the complainant has filed a complaint against either a member of TRACS staff or the Accreditation Commission, the following procedures will be followed for review and consideration of the complaint:

If the complaint is against a member of TRACS staff or an agency representative, the following procedures apply:

- a. The President will acknowledge receipt of the complaint within 15 working days.
- b. Within 30 working days of receipt of the complaint, the President of TRACS will review the complaint and its documentation and determine:
 - i. Whether the issues raised in the complaint raises questions regarding a failure of TRACS staff and/or an agency representative in following TRACS policies and procedures in the matter(s) noted in the complaint.
 - ii. If there is adequate documentation in support of the complaint.
- c. The President will inform the complainant of the disposition of the complaint within 30 working days of receipt of the complaint.

If the complaint is against the President of TRACS or a member of the TRACS Commission, the following procedures apply:

- a. The Chair will acknowledge the complaint within 15 working days of receipt and will designate a committee composed of members of the Executive Committee of the Accreditation Commission to (1) review the complaint (including all documents submitted by the complainant), (2) request and review information submitted in writing from the President of TRACS or the Commissioner in question and (3) propose a recommend action to the Chair within 30 working days of the beginning of the review.
- b. The Chair will review the recommendation and inform the complainant and the President of TRACS or the Commissioner in question of action to be taken within 30 working days of receipt of the recommendation.
- c. If the complaint involves a member of the Executive Committee, the Chair will appoint another member of the Accreditation Commission to serve on the committee reviewing the complaint.

If the complaint is against the TRACS Commission Chair, the Vice Chair will assume the role detailed above and the complaint should be sent to the TRACS Commission Vice Chair.

Complaints and the News Media

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

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

Means of Communication

After the receipt of an official complaint, follow-up correspondence may be in writing, through e-mail, via the TRACS portal (if the subject of the complaint is a member institution) or by any reasonable means which helps to facilitate a solution to the issues at the lowest possible level.

Retention of Records

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

Accessibility for Individuals with Disabilities

Since one method for the submission of an official complaint with TRACS concerns the submission of the on-line form accessible via the TRACS website, it should be noted that the TRACS website (www.tracs.org) is designed to be compatible with common assistive technologies, including screen readers (e.g., JAWS, NVDA, VoiceOver), speech recognition software, and alternative input devices. The TRACS website may not display optimally in Internet Explorer or older browsers.

TRACS engages in interval audits, web page scans, and testing by professionals with disabilities to continually assess and improve the accessibility of the website. TRACS further invests in training on accessibility for our digital team to ensure our web content personnel, developers, designers, and other team members are knowledgeable and follow best practices for accessibility.

The *Web Content Accessibility Guidelines* (WCAG) defines requirements for designers and developers to improve accessibility for people with disabilities. It defines three levels of conformance: Level A, Level AA, and Level AAA. The TRACS website is fully conformant with WCAG 2.2 level AA. Fully conformant means that the content fully conforms to the accessibility standard without any exceptions. In addition to WCAG 2.2, our website is compliant with the ADA and Section 508.

BP105 - Disclosure of Information

Reference: §602.26 (f)(1-2)
Adoption Date: June 2000
Last Revision Date: June 2024

Public Disclosure of Information

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

TRACS urges member institutions to make available to the public, information regarding their accreditation status and pertinent documents related to the accreditation process, including Evaluation Team Reports. ~~Although this information may be requested from TRACS, the request will be forwarded to the institution and the institution is not required to disclose any such documents. (These documents are made available only upon the written consent of the institution).~~ Disclosure by TRACS of institutional accreditation documents in response to third-party requests for disclosure – by other agencies, institutions, or individuals – may be granted only upon the receipt of written approval of disclosure by the subject institution or after proper subpoena and/or court order. If disclosure is sought by subpoena and/or court order, the institution whose documents are being requested will be notified of the request immediately to enable the institution opportunity to file any objections with the appropriate court.

Information Made Available from TRACS

1. The accreditation actions granted by the Accreditation Commission.
2. The procedures that institutions must follow in applying for pre-accreditation or accreditation.
3. The TRACS Accreditations Standards and procedures utilized in the accreditation process and the basis for the Accreditation Commission's determinations to grant, reaffirm, reinstate, deny, terminate, or take any other action related to each type of pre-accreditation and accreditation that the agency grants.
4. The institutions (including the programs offered by these institutions) that hold Candidate or Accredited status with TRACS, and for each institution, the year TRACS will next review or reconsider the institution for accreditation action.
5. The names, academic and professional qualifications, and relevant employment and organizational affiliation of:
 - a. The members of TRACS policy and decision-making bodies.
 - b. TRACS principal administrative staff.
6. Notification sent to TRACS of an institution's voluntary withdrawal from Candidacy or Accreditation. Such notification shall be sent to the U.S. Secretary of Education and other appropriate governmental and accrediting agencies within 10 days of TRACS receiving the notification of withdrawal. (see BP212)
7. All final decisions of the Accreditation Commission regarding accreditation will be reported to the public (including the basis of the decision) no more than 30 days after such decisions are made, including:
 - a. A decision to award pre-accreditation or accreditation to an institution.
 - b. A decision to renew an institution's accreditation.

- c. A decision to accept an institution's voluntary withdrawal from Candidacy or Accreditation. Such notification will be reported to the public (including the basis of the decision) no more than 30 days after such decisions are made and provided in writing to the U.S. Secretary of Education, and other appropriate governmental and accrediting agencies, within 24 hours of notifying the institution, but no more than 30 days after the Accreditation Commission accepts the withdrawal. (BP212)
 - d. A final decision to place an institution under Sanction (Warning, Probation, or Show Cause). Decisions involving such actions will be reported to the public within 24 hours of notifying the institution affected.
 - e. A final decision of **Adverse Action (Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation)** taken against an institution. ~~deny or terminate the Candidacy (pre-accreditation) or Accreditation of an institution. Decisions involving denial or termination of Candidacy or Accreditation~~ Such **Adverse Actions** will be reported to the public within 24 hours of notifying the institution affected. Notice with respect to any of these final decisions shall also:
 - i. Include the specific reasons for the Accreditation Commission's decision.
 - ii. Include any official response provided by the affected institution with regard to the decision or evidence that the institution had the opportunity to provide official comments.
8. A list of scheduled dates for meetings of the Accreditation Commission.

Information Not Available for Dissemination

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

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

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

Certain relationships yield information which legally cannot be disclosed without the consent of the individual providing the information. If such information or other similar information that is protected under law is disclosed to TRACS or peer reviewers, the information will not be disclosed without written consent of the party legally entitled to disclose the information.

BP106 - Information Provided to Other Entities

Reference: §602.26 (f)(1-2)

Adoption Date: June 2000

Last Revision Date: June 2024

Notification of the following decisions of the Accreditation Commission regarding the accreditation of institutions will be provided in writing to the U.S. Secretary of Education, and other appropriate governmental and accrediting agencies, within 24 hours of notifying the institution affected, but no more than 30 days after the Accreditation Commission makes the decisions.

1. A decision to award Candidacy (pre-accreditation), Accreditation, or Reaffirmation of Accreditation.
2. A decision to accept an institution's withdrawal from membership.

Notification of the following decisions of the Accreditation Commission regarding negative actions taken against a member institution will be provided in writing to the U.S. Department of Education, and to appropriate state and accrediting agencies, within 24 hours of notifying the institution affected, but no more than 30 days after the Accreditation Commission makes the decisions.

1. A decision to place an institution under Sanction (Warning, Probation, or Show Cause).
2. A decision to take Adverse Action (deny or terminate the pre-accreditation or accreditation) against a member institution).

Notification with respect to any negative action taken against a member institution shall include:

1. The specific reasons for the Accreditation Commission's decision.
2. Any official response provided by the affected institution with regard to the decision or evidence that the institution had the opportunity to provide official comments.

Notification of the following actions will be provided in writing to the U.S. Secretary Department of Education and other appropriate governmental and accrediting agencies:

1. TRACS' receipt of a notification from a member institution to voluntarily withdraw from Candidacy or Accreditation. This notice shall be provided no more than 10 days from the date TRACS receives the notification of withdrawal. (Per BP105, notification of a final decision by the Accreditation Commission to accept an institution's voluntary withdrawal from Candidacy or Accreditation will be reported to the public (including the basis of the decision) no more than 30 days after such decisions are made, and provided in writing to the U.S. Secretary of Education, and other appropriate governmental and accrediting agencies, within 24 hours of notifying the institution, but no more than 30 days after the Accreditation Commission accepts the withdrawal. (see BP212)
2. TRACS' determination that an institution has allowed its Candidacy or Accreditation to lapse. This notice shall be provided no more than 10 days from the date TRACS determines that the institution's Accreditation or Candidacy has lapsed.

Additionally, the following information will be provided to the U.S. Department of Education:

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

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

TRACS will respond to requests for information from the U.S. Department of Education, other recognized accrediting agencies, and state agencies no more than 30 days from the receipt of the request and earlier if required by state or federal laws or regulations. Requests should be addressed to the President of TRACS.

Disclosure by TRACS of institutional accreditation documents in response to third-party requests for disclosure – by other agencies, institutions, or individuals – may be granted only upon the receipt of written approval of disclosure by the subject institution or after proper subpoena and/or court order. If disclosure is sought by subpoena and/or court order, the institution whose documents are being requested will be notified of the request immediately to enable the institution opportunity to file any objections with the appropriate court.

BP207 - Institutional Staff Reviews

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

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

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

Utilizing a TRACS generated Compliance Report on the TRACS portal, the institution must respond to the issue(s) identified ~~in the notification of~~ on the ISR / ISRF Compliance Report within 30 days of the date that the institution received the notification. At the discretion of the President of TRACS, a staff visit may be required within the 30 days allowed for the institution's response.

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

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

Information Specific to the Institutional Staff Review Financial

The specific purposes of the Institutional Staff Review Financial (ISRF) are to (1) ascertain the current financial condition of the institution relative to the financial Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations related to financial matters, (2) review the institution's plan to maintain financial stability into the future, (3) determine if the institution is able to demonstrate compliance with financial Accreditation

Standards, TRACS policies and procedures and / or any applicable Federal Regulations. ~~or if monitoring (see definition for Monitoring) or other actions are merited and/or to offer such support and advice as may be helpful to the institution.~~

Institutions undergoing an ISRF are automatically considered under Financial Monitoring. Financial Monitoring is not considered a Sanction as defined in TRACS policy BP211, and is therefore not a public action requiring public, Department of Education, or other agency notification.

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

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

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

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

BP211 - Sanctions and Adverse Action

Reference: §602.18 (d) and §602.20

Adoption Date: June 2000

Last Revision Date: June 2024

The Transnational Association of Christian Colleges and Schools (TRACS) requires its member institutions to remain in and demonstrate compliance with the Accreditation Standards as detailed in the TRACS Accreditation Manual. Additionally, member institutions must comply with TRACS policies and procedures and with all applicable Federal Regulations. Institutions must provide compliance information, as requested, by TRACS staff and/or the Accreditation Commission in order to maintain membership. When an institution fails to comply with these requirements within the maximum allowable time period, the Accreditation Commission is required to take action against the institution in one of the ways defined in Section A of this policy.

A. Definitions

1. **Sanctions** – TRACS considers Warning, Probation, and Show Cause (listed in order of degree of non-compliance) to be Sanctions. Sanctions are public actions which may not be appealed.
2. **Adverse Action** - TRACS considers Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation of an institution to be synonymous Adverse Actions in that these actions all result in the loss of Candidacy or Accreditation. Adverse Actions are public actions which may be appealed according to TRACS policy BP219.

B. Methods for Determining Institutional Non-Compliance

1. **Evaluation Team or Focus Team Visit** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an Evaluation Team or Focus Team visit, are normally addressed according to the review and response processes described in TRACS policy BP305. The process described in BP305 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP305 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy (BP211) as deemed appropriate.
2. **Interim Fifth-Year Review** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an institution's participation in the Interim Fifth-Year Review (IFYR) process are normally addressed according to the review and response processes described in TRACS policy BP310. The process described in BP310 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP310 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy (BP211) as deemed appropriate.
3. **Annual Reporting** - Non-compliances with Accreditation Standards, TRACS policies and procedures and any applicable Federal Regulations which are discovered as a result of an institution's submission of an Annual Operational Report (AOR) or an

Annual Financial Report (AFR) are normally addressed according to the review and response processes described in TRACS policy BP203. The process described in BP203 includes the appropriate timelines for demonstrating compliance as described in Section C.2. of this policy. However, the review and response processes outlined in BP203 do not prevent the Accreditation Commission from taking any of the actions detailed in this policy as deemed appropriate.

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

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

C. Recommendations for Sanctions or Adverse Action

Sanctions - After receiving and reviewing the institution's response associated with the ISR / ISRF (Financial Monitoring) process, or as deemed appropriate by the Accreditation Commission, with any process described in Section B. 1, 2, and 3 of this policy (BP305, BP310 or BP203), the President of TRACS will make one of the following determinations:

1. If the President determines that the institution ~~is in~~ demonstrates compliance with the issues in question and that no follow-up action is required, within 30 days of this determination, the President of TRACS will send a written notice to the institution's Chief Executive Officer indicating the review has been completed and that no follow-up action is required. The President of TRACS will report on the review and determinations to the Accreditation Commission; however, the review and determinations will remain confidential. Should the compliance be considered marginal, the President may require continued staff monitoring to ensure on-going compliance. Such monitoring may require additional reporting.
2. If the President determines that the institution ~~is in non-compliance does not~~ demonstrate compliance with one or more of the TRACS Accreditation Standards, TRACS policies and procedures and / or any applicable Federal Regulations, the President of TRACS shall recommend that the Accreditation Commission, at its next regularly scheduled meeting, place the institution under the appropriate Sanction and thus require the institution to take necessary action to ~~bring itself into demonstrate~~ bring itself into demonstrate compliance with the agency's Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed. Institutions to be considered for Sanction by the Accreditation Commission shall be notified by the President of TRACS at least 30 days prior to the meeting where the action will be considered.

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

1. Twelve months, if the program, or the longest program offered by the institution, is less than one year in length.
2. Eighteen months, if the program, or the longest program offered by the institution, is at least one year, but less than two years, in length.
3. Two years, if the program, or the longest program offered by the institution, is at least two years in length.

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

The Accreditation Commission will review compliance progress by the institution under Sanction either (a) on an annual basis, or (b) at any meeting of the Accreditation Commission as deemed necessary. The institution will utilize the TRACS portal Compliance Report process for submitting compliance progress updates. Compliance Reports must be submitted by March 1 for Commission consideration at the April meeting, by September 1 for Commission consideration at the October meeting, or by a determined date for Commission consideration at any other meeting. [§602.18 (d)].

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

1. If the Accreditation Commission takes Adverse Action (Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation) against an institution, the institution will receive notification within 30 days of the action, detailing the Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations with which the institution is in non-compliance and will be informed of the option to file an appeal of the action according to TRACS policy BP219.
2. The Accreditation Commission may “... for good cause, extend the period for achieving compliance.” [§602.20(b)] Extensions granted under this provision will not be the normal procedure, and will not be used repeatedly, and may not extend beyond the term of recognition for the institution's accreditation status. If the Accreditation Commission grants an extension, the institution will receive notification within 30 days of the action, detailing the Accreditation Standard(s), TRACS policies and

procedures or any applicable Federal Regulations with which the institution remains in non-compliance and will be informed regarding the timeframe for the extension and the processes to be utilized by the institution for demonstrating compliance.

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

3. The Accreditation Commission may limit the Adverse Action to a particular program or to a particular Remote ~~Instructional~~ Location ~~(Branch Campus or Teaching Site)~~ (Instructional Site, Extension Site, Teaching Site, or Branch Campus) if it concludes that the noncompliance is limited to that particular program or location.
4. In imposing an Adverse Action, the Accreditation Commission may maintain the institution, program, or location's status long enough to enable the institution, program, or location to fulfill any Teach-Out Plan or Teach-Out Agreements in order to assist the current students in transferring or completing their course of study.

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

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

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

1. **The institution's non-compliance with the Accreditation Standards, or TRACS policies and procedures is relatively insignificant, does not involve any of the Accreditation Standards associated with an Institutional Eligibility Requirement, and does not rise to the level where the institution's ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.** - This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution will be able to correct within the timeframe allowable by federal regulations and which the institution has, or can reasonably obtain, the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on **Warning**.
2. **The institution's non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is significant and/or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and rises to the level where the institution's ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.** - This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the

Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution has, or can reasonably obtain, the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on **Probation**.

3. **The institution's non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is serious and / or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and immediately threatens the institution's ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution.** - This determination reflects a level of non-compliance which must be corrected by the institution and requires the imposition of a Sanction by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution may not have the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on **Show Cause**.
4. **The institution fails to demonstrate compliance with Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed for demonstrating compliance and the non-compliance is convincingly significant and / or concerns one or more of the Accreditation Standards associated with an Institutional Eligibility Requirement, and the institution's inability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is clear.** - This determination reflects a level of non-compliance which usually requires the imposition of **Adverse Action** by the Accreditation Commission. It is a level of non-compliance which, in the professional judgment of the members of the Accreditation Commission, the institution does not have the resources needed to correct.

E. Accreditation Commission Action

The Accreditation Commission may only act on a recommendation for a Sanction or Adverse Action when notification of the recommendation is received by the relevant institution at least 30 days prior to the Accreditation Commission's consideration of the recommendation. An exception to this 30 day requirement may occur when (1) the President of TRACS determines that an institution's non-compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations is substantively significant and immediately threatens the institution's ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution; or (2) the ISR/ISRF could not be completed in time to make the recommendation at least 30 days before the Accreditation Commission's meeting; and (3) the President of TRACS notifies the institution of the possibility of such a recommendation at least 30 days before the Accreditation Commission's meeting, and the President of TRACS makes the recommendation for adverse action at least 5 days before the Accreditation Commission's meeting.

When recommending that either a Sanction or Adverse Action be taken, the President of TRACS will provide all relevant information on the institution to the Accreditation Commission at least 30 days in advance of the meeting where the recommended action is to be considered. The Accreditation Commissions will review the information related to the recommended action to determine if the recommendation of the President of TRACS is appropriate. The President of TRACS may require a staff visit to the institution to gather additional information which may be needed to prepare the report for the Accreditation Commission's review.

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

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

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

The Accreditation Commission can only impose a Sanction or Adverse Action against a member institution when a quorum of Commissioners is present and when at least fifty-one percent of the members present at the meeting affirmatively vote to take the action. The Accreditation Commission or the President of TRACS may require staff, Focus Team, or Evaluation Team visits to any institution against which the Accreditation Commission has imposed either a Sanction or Adverse Action.

At each regular meeting of the Accreditation Commission, the President of TRACS will report on each institution against which the Accreditation Commission has previously taken action in cases where that action has not been removed. The report will include a summary of any actions the institution has taken to correct its deficiencies and come into compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations. The President of TRACS may include any other relevant information, including

a recommendation that the Accreditation Commission remove the previously imposed action against the institution. If the Accreditation Commission determines, at any time, that an institution is in compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations the Accreditation Commission, on its own initiative and without a recommendation from the President of TRACS, may remove the institution from previously imposed action.

F. Institutions Seeking Accreditation or Reaffirmation of Accreditation

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

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

G. Implications of Sanctions and Adverse Action

Institutions placed on Sanction or Adverse Action will be so identified on the TRACS website. In addition, any person inquiring about the accreditation status of an institution on Sanction or Adverse Action will be informed of the status. Further, the institution must disclose the fact that it was placed on Sanction or Adverse Action to current and prospective students within seven days of receiving notification of the action and must accurately present this status in all publications and communications including the institution's website no more than 30 days after the action becomes final.

1. Warning

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

- iii. Take Adverse Action against the institution.

2. Probation

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

3. Show Cause

- a. Institutions required to Show Cause must submit a written report to the TRACS office which provides all of the institution's reasons that the Accreditation Commission should not take Adverse Action resulting in the termination of its accreditation. This report is required in addition to any other report(s) specifically required by the Accreditation Commission. The Accreditation Commission may interpret a failure to submit this report on time as an indication that the institution acknowledges its non-compliance with the issues in question. The report must:
 - i. Address all of the actions it has taken to remedy its deficiencies and demonstrate compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations;
 - ii. Include a Teach-Out Plan which meets the requirements of TRACS Policies BP222 and BP224; and
 - iii. Be received within 60 days of the day the official notice of the Show Cause action is received by the institution.
- b. If, after staff review of the report and supporting documentation, it is determined that the institution has demonstrated compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to place the institution under Show Cause, the Accreditation Commission shall remove all action against the institution.
- c. If, after staff review of the report and supporting documentation, it is determined that the institution has not demonstrated compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations before the first regular meeting of the Accreditation Commission following the

meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission will either:

- i. Take Adverse Action against the institution; or
- ii. Place the institution under the appropriate level of Sanction in extenuating cases where significant progress has been made toward correcting the identified deficiencies.
 - 1) This can only be granted one time.
 - 2) The total amount of time granted to the institution for demonstrating compliance may not exceed the maximum timeframe allowed.

4. **Adverse Action**

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

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

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

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

H. Notification of Commission Action

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

In all notifications, TRACS will specify the basis for the decision to impose the action.

If the Accreditation Commission takes an Adverse Action (denial, withdrawal, suspension, revocation, or termination of Accreditation or Candidacy) against an institution, the institution is required to disclose the decision to current and prospective students within seven business days of receipt of the Commission's decision

Within 60 days of the decision TRACS will provide a brief statement summarizing the reasons for the Commission's decision and any official comments provided by the institution with regard to the decision or evidence that the institution was provided with the opportunity to provide official comment.

I. Appeals

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

J. Final Disposition

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

K. Final Notification of Disposition

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

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

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

L. Institutional Comments Regarding an Adverse Action

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

M. Time Allowed for Notifications and / or Responses

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

N. Means of Notification, Responses, and Comments

The President of TRACS may notify an institution on any matter noted in this policy by either electronic or hard copy means. Any hard copy notice that the President of TRACS sends to an institution shall be sent by any service which requires a signature at the time of delivery. The earlier of the dates of the electronic notification or when any representative of the institution signs accepting delivery of the written notice is deemed to be the date of notification.

The institution may submit responses and / or comments by either electronic or hard copy means. Any hard copy notice that the institution sends to TRACS shall be sent by any service which requires a signature at the time of delivery. The earlier of the dates of the electronic notification or when any representative of TRACS signs accepting delivery of the written notice is deemed to be the date of submission.

BP214 - Lapse of Candidacy or Accreditation

Reference: §602.18, §602.20, §602.26 (f)(1-2)

Adoption Date: June 2000

Last Revision Date: June 2024

An institution which is recognized as a Candidate or Accredited institution must actively pursue accreditation or reaffirmation of accreditation at specified intervals. If an institution so recognized (1) does not act in a timely manner to complete the tasks required for pursuing accreditation or reaffirmation of its accreditation, or (2) is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution's period of recognition expires; the President of TRACS shall inform the Accreditation Commission that the institution has either chosen not to pursue accreditation or reaffirmation of its accreditation or that the institution is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution's period of recognition expires.

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

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

1. Grant the institution a specified additional amount of time to complete the tasks necessary to actively pursue accreditation or reaffirmation of accreditation. The Accreditation Commission may only take this action if the institution provides a full explanation concerning its inability to move forward in the accreditation or reaffirmation process in the timeframe required.
2. Terminate the institution's candidacy or accreditation as of the date the institution's recognition is scheduled to expire.

When considering whether to take one of the actions noted above, the Commission may consider the factors which may have contributed to institutional non-compliance specified in TRACS policy BP313 – Good Cause Extensions. (if BP313 is adopted)

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

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

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

Notification that an institution has allowed its Candidacy or Accreditation to lapse shall be provided in writing to the U.S. Secretary of Education and other appropriate governmental and accrediting agencies no more than 10 days from the date TRACS determines that the institution's Candidacy or Accreditation has lapsed.

BP215 - Decisions of Governmental or Other Accrediting Agencies

Reference: 34 CFR §602.28 and 34 CFR §600.11 (a)-(b)
Adoption Date: June 2000
Last Revision Date: June 2024

1. TRACS staff will not consider an institution for Applicant status and the Accreditation Commission will not consider an institution for Candidacy (pre-accreditation), Accreditation, or Reaffirmation of Accreditation if that institution:
 - a. Is the subject of a pending or final action by a governmental agency to suspend, revoke, withdraw, or terminate the institution's legal authority to provide postsecondary education; or
 - b. Is the subject of a pending or final action by another recognized accrediting agency to terminate the institution's accreditation or pre-accreditation; or
 - c. Has been denied pre-accreditation or accreditation by a recognized accrediting agency; or
 - d. Has been placed on any sanction (as defined in TRACS Policy BP211) by a recognized accrediting agency.
2. For any situation in Item 1, the Accreditation Commission may:
 - a. Grant an extension of time for its regularly scheduled action to consider awarding Candidacy, Accreditation, or Reaffirmation of Accreditation for a period of time not to exceed ~~the allowable term for the status under consideration; or the first regular meeting of the Accreditation Commission following notice of the finality of the relevant decision, even if the extension means that the institution's status is maintained for a longer period than would otherwise be allowed (5 years for Candidate and initially Accredited institutions and 10 years for Reaffirmation of Accreditation); or~~
 - b. Grant an institution that was accredited by another recognized agency, and whose accreditation has been terminated by that agency, the opportunity to apply to TRACS no sooner than 12 months after the termination action is imposed by the agency. In such cases, the TRACS Accreditation Commission cannot take action regarding Candidacy prior to 24 months following the termination action; or
 - c. Terminate the institution's Candidacy or Accreditation; or
 - d. Grant Candidacy, Accreditation, or Reaffirmation of Accreditation, but only if it provides to the U.S. Secretary of Education, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards and policies, why the action of the other recognized accrediting agency does not preclude TRACS from granting Candidacy, Accreditation, or Reaffirmation of Accreditation; or
 - e. Allow an application from an institution that has been granted approval by the U.S. Department of Education for a change of accreditors or for accreditation by more than one agency.
 - f. Accept any alternate recommendation presented by the President of TRACS.
3. If TRACS learns that a member institution is the subject of an adverse action by another recognized accrediting agency or has been placed on any sanction by another recognized agency, TRACS will promptly review that institution's accreditation status.
4. For any situation in Item 3, the Accreditation Commission shall:
 - a. Place the institution on Warning or Probation; or

- b. Require the institution to Show Cause as to why its Accreditation should not be terminated; or
 - c. Continue the institution's Candidacy (not to exceed the allowable 5 year term for Candidate institutions) or Accreditation ~~(the with written rationale for this option will be~~ provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified); or
 - d. Accept any alternate recommendation presented by the President of TRACS ~~(the with written rationale for this option will be~~ provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified).
5. If an institution loses governmental authorization to operate, the President of TRACS shall recommend that the Accreditation Commission, at its next scheduled meeting, terminate the institution's Candidacy or Accreditation.
6. For any situation in Item 5, the Accreditation Commission shall:
- a. Terminate the institution's Candidacy or Accreditation, which is a public action; or
 - b. Continue the institution's Candidacy (not to exceed the allowable 5 year term for Candidate institutions) or Accreditation ~~(the with written rationale for this option will be~~ provided to the U.S. Secretary of Education and the relevant governmental agency at the same time the institution is notified).
7. Institutions which are pre-accredited or accredited by another recognized accrediting agency will submit to TRACS, within 60 days of receipt, copies of the final visiting team report and any findings of non-compliance identified by the other agency. Institutions will be considered out of compliance with any TRACS standard which is equivalent to the other agency's standards with which the institution was found out of compliance. Such determinations will result in an Institutional Staff Review (ISR) per TRACS Policy BP207, with final compliance with any standard(s) in question determined by the Accreditation Commission.

BP219 - Appeals

Reference: 34 CFR 602.15

Adoption Date: June 2000

Last Revision Date: ~~April~~ October 2025

An appeal is defined as a request for an independent reconsideration of an Adverse Action (as defined in TRACS Policy *BP211*) of the Accreditation Commission. An institution may make only one appeal to such Adverse Actions. Sanctions (as defined in TRACS Policy *BP211*) are not appealable. When the Accreditation Commission takes an Adverse Action against an institution, the President of TRACS shall include a copy of this policy with the written notification of the Accreditation Commission's action. Throughout the appeal process, the institution filing the appeal bears the burden of proof.

A. Grounds for an Appeal

1. An institution may base its appeal on grounds that the action of the Accreditation Commission was:
 - a. Based on misinformation;
 - b. Based on factual error;
 - c. Based on bias;
 - d. Arbitrary;
 - e. The result of the Accreditation Commission's failure to follow its published procedures; or
 - f. Based solely on financial information and the institution is able to produce verified information that the financial problems which led to the adverse action have been corrected
2. An appeal based on a ground not identified under item 1 above will not be considered.

B. Filing an Appeal

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

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

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

C. Composition of the Appeal Committee

Upon the receipt of an appropriately filed appeal, the President of TRACS shall assemble an Appeal Committee (process described in section D of this policy) to hear and render a decision regarding the appeal. An Appeal Committee shall consist of five members, with at least one member of the Committee from each of the following categories: (1) an administrator from either a member or non-member institution (2) a faculty member from either a member or non-member institution, and (3) a representative of the public.

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

Current members of the Accreditation Commission may not serve on an Appeal Committee.

D. Process for the Selection of Appeal Committee Members

1. Within fourteen days of the date TRACS receives a notice of appeal, the President of TRACS shall identify at least six individuals from the TRACS Peer Evaluator Pool as potential administrative and/or faculty Appeal Committee members, and at least three individuals representing the public as potential public representative Appeal Committee members, to evaluate (see point 3 below) for potential service on the Appeal Committee. As existing members of the Peer Evaluator Pool, potential administrative and faculty members of the Appeal Committee will already have current resumes on file with TRACS. Any individual representing the public proposed for service on an Appeal Committee will be required to have a current resume on file with TRACS before being seated on an Appeal Committee. Any individual listed in the Peer Evaluator Pool who is not affiliated with a TRACS member institution, and is therefore a member of the public, may be called upon to serve on an Appeal Committee. Additionally, through its connections with other organizations which are not affiliated with TRACS or any of its member institutions, TRACS may contact other qualified members of the public to serve as a Public Representative on an Appeal Committee. Any member of the public who is not listed in the Peer Evaluator Pool who is seated on an Appeal Committee will be oriented concerning the appeal process as a part of the training provided to the Appeal Committee.
2. These potential Appeal Committee members will then be evaluated by the President of TRACS, based on the criteria specified on the *Potential Appeal Committee Review Form*, to ensure that the potential Appeal Committee roster meets the composition and qualifications requirements for Appeal Committees outlined in this policy.
3. Following this evaluation process, the President of TRACS will contact at least six individuals (more if deemed appropriate) identified as potential Appeal Committee

members to determine their willingness to serve as member of the Appeal Committee. This list of individuals must include at least two specified as administrators, two specified as faculty members, and two specified as public representatives.

4. Once at least six individuals in the appropriate categories have consented to serve on the Appeal Committee, the President of TRACS shall forward to the institution the names of six individuals as potential Appeal Committee members. This list of individuals shall include two specified as administrators, two specified as faculty members, and two specified as public representatives.
5. Once the list of potential Appeal Committee members is submitted to the institution, the institution will submit a *Conflict of Interest Form* regarding the potential roster for service on the Appeal Committee.
6. The President of TRACS shall review any request noted on the institution's *Conflict of Interest Form* to exclude a proposed member of the Appeal Committee and evaluate that request against the TRACS conflict of interest policy, BP113 - Conflicts of Interest.
 - a. If the President of TRACS accepts the institution's request to exclude a potential member, that person will not serve on the Appeal Committee.
 - b. If at least five potential qualified members remain, the President of TRACS shall select the five who will serve on the Appeal Committee and appoint a Chair from among those members.
 - c. If fewer than five potential qualified members remain, the President of TRACS shall identify additional potential members of the Appeal Committee and present those potential members to the institution for consideration.
 - d. The procedures detailed above will be used with additional potential members of the Appeal Committee
 - e. The President of TRACS shall follow the procedures in this section until there are five members of the Appeal Committee, including at least one member who represents the public, one member who is a faculty member, and one who is an administrator.
 - f. If the President of TRACS does not honor an institution's request to exclude a potential member of the Appeal Committee, the President of TRACS shall provide a written explanation for that decision to the institution. Such a decision is not appealable.
7. Once the Appeal Committee roster has been finalized, the selected Appeal Committee members will be notified and required to complete and submit a *Conflict of Interest Form* specific to their service on the Appeal Committee.
8. The members of the Appeal Committee shall receive detailed training specific to the appeal before the appeal process begins. This training includes information regarding this TRACS appeal policy, appeal hearing procedures, applicable TRACS Accreditation Standards, conflicts of interest, confidentiality, and the role of a member of an Appeal Committee. All Appeal Committee members will sign and submit an *Appeal Committee Training Verification Form* after the training is complete and before hearing the appeal. This form is used to verify that the Appeal Committee member has participated in the training, that he / she agrees to serve on the Appeal Committee, that he / she is doing so without a conflict of interest, and that he / she will abide by confidentiality expectations.

E. Institutional Documentation

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

F. Time and Location of Meeting with the Appeal Committee

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

G. Procedures of Appeal Committees

1. The Chair of the Appeal Committee shall preside at the meeting of the Appeal Committee and make rulings regarding time limits, admissibility of evidence, and procedural matters.
2. Appeal Committee meetings are closed to the public.
3. The institution may have no more than six individuals present, one of whom is the Chief Executive Officer or his/her designee, and all who are present must be able to speak to the grounds for the appeal. No consultants may be present.
4. The institution may be represented by counsel and counsel may participate in the institution's presentation.
5. TRACS may have no more than six individuals present, other than the members of the Appeal Committee, and all who are present must be able to speak to the grounds for the adverse action.
6. TRACS may be represented by counsel and counsel may participate in TRACS presentation.
7. Presentations:
 - a. The institution will make a presentation of no more than one hour and will be heard first followed by questions from the Appeal Committee.
 - b. TRACS will make a presentation of no more than one hour followed by questions from the Appeal Committee.
 - c. Counsel for the institution or TRACS may present or assist in the presentations.

- d. Only the representatives of the institution are to be present in the hearing during the institution's presentation and only TRACS representatives are to be present in the hearing during the presentation by TRACS.
- 8. Appeals are administrative hearings and thus not subject to the rules of evidence and procedure.
- 9. The institution may not challenge the competency of members of the Appeal Committee.
- 10. Only members of the Appeal Committee may ask questions.
- 11. The Appeal Committee will record the proceedings when the institution is present, but not during its proceedings with TRACS or during its consideration and discussions regarding evidence and not when voting. The institution may request a copy of the recorded proceedings, with any cost associated with the request included in its costs for filing the appeal.

H. Decision of the Appeal Committee

- 1. The Appeal Committee shall consider the evidence presented after the representatives of the institution and TRACS have been excused.
- 2. The Appeal Committee shall review the evidence of the institution's compliance with TRACS Standards as of the time the Accreditation Commission imposed the Adverse Action and any evidence that the institution has come into compliance TRACS Standards up to the deadline for submission of institutional documentation.
- 3. The Appeal Committee shall give no weight to evidence which demonstrates partial compliance with TRACS Standards, or which indicates that compliance may occur after the deadline for submission of institutional documentation.
- 4. All decisions made by the Appeal Committee shall be reached by majority vote of its members and shall be reflected on the *Appeal Committee Decision Form*.
- 5. If the Appeal Committee finds the institution has not demonstrated, as appropriate to the appeal, that the action of the Accreditation Commission was based on the reason(s) cited in the appeal, the Appeal Committee shall affirm the decision of the Accreditation Commission.
- 6. If the Appeal Committee finds the institution has demonstrated, as appropriate to the appeal, that the action of the Accreditation Commission was based on the reason(s) cited in the appeal, the Appeal Committee shall reverse or amend the decision of the Accreditation Commission or remand-revert the adverse action matter to the Accreditation Commission. In such cases, an applicant institution which was denied Candidate status by the Accreditation Commission must be found to be in compliance with all Institutional Eligibility Requirements (IERs) if the Appeals Committee chooses to amend or reverse the decision of when the matter is reconsidered by the Accreditation Commission.
- 7. If the Appeal Committee, based on the information available, determines that it is unable to affirm, reverse, or amend the decision of the Accreditation Commission or that an Applicant institution is not in compliance with all IERs, it shall remand-revert the decision-matter to the Accreditation Commission for further consideration. In doing so, the Appeal Committee shall identify specific issues that the Accreditation Commission must-should consider.
- 8. The Appeal Committee shall forward its decision regarding the appeal to the President of TRACS, the institution's Chief Executive Officer, and the Chair of the institution's governing board who will notify the institution in writing within fourteen

days of the date of the hearing providing the result of the appeal and the basis for that result. This notice shall be sent by electronic means, express mail or its equivalent.

I. Effect of the Appeal Committee's Decision and Arbitration Option

1. If the Appeal Committee affirms the adverse action decision of the Accreditation Commission, an arbitration process is available to institutions that seek to contest such a decision by the Appeal Committee. TRACS Policy BP221 – *Arbitration* describes the arbitration process. Institutions desiring to contest a decision made by an Appeal Committee (by arbitration) must notify TRACS within thirty days of the Appeal Committee's decision, otherwise, the decision of the Appeal Committee shall become final at the end of the thirty day period.

~~2. If the Appeal Committee reverses the adverse action decision of the Accreditation Commission, the institution shall maintain the accreditation status held by the institution before the Adverse Action was imposed by the Accreditation Commission.~~

- ~~3. If the Appeal Committee amends the adverse action decision of the Accreditation Commission, the Accreditation Commission shall act on the decision at its first meeting following the notice of amendment and apply the amended adverse action as of the date of that meeting.~~

- ~~4.2. If the Appeal Committee remands-reverts the adverse action decision of the Accreditation Commission back matter~~ to the Accreditation Commission for further consideration, the Accreditation Commission shall consider the specific issues identified by the Appeal Committee at its first meeting following the notice of ~~remand~~ reversion. The Accreditation Commission shall then appropriately notify the institution of its final decision regarding the institution's status.

- ~~5.3.~~ Once the appeal and any possible Arbitration processes are concluded, the decision of the Appeal Committee or Arbitration Panel (if applicable) is final and not subject to further appeal or arbitration (except as allowed under J. Appeal due to new financial information (below)).

- ~~6.4.~~ The Accreditation Commission shall act in a manner which is consistent with the decision of the Appeal Committee or Arbitration Panel (if applicable).

J. Appeal due to New Financial Information

1. An institution or program may, before the Commission reaches a final adverse action decision, seek review of new financial information if all of the following conditions are met:

- a. The financial information was unavailable to the institution or program until after the decision subject to appeal was made.
- b. The financial information is significant and bears materially on the financial deficiencies identified by the agency.
- c. Information is deemed significant and material if it meets these criteria:
 - i. A subsequent Certified Audit that reports a positive change in Total Net Assets (not-for profit) or Total Equity (proprietary)
 - ii. A subsequent Certified Audit that supports a Financial Responsibility Composite Score of 1.5 or greater.
- d. The only remaining deficiency cited by the agency in support of a final adverse action decision is the institution's or program's failure to meet an agency standard pertaining to finances.

2. An institution or program may seek the review of new financial information described in J.1.c only once any determination by the Commission made with respect to that review does not provide a basis for an appeal.

J.K. Costs of an Appeal

1. If TRACS' costs of the appeal exceed the \$15,000 fee paid by the institution, TRACS shall provide the institution with a statement of the amount of the additional costs. The institution is to pay these costs within thirty days of receiving the statement.
2. The institution shall be responsible for its own costs associated with the appeal.

K.L. Withdrawal of Appeal.

1. An institution may withdraw its request for an appeal at any time up to the start of the appeal hearing.
1. The institution's governing board must authorize such a request.
2. If the institution withdraws its request after the fourteen-day limit for filing an appeal has passed, the institution will not be able to refile the appeal and the Adverse Action being appealed will continue in force as a final decision with the effective date being the date of the written notice withdrawing the appeal.
3. If the institution withdraws its appeal, it will be liable for any expenses already incurred by TRACS for the process to that point.

L.M. Computation of Time

1. The counting of days begins on the day after the triggering event.
2. If the last day allowed for a response is a Saturday, Sunday, or legal holiday, the next business day will be deemed to be the last day.

M.N. Notifications

1. Any notice that the TRACS President sends to an institution regarding an appeal shall be sent either electronically with response requested or by any delivery method that requires a signature upon delivery.
2. The date any representative of the institution acknowledges receipt of the notice is deemed to be the date of notification.
3. Institutional replies should be sent either electronically with response requested or by any delivery method that requires a signature upon delivery.
4. The date a representative of TRACS acknowledges receipt of the institution's response shall be deemed the date of receipt.

N.O. Institutional Status During Appeal and Public Notice

1. During the appeal, the appealing institution shall maintain the status it held with TRACS prior to the Adverse Action.
2. Inquiries regarding the accreditation status of an institution which has filed an appeal shall be answered by explaining the Adverse Action the Accreditation Commission took against the institution and that the institution is appealing that action.
3. Public notice of an Adverse Action, in accordance with TRACS policy, shall be made once an appeal is withdrawn or the Appeal Committee has issued its decision or arbitration is finalized.

BP221 – Arbitration / Litigation

Reference: 20 U.S.C. §1099b(e), 34 C.F.R. §602.20(e), and Federal Arbitration Act, , 9 U.S.C. §§1-16
Adoption Date: April 2010
Last Revision Date: April 2024

The Arbitration Policy of the Transnational Association of Christian Colleges and Schools (TRACS or the Commission) shall apply only to final decisions rendered by an Appeal Committee pursuant to TRACS policy BP219 Appeals. TRACS desires to ensure fair and expeditious procedures for an institution to submit disputes regarding adverse actions prior to the taking of any legal action.

As a condition of applying for initial accreditation (Candidate status) and for continued membership with TRACS, all Candidate or member institutions consent to resolving disputes regarding unfavorable decisions rendered by an Appeal Committee in accordance with the arbitration process set forth in this policy as required by 20 U.S.C. §1099b(e) and 34 C.F.R. §602.20(e).

TRACS will inform all institutions subject to this policy of its requirements and their consent as a condition of accreditation.

A. Arbitration and Governing Law

1. Governing Law: The arbitration process in this policy is governed by the Federal Arbitration Act, , 9 U.S.C. §§1-16 (Act). This will be deemed to preempt any State arbitration provisions that may otherwise be applicable.
2. Jurisdiction: The arbitrators shall have jurisdiction to determine whether the decision of an Appeal Committee was rightly decided. The arbitrators will have no authority to award monetary damages.
3. Decisions: All decisions of the arbitrators shall be by majority vote.

B. Arbitration Process

1. Institutions desiring to contest a decision made by an Appeal Committee (by arbitration) must notify TRACS within thirty days of the Appeal Committee's decision, otherwise, the decision of the Appeal Committee shall become final at the end of the thirty day period.
2. As a member of the *Council for Higher Education Accreditation* (CHEA), when arbitration is required, TRACS shall utilize the CHEA Arbitration Program that is available to all CHEA member agencies. Institutions not desiring to utilize the CHEA arbitration process may propose an alternative arbitration method acceptable to TRACS and consistent with federal regulations.
3. The CHEA Arbitration Program is an impartial, non-binding, process with trained arbitrators to facilitate non-binding arbitration between institutions of higher education and recognized postsecondary accrediting organizations, consistent with federal law and regulation. The arbitration is designed to address and resolve disputes regarding adverse final accreditation decisions.
4. Any discrepancies in the notification deadlines associated with the CHEA arbitration process, and those prescribed in TRACS policy shall default to those prescribed by the CHEA arbitration process.

5. The CHEA Arbitration Program, including the arbitration process and requirements for all parties involved, is described on the CHEA website. - <https://www.chea.org/cheaarbitration-program>

C. Financial Obligations Related to Litigation

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

BP224 – Teach Out Plans

Reference: §487(c)(1)(F), §602.23(f)(1)ii, §668.162(c), §668.162(d)(2)

Adoption Date: June 2000

Last Revision Date: June 2024

A Teach-Out Plan is Required When:

1. The U.S. Secretary of Education notifies TRACS that the U.S. Secretary of Education has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required.
2. The US Secretary of Education notifies TRACS that the institution is participating in title IV, HEA programs under a provisional program participation agreement and the Secretary has required a teach-out plan as a condition of participation.
3. The US Secretary of Education notifies TRACS of a determination by the institution's independent auditor expressing doubt about the institution's ability to operate as a going concern or indicating an adverse opinion or a finding of material weakness related to financial stability.
4. The US Secretary of Education notifies TRACS that it has placed the institution on the reimbursement payment method under 34 CFR 668.162(c) or the heightened cash monitoring (HCM2) payment method requiring the Secretary's review of the institution's supporting documentation under 34 CFR 668.162(d)(2).
5. TRACS places the institution on Probation or requires an institution to Show Cause why its accreditation or pre-accreditation should not be terminated.
6. TRACS takes any action against the institution which has the effect of suspending its accreditation or pre-accreditation.
7. The institution notifies TRACS that it intends to cease operations entirely or close a remote instructional site (Teaching Site or Branch Campus) that provides one hundred percent of at least one program, including if the location is being moved and is considered by the U.S. Secretary of Education to be a closed school.
8. The institution notifies TRACS that it intends to close a program.
9. A State licensing or authorizing agency notifies TRACS that an institution's license or legal authorization to provide an educational program has been or will be terminated.
10. An institution is granted initial Candidate (Preaccredited) status.

Guidelines for the Teach-Out Plan

1. The plan must be approved by the institution's governing board as demonstrated by Board meeting minutes or an official signed attestation statement from the Board Chair.
2. The plan must be detailed and consistent with applicable federal regulations. It must include how the institution will provide for all its instructional, student, financial, faculty, and operational obligations.
3. The plan must provide for the equitable treatment of all students.
 - a. Students are provided, without an increase in tuition or fees, all instruction promised by the institution, prior to its closing or the closure of a remote instructional site, but not delivered to the students because of the closing.

- b. The proposed teach-out institution is geographically proximate to the closed institution or remote instructional site, is accredited by an accrediting body recognized by the U.S. Secretary of Education, and can demonstrate compatibility of its program structure and scheduling to that of the closed institution.
- c. Should the plan require students to pay additional charges, those charges must be identified and the institution must provide notice of those charges to the students.
4. The plan must be backed by demonstrated adequate financing by the closing institution.
5. The plan must include a list of currently enrolled students and academic programs offered by the institution.
6. Although the institution ~~does~~ may not have to submit a Teach-Out Agreement, ~~if the Teach-Out Plan must demonstrate that it has identified~~ identify other institutions that offer similar programs and that could potentially enter into a Teach-Out agreement with the institution ~~which may enter into such an agreement.~~
7. The Teach-Out Plan must be submitted to TRACS for approval.
8. Teach-Out Plans that do not provide all required elements will not be approved by TRACS.

Additional Guidelines for the Teach-Out Plan for Candidate Institutions

1. The plan must be approved by the institution's governing board.
 2. The plan must be consistent with applicable federal regulations.
 3. The plan must be submitted and approved within six months of the initial granting of Candidate (preaccredited) status.
 4. The plan must ensure students completing the teach-out would meet curricular requirements for professional licensure or certification, if any.
 5. The plan must include a listing of academic programs offered by the institution.
 6. The plan must include the names of other institutions that offer similar programs and that could potentially enter into a teach-out agreement with the institution.
- Institutions must be geographically near the candidate institution or must offer sufficient opportunity via Distance Education to meet curricular requirements.

~~Required Elements and TRACS Review of the Teach-Out Plan~~

~~Teach Out Plans must include a list of currently enrolled students, academic programs offered by the institution, and the names of other institutions that offer similar programs and that could potentially enter into a teach-out agreement with the institution. Teach Out Plans that do not provide this information will not be approved by TRACS.~~

If TRACS approves a Teach-Out Plan that includes a program that is accredited by another recognized accrediting agency, TRACS will notify that accrediting agency of its approval. TRACS may require an institution to enter into a Teach-Out Agreement before approving the Teach-Out Plan.

Additional Restrictions

Irrespective of any Teach-Out plan or signed Teach-Out Agreement, the Accreditation Commission will not permit an institution to serve as a teach-out institution under the following conditions:

1. The institution is subject to any of the conditions under (A.) above;

2. The institution is under investigation, subject to an action, or being prosecuted for an issue related to academic quality, misrepresentation, fraud, or other severe matters by a law enforcement agency.

BP225 – Teach Out Agreements

Reference: § 602.24(c)(5)(6)((i-v) [§ 602.24\(c\)\(8\)](#)

Adoption Date: January 2011

Last Revision Date: ~~September 2025~~ [June 2024](#)

A Teach-Out Agreement is a formal written agreement with another institution of higher education which is accredited or pre-accredited by an agency recognized by the U.S. Secretary of Education.

When a Teach-Out Agreement is required

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

Guidelines for the Teach-Out Agreement

1. Requirements of the institution which is ceasing to operate or is closing a remote instructional site (Teaching Site or Branch Campus).
 - a. The agreement must be approved by the institution's Board.
 - b. The institution must devote sufficient resources to implement the agreement and provide for equitable treatment of all affected students.
2. Requirements of the teach-out institution.
 - a. The agreement must be approved by the institution's Board.
 - b. The institution must demonstrate that it has the necessary experience, resources, and support services to:
 - i. Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and
 - ii. Remain stable, carry out its mission, and meet all obligations to existing students; and
 - iii. Provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.
3. Required form and content of the agreement.
 - a. The agreement must be detailed.
 - b. The agreement must be consistent with applicable federal regulations.
- ~~4.~~ [The Teach-Out Agreement must be submitted to TRACS for approval.](#)
- ~~4.5.~~ [An institution may not enter into a Teach-Out agreement if that institution is subject to one or more of the stipulations under BP224.A or if this institution is under investigation, subject to an action, or being prosecuted for an issue related to academic quality, misrepresentation, fraud, or other severe matters by a law enforcement agency.](#)

TRACS Review of the Teach-Out Agreement

TRACS will approve a ~~T~~[Teach-Out](#) agreement only after reviewing the following and concluding that the agreement provides for the equitable treatment of students:

1. A comparison of the courses the students would need to take at the institution which is closing and the equivalent courses at the teach-out institution;
2. A comparison of the requirements the students would need to satisfy at the institution which is closing and what they will be required to satisfy at the teach-out institution;
3. If the institutions are not on the same system, e.g., semester, an explanation of any effect the change would have on students; and
4. Documentation that the teach-out institution has sufficient faculty, facilities, support staff, learning resources, and student support services to support the teach-out.
5. Copies of all notifications related to the institution's closure which accurately represent the student's ability to transfer credits.

Institutions that are closing must also include the following in its Teach Out Agreement:

1. A complete list of students currently enrolled in each program at the institution and the program requirements each student has completed;
2. A plan to provide all potentially eligible students with information about how to obtain a closed school discharge and, if applicable, information on State refund policies;
3. A record retention plan to be provided to all enrolled students that delineates the final disposition of teach-out records (e.g., student transcripts, billing, financial aid records);
4. Information on the number and types of credits the teach-out institution is willing to accept prior to the student's enrollment; and
5. A clear statement to students of the tuition and fees of the educational program and the number and types of credits that will be accepted by the teach-out institution.

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

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

BP226 - Institutional Changes

Reference: 34 CFR §602.22(a)(1), (b)(1), 34 C.F.R. §668.13; 34 CFR § 668.237
Adoption Date: June 2000
Last Revision Date: October ~~2024~~2025

An Institutional Change is defined as any modification (academic or non-academic) that has either been implemented (those requiring notification but not approval) or is being proposed for implementation (those requiring the approval of either the President of TRACS or the Accreditation Commission) by the institution that differs from the institution's current scope of recognition with TRACS. TRACS classifies institutional changes as either **Non-Substantive Changes** or **Substantive Changes**.

Non-Substantive Changes (Category 1) do not require approval prior to implementation but require notification to TRACS no later than 30 days after implementation.

Substantive Changes (Categories 2-4) require the approval of either the Accreditation Commission or the President of TRACS prior to implementation.

Thus, Institutional Changes fall into one of the following Categories:

- **Category 1** - Do not require approval prior to implementation but require notification to TRACS no later than 30 days after implementation.
- **Category 2** - Require (1) review by TRACS staff, (2) approval by either the Accreditation Commission or TRACS President, and (3) do not require a visit to the institution.
- **Category 3** - Require (1) review by TRACS staff, (2) approval by either the Accreditation Commission or TRACS President, and (3) a staff only visit (either on-site or virtual) to the institution.
- **Category 4** - Require (1) review by TRACS staff, (2) review by a Peer Evaluator(s), (3) approval by either the Accreditation Commission or TRACS President, and (4) a visit (either on-site or virtual) by TRACS staff and the Peer Evaluator(s) to the institution.

All Institutional Changes, whether Non-Substantive or Substantive, are submitted as an *Institutional Change Form* (ICF) on the TRACS portal. Each institutional change, whether Non-Substantive or Substantive, must be submitted on a single ICF.

Candidate institutions may only submit Non-Substantive Change notifications. Accredited institutions may submit both Non-Substantive and Substantive Change proposals.

Substantive Changes requiring approval of the Accreditation Commission are marked with an "*" next to the category number. For a Substantive Change proposal requiring the approval of the Accreditation Commission to be considered at a spring Accreditation Commission meeting, the proposal, all required visits, and subsequent institutional responses must be completed by March 1st. For a Substantive Change proposal requiring the approval of the Accreditation Commission to be considered at a fall Accreditation Commission meeting, the proposal, all required visits, and subsequent institutional

responses must be completed by September 1st.

Substantive Changes that require approval by the President of TRACS will be considered as soon as practical following the receipt of the ICF, all required documentation, all required visits, and the opportunity for staff to review all documentation and submit a recommendation to the President of TRACS.

The effective date of an approved Substantive Change will be the date of the Commission or Presidential approval. TRACS will appropriately notify the institution following the decision of the Commission or the President. No institutional change will be approved retroactively, except that the effective date for a change in institutional ownership will be the date the actual change in ownership took place only if the accreditation decision is made within 30 days of the change in ownership.

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

Because proposed Institutional Changes are time sensitive:

- An Institutional Change Form (ICF) that has been initiated by the institution and remains in an "Unsubmitted" status for 90 days will be expired by TRACS and will need to be re-initiated by the institution if so desired.
- A submitted ICF that is "Reverted" to the institution for additional documentation or clarification, may remain in that status for no more than six months. Within the six-month period, the institution must address the noted areas and resubmit the ICF. Upon resubmission, the institution should confirm the accuracy and currency of the information presented in the original ICF submission. "Reverted" ICFs that are not resubmitted within the six-month time period will automatically be "Denied" and will need to be re-initiated by the institution if so desired.
- All submitted ICFs must be completely processed within twelve months of the date the ICF was originally submitted. If an ICF has not been completed by the end of the twelve months, it will automatically be "Denied" and will need to be re-initiated by the institution if so desired.
- Denied ICF's may be resubmitted under current procedures and must include a new review fee as applicable.

Substantive Change proposals will not be considered for approval in the following cases:

1. For institutions that are under consideration for an Accreditation Commission imposed Sanction or Adverse Action at the time the proposal is to be considered.
2. For institutions under an Accreditation Commission imposed Sanction (Warning, Probation, or Show Cause) at the time the proposal is to be considered.
3. For institutions that have filed an unresolved appeal of an Adverse Action imposed by the Accreditation Commission at the time the proposal is to be considered.

In such cases, Substantive Change proposals will not be considered for approval until either:

1. A potential Sanction or Adverse Action is not imposed,
2. Any previously imposed Sanction is removed
3. The institution under Adverse Action completes a successful appeal of that action.

Even in such cases, Substantive Change proposals may be considered with prior approval from the President of TRACS or the Accreditation Commission.

Per 34 CFR §602.22 (b)(1), Distance Education may be considered for institutions that have been placed on any Sanction by TRACS over the prior three academic years or are under a provisional certification with the US Department of Education at the time of consideration for Distance Education approval.

Non-Substantive Changes (Category 1)

Category 1 - Do not require approval prior to implementation but require notification to TRACS no later than 30 days after implementation.

1.1 - Changes to total units required for graduation or program completion. (changes of 10% or more in undergraduate or 25% or more in graduate programs require submission of a 2.4 ICF)

1.2 - Changes to general education requirements.

1.3 - The addition or deletion of a non-degree granting Certificate embedded within an approved program. *Institutions offering only Diploma and/or Certificate programs are required to submit a Category 2.6 Institutional Change Form for the addition of any new Diploma or Certificate program.*

1.4 - A change of address that does not involve relocation of the institution or one of its Remote Locations.

1.5 - The addition or deletion of non-degree granting programs. *The addition of a Certificate program requires the submission of either a Category 1.3 notification or a Category 2.6 proposal.*

1.6 - The establishment of an Instructional Site: A location separate from the main campus of the institution which does not require specific authority to operate where courses offered on-site comprise less than 50 percent of all educational programs offered by the institution.

1.7 - The addition of Dual Enrolment courses as defined by TRACS Policy BP223.

1.8 - The placing of an approved academic program into abeyance / inactive status. *Programs placed in abeyance will require the approval of the President of TRACS before reinstatement.*

1.9 - The addition or deletion of an already approved educational program at an approved Remote Location.

1.10 *- Notification of an institutional change that was approved by another U.S. Department of Education recognized accrediting agency where TRACS does not serve as the institution's primary accreditor. The notification should include (a) a copy of the institutional change documentation submitted to the other agency and (b) verification that the institutional change has been approved by the other agency or that the institutional changes does not require the approval of the other agency. [Such notifications will be reviewed and authorized by the TRACS Accreditation Commission.](#)

1.11 - Notification of a change in the method of delivery for existing educational programs. *The method of delivery utilized by the institution must already be included in the institution's scope of recognition. Such notifications may require additional staff review. Institutions that have been placed on probation or equivalent status, have been subject to negative action by TRACS over the prior three academic years, or are under a provisional certification, as provided in 34 CFR 668.13, must receive prior approval from TRACS for a change in the method of delivery for existing educational programs.*

1.12 - Other as specified. *Institutions that have been placed on probation or equivalent status, have been subject to negative action by TRACS over the prior three academic years, or are under a provisional certification, as provided in 34 CFR 668.13, must receive prior approval from TRACS for certain non-specific notification only changes. Contact your TRACS staff representative for more information.*

Non-Substantive Change Procedures

1. Non-Substantive Change proposals (notifications) are submitted as an *Institutional Change Form (ICF)* on the TRACS portal.
2. Once the ICF is submitted, the TRACS staff assigned to the institution will review the submission to ensure completeness.
3. If additional information or clarifications are needed, the institution will be notified and provided the opportunity to respond with additional information and/or clarifications.
4. Once the ICF has been determined to be complete, the TRACS staff assigned to the institution will acknowledge receipt of the notification and make any necessary adjustment to the institution's scope of recognition with TRACS

Substantive Changes (Categories 2-4)

Category 2 - Require (1) review by TRACS staff, (2) approval by either the Accreditation Commission or TRACS President, and (3) do not require a visit to the institution.

Category 2 Proposals Requiring Commission Approval

2.1 *- Any change in the established Mission or Institutional Objectives including a name change related to these changes. *The rewording of the Mission or Institutional Objectives that does not change the actual content of the Mission or Institutional Objectives is*

not considered a change requiring approval but should be reported as a Non-Substantive change. This proposal may trigger a Comprehensive Evaluation. (See Note 1)

2.2 * - Any change in the legal status, form of control, or ownership of the institution including a name change related to these changes. *This proposal may trigger a Comprehensive Evaluation. (See Note 1)*

2.3 - A change in the way an institution measures student progress, including whether the institution measures progress in clock hours or credit hours, semesters, trimesters, or quarters, or uses time-based or non-time-based methods.

2.4 - A substantial increase or decrease (10 percent or more for undergraduate programs/25 percent or more for graduate and post-graduate programs) in the number of clock hours or credit hours or in the program content required for successful completion of a program, or an increase in the level of credential awarded, for successful completion of one or more programs.

2.5 - The entering into a contract (written agreement) with another institution or organization where the students at the TRACS accredited institution can earn more than 25 percent (but less than 50 percent) of the credit hours required for their academic program at the contracted institution, and the contracted institution is either unaccredited, accredited by an accrediting agency not recognized by the U.S. Secretary of Education or accredited by an accrediting agency which is recognized by the U.S. Secretary of Education but not certified to participate in Title IV, HEA programs.

Category 2 Proposals Requiring Presidential Approval

2.6 - The addition of programs at a degree or credential Category included in the institution's current scope of recognition that do not represent a significant departure from already approved educational programs, including the addition of a non-degree granting Certificate program that is not embedded within an already approved educational program.

2.7 - A change in the name of an approved educational program.

2.8 - The deletion of an approved educational program.

2.9 - The addition or deletion of a concentration/area of emphasis within an approved educational program. *A concentration/area of emphasis consists of 10 or more semester credit hours / 15 or more quarter hours where all the courses are within the same or a related field.*

2.10 - The change of the name of the institution not related to a 2.1 or 2.2 Substantive Change.

2.11 - The closure of an Institution or one of its Branch Campuses, Teaching Sites, or Extension Sites.

2.12 - The reinstatement of an academic program, including Distance Education, which had previously been placed in abeyance/inactive status.

2.13 - The establishment of an Extension Site: A location separate from the main campus of the institution which requires specific authority to operate where courses offered on-site comprise less than 50 percent of all educational programs offered by the institution.

2.14 - The initiation of a Pilot Project. *Institutions seeking to initiate any institutional change where such a change would be considered temporary and limited (relative to the scope of approval) in nature, may apply for approval of the proposed change as a Pilot Project. Approvals for Pilot Projects may be granted with the understanding that the approval will specify the scope of approval, including the date of expiration for the approval and any other limitations stipulated by the President of TRACS. (See Note 5)*

Category 3 - Require (1) review by TRACS staff, (2) approval by either the Accreditation Commission or TRACS President, and (3) a staff only visit (either on-site or virtual) to the institution.

Category 3 Proposals Requiring Commission Approval

3.1 - The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.

Category 3 Proposals Requiring Presidential Approval

3.2 *- The establishment of a Teaching Site - (a) An additional location of an institution that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of any educational program and may qualify as a Branch Campus, or (b) a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional facility where instruction is offered regardless of the percentage of instruction delivered on-site or through Distance Education. (For part a Teaching Sites, See the TRACS Definition of a Teaching Site, applicable TRACS Policy, and Note 4. / For part b Teaching Sites that will serve as a PEP location, see the TRACS Definition of a Teaching Site, applicable TRACS Policy, and Note 6.)

3.2

Category 3 Proposals Requiring Presidential Approval

3.3 - The change of the location of the Institution or one of its Branch Campuses or Teaching Sites.

Category 4 - Require (1) review by TRACS staff, (2) review by a Peer Evaluator(s), (3) approval by either the Accreditation Commission or TRACS President, and (4) a visit (either on-site or virtual) by TRACS staff and a Peer Evaluator(s) to the institution.

Formatted: Font: (Default) Book Antiqua

Formatted: Normal, Indent: Left: 0.81", No bullets or numbering

Formatted: Indent: Left: 1.07", No bullets or numbering

Category 4 Proposals Requiring Commission Approval

4.1 - The addition of programs that represent a significant departure from the programs that are included in the institution's current scope of recognition.

4.2 * - The addition of Level 1 Distance Education for course or program delivery where less than 50 percent of a program is offered via Distance Education, less than 50 percent of total students enrolled at the institution are enrolled in at least one Distance Education course, and less than 50 percent of all courses offered by the institution are offered via Distance Education. (See Note 2)

4.3 * - The addition of Level 2 Distance Education for course or program delivery where at least 50 percent of a program is offered via Distance Education, at least 50 percent of total students enrolled at the institution are enrolled in at least one Distance Education course, or at least 50 percent of all courses offered by the institution are offered via Distance Education. (See Note 2)

4.4 * - The addition of programs of study at a degree or credential Category different from that which is included in the institution's current scope of recognition. *This proposal may trigger a Comprehensive Evaluation.* (See Note 1)

4.5 * - The establishment of a Branch Campus - An additional location of an institution that is geographically apart from and independent of the main campus of the institution. TRACS considers a location of an institution to be independent of the main campus if the location (a) is permanent in nature; (b) offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (c) has its own faculty and administrative or supervisory organization; and (d) has its own budgetary and hiring authority. (See the TRACS Definition of a Branch Campus, applicable TRACS Policy, and Note 3.)

4.6 * - The acquisition of any other institution or any program or location of another institution.

4.64.7 * - The addition of a direct assessment program.

Substantive Change Procedures

1. Substantive Change proposals are submitted as an *Institutional Change Form* (ICF) on the TRACS portal and require payment of the associated fee at the time of submission. Once the ICF is submitted, the following verifications are completed:
 - a. The institution holds Accredited status. (Candidate institutions may not make Substantive Changes.)
 - b. The ICF has been fully completed.
 - c. Materials were received addressing all the *Prospectus Checklist* items identified for the particular type of Substantive Change proposed.
 - d. Determine if the Substantive Change proposal requires a Comprehensive Evaluation. (See Note 1)

Formatted: List Paragraph, Right: 0", No bullets or numbering

- e. Determine if a staff visit or Peer Evaluation / Focus Team visit is required.
2. TRACS Staff will complete a review of all documentation and communicate with the institution regarding any areas needing clarification and if the proposal requires a Comprehensive Review.
3. If a staff visit or Focus Team visit is required:
 - a. The institution will be notified whether the visit will be with staff only or with a Focus Team, and whether the visit will be conducted on-site or remotely, and will be informed concerning the areas to be reviewed during the visit.
 - b. If a Focus Team visit is required, the selection of the Peer Evaluator(s) will follow the procedures for Peer Evaluator selection outlined in the current *Policies and Procedures Manual*.
 - c. The staff visit or Focus Team visit will be scheduled as soon as practical.
 - d. A draft staff or Focus Team Report will be prepared regarding the areas reviewed during the visit.
 - e. The visit may conclude with an exit interview with selected members of the institution.
 - f. At the end of the exit interview or as soon thereafter as practical, the institution will be provided with a draft copy of the staff or Focus Team Report and an explanation of how to correct errors of fact in the report.
 - g. An official copy of the final staff or Focus Team Report will be posted to the ICF as an attachment to a comment.
 - h. The institution will have an opportunity to prepare a formal response to the determinations noted in the report via a TRACS initiated Compliance Report.
4. TRACS Staff will prepare a recommendation to the Accreditation Commission or TRACS President (as applicable) regarding the proposed Substantive Change once the review is complete. If the proposed Substantive Change requires a Comprehensive Evaluation of the institution, staff will include in the recommendation whether the Substantive Change should be approved prior to the Comprehensive Evaluation.
5. Staff will provide the Commission or the TRACS President with all documentation regarding the proposed Substantive Change.
6. When the proposed Substantive Change requires Commission approval, the institution will have the opportunity to make a presentation to the Commission at the time the proposal is considered if the appearance is deemed necessary or is requested by the institution. The institution's appearance should only address issues identified in the staff or Focus Team Report. If the institution provides the Commission with written materials at its appearance which cannot be considered fully during the Commission's deliberations, the Commission may defer action on the proposal until the next Commission meeting.
7. If the Substantive Change requires Commission approval, the Commission will consider the Substantive Change proposal at the first regular meeting following the completion of the staff review and recommendation.
8. If the documentation provided by the institution fully addresses the proposed Substantive Change, and, if after implementing the proposed change, the institution would remain in compliance with TRACS Standards, the Commission

or TRACS President will approve the proposed Substantive Change, and TRACS staff will make any appropriate adjustments to the institution's scope of recognition with TRACS.

9. If the documentation provided by the institution does not fully address the proposed Substantive Change, or, if after implementing the proposed change, it is not clear that the institution would remain in compliance with TRACS Standards, the Commission or the TRACS president may defer action on the proposed Substantive Change until such time as the institution is able to document that implementation of the proposed change would not place the institution out of compliance with TRACS Standards,
10. If the documentation provided by the institution fails to address the proposed Substantive Change, or, if the institution were to be approved to implement the proposed Substantive Change, the institution would not remain in compliance with TRACS Standards, the Commission or the TRACS President will deny the proposed Substantive Change. The institution will be informed of the denial as well as the basis of the Commission's decision to deny.
11. An institution may file a new Application for a Substantive Change that has been denied, but only after it has addressed the reasons cited for the denial.
12. An institution may appeal a decision to deny a proposed Substantive Change to the Commission or to the President of TRACS. The institution may only appeal if it can demonstrate that the Commission's or President's decision to deny was:
 - a. Based on misinformation;
 - b. Based on factual error;
 - c. Based on bias;
 - d. Arbitrary; or
 - e. The result of the Accreditation Commission's or President's failure to follow TRACS published procedures. The Commission or President of TRACS will only consider documentation provided by the institution during or prior to the time the proposal was denied. There is no charge to the institution for an appeal of denial of a Substantive Change.
13. TRACS Standards require approval of a Substantive Change before it is implemented. If the initiative proposed in a Substantive Change is implemented by the institution before Accreditation Commission or TRACS Presidential approval is granted, the Commission may consider whether or not to impose a sanction action against the institution without the requirement to follow the TRACS policy regarding such actions and without advance notice from the President of TRACS of such consideration.
14. In such cases, the institution must be prepared to explain why the initiative proposed in a Substantive Change was implemented without prior approval from the Accreditation Commission or TRACS President and should be prepared to respond to the Commission's possible consideration of sanctions.

Note 1: Substantive Changes That May Require a Comprehensive Evaluation

The following Substantive Changes or proposed Substantive Changes may require a Comprehensive Evaluation of the institution. A Comprehensive Evaluation consists of a focused Self-Study, the hosting of an Evaluation Team or Focus Team, and institutional

responses to any determinations noted in a report from the Evaluation Team or Focus Team.

1. Any change in the established mission or objectives of the institution. (2.1)
2. A change in ownership that results in a change of control. (2.2)
3. Any change from an undergraduate only institution (Categories I and II) or graduate only institution (Level III) to an institution offering both undergraduate and graduate programs (Categories I, II, and III) or the addition of doctoral programs for the first time (Category IV). (4.2)
4. A series of changes that would result in the institution becoming what is essentially a new and different institution than it was when the Accreditation Commission last acted on its accreditation.
 - a. Each request for a Substantive Change will be evaluated in conjunction with all of the Substantive Changes that have been approved for the institution since the last action of the Accreditation Commission on that institution's accreditation status (e.g., Accreditation granted, Accreditation reaffirmed, or removal from a sanction).
 - b. If the Accrediting Commission determines that the proposed Substantive Change and the prior approved Substantive Changes taken together appear to transform the institution to the extent that the institution is essentially a new institution from what it was at the last action of the Accreditation Commission, the institution must undergo a Comprehensive Evaluation.
 - c. After the Accreditation Commission determines that a Comprehensive Evaluation is required, the institution must complete the evaluation even if the institution withdraws its request for the proposed change.
 - d. In the institution's Self-Study as a part of the Comprehensive Evaluation, the institution must address specifically each of the Substantive Changes which have been approved since the last action of the Accreditation Commission on the institution's accreditation. The institution must include a narrative concerning the proposed Substantive Change which led to the decision to require a Comprehensive Evaluation, even if the proposal was not approved.

At its discretion, the Accreditation Commission may approve the proposed Substantive Change prior to the Comprehensive Evaluation process.

Note 2: Substantive Change Proposal for the Addition of Distance Education

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

Institutions desiring to initiate course and/or program delivery via Distance Education, whether Level 1 or Level 2, are required to complete and submit the appropriate

Institutional Change Form. Per 34 CFR §602.22 (b)(1), Distance Education may be considered for institutions that have been placed on any Sanction by TRACS over the prior three academic years or are under a provisional certification with the US Department of Education at the time of consideration for Distance Education approval. The institution's proposal will follow the procedures below.

1. The institution must address all specified Prospectus Checklist items.
2. Upon submission of the *Institutional Change Form* the proposal will be reviewed by TRACS staff for completeness.
3. Once the *Institutional Change Form* is submitted, a Focus Team visit (either virtual or in person) will be conducted. The Focus Team will consist of TRACS staff and at least one peer reviewer experienced in Distance Education.
4. Following the Focus Team visit, a Focus Team Report will be prepared including an analysis of the institution's proposal and Focus Team observations during the visit. The institution will have the opportunity to correct any errors of fact which may be contained in the report.
5. Once finalized, a copy of the Focus Team Report, along with a Compliance Report containing the Focus Team's Findings and Recommendations, will be submitted to the institution. The institution must respond to all Findings and Recommendations, utilizing the Compliance Report, by the date specified. Once the institution has submitted its responses to the Findings and Recommendations, all materials related to the proposal to add Distance Education will be forwarded to the Accreditation Commission for consideration at the next regularly scheduled meeting.
6. In its review, the Accreditation Commission will consider the institution's proposal, the Focus Team Report, the institution's written responses to the Findings and Recommendations, and the staff recommendation regarding the proposal.
7. If the Accreditation Commission grants approval for the institution to initiate Distance Education, such approval will allow the institution to begin such instruction within a time specified by the Accreditation Commission.

Note 3: Substantive Change Proposal for the Addition of a Branch Campus

A Branch Campus is an additional location of an institution that is geographically apart and independent of the main campus of the institution. TRACS considers a location of an institution to be independent of the main campus if the location (1) is permanent in nature; (2) offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (3) has its own faculty and administrative or supervisory organization; and (4) has its own budgetary and hiring authority. (34 CFR § 600.2)

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

1. An institution that is subject to any sanction will not be authorized to open a Branch Campus until the sanction has been removed.
2. An institution that undergoes a change in ownership resulting in a change of control as defined in 34 CFR §600.31 will not be authorized to open a Branch

Campus until the institution's business plan demonstrates that it will be in compliance with the Standards related to a Branch Campus.

3. When submitting an *Institutional Change Form* to add a Branch Campus, the proposal must address all prospectus checklist items designated.
4. Upon submission of the *Institutional Change Form*, the proposal will be reviewed by TRACS staff for completeness.
5. Once the *Institutional Change Form* is complete a Focus Team visit to the proposed Branch Campus will be conducted. The Focus Team will consist of TRACS staff and at least one peer reviewer well versed and experienced in matters related to the area(s) of review.
6. Following the Focus Team visit, a Focus Team Report will be prepared including an analysis of the institution's proposal and the Focus Team's observations during the visit. The institution will have the opportunity to correct any errors of fact which may be contained in the report.
7. Once finalized, a copy of the Focus Team Report, along with a Compliance Report containing the team's Determinations (Findings and Recommendations), will be submitted to the institution. The institution must respond to all Findings and Recommendations, utilizing the Compliance Report, by the date specified. Once the institution has submitted its responses to the Findings and Recommendations, all materials related to the proposal to add a Branch Campus will be forwarded to the Accreditation Commission for consideration at the next regularly scheduled meeting.
8. If the Accreditation Commission grants approval for the institution to open a Branch Campus, such approval will allow the institution to begin instruction at the Branch Campus within a time specified by the Accreditation Commission (not to exceed five years).
- 8.9. Upon approval by the Accreditation Commission, the institution must request Title IV funding approval by the Secretary of Education (via Federal Student Aid).
- 9.10. Within six months of courses commencing at the Branch Campus, TRACS will conduct a follow-up staff visit to the Branch Campus to verify that the Branch Campus maintains all of the required personnel, facilities, and resources. If the Branch Campus receives approval with conditions, staff will confirm that these conditions have been met at the follow-up visit. The institution will receive a draft copy of a follow-up staff report which may contain Findings and Recommendations. The institution will have the opportunity to correct any errors of fact which may be contained in the follow-up report before the report is finalized.
- 10.11. The institution will be required to submit Compliance Reports addressing any outstanding Determinations until any outstanding areas of non-compliance have been satisfactorily addressed.
- 11.12. As long as the Branch Campus remains in operation, it will be included in the institution's annual reporting data as well as in all subsequent reaffirmation processes.

Note 4: Substantive Change Proposal for the Addition of a Teaching Site

A *Teaching Site* (Additional Location) is defined as (a) An additional location of an institution that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of any educational program and may qualify as a Branch Campus, or (b) a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional facility where instruction is offered regardless of the percentage of instruction delivered on-site or through Distance Education. (34 CFR § 600.2)

Formatted: Indent: Left: 0"

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

1. An institution that is subject to any sanction will not be authorized to open a Teaching Site until the sanction has been removed.
2. An institution that undergoes a change in ownership resulting in a change of control as defined in 34 CFR §600.31 will not be authorized to open a Teaching Site until the institution's business plan demonstrates that it will be in compliance with the Standards related to a Teaching Site.
3. When submitting an *Institutional Change Form* to add a Teaching Site, the proposal must address all prospectus checklist items designated.
4. Upon submission of the *Institutional Change Form*, the proposal will be reviewed by TRACS staff for completeness.
5. For all proposed Teaching Sites, whether the location falls under category (a) or category (b) of the Teaching Site definition, a pre-approval staff visit may be required if (1) the institution has a total of three or fewer additional locations; or (2) the institution has not demonstrated, to TRACS' satisfaction, that the proposed Teaching Site meets all of the applicable TRACS Accreditation Standards. In any other case, a staff visit to the proposed Teaching Site may be required prior to approval as deemed appropriate by TRACS. If a pre-approval staff visit is required, the staff visit may also include a visit to the institution's main campus. In any case, a staff visit will be required within 6 months of approval of any teaching site.
- 5-6. Staff site visits will verify the site has the personnel, facilities, and resources the institution claims in the change form.
- 6-7. For proposed Teaching Sites that fall under category (a) of the Teaching Site definition, the stipulations in BP228 will apply.
- 7-8. For proposed Teaching Sites that fall under category (b) of the Teaching Site definition, whether or not the institution will seek approval for Prison Education Program (PEP) participation for such locations, the following stipulations apply:
 - a. Institution must declare whether or not the site will be submitted for PEP participation approval. The TRACS approval letter will indicate such status.
 - b. TRACS will evaluate the first additional proposed location where a potential PEP could be offered by a new method of delivery to ensure the institution's

ability to offer and implement the potential PEP and that the potential PEP meets the applicable TRACS accreditation Standards. [34 CFR § 668.237(b)(2)]

- c. TRACS staff will conduct a site visit at the first two locations as soon as practicable, which may include a pre-approval visit, but no later than six months after the institution initiates a Teaching Site potentially eligible for PEP participation. [34 CFR § 668.237(b)(3)]
- d. Teaching sites seeking designation as approved for PEP must meet the additional stipulations detailed in BP228.

~~8-9~~ If TRACS approves the request to operate a Teaching Site, that approval will allow the institution to begin instruction at the Teaching Site within a specified time which is not to exceed 1 year. A letter of notification of approval of the proposed Teaching Site will be mailed to the institution.

~~9-10~~ As long as the Teaching Site remains in operation, it will be included in the institution's annual reporting data as well as in all subsequent reaffirmation processes and will be reflected in the institution's scope of recognition with TRACS.

Note 5: Substantive Change Proposal for the Initiation of a Pilot Project

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

1. When submitting an *Institutional Change Form* to initiate a Pilot Project, the proposal must address all prospectus checklist items designated.
2. Upon submission of the *Institutional Change Form*, the proposal will be reviewed by TRACS staff for completeness.
3. After TRACS receives a completed *Institutional Change Form* requesting approval for a Pilot Project, TRACS will determine if a staff visit to the institution should be conducted. If a staff visit is required, the institution will receive a copy of the report of the staff visit, which will include an analysis of the institution's proposal.
4. If TRACS approves the request to initiate a Pilot Project, that approval will allow the institution to initiate the Pilot Project within the parameter specified in the approval. A letter of notification of approval of the proposed Pilot Project will be mailed to the institution.
5. In the event that the institution desires to make permanent the action authorized by the approval of a Pilot Project, the institution will be required to apply for the appropriate approval via the established processes for that particular initiative. If the initiative is to be continued beyond the term for Pilot Project approval, the final approval should be obtained prior to the expiration of the term for Pilot Project approval.

Note 6: Prison Education Programs (PEP)

A Prison Education Program (PEP) is defined as an eligible educational program approved by the process described below and offered by an educational institution as defined in 34 CFR 600.2 to students who are confined or incarcerated in correctional facilities. Students in such facilities must be enrolled in an approved PEP to receive Federal Pell Grants.

Institutions interested in establishing and implementing a PEP must follow these steps:

1. **Agreement with Oversight Entity:** Institutions must first apply and be approved by the Oversight Entity – generally their State’s Department of Corrections (DOC), although it could also be a Federal entity – and obtain a Memorandum of Understanding or other written agreement. The PEP process also requires the institution and the Oversight Entity to set up formal data sharing agreements. TRACS provides nonbinding feedback as a relevant stakeholder when invited by the Oversight Entities on the PEP application process.
2. **TRACS Institutional Change Approval:** This process is required regardless of the number of Teaching Sites for which the institution is already approved, and even if the institution has been offering TRACS approved academic programs at prison locations under the Second Chance Pell initiative. Institutions must obtain TRACS Institutional Change approval prior to implementing the following:
 - a. **Teaching Site (part b) - (REQUIRED):** The institution must submit the appropriate Institutional Change Form on the TRACS portal when offering a program at all prison locations – one form for each location.
 - b. **New Program or New Degree Level (IF APPLICABLE):** Offering a new program or a program at a new degree level requires the submission of the appropriate Institutional Change Form on the TRACS portal.
 - c. **Program Delivery by a Method Not Already Approved. (IF APPLICABLE):** Offering a program by a method for which the institution is not already approved requires the submission of the appropriate Institutional Change Form on the TRACS portal.

Proposal(s) to establish a PEP location must include the following documentation:

- a. A fully completed and submitted Institutional Change Form for the addition of a Teaching Site (part b) that includes the completed applicable Prospectus Checklist. Institutions must submit a separate Teaching Site (part b) Institutional Change Form for each PEP location to be considered.
- b. If applicable, a fully completed and submitted Institutional Change Form for the addition of a new program or a program at a new degree level that includes the completed applicable Prospectus Checklist. This is not required if the program to be offered at the PEP location is already approved by TRACS and is included in the institution’s scope of accreditation.
- c. If applicable, a fully completed and submitted Institutional Change Form for approval to offer a program by a method not already included in the institution’s scope of accreditation.
- d. If applicable, the institutional response to the relevant DOC’s Request for Information (RFI) or application.

Formatted: Font: (Default) Book Antiqua, 12 pt, Bold

Formatted: Left, Right: 1", Tab stops: 1.5", Left

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Space After: 0 pt

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: List Paragraph, Indent: Left: 1.56", Right: 1", Space After: 0 pt, Line spacing: single, Numbered + Level: 2 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75" + Indent at: 1"

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua

Formatted: List Paragraph, Indent: Left: 1.56", Right: 1", Space Before: 6.05 pt, After: 0 pt, Line spacing: single

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Indent: Left: 0.81", Space After: 0 pt

Formatted: List Paragraph, Indent: Left: 1.56", Right: 1", Space After: 0 pt, Line spacing: single, Numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75" + Indent at: 1"

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: List Paragraph, Indent: Left: 1.56", Right: 1", Space Before: 6.05 pt, After: 0 pt, Line spacing: single, Numbered + Level: 1 + Numbering Style: a, b, c, ... + Start at: 1 + Alignment: Left + Aligned at: 0.75" + Indent at: 1"

- e. The approval document from the DOC, which may include a Memorandum of Understanding between the institution and DOC and related documents.
- f. The budget for the PEP.
- g. Any other institutional or State approvals for the proposed PEP.

3. **Approval by USDE:** Once approved by TRACS, institutions must submit a Prison Education Program Application to the USDE. Institutions must include the documentation (approval letter) that confirms TRACS has evaluated the PEP and has included the Teaching Site and program in the institution's scope of accreditation.
4. **Submit USDE Approval to TRACS:** Institutions must submit the USDE Eligibility Certification and Approval Report (E-CAR) to TRACS within 10 business days of receipt. TRACS will then report the prison locations to the Database of Accredited Postsecondary Institutions and Programs (DAPIP)
5. **Implementation:** The institution may then implement the program(s) at the approved facility(ies) and access Pell Grants to support students who are confined or incarcerated while the Oversight Entity conducts the Best Interest Determination.
6. **TRACS Site Visit:** TRACS shall conduct a site visit to at least the first two approved PEP location(s) within one year of implementation. TRACS reserves the right to require site visits to any and all PEP locations as a part of the oversight process.
7. **Best-Interest Determination by the Oversight Entity:** The Oversight Entity will determine whether PEP programs are "operating in the best interest" of students in the facilities (34 CFR 668.241(a)). TRACS will participate in this determination process upon invitation by the Oversight Entities. More guidance may be forthcoming from the USDE on this and subsequent steps.

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: List Paragraph, Indent: Left: 1.81", Right: 1", Space Before: 6.05 pt, After: 0 pt, Line spacing: single, No bullets or numbering

Formatted: Font: (Default) Book Antiqua, Bold, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Bold, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Bold, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: (Default) Book Antiqua, Ligatures: None

Formatted: Font: Book Antiqua

BP227 - Branch Campuses

Reference: 34 CFR § 600.2

Adoption Date: June 2000

Last Revision Date: June 2023

A Branch Campus is an additional location of an institution that is geographically apart and independent of the main campus of the institution. TRACS considers a location of an institution to be independent of the main campus if the location (a) is permanent in nature; (b) offers courses in educational programs leading to a degree, certificate, or other recognized educational credential; (c) has its own faculty and administrative or supervisory organization; and (d) has its own budgetary and hiring authority.

Although a Branch Campus may have its own administrative or supervisory organization, it remains fully subject to the institution's Board and is accountable to comply with all policies of the institution.

Accreditation is granted only to an institution and applies to all approved Branch Campuses of that institution.

1. Approval of a Branch Campus will be:
 - a. Part of an institution's consideration for Candidacy and subsequent consideration for Accreditation / Reaffirmation of Accreditation, or
 - b. Part of an Accredited institution's request for an Institutional Change for the addition of a Branch Campus.
2. A Branch Campus will:
 - a. Be approved? recognized? by the Secretary of Education. (Pending clarification regarding the process and timing of Secretary's approval – Before applying to TRACS or after notified of approval by TRACS? If the latter, approvals must be granted provisionally pending notification of the Secretary's approval.) to qualify for inclusion in Title IV authorization.
 - b. Have its own Catalog, or
 - c. Be referenced clearly in the institution's Catalog.
3. All faculty and staff of a Branch Campus must be employees of the institution with the same rights and responsibilities as those working on the main campus.
4. A Branch Campus will be financially stable and have no adverse impact on the institution's ability to comply with the financial Standards of TRACS.
5. A Branch Campus will be fully integrated into the administration of the institution.
6. All appropriate institutional policies apply to a Branch Campus.
7. A Branch Campus must have its own administrative or supervisory organization that reports within the administrative structure of the main campus.
8. A Branch Campus located outside of the U.S., or its territories must comply with U.S. norms and TRACS Standards, unless there is a legal requirement and/or national norms in the country which require a variation, or to do so would jeopardize the health or safety of the employees.

Although instruction at a Branch Campus may be offered in a language other than English, all communications with TRACS will be in English. Any document submitted to TRACS as part of an Institutional Change request, Self-Study Report, or other required reports will be

prepared in English. The institution will certify that any document which has been translated is accurate, identify the person who made the translation, and identify that person's qualifications for translating the documents. If a submitted document is not translated or if the qualifications of the translator are inadequate, TRACS may have the document translated and the institution will bear the cost of the translation.

On any Branch Campus where the mode of education is in a language other than English, appropriate documents and websites will be provided in that language for staff, faculty, and students.

After final approval, a Branch Campus will be evaluated as part of the institution's schedule of review for Reaffirmation of Accreditation or any considerations for Sanctions and/or Adverse Action. An institution with a Branch Campus will include that Branch Campus in all *Annual Operational Reports* and *Self-Study Reports*. Evaluation Team visits following an institutional Self-Study will include visits to the Branch Campus(es).

An institution which seeks to add three or more additional teaching locations (Teaching Sites and/or Branch Campuses) within one year may be subject to additional review requirements (including possible staff visits) to demonstrate the ability to maintain educational quality.

TRACS will conduct a staff visit to each Branch Campus at least once every 5 years.

BP228 – Teaching Sites

Reference: 34 CFR § 600.2; 34 C.F.R. §668.13; 34 CFR § 668.237

Adoption Date: June 2000

Last Revision Date: June 2024

TRACS defines a Teaching Site as either (a) an additional location of an institution that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of any educational program and may qualify as a Branch Campus, or (b) a Federal, State, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional facility where instruction is offered regardless of the percentage of instruction delivered on-site or through Distance Education.

Teaching Site are approved:

1. as part of an institution's consideration for Candidacy or,
2. as a part of an Accredited institution's request for an Institutional Change.

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

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

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

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

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

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

An institution which seeks to add three or more additional teaching locations (Teaching Sites and/or Branch Campuses) within one year may be subject to additional review requirements (including possible staff visits) to demonstrate the ability to maintain educational quality.

Category (b) Teaching Sites must meet the following additional guidelines:

1. Institutions seeking to add a category (b) Teaching Site must respond to all additional information requirements in the appropriate prospectus checklist whether or not the institution seeks Prison Education Program (PEP) participation for that location.
2. Category (b) Teaching Sites seeking PEP participation will be governed by the following:
 - a. Private for-profit (proprietary) institutions may not operate a Title IV eligible PEP location.
 - b. Prior to seeking approval for a Title IV eligible PEP location, the institution:
 - i. must have successfully completed at least one cycle of accreditation,
 - ii. must not have been placed on probation or equivalent status or not have been subject to a negative action by TRACS over the prior three academic years, and not be under provisional certification.
3. Subsequent PEP participation locations where instruction will be offered by a new method of delivery require explicit TRACS approval.
4. If the program to be offered at a PEP participation location is designed to lead to professional licensure or certification the institution must provide evidence that program requirements meet licensure requirements and, if such job or occupation involves prohibitions on the licensure or employment of formerly incarcerated individuals, the institution may not enroll students through the PEP.

5. *See TRACS Policy BP226 (Note 6) for additional information regarding the process for adding a PEP location.*

BP229 - Distance Education

Reference: 34 CFR §600.9, §602.3, §602.17 and §602.22 (b)(1)

Adoption Date: April 2011

Last Revision Date: April 2022 (edited ~~June 2023~~ August 2025)

Formatted: Highlight

TRACS defines Distance Education as 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~~ other media, if used in a course in conjunction with any of the technologies listed above.

Coursework must evidence regular and substantive interaction (see BP102 Definitions) between the instructor and student. For interactions to be considered regular and substantive, they need to meet the following characteristics: 1) mostly instructor-initiated; 2) regular, scheduled, and predictable, and; 3) substantive (i.e. focused on the course subject).

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

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

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

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

1. The institution uses a method of verifying the identity of students which reasonably assures that the student is the same person who registered for the course. (Among the most common methods are a secure login and password for electronic access and proctored examinations.),
2. The institution provides students with a written rationale for the method or methods it employs,
3. Students are notified of any charge related to the method of verification, at the time of registration or enrollment, and
4. The institution provides a written statement of how it will protect the privacy of students enrolled in alternative delivery method programs / courses.

5. Institutions are required to demonstrate compliance with all TRACS Standards and Federal regulations related to Distance Education.

Additionally, courses and / or programs offered via Distance Education must meet all applicable Federal Requirements and all applicable TRACS Accreditation Requirements including:

- 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)

Before an institution offers any Distance Education courses / programs that can be eligible for Title IV, the institution must be evaluated and approved for its effective delivery of Distance Education courses / programs. Such evaluations may take place as part of the accreditation / reaffirmation process or via the Institutional Change process prescribed by TRACS for already accredited institutions.

A program is not Title IV-eligible if it is offered through Distance Education by an institution that is required to be evaluated and approved by TRACS but has yet to complete that approval process. The institution will be responsible for any liabilities established by the US Department of Education as a result of Title IV aid disbursed to students in an ineligible program.

Distance Education may be approved and offered at one of two levels:

- **Level 1:** Course or program delivery where less than 50 percent of a program is offered via Distance Education, less than 50 percent of total students enrolled at the institution are enrolled in at least one Distance Education course, **and** less than 50 percent of all courses offered by the institution are offered via Distance Education.
- **Level 2:** Course or program delivery where at least 50 percent of a program is offered via Distance Education, at least 50 percent of total students enrolled at the institution are enrolled in at least one Distance Education course, **or** at least 50 percent of all courses offered by the institution are offered via Distance Education.

Once an institution has been approved to offer **Level 1** Distance Education by TRACS, the institution may offer Distance Education courses / programs below the 50 percent threshold without further TRACS approval – unless and until the institution, during an award year, meets or exceeds the 50 percent threshold. For purposes of these calculations, a student is “enrolled in Distance Education” if the student enrolls in at least one course offered through Distance Education.

Meeting or exceeding the 50 percent threshold for Distance Education is considered a significant departure from the existing offerings or educational programs, or method of delivery for **Level 1** approval, and therefore requires the institution to obtain **Level 2** approval. Institutions may be

granted **Level 2** approval as an initial action if the institution's Distance Education offerings meet or exceed the 50 percent threshold upon initial consideration and is not required to obtain **Level 1** approval first.

Per §602.22 (b)(1), the Distance Education evaluation and approval processes apply equally to institutions that have been placed on any Sanction by TRACS over the prior three academic years or are under a provisional certification with the US Department of Education.

Institutions that make changes to an existing program's method of delivery (i.e., the offering of courses / programs via Distance Education or ceasing to offer courses / programs via Distance Education for already approved programs) must be reported to TRACS within 30 days of implementation, via the Institutional Change process on the TRACS portal. In such cases, Distance Education must already be included in the institution's scope of recognition.

As a part of the Annual Operational Report process, TRACS will monitor the level of Distance Education offered at an institution to determine when an institution meets or exceeds the 50 percent threshold.

BP230 - Agreements Between Institutions

Reference: §602.22(a)(2)(ii)

Adoption Date: June 2000

Last Revision Date: June 2024

Formatted: Highlight

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

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

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

For an agreement that is treated as a Substantive Change, The Accreditation Commission will consider the reasons for the agreement; ensure that all statements or information specified in applicable federal regulations are included, and that it is consistent with national norms.

An institution desiring to enter into a contract (written agreement) with another institution or organization where the students at the TRACS accredited institution can earn more than 25 percent of the credit hours required for their academic program at the contracted institution, and the contracted institution is either unaccredited, accredited by an accrediting agency not recognized by the U.S. Secretary of Education or accredited by an accrediting agency which is recognized by the U.S. Secretary of Education but not certified to participate in Title IV, HEA programs is required to submit a Substantive Change. Under this agreement, students may not earn more than 50 percent of the credit hours required for the academic program at the contracted institution. This Substantive Change will be reviewed by the Commission and a final decision made no later than 90 days after receipt of a materially complete request, unless the Commission or TRACS staff determine significant circumstances related to the substantive change require a review by the Commission to occur within 180 days.

BP303 – Changes to Accreditation Standards and Institutional Eligibility Requirements

Reference: 34 CFR §602.16, §602.20, and §602.21

Adoption Date: June 2000

Last Revision Date: June 2024

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

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

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

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

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

When a new Accreditation Standard or IER or a change in an existing Accreditation Standard or IER is proposed, the Standards Review Committee reviews the proposal and, if deemed appropriate, presents the proposal to the Accreditation Commission for initial consideration at its next scheduled meeting. Once the Accreditation Commission has reviewed and, as appropriate, made modifications to the new or revised Accreditation Standard or IER, the Accreditation Commission grants initial approval of the new or revised Accreditation Standard or IER and authorizes its release for public comment.

Within 30 days of the Accreditation Commission action to release the proposed new or revised Board Policy, the proposal is forwarded to the Chief Executive Officers of all member institutions, all other ED recognized accrediting agencies, and all State Secretary of Higher Education offices, for a 30-day comment period.

After receipt of all comments received, the proposed new or revised Accreditation Standard or IER is placed on the agenda for consideration by the Standards Review Committee at its next scheduled meeting. After review and consideration of the comments received on the proposed new or revised Accreditation Standard or IER, and after making any appropriate adjustments to the wording of the proposed new or revised Accreditation Standard or IER, based on the comments received, the Standards Review Committee shall forward the proposal to the Accreditation Committee for consideration and final approval at its next scheduled meeting.

~~Once the Accreditation Commission has reviewed the recommendations of the Standards Review Committee and made any modifications deemed appropriate, The Accreditation Commission approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Chief Executive Officers of all member institutions, all other ED recognized accrediting agencies, and all State Secretary of Higher Education offices, for a 30-day comment period.~~

~~After receipt of and consideration of all comments, the item is placed on the agenda of the next Accreditation Commission meeting, where the Commission approves the final changes to the Accreditation Standards and / or IERs.~~

Changes to the Accreditation Standards and / or IERs become effective as soon as practical, but no more than 12 months after the Accreditation Commission approval.

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

BP304 – The Application Process

Reference: 602.18(c)
Adoption Date: June 2000
Last Revision Date: June 2023

The process whereby interested institutions may seek Applicant Status with TRACS is outlined in the TRACS publication, *Steps Toward Accreditation*. The steps in the application process are as follows:

1. Initial Communication and Orientation

- a. Institutions interested in pursuing membership with TRACS should complete and submit the *Initial Inquiry Form* found on the TRACS website. (tracs.org/start)
- b. Upon submission of the *Initial Inquiry Form*, the institution will receive a follow up email with links to pertinent TRACS documents for review. If, after reviewing this information, the institution decides to continue the process, the institution will submit the *Institutional Profile Form* using the link provided in the email.
- c. Upon submission of the *Institutional Profile Form*, TRACS staff will review the form to determine the institution's eligibility for membership.
- d. If the institution appears to be eligible for membership, the institution is assigned a TRACS staff representative. At this point the institution is considered a "Corresponding" institution.
- e. The institution and assigned TRACS staff representative will schedule the required Application Orientation. The Application Orientation may take place at either the institution's campus, at the TRACS office, at the Application Workshop conducted at the TRACS Annual Conference or virtually via teleconference. If the Orientation takes place at the institution's campus, the institution is expected to cover the staff representative's travel expenses. There is no fee associated with the Application Orientation.
- f. After completing the Application Orientation, the TRACS office will create an account for the institution on the TRACS portal and the individual identified by the institution as the accreditation liaison will be granted access to the TRACS portal in order for the institution to begin the application process.

2. Institutional Submissions - The application process includes the completion and submission of the following via the TRACS portal:

- a. The *Application Compliance Checklist* (ACC) along with all required supporting documents
- b. The non-refundable Application Fee according to the current fee schedule

NOTE: Once initiated by the institution, the ACC must be submitted within one year of the initiation date. ACC's that have been initiated but remain unsubmitted at the one-year deadline will be expired by TRACS and the institution will be required to participate in another Application Orientation before being eligible to initiate another ACC.

3. Application Review Committee Procedures and Determination

- a. The Application Review Committee (ARC) will conduct an initial review of the application materials. Financial documentation is reviewed by the TRACS Vice President of Finance.
- b. The ARC makes one of the following determinations regarding the institution's application. The institution will be notified of the ARC's determination via a comment to the ACC on the TRACS portal.
 - Approve the institution's application - If after the ARC's initial review of the application materials the ARC determines that the institution has demonstrated compliance in all required areas, the institution's application will be approved. Once the application is approved, the institution is considered an "Applicant" institution and may begin the Self-Study process toward Candidate status. Applicant institutions must gain Candidate status within three years of the date the application is approved or must submit a new application.
 - Defer the institution's application - If after the ARC's initial review of the application materials, the ARC determines that the institution has not demonstrated compliance in all required areas, the institution's application will be deferred for approval and will be reverted to the institution, along with staff comments, citing areas that need to be clarified and noting any additional documentation that is needed. If the application is initially deferred by the ARC, the institution will be allowed no more than two additional opportunities to submit clarifying information and / or additional documentation.

All subsequent application submissions concerning deferred applications must be received within one year of the date the initial ACC was submitted. After the initial one-year time period has expired, the President of TRACS may, at his discretion and upon request by the institution, grant the institution a one-time, six month extension for completion of the application process. If such an extension is granted, the institution will be required to submit an *Application Extension Fee* in the amount of 50 percent of the current Application Fee and will be required to either reaffirm that all previously submitted application materials remain current or submit updated application materials.

- Deny the institution's application - If the institution is not able to demonstrate compliance in all required areas after a review of all allowed submissions, the application will be denied. If the application is denied, TRACS staff will notify the institution of the reason(s) for the denial and provide information concerning the timeline for re-application. If the application is denied, the institution may reapply after one year.

NOTE: Submitting an application does not guarantee the institution will achieve "Applicant" institution status and be permitted to move toward Candidacy.

4. Alternative Means for Demonstrating Compliance

The application process requires the applying institution to demonstrate compliance with the TRACS Accreditation Standards identified as Institutional Eligibility Requirements (IERs). However, if the applying institution contends that it is able to demonstrate compliance with equivalent written standards, policies and procedures that provide alternative means of satisfying the application requirements of TRACS, such alternative means may be utilized if:

- a. The alternative means are approved by the Accreditation Commission and otherwise meet the intent of TRACS' expectations and requirements;
- b. TRACS sets and applies equivalent goals and metrics for assessing the compliance of the institution;
- c. TRACS' process for establishing and applying the alternative means is clearly presented in writing to the institution; and
- d. TRACS requires the institution seeking the application of alternative means to demonstrate the need for an alternative approach, that students will receive equivalent benefit, and that students will not be harmed through the application of such alternative means.

BP305 – The Accreditation Process

Reference: 34 CFR §602.15(a), §602.18, §602.20(a)(4)(c), §602.22(b)

Adoption Date: June 2000

Last Revision Date: June 2024

Accreditation in the United States (US) is voluntary and non-governmental in nature. TRACS provides accreditation for Christian liberal arts colleges, universities, graduate schools, seminaries, Bible colleges and institutes that offer certificates, diplomas, associate degrees, bachelor degrees, and/or graduate degrees. TRACS provides *Institutional Accreditation* which means the institution as a whole is accredited rather than simply the educational programs offered by the institution. TRACS' geographic scope is international.

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

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

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

1. Self-Study and Self-Study Report

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

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

2. Evaluation Team Visit and Evaluation Team Report

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

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

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

3. Accreditation Commission Review and Action

At each meeting, the Accreditation Commission will review the following documents when considering and determining the status of the institution: the institution's Self-Study Report, the Evaluation Team Report, the Evaluation Team's recommendation concerning the status sought, the institution's Compliance Report, and the TRACS staff analysis concerning the institution's responses on the Compliance Report. ~~recommendation of TRACS staff concerning the status sought.~~

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

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

The various categories of recognition in the accreditation process are:

- **Corresponding Institution:** an institution that has made initial contact with TRACS and is actively pursuing the process toward accreditation. This status does not require Commission consideration and action.
- **Applicant Status:** an institution that has submitted, via the TRACS portal, an Application Compliance Checklist which has been approved by the Application Review Committee (ARC). This status does not require Commission consideration and action.
- **Candidate (Pre-Accredited) Status:** this status is granted by the Accreditation Commission when an institution has demonstrated compliance with all of the TRACS Standards related to the Institutional Eligibility Requirements (IERs), has submitted a Self-Study Report and supporting documentation via the TRACS portal, and has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution provides the basic level of quality in instruction and student services required of a pre-accredited institution of higher education. The maximum time period allowed for an institution to progress from Candidate Status to Accredited Status is five years. If a Candidate institution is denied Accredited status, TRACS will maintain the institution's Candidate status until the institution has had a reasonable time to complete the activities in its teach-out plan to assist students in transferring or completing their program, but for no more than 120 days unless approved for good cause.

- **Accredited Status:** this status is granted by the Accreditation Commission when an institution has demonstrated that it is in compliance with all the IER related Standards, has submitted a Self-Study Report and supporting documentation via the TRACS portal, has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution demonstrates financial stability and provides the level of quality in instruction and student services required of an accredited institution of higher education. Initial accreditation may be granted for a period of up to five years. Under no circumstances will TRACS move an institution granted Accredited status to Candidate status, unless, following the loss of accreditation, the institution applies for initial accreditation and is awarded Candidate status under the new application.
- **Reaffirmation Status:** this status is granted by the Accreditation Commission when an institution has demonstrated that it remains in substantive compliance with the TRACS Standards since the last review for Accredited Status, has submitted a Self-Study Report and supporting documentation via the TRACS portal, has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution maintains financial stability and continues to provide the level of quality in instruction and student services required of an accredited institution of higher education. Beginning with the institution's first Reaffirmation (Reaffirmation I), accreditation will be granted for a maximum of ten years with a required Interim Fifth-Year Review (IFYR) to be conducted in the fifth year of the period of recognition. This Reaffirmation process will be repeated every tenth year.

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

- Determinations of the other agency regarding the institution's compliance with the standards of that agency that are comparable to TRACS Accreditation Standards. Such standards will include, but may not be limited to, those related to financial stability and sustainability.
- The institution's compliance with the Accreditation Standards that are unique to TRACS and are thus not required by the other agency.
- A Focus Team and / or Evaluation Team visit to the institution will be required to verify the institution's compliance with TRACS Accreditation Standards.
- The institution will have the opportunity to respond to the determinations detailed in the report that is generated as a part of the visit, prior to the consideration by the Accreditation Commission.
- At a minimum, after a complete application is submitted, the Application Review Committee must approve any request by the institution to seek immediate Accredited status prior to the applicant institution's appearing before the Accreditation Commission for consideration. The Commission may grant the request for Accredited status with or without requirements as it would any other accreditation request, grant Candidate status, or Defer the institution. The granting of Candidate status shall not work as an appealable "denial of accreditation".

- If Accredited status is granted to an institution under this provision, the status would be considered initial accreditation and would be for a period of up to five years. Reaffirmations of accredited status granted in this manner would follow the normal procedures for reaffirmation of accredited institutions.

Institutions that are deferred in their bid for Candidate status, after having made an initial appearance before the Accreditation Commission, may make one subsequent appearance before the Commission for consideration of Candidate status. The subsequent appearance before the Commission must take place within twelve (12) months of the Commission's original deferral.

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

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

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

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

In the event that the initial application review is extended by the accreditor, including to provide additional time for the program to graduate an initial cohort or come into full compliance based on a good cause determination by the accreditor, then the initial review period extends to the date agreed to by the program and the accreditor. All students enrolled during that time period, including the extension, may be considered to have enrolled in or graduated from an accredited program. However, if the initial application results in denial and a new application must be submitted to initiate a new review process, the students who enrolled in or completed the program during the initial application process would not be eligible to benefit from a retroactive effective date based on an affirmative award resulting from the second initial application for accreditation, except that if accreditation was granted prior to that student's graduation, the student would then be considered to have graduated from an accredited program.

Accreditors that utilize retroactive establishment dates to serve students enrolled in programs that receive an affirmative accreditation decision may elect to establish the effective date based on their standards and criteria and the approval of the agency's appropriate decision-making body.

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

This means, in most cases:

- If an institution is granted Candidacy or Accreditation at the spring meeting of the Accreditation Commission, the institution's status is retroactive to January 1 of that year.
- If an institution is granted Reaffirmation of Accreditation at the spring meeting of the Accreditation Commission, in order to give the institution continuous status, the effective date will be July 1 of that year.
- If an institution is granted Candidacy or Accreditation at the fall meeting of the Accreditation Commission, the institution's status is retroactive to July 1 of that year.
- If an institution is granted Reaffirmation of Accreditation at the fall meeting of the Accreditation Commission, in order to give the institution continuous status, the effective date will be January 1 of the next year.
- The Accreditation Commission may determine to set a specific retroactive date for the status granted (Candidacy, Accreditation or Reaffirmation of Accreditation). The effective date may go back as far as, but cannot be prior to, the date on which the agency completed the review of the program's application and officially recognized the program as being in the accreditation review process.

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

In accordance with Federal regulations, the Accreditation Commission establishes the deadline by which an institution must demonstrate compliance with all TRACS Standards. Following the meeting of the Accreditation Commission wherein a decision regarding an institution's accreditation status is made, a letter is sent from the TRACS office to the institution. This letter contains (1) the Accreditation Commission decision, (2) the deadline

by which an institution must demonstrate compliance with all TRACS Standards and any outstanding Findings and Recommendations contained in the Evaluation Team Report, and (3) a Compliance Report for monitoring the institution's progress toward full compliance with such Findings and Recommendations. The institution is required to submit regular updates to the Compliance Report, via the TRACS portal, for review at each subsequent meeting until the institution demonstrates compliance with all TRACS Standards.

5. **Alternative Means for Demonstrating Compliance** – Recognition with TRACS requires institutions seeking Candidacy, Accreditation or Reaffirmation of Accreditation to demonstrate compliance with the TRACS Accreditation Standards. However, if the institution contends that it is able to demonstrate compliance with equivalent written standards, policies and procedures that provide alternative means of satisfying the recognition requirements of TRACS, such alternative means may be utilized if:
- a. The alternative means are approved by the Accreditation Commission and otherwise meet the intent of TRACS' expectations and requirements;
 - b. TRACS sets and applies equivalent goals and metrics for assessing the compliance of the institution;
 - c. TRACS' process for establishing and applying the alternative means is clearly presented in writing to the institution; and
 - d. TRACS requires the institution seeking the application of alternative means to demonstrate the need for an alternative approach, that students will receive equivalent benefit, and that students will not be harmed through the application of such alternative means.

BP310 – Interim Fifth-Year Review

Reference: None
Adoption Date: December 2015
Last Revision Date: ~~July 2022~~August 2025

TRACS institutions that have been granted a ten-year reaffirmation status are required to participate in an Interim Fifth-Year Review (IFYR) which includes the completion and submission of an *Interim Fifth-Year Review Compliance Checklist* and supporting documents. The IFYR focuses on the TRACS *Institutional Eligibility Requirements* (IERs) and occurs during the fifth year of the institution's reaffirmation status.

The *Interim Fifth-Year Review Compliance Checklist* will be completed and submitted utilizing the TRACS portal and will consist of a narrative addressing the institution's compliance with the IERs along with documentation supporting each compliance narrative.

The deadline for the submission of the *Interim Fifth-Year Review Compliance Checklist* and supporting documentation is ~~June~~April 30th (or by the last business day of the month if ~~June~~April 30th falls on a Saturday or Sunday)

The IFYR process involves the following steps:

1. In January of the year in which the institution's IFYR occurs, TRACS notifies the institution and provides the necessary instructions and guidance.
2. The institution completes and submits the *Interim Fifth-Year Review Compliance Checklist* and supporting documentation via the TRACS portal by ~~June~~April 30th.
 - a. The institution should ensure that irrelevant personal information has been redacted from supporting documentation.
 - b. The payment of the appropriate *Interim Fifth-Year Review* fee and travel deposit fee (according to the current *Fee Schedule*) will be processed as a part of the TRACS portal submission process.
3. Once the *Interim Fifth-Year Review Compliance Checklist* and supporting documentation have been submitted, TRACS staff will review the narratives and supporting documents and make an initial determination regarding the institution's compliance with the IERs.
- ~~4.~~ TRACS staff will then contact the institution, ~~via comments within the TRACS portal, to convey initial staff determinations and, as appropriate, will request clarifications and/or additional supporting documentation if compliance could not be verified with the initial submissions to coordinate an on-site, one-day visit. The notification will include the identification of a peer evaluator and require the institution to submit a conflict-of-interest notice.~~
5. TRACS Staff and the peer evaluator will conduct the visit on a date agreeable to the institution to review the submission, interview relevant individuals, and clarify any questions. (Peer evaluators may participate virtually.)
- ~~4.6.~~ Following the visit, TRACS staff will produce a report noting any areas of non-compliance identified by the peer evaluator requiring institutional response.
- ~~5.7.~~ This process of staff reviews and follow-up responses from the institution will continue within the TRACS portal until the institution has demonstrated compliance with all of

Formatted: Font: Not Italic

- ~~the IERs, with the date for demonstrating such compliance not to extend beyond February 15th of the year following the initiation of the IFYRA compliance report will be created based on the report and requiring the institution's response by September 1.~~
8. ~~Once the compliance report is submitted with all of the IERs has been determined,~~ staff will review the response for completeness, write a report and recommendation regarding the totality of the IFYR process for consideration by the Accreditation Commission at their April-October meeting ~~in the year following the initiation of the IFYR.~~
- ~~6.9.~~ A Commissioner will be assigned to review the IFYR in its totality and determine compliance for all items resulting in a recommendation to the entire Commission.

BP312 – Multiple Accreditors

Reference: 34 CFR §600.11; 20 USC §1099b(h); DCL GEN-22-10

Adoption Date: June 2025

Last Revision Date: N/A

TRACS is an institutional accrediting agency. In keeping with the voluntary nature of accreditation, TRACS seeks to assist Christian postsecondary institutions. Under existing rules, institutions generally hold institutional accreditation from a single agency although specialized or programmatic accreditation may be added.

Changing Primary Accreditor or Obtaining Multiple Accreditations

- **Title IV Institutions:** The United States Department of Education (Department or ED) must grant permission for an institution to change or add accreditors.. Under 20 U.S.C. §1099b(h), an institution seeking to change accrediting agencies or maintain institutional accreditation by multiple agencies must first receive approval from the Department. The Department provides such approval if it determines there is a reasonable cause for the change or accreditation by more than one agency. (See 34 C.F.R. §600.11(a)-(b)). Without approval, the Department will be unable to recognize the pre-accreditation (Candidacy) or Accreditation of the institution while in the process of changing agencies or maintaining accreditation by multiple agencies. (See 34 C.F.R. §600.11(a)-(b)). This can result in the institution being ineligible for Title IV funding. An institution seeking to change its accrediting agency must submit to FSA all materials relating to the prior accreditation and materials demonstrating reasonable cause for changing the accrediting agency (34 CFR §600.11; DCL GEN – 22-10). Institution must submit FSA approval to TRACS prior to proceeding to the Self-Study phase.
- **Non-Title IV Institutions:** Institutions under adverse action (Termination) with any other ED recognized accreditation agency must wait one year from the date the adverse action was finalized to apply with TRACS (TRACS Policy BP215 & ED Criteria for Recognition 34 CFR §602.28). *The Accreditation Commission shall: 2.c. Grant an institution that was accredited by another agency, opportunity to apply to TRACS one year after the adverse action by the other accrediting agency. (BP215.2.c.).*

Institutions holding active TRACS accreditation who plan to obtain additional accreditations must notify the TRACS President in writing prior to pursuing the additional accreditation. Results of all evaluations by other accrediting agencies must be submitted to TRACS in a timely manner.

Designation of Primary/Secondary Accreditor

Institutions holding multiple institutional accreditations must designate in writing their choice of agency to be their primary and/or secondary accreditors by means of a Category 1.12 Institutional Change Form. Programmatic or specialized accreditors may not be designated as primary accreditors.

Substantive Changes

Substantive Changes must be submitted to the primary accreditor before submission to any secondary accreditors. If TRACS is the designated secondary accreditor, notification of approved substantive changes must be made in accordance with BP226.

Reaffirmation of Accreditation

If TRACS is the designated secondary accreditor, the institution will be required to complete all accreditation activities ~~for Reaffirmation~~ including the submission of a Self-Study Proposal, submission of a Self-Study Report, and hosting an Evaluation Team Visit. However, the institution may utilize documentation and narratives supplied to the primary accreditor in order to demonstrate compliance with equivalent TRACS Standards.

Annual Reporting

Institutions with multiple accreditors are required to annually report interactions with other accreditors.

Decisions of Other Accrediting Agencies

7. Institutions facing adverse actions of other accrediting agencies are subject to the processes of TRACS Policy BP215. Institutions which are pre-accredited or accredited by another ED recognized accrediting agency will submit to TRACS, within 60 days of receipt, copies of any final visiting team reports, staff reports, and any findings of non-compliance identified by the other agency. Institutions will be considered out of compliance with any TRACS standard which is equivalent to the other agency's standards with which the institution was found out of compliance. Such determinations will result in an Institutional Staff Review (ISR) per TRACS Policy BP207, with final compliance with any standard(s) in question determined by the Accreditation Commission.

Fees

Institutions where TRACS is designated as the secondary accreditor should contact the TRACS office regarding fee schedules.