BP102 - Definitions

Reference: 34 CFR §600.2
Adoption Date: June 2013
Last Revision Date: October 2026

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.

Adequate Facilities (Distance Education Only Institutions): Distance Education only institutions must maintain a permanent physical facility that supports its educational offerings and business operations in a professional setting. The facility is maintained at a fixed geographic location that is appropriately licensed or authorized, as required by local and state regulatory authorities. A Post Office box is not a physical facility address.

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 US Secretary of Education 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. Correspondence Education courses are typically self-paced. Correspondence Education is not Distance Education.

This definition of Correspondence Education is provided to ensure that 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 other

media, if used in a course in conjunction with any of the technologies listed above. (See also: *Instructor, Regular Interaction, Substantive Interaction*

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.

Institutional Objectives: Broad, mission-driven statements that describe what an institution intends to accomplish in fulfilling its mission. They define the institution's strategic aims and priorities for education, service, and effectiveness - serving as a foundation for planning, assessment, and improvement.

Institutional Outcomes: Measurable results or indicators that demonstrate the extent to which the institution has achieved its stated objectives and mission. They provide evidence of effectiveness and are used to guide continuous improvement.

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.

Instructor: A qualified human individual designated by the institution who is responsible for delivering course content and has substantive responsibility for facilitating, supporting, and evaluating student learning in a course or other instructional activity, regardless of modality. Artificial intelligence, automated systems, adaptive-learning systems, and other instructional technologies may assist or enhance teaching and learning but may not serve as the instructor or assume the substantive instructional responsibility assigned to an instructor. A qualified human instructor must retain responsibility for the instruction, substantive interaction with students, evaluation of student learning, and academic judgement. The designation of a human instructor of record does not satisfy this requirement when substantive instructional responsibilities are performed solely by artificial intelligence or another automated system. (See also Distance Education, Regular Interaction, Substantive Interaction)

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 qualified human individual designated as 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 and Instructor)

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, a qualified human individual 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 discussion regarding the content of a course or competency; 5) other instructional activities approved by the accrediting agency. (See Regular Interaction and Instructor)

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.

BP112 - Institutional Misrepresentation

Reference: 34 CFR §602.23(d), (e)~~None~~
Adoption Date: January 2011
Last Revision Date: ~~April 2019~~

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

If the institution does not publish the required correction by the date specified, or if the correction published ~~is itself~~itself is incomplete or misleading, TRACS will publish the public correction itself. TRACS will post a Public Correction Notice on the Public Notices and Corrections page of the TRACS website (www.tracs.org) within ten (10) business days of the institution's failure to comply. The Notice will identify the institution, describe the incorrect or misleading information as released, state the correct information, and state the date and nature of any related Commission action or on-site review report. TRACS may also, at the discretion of the President, transmit the Notice directly to the U.S. Department of Education, the relevant state authorizing agency, other recognized accrediting agencies, affected students, and news media, and may distribute it to the TRACS membership.

Any non-member institution falsely claiming affiliation with TRACS is subject to legal action by TRACS.

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:	~~December 2025~~

The Arbitration Policy of the Transnational Association of Christian Colleges and Schools (TRACS or the Commission) shall apply only to Adverse Actions (as defined in TRACS policy BP211 - Sanctions and Adverse Action) by the TRACS Accreditation Commission and opinions 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 pre-accreditation (Candidate status) and for continued membership with TRACS, all applicant and member institutions consent to resolving disputes regarding ~~unfavorable decisions rendered by an~~ Adverse Action by the TRACS Accreditation Commission 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).

Arbitration will be based on the information and materials generated throughout the process that led to the Adverse Action of the Accreditation Commission. The institution may also provide full merit documentation relevant to the institution.

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. 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. CHEA Arbitration Process

1. Institutions desiring to contest a decision made by an Appeal Committee (by arbitration) must notify TRACS within ~~thirty~~ 20 business 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 non-binding arbitration process and requirements for all parties involved, is described on the CHEA website. - https://www.chea.org/cheaarbitration-program
6. The decision of the CHEA Arbitrator is communicated to the TRACS Accreditation Commission for final action on the accreditation status of the institution.

C. Alternative Arbitration Process

Prior to litigation of an Adverse Action, should an institution or TRACS decide not to utilize the CHEA arbitration process, either party may propose an alternative arbitration method mutually acceptable to both parties and consistent with federal regulations.

1. Intent to arbitrate must be submitted 20 business days after the receipt of official notice of the final adverse action by the Accreditation Commission. The agency will confirm receipt within 10 business days to begin the arbitrator selection process.
2. The arbitration will be heard and determined by a single Arbitrator.
3. The arbitrator will be mutually selected by both parties and must affirm that they have no conflict of interest according to TRACS BP113. Both the institution and agency will select three individuals as potential arbitrators with experience in higher education and/or accreditation. Both the JAMS Neutral Directory and the AAA National Roster of Arbitrators and Mediators are reliable sources for potential arbitrators. If the parties are unable to agree on a single arbitrator within 30 days, the arbitration will be submitted to the JAMS Managed Arbitration Process.
4. Grounds for arbitration: All materials relevant to the decision leading to adverse action, the appeal, institutional responses, and rebuttals will be made available to the arbitrator. In addition, the institution may present a full merits review of relevant information, even if it occurs after the adverse action. Each party is permitted to be represented by legal counsel, but each party is responsible for its own legal fees.
5. The institution will retain its candidacy or accredited status until the completion of any arbitration proceeding and until the final action of TRACS on the accreditation status of the institution.
6. The private arbitration meeting will be held in person or virtually and moderated by the arbitrator. Both TRACS and the institution will be granted opening presentations, questions, rebuttal, and final remarks. The arbitrator may also ask questions and seek additional information.
7. The standard of review will be the preponderance of evidence standard. The arbitrator will either affirm or reverse the decision and notify TRACS within 30 days. The arbitrator will provide the rationale for the decision and sign the report provided to the Accreditation Commission. The arbitrator's decision is non-binding on the TRACS Accreditation Commission.
8. The decision of the arbitrator will be forwarded to the TRACS Accreditation Commission for its review and final decision on the accreditation status of the institution.

D. 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.

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: ~~December 2025~~September 2026

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 the Accreditation Commission, 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 the Accreditation Commission, 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.

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 Enrollment 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 ~~Notificaton~~Notification of the following change: a) ~~Notification of a~~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.*)*;* b) An aggregate change of 25 percent of more of the clock hours, credit hours, or content of a program since the most recent accreditation review; c) the development of customized pathways or abbreviated or modified courses or programs to i) accommodate and recognize a student's existing knowledge, such as knowledge attained through employment or military service; and ii) close competency gaps between demonstrated prior knowledge or competency and the full requirements of a particular course or program; d) entering into a written arrangement under 34 CFR 668.5 under which an institution or organization not certified to participate in the Title IV HEA programs offers up to 25 percent of one or more of the accredited institution's educational programs. *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.~~any of the above areas.*

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.

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)* **(Accreditation Commission Approval)**

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)* **(Accreditation Commission Approval)**

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. **(TRACS President Approval)**

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. **(TRACS President Approval)**

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. **(TRACS President 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. **(TRACS President Approval)**

2.7 A change in the name of an approved educational program. **(TRACS President Approval)**

2.8 The deletion of an approved educational program. **(TRACS President Approval)**

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.* **(TRACS President Approval)**

2.10 The change of the name of the institution not related to a 2.1 or 2.2 Substantive Change. **(TRACS President Approval)**

2.11 The closure of an Institution or one of its Branch Campuses, Teaching Sites, or Extension Sites. **(TRACS President Approval)**

2.12 The reinstatement of an academic program, including Distance Education, which had previously been placed in abeyance/inactive status. **(TRACS President Approval)**

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. **(TRACS President Approval)**

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) **(TRACS President Approval)**

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

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. **(Accreditation Commission 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.)* **(Accreditation Commission Approval)**

3.3 The change of the location of the institution or one of its Branch Campuses or Teaching Sites. **(Accreditation Commission Approval)**

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

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. **(Accreditation Commission Approval)**

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)* **(Accreditation Commission Approval)**

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)* **(Accreditation Commission Approval)**

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)* **(Accreditation Commission Approval)**

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.)* **(Accreditation Commission Approval)**

4.6 The acquisition of any other institution or any program or location of another institution. **(Accreditation Commission Approval)**

4.7 The addition of a direct assessment program. **(Accreditation Commission Approval)**

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)
e. Determine whether 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 l.
   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~~other media, 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).
9. Upon approval by the Accreditation Commission, the institution must request Title IV funding approval by the Secretary of Education (via Federal Student Aid) if the institution desires the Branch Campus to be eligible for FSA.
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.

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.
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)

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.
6. Staff site visits will verify the site has the personnel, facilities, and resources reported by the institution.
7. For proposed Teaching Sites that fall under category (a) of the Teaching Site definition, the stipulations in BP228 will apply.
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.

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.
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 to 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.
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 U.S. Department of Education (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.

BP229 - Distance Education

Reference: 34 CFR §600.9, §600.2, §602.3, §602.17 and §602.22 ~~(b)(1)~~
Adoption Date: April 2011
Last Revision Date: ~~April 2022 (edited June 2026)~~September 2026

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 other media, if used in a course in conjunction with any of the technologies listed above.

Coursework must evidence both regular and substantive interaction (see TRACS Policy BP102 - Definitions) between the instructor and student. For interactions to be considered ~~regular and~~ substantive, they must include at 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 discussion regarding the content of a course or competency; 5) other instructional activities approved by the accrediting agency. Regular interaction requires both 1) an opportunity for substantive interaction on a predictable and scheduled basis commensurate with the course's length and content; **and** 2) monitoring the student's academic engagement and success, with an instructor responsible for promptly and proactively engaging when needed or upon student request.~~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)~~.

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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 through individual State authorization, exemption, a State authorization reciprocity agreement, or another legally recognized basis. ~~.~~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. An institution must make a determination regarding the State in which a student is located at the time of the student's initial enrollment in an educational program and, if applicable, upon formal receipt of information from the student, in accordance with the institution's procedures, that the student's location has changed to another state.

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~~ has processes through which it establishes that a student who registers for any course offered through distance education is the same student who academically engages in the course or program. (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
- ~~I~~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~~institutions which have been placed on probation or equivalent status by TRACS, have been subject to negative action by the agency over the prior three academic years or are under a provisional certification with the US Department of Education must receive prior approval for a change in an existing program's method of delivery.

All other i~~I~~nstitutions 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.

NOTE: Distance Education only institutions must maintain a permanent physical facility that supports its educational offerings and business operations in a professional setting with appropriate signage. The facility is maintained at a fixed geographic location that is appropriately licensed or authorized, as required by local and state regulatory authorities. A Post Office box is not a physical facility address.

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: December 2025

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. If TRACS' renewal of authorization with the Department of Education coincides with the 5 year Standards review cycle, the Departmental renewal process will serve as the 5 year Accreditation review process for TRACS since all TRACS Accreditation Standards are reviewed and, as necessary, modified to ensure compliance with federal requirements as a part of the Departmental renewal process.

The Standards Review Committee recommends to the Accreditation Commission any action to modify Accreditation Standards and IERs as soon as it determines modifications 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 (qualified members of the higher education community), members of the public, including but not limited to non-member institutions and students, 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.

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When a new Accreditation Standard or IER or a modification to 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 adjustments to the proposed new or modified Accreditation Standard or IER, the Accreditation Commission grants initial approval of the

new or modified Accreditation Standard or IER and authorizes release of the proposed new or modified Accreditation Standard or IER for public comment.

Within 30 days of the Accreditation Commission action to release the proposed new or modified Accreditation Standard or IER, 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, and is posted on the TRACS website for public input for a 30-day comment period.

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

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.

Regular ~~r~~Review of Standards

While Accreditation Standards may be reviewed and revised at any time as needed, TRACS reviews all Accreditation ~~s~~Standards on a rotating basis every 5 years. Sixty days in advance of the scheduled Accreditation Commission review of Standards, a notice will be sent to member institutions and other constituencies and will be posted on the TRACS website inviting public comment. In the event that an Accreditation Standard has been reviewed prior to the regular schedule, the Commission may choose to forgo the schedule provided the review was completed in the previous 4 years. The schedule for review is as follows:

Fall 2026, 2031, 2036

- Standard Area 1 - Faith Statement
- Standard Area 2 - Mission and Name
- Standard Area 3 - Institutional Objectives
- Standard Area 4 - Institutional Integrity

Fall 2027, 2032, 2037

- Standard Area 5 - Operational Authority
- Standard Area 6 - Organizational Structure
- Standard Area 7 - Publications and Policies

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Fall 2028, 2033, 2038

- Standard Area 8 - Educational Programs
- Standard Area 9 - Faculty
- Standard Area 17 - Federal Requirements

Fall 2029, 2034, 2039

- Standard Area 10 - Student Services
- Standard Area 14 - Library and Learning Resources
- Standard Area 15 - Facilities and Equipment
- Standard Area 16 - Health and Security

Fall 2030, 2035, 2040

- Standard Area 11 - Financial Operations
- Standard Area 12 - Institutional Assessment
- Standard Area 13 - Strategic Planning

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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: ~~December 2025~~

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.

The various categories of recognition with TRACS are:

- **Corresponding Institution**: An institution that has made initial contact with TRACS and is actively pursuing the recognition process. This status does not require Commission consideration and action.
- **Applicant Institution:** 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 and does not constitute membership with TRACS.
- **Candidacy (Pre-Accreditation)**: This status is granted by the Accreditation Commission when an institution has demonstrated compliance with all of the TRACS Standards identified as Institutional Eligibility Requirements (IERs), 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 provides the basic level of quality in instruction and student services required of a pre-accredited institution of higher education. 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.
- **Initial Accreditation**: This status is granted by the Accreditation Commission when an institution has demonstrated that it not only demonstrates compliance with all of the TRACS Standards identified as IERs, but demonstrates substantive compliance with the non-IER Accreditation 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.

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- **Reaffirmation of Accreditation**: This status is granted by the Accreditation Commission when an institution has demonstrated that it remains in substantive compliance with all TRACS Accreditation Standards since being granted Initial Accreditation or previous Reaffirmation of Accreditation, 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.

Achieving Initial Accreditation

TRACS offers two possible processes for institutions to achieve Initial Accreditation, depending on the institution's accreditation standing and history. In both processes, institutions are evaluated at multiple points to determine that they meet the applicable TRACS Accreditation Standards. (See the TRACS publication "*Steps Toward Accreditation*" for a detailed description of the various steps in the recognition process.)

Process 1: Candidacy to Initial Accreditation

Most new member institutions first achieve Candidacy with TRACS before being considered for Initial Accreditation. Once granted Candidacy, institutions are required to maintain and demonstrate compliance with TRACS Accreditation Standards for a period of at least one year and until the following Candidacy benchmarks have been met before pursuing Initial Accreditation.

1. The completion and documentation of at least one program review after the granting of Candidacy,
2. The completion of all assessment processes, including the compilation, processing, and publication of student learning outcomes for at least one graduating class / cohort in at least one of the educational programs offered by the institution,
3. Continuous compliance with all TRACS Accreditation Standards including those associated with financial viability and sustainability, during the period of Candidacy, and
4. An Accreditation Commission determination that the Candidate institution has demonstrated compliance with any areas of non-compliance with Accreditation Standards that were noted when Candidacy was granted.

As deemed appropriate, TRACS may require the achievement of additional or other benchmarks before allowing a Candidate institution to pursue Initial Accreditation.

Process 2: Accelerated Process for Initial Accreditation

Applicant institutions may obtain Initial Accreditation with TRACS without having first obtained Candidacy if the institution meets the following criteria:

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1. The institution is currently institutionally accredited by an accreditor that is recognized by the U.S. Department of Education as an institutional accreditor of degree-granting institutions of higher education. As determined by the Accreditation Commission, exceptions to this requirement may apply for institutions whose accreditation agency's recognition has been denied by the US Department of Education or if the agency has withdrawn from recognition.
2. The institution, in its current form, has undergone at least one Reaffirmation of Accreditation with its current institutional accreditor. If an institution has not, in its current form, undergone at least one Reaffirmation of Accreditation with its current institutional accreditor, the institution must be able to demonstrate other evidence of continuity and stability in its accreditation history.
3. The institution has not been placed on a sanction (Warning, Probation, or Show-Cause), or other similar negative action with its current institutional accreditor for at least the past five years, and its current institutional accreditor is not currently considering placing the institution on a sanction (Warning, Probation, or Show-Cause) or other similar negative action.

As deemed appropriate, TRACS may require institutions to meet additional or other criteria before allowing an institution to pursue Initial Accreditation through this accelerated process.

Notwithstanding any institution's ability to meet the above criteria, neither TRACS' policies nor federal regulations require TRACS to consider any institution for Initial Accreditation, whether through the Accelerated Process for Initial Accreditation or through the usual Recognition Process.

Institutions seeking to gain initial Accreditation under the Accelerated Process provision must submit a formal request, in writing, to the President of TRACS. Such requests must include the rationale for the request and evidence that the above named criteria have been met. Only approved Applicant institutions may submit an accelerated process request and such requests must be submitted and approved prior to the institution's engagement in the Self-Study Process. Institutions approved for this accelerated process would be required to follow the Recognition Processes described below.

While institutions accredited by another agency may submit compliance documentation submitted to and utilized by the other agency in reaching its conclusions to TRACS as a part of the Self-Study process, such documentation must address TRACS Accreditation Standards directly and would not be determinative regarding the institution's review of and consideration by TRACS staff, Evaluation Teams, or the Accreditation Commission. TRACS does not rely on the review and/or determinations of other accrediting agencies when reaching its own conclusions regarding institutional compliance with TRACS Accreditation Standards.

If Initial Accreditation is granted to an institution under the Accelerated Process provision, the status would be for a period of up to five years. Subsequent Reaffirmation of Accreditation processes would follow the procedures for Reaffirmation of Accreditation as outlined in the Recognition Process below.

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Recognition Processes

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, Initial Accreditation (whether by *Process 1* or *Process 2* as noted above) 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 recognition with TRACS ~~accreditation~~ at its various levels: (Candidacy, Initial Accreditation, and Reaffirmation of Accreditation)

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 the institution has with each of the TRACS Accreditation Standards. The Self-Study Report serves as the basis of the on-site Evaluation Team's review.

The TRACS Accreditation 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 Accreditation 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, t~~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 to the Evaluation Team's determinations on the

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Compliance Report.

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.

If the Accreditation Commission determines an institution has not demonstrated compliance with one or more Accreditation Standards, they may choose to defer or deny the institution the status sought. Institutions seeking Initial Accreditation or Reaffirmation of Accreditation may only be deferred if time remains in the institution's current cycle of recognition.

~~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.

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Institutions that are deferred in their bid for Candidacy~~te~~, Initial Accreditation~~ed~~ or Reaffirmation of Accreditation ~~status~~, after having made an initial appearance before the Accreditation Commission, may make one subsequent appearance before the Commission for consideration of status. The subsequent appearance before the Commission must take place within twelve (12) months of the Commissions original deferral for institutions seeking Candidacy~~te seeking institutions~~, or within six (6) months for institutions seeking Initial Accreditation~~ed~~ or Reaffirmation of Accreditation ~~status~~ so long as the appearance for institutions seeking Initial Accreditation~~ed~~ or Reaffirmation of Accreditation ~~status~~ takes place prior to the expiration of their current status.

After having appeared before the Accreditation Commission, institutions that are denied their bid for Candidacy~~te 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 Accreditation 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.*

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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 Initial 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 Initial 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, Initial 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

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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, Initial Accreditation or Reaffirmation of Accreditation to demonstrate compliance with the TRACS Accreditation Standards. This policy does not allow for the use of alternative Accreditation Standards, policies, and procedures for institutions 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:~~

- ~~The alternative means are approved by the Accreditation Commission and otherwise meet the intent of TRACS' expectations and requirements;~~
- ~~TRACS sets and applies equivalent goals and metrics for assessing the compliance of the institution;~~
- ~~TRACS' process for establishing and applying the alternative means is clearly presented in writing to the institution; and~~
- ~~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.~~

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BP312 – Multiple Accreditors

Reference: 34 CFR §600.11; 20 USC §1099b(h); DCL GEN-22-10
Adoption Date: June 2025
Last Revision Date: ~~December 2025~~

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.

Achieving Candidacy, Initial Accreditation, or Reaffirmation of Accreditation
Even if ~~If~~ TRACS is the designated secondary accreditor, ~~the~~ institutions seeking Candidacy, Initial Accreditation, or Reaffirmation of Accreditation with TRACS will be required to complete all ~~accreditation activities~~ Self-Study processes including the submission of a Self-Study Proposal, submission of a Self-Study Report, and hosting an Evaluation Team Visit.

While institutions accredited by another agency may submit compliance documentation submitted to and utilized by the other agency in reaching its conclusions to TRACS as a part of the Self-Study process, such documentation must address TRACS Accreditation Standards directly and would not be determinative regarding the institution's review of and consideration by TRACS staff, Evaluation Teams, or the Accreditation Commission. TRACS does not rely on the review and/or determinations of other accrediting agencies when reaching its own conclusions regarding institutional compliance with TRACS Accreditation Standards. *(See TRACS Policy BP305 for a Complete description of the Accreditation Process)*
~~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
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 Accreditation 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.