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

## INTRODUCTION

INTRODUCTION ........................................................................................................ iii

## BOARD POLICIES AND PROCEDURES RELATING TO:

### 100 THE ACCREDITATION COMMISSION

| §101 | Policies and Procedures |
| §102 | Definitions |
| §103 | Use of TRACS Logo |
| §104 | Complaints Against Member Institutions Or TRACS |
| §105 | Disclosure of Information |
| §106 | Information Provided to Federal and State Agencies, Other Accreditors, and the Public |
| §107 | Documents Provided to the Accreditation Commission |
| §108 | Budget and Financial Reports |
| §109 | Financial Support |
| §110 | Reliability-Validity Study |
| §111 | Annual Operational Report Summary |
| §112 | Institutional Misrepresentation |
| §113 | Conflicts of Interest |
| §114 | Commission Member Continuing Education |
| §115 | Travel and Related Expenses |
| §116 | Anti-Discrimination |
| §117 | Anti-Harassment |
| §118 | Unannounced Visits |
| §119 | Records Management, Retention and Destruction |
| §120 | TRACS Responsibilities for Institutional Title IV Compliance |
| §121 | Investment Policy |

### 200 INSTITUTIONS

| §201 | Institutional Responsibilities in Accreditation |
| §202 | Institutional Official Representative to TRACS |
| §203 | Annual Institutional Reporting |
| §205 | Monitoring Institutional Growth |
| §206 | Monitoring Student Achievement |
| §207 | Institutional Staff Reviews |
| §208 | Title IV Participation |
| §209 | Student Refunds |
| §210 | Credit Hour |
| §211 | Commission Actions Against Institutions |
§212 Request for Withdrawal
§213 Failure to Pay
§214 Lapse of Candidacy or Accreditation
§215 Decisions of State Agencies and other Accrediting Agencies
§216 Investigation of Allegations of Fraud
§217 Unethical Conduct
§218 Reapplication after Withdrawal or Termination
§219 Appeals
§220 Choice of Law and Venue
§221 Institutional Financial Obligations Related to Litigation
§222 Closure of An Institution
§224 Teach-Out Plan
§225 Teach-Out Agreement
§226 Institutional Changes
§227 Branch Campus
§228 Teaching Site
§229 Distance and Correspondence Education Reporting
§230 Agreement Between Institutions
§231 Using Facilities of Another Organization
§232 Using Services of Another Organization
§233 Records Management
§234 Records of Student Complaints
§235 Crime reports (Deleted by Commission action 6/12/2015)
§236 Best Practices in Advertising
§237 Best Practices in Student Recruiting
§238 Best Practices in Representing TRACS Status
§239 Use of Consultants

300 ACCREDITATION.............................................................................................. 300-1

§301 Institutional Accreditation
§302 Accreditation Standards
§303 Changes to Board Policies, Accreditation Standards and IERs
§304 Application for Candidate Status
§305 The Accreditation Process
§306 The Peer Evaluators
§307 Third Party Comments
§308 Posting of Institutional Review Dates
§309 Professional Programs
§310 Interim Fifth-Year Review
INTRODUCTION

Purpose of the Transnational Association of Christian Colleges and Schools

The Transnational Association of Christian Colleges and Schools (TRACS) is a voluntary, non-profit, self-governing organization of Christian postsecondary institutions. TRACS was established by a group of educators in 1979. The purpose of TRACS is to promote the welfare, interests, and development of quality Christian postsecondary institutions whose mission is distinctly Christian, and is undergirded by a belief in biblical inerrancy, biblical authority and the historicity of the first eleven chapters of Genesis, including special creation. While TRACS encourages each member institution to develop its own distinctive character, TRACS expects member institutions to provide quality postsecondary education within the context of Christian values, with emphasis on high academic standards, integrity, practical application, and spiritual development. The governing boards of these institutions have voluntarily applied to TRACS and have been approved by the Accreditation Commission after having met the established requirements for membership at either the accredited or candidacy (pre-accredited) level as described below.

The required criteria include both FOUNDATIONAL STANDARDS assuring the institution’s constituents and the public of its biblical, philosophical, and ethical positions, and the OPERATIONAL STANDARDS providing assurance of educational quality and financial stability.

Aims

- To foster excellence and quality in Christian postsecondary education through the development of policies, procedures and standards for assessing educational effectiveness leading to enhanced educational quality.
- To ensure the consistent application of accreditation standards.
- To develop an accreditation process that requires continuous institutional self-study and assessment.
- To serve as an accrediting agency that recognizes institutions demonstrating quality through compliance with the standards at a candidate (pre-accredited) or accredited level.
- To provide counsel and assistance to both established and developing institutions.
- To provide institutions, accredited and pre-accredited (candidate) the opportunity to participate in programs authorized under Title IV and other federal programs.
- To assure the educational community, the general public, and other agencies or organizations that an institution evaluated by TRACS 1) has clearly defined and appropriate educational objectives and outcomes, 2) has established conditions under which educational outcomes are being achieved at an acceptable level with reference to TRACS’ standards, and 3) is so organized, staffed, and
supported that it can be expected to continue to offer quality education in the foreseeable future.

- To establish and encourage cooperative relationships among its member institutions and promote common interests both nationally and internationally.
The *Policies and Procedures Manual* is intended for institutions applying for candidate (pre-accredited) status, accredited status and those seeking reaffirmation of accredited status. Questions regarding the accreditation process (policies, procedures, or standards) should be directed to the TRACS office.
BP 101 Policies and Procedures

Reference: None
Adoption Date: June 2000  Last Revision Date: June 2013

To ensure operational integrity and fairness in the accreditation process, the *Policies and Procedures Manual* will contain all policies and procedures which have been established and approved by the Accreditation Commission.

**Changes to Policies and Procedures**

The policies and procedures for the accreditation process may be modified by the Accreditation Commission.

The process will begin with the solicitation of comments on any proposed changes from all parties and institutions significantly affected.

Proposed new or changes to existing policies and procedures are submitted in writing to the President of TRACS for consideration at least 30 days in advance of any scheduled Accreditation Commission meeting. Changes may be proposed by TRACS staff, Commission members, presidents of the member institutions, the U.S. Department of Education, state agencies that approve postsecondary education institution, or individuals. The proposed policies, procedures, or standards will be reviewed by TRACS staff and submitted to the Accreditation Commission for appropriate action.

All proposed new or substantial changes to existing policies and procedures will be published at www.tracs.org and submitted to all institutional presidents. Before voting, the Accreditation Commission will allow at least 30 days for comments from member institutions. All comments received will be considered by the Accreditation Commission prior to approving any changes to or adopting any new policies or procedures to which the comments relate. New policies and procedures or changes to existing policies and procedures become effective when approved by the Commission.
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.

**Accepted practice:** The common practices in American higher education.

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

**Arbitrary:** Depending on individual discretion rather than by fixed rules, procedures, or law.

**Academic:** Someone currently or recently directly engaged in a significant manner in postsecondary teaching and/or research.

**Administrator:** Someone currently or recently directly engaged in a significant manner in postsecondary program or institutional administration.

**Applicant Status:** An institution which has an Application approved by the Applicant Review Committee (ARC) after hosting a successful staff visit and responding positively to the staff report recommendations.

**Bias:** Inclination or prejudice for one side over the other for reasons other than the facts and rules.

**Basic Compliance:** A conclusion by the Accreditation Commission that an institution is in full compliance with all Standards related to the Institutional Eligibility Requirements (IERs) and has the ability to be in compliance with all of the Standards within the period of candidacy for accreditation.

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

**Candidate Status:** A status which has been awarded by action of the Accreditation Commission indicating that the institution has been found to be in basic compliance.
Certified External Audit: An audit performed in conformity with generally accepted accounting principles (GAAP) and federal guidelines by auditors who are not inappropriately involved with the institution (e.g., auditors are not members of the governing board, not employees of the institution, not under contract to the institution for services other than the audit, or not involved in the decision-making activity, etc.).

Correspondence Education: Education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor; interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; correspondence courses are typically self-paced; and correspondence education is not distance education.

Corresponding Institution: An institution which has made initial contact with TRACS and is actively pursuing the process toward accreditation.

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

Earned degree: a degree earned at an accredited institution or demonstrated competencies which were determined by the institution to be equivalent to the required degree prior to issuing a contract to the faculty member. Faculty members deemed qualified by demonstrated competencies will not be considered to meet the requirements of Standard 15.1 or the required ratios of Standard 15.6.

Educator: Someone currently or recently directly engaged in a significant manner in postsecondary education in an academic capacity (e.g., professor, instructor, academic dean).

Factual Error: An untrue conclusion regarding the facts.

Familial Relationship with the Chair of the Board or the Chief Executive Officer of the Institution: The spouse, parent, child, or sibling of the Chair of the Board or the Chief Executive Officer of the Institution.

Financial Monitoring – Weekly reporting of Institution’s cash on hand and monthly submission of internally produced interim Income Statement and Balance Sheet.

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, enrollment decline of 20% or more, notification from the DOE of composite score below 1.5, the use of pledges to achieve a positive change in Unrestricted Net Assets or the required 10% line of credit 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 Employee:** An employee who has a full-time contract or other legal arrangement which indicates to the employee that the term of employment will only be terminated for cause or financial exigency; whose experience and education or training are related to the scope of employment; 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; who devotes substantially all working time during the contracted period to the specified job responsibilities; and whose outside professional activities do not detract from the specified job responsibilities. The contract or other legal arrangement must include language that specifies the employee has read the institution’s purpose, objectives, and philosophy and agrees with and supports them.

**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; who devotes substantially all working time during the contracted period to the specified job responsibilities; and whose outside professional activities do not detract from the specified job responsibilities.

**Full-Time President or 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; who devotes substantially all working time during the contracted period to the specified job responsibilities; and whose outside professional activities do not detract from the specified job responsibilities. The contract must include language that specifies the individual has read the institution’s purpose, objectives, and philosophy and agrees with and supports them.

**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 Institutional Eligibility Requirements (IERs) are the set of TRACS Standards with which an institution must be in compliance in order to be considered by the Accreditation Commission for Candidate Status. Compliance with the IERs is considered basic compliance.

**Misinformation:** Information that is false or misleading.

**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; whose salary is fixed and not contingent; 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. The contract must include language that specifies the faculty member has read the institution’s purpose, objectives, and philosophy and agrees with and supports them.

**Practitioner:** Someone currently or recently directly engaged in a significant manner in the practice of a profession in the area being evaluated.

**Program Area:** A discipline area at either the undergraduate or graduate level in which an institution has a degree program. A Program Area may include one or more degree programs including degree programs which are totally contained within a higher degree program. (Examples: At the undergraduate level - an Associate Degree in Biblical Studies in which all courses are a totally contained subset of a Bachelor Degree in Biblical Studies. At the graduate level – A Master of Arts in Theology or Master of Arts in Biblical Studies in which all courses are a totally contained subset of a Master of Divinity.)

**Professionally Qualified Librarian:** An individual who has earned a master’s degree in library science, or its equivalent, from an accredited institution and who is capable of leading library development and operations, including reference, collection development, information services, bibliographic control of materials, on-line resources, and administration.

**Staff Visit:** The visiting of an institution by TRACS staff related to routine issues such as institutional changes or visits made at the request of the institution.

**Teaching Site:** A location geographically apart from the main campus at which the institution offers less than 50 percent of any educational program. No student can earn 50 percent or more of any educational program at any degree level at a teaching site.

**Termination of Accreditation:** The removal of candidate or accredited status from an institution by the Accreditation Commission after completing all policy defined processes for appeal of such action. TRACS considers *termination* of accreditation as synonymous with *withdrawal*, *suspension*, and *revocation* of accreditation.
Use of the TRACS logo by any individual, organization, or institution is forbidden without written prior approval from TRACS.
STATEMENT OF PURPOSE

The Transnational Association of Christian Colleges and Schools (TRACS) values the role of information provided by students, employees, and others in performing its role of monitoring an institution’s compliance with TRACS Standards. TRACS is also interested in assuring that member institutions maintain appropriate grievance and due process procedures, provide procedural fairness, and consistently apply their policies and procedures.

I. COMPLAINTS AGAINST INSTITUTIONS

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

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

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

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

A. Responsibilities of Institutions

1. The institution has adequate procedures for addressing written student complaints and is responsible for demonstrating that it follows those procedures when resolving student complaints. Institutions are expected to be in compliance with the following TRACS Accreditation Standards regarding processes for handling complaints by students or faculty:
   c. Institutional Standards 9.5 and 9.8.

2. The record of all student complaints is maintained in a designated office, is made available to TRACS upon request and is reviewed and evaluated by the Visiting Team as part of the institution’s scheduled reviews for candidate, accredited and reaffirmation status.

B. Procedures for Filing a Complaint against an Institution

1. An individual may make an inquiry to TRACS regarding complaint procedures or about issues and concerns that could be considered complaints at which time TRACS will direct the individual to the TRACS website at www.tracs.com with instructions on downloading the packet containing the Policies and Procedures for Complaints Against Member Institutions, the TRACS Complaint Information Sheet, and the TRACS Complaint Processing Form. However, TRACS response and its obligations to meet the specific timetables outlined in these procedures will begin only after the complainant submits all documents required in the TRACS Complaint Information Sheet.

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

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

4. By the end of the 30 working days review TRACS will inform the complainant regarding one of the following dispositions of the complaint:
   a. The complaint will not be processed further because it is not within the jurisdiction of TRACS (not related to a TRACS Standard) or there is inadequate documentation to raise questions concerning the institution’s compliance with the TRACS Standards.
   b. Documentation is inadequate and additional documentation may be necessary from the complainant.
   c. The institution will be asked for information regarding the complaint.

5. If information is required from the institution, TRACS will forward a copy of the complaint to the institution’s President who will be asked to respond and provide all documentation to TRACS within 30 working days of receipt of the complaint.

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

7. If either b. or c. above occurs, within 20 working days the President of TRACS will notify the complainant that the complaint is settled and which of those options TRACS will pursue and also notify the institution which of those options TRACS will pursue.

8. The President of TRACS will present the findings of any team report to the Commission along with a recommendation at the next scheduled meeting; at which time the Commission will make a decision regarding the disposition of any non-compliance. The decision of the Commission is final.

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

TRACS Board Policy# 211. B. stipulates the following:

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

Transnational Association of Christian Colleges and Schools

104-3
The findings of non-compliance from that review could lead to an action against the institution.

II. COMPLAINTS AGAINST TRACS

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

A. Procedures for Filing a Complaint against TRACS

1. If the complaint is against a TRACS staff member or an agency representative, such as an offsite or on-site visiting team member, the following procedures apply:
   a. The individual (or institution) should submit the written complaint including a description of the specific complaint accompanied by documentation supporting the allegation.
   b. The complaint is to be sent to: President, Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   c. The President will acknowledge receipt of the complaint within 10 working days of its receipt.
   d. Within 30 working days of receipt of the complaint, the President of TRACS will review the complaint and its documentation and determine:
      i. If there is adequate documentation in support of the allegations.
      ii. Whether the complaint raises questions regarding the institution’s compliance with the TRACS Standards sufficient to require the institution to submit information and documentation regarding the complaint.
   e. The President will inform the complainant of action within 30 working days of receipt of the complaint.

2. If the complaint is against the President of TRACS (such as an allegation of failure to follow the TRACS policy), the following procedure applies:
   a. The individual should submit a written complaint to the Chair of the TRACS Commission that includes a description of the specific complaint and all documentation which supports the complaint. It should be addressed to: Commission Chair (For Chair Only), Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   b. The Chair will acknowledge the complaint within 20 working days of receipt and will designate a committee composed of members of the Executive Committee to investigate the complaint (including all documents submitted by the complainant), request and review information in writing from the President, and recommend actions to the Chair within 25 working days.
   c. The Chair will review the Executive Committee recommendation and inform the complainant and the President of TRACS of action to be taken within 45 days of receipt of the complaint.
d. Concern that a TRACS action was not in accord with the complainant’s expectations is not in and of itself cause for review of the complaint.

3. If the complaint is against a member of the TRACS Commission (such as that a Commissioner failed to recuse him or herself from the discussion and vote where an alleged conflict of interest existed or evidence that the Commission failed in the application of a policy or procedure), the following procedures apply;
   a. The individual should submit a written complaint to the Chair of the TRACS Commission that includes a description of the specific complaint and all documentation which supports the complaint. It should be addressed to: Commission Chair (For Chair Only), Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   b. The Chair will acknowledge the complaint within 20 working days of its receipt and will designate a committee composed of members of the Executive Committee to investigate the complaint (including all documents submitted by the complainant), request and review information in writing from the Commission member and recommend action to the Chair within 25 working days.
   c. The Chair will review the Executive Committee’s recommendation and inform the complainant and the Commission member and the President of TRACS of the action within 45 days of receipt of the complaint.
   d. Concern that a Commission action was not in accord with the complainant’s expectations is not in and of itself cause for review of the complaint.

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

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

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

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

A. Procedures for Filing a Third-Party Comment

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

1. Third-party comments should be filed in accordance with the following procedures:
   a. The individual should submit the third-party comment in written form including the commenter’s name, mailing address, e-mail address, phone number, and a clear statement describing the performance of the institution in relation to compliance with the TRACS Standard with which the institution is allegedly not compliant or the Policy or Procedure which TRACS has not properly followed.
   b. All third-party comments are to be sent to: President, Transnational Association of Christian Colleges and Schools, 15935 Forest Rd., Forest, VA 24551.
   c. The President will acknowledge receipt of the complaint within 10 working days of its receipt.
   d. If the commenter indicates that his or her identity may not be shared, TRACS will make every effort to preserve the confidentiality of the commenter. However, depending on the nature of the comment and the circumstances, it may not be possible to determine the validity of the comment unless this information is shared. For this reason, TRACS staff may choose to disregard any comment that indicates that the commenter wishes not to have his or her identity shared.
   e. All third-party comments should be accompanied by appropriate supporting documentation. TRACS will not consider unsupported comments.
   f. Within 30 working days of receipt of the third-party comment, the President of TRACS will review the third-party comment and its documentation and determine:
      i. Whether there is sufficient documentation in support of the allegations.
      ii. Whether the issues raise questions regarding the institution’s compliance with the TRACS Standards sufficient to require the institution to submit information and documentation regarding those issues.
      iii. Whether the TRACS Commission or Staff has violated a TRACS Policy or Procedure.
   g. Normally, no additional response is made to the individual filing a third-party comment. If appropriate, staff may contact the commenter for clarification or additional information.
   h. For comments regarding an institution, the President of TRACS will determine the appropriate handling of the comment which may include, but is not limited to:
      i. Sending the information to the institution for its input and follow up.
      ii. Referring the information or a summary of issues to a future visiting team with instructions to verify information contained in the comment with other sources in order to determine its validity.
      iii. Holding the information in a file for future reference.
      iv. Dismissing the comment for lack of evidence of non-compliance.
      v. Proceeding to the Adverse Action Policy procedures.
   i. For comments regarding the TRACS Commission or Staff, The President of TRACS will prepare a report for the next scheduled meeting of the Commission which includes recommendations for resolving the issues identified in the third-party comment.

FIELDING INQUIRIES FROM THE MEDIA

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

Media shall be directed by the President of TRACS to the appropriate location on the TRACS website (www.tracs.org) for information regarding the Complaint Policy and Procedures and Accreditation Standards.

IV. MEANS OF COMMUNICATION

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

V. RETENTION OF RECORDS

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

TRACS posts its publications and public notices on its website, www.tracs.org. These documents are available for downloading or printing.

Any person who wants a printed copy of any information or document publicly disclosed should request that copy from the TRACS office. The address and phone number are available on the TRACS website.

TRACS urges member institutions to make available to the public, information regarding their accreditation status and the reports related to the accreditation process, including evaluation team recommendations from TRACS. Although this information can be requested from TRACS, the request will be forwarded to the institution and the institution is not required to disclose any of it. (These are available only upon the written consent of the institution).

B. Information Available:

1. Each type of accreditation and pre-accreditation it grants.

2. The procedures that institutions or programs must follow in applying for accreditation or pre-accreditation.

3. The standards and procedures it uses and the basis for determining to grant, reaffirm, reinstate, deny, terminate, or take any other action related to each type of accreditation and pre-accreditation that the agency grants.

4. The institutions and programs that the agency currently accredits or pre-accredits, and for each institution and program, the year the agency will next review or reconsider it for accreditation.

5. The names, academic and professional qualifications, and relevant employment and organizational affiliation of:
   a. The members of the agency’s policy and decision-making bodies.
   b. The agency’s principal administrative staff.

6. All final decisions of the Accreditation Commission regarding accreditation will be reported to the public (including the basis of the decision) within 24 hours of its notice to the institution, but no more than 30 days after its makes the decision, including:
   a. A decision to award initial accreditation or pre-accreditation to an institution or program.
b. A decision to renew an institution’s or program’s accreditation.
c. A decision to accept an institution’s withdrawal from membership.
d. A final decision to take an adverse action placing an institution or program on probation or show cause.
e. A final decision to deny or terminate the accreditation or pre-accreditation of an institution or program. Notice with respect to any of these final decisions shall also:
   (1) Include the specific reasons for its decision.
   (2) Include any official response provided by the affected institution or program with regard to the decision or evidence that the institution had the opportunity to provide official comments.

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

C. Information Not Available For Dissemination

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

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

1. Visiting team and staff reports, including recommendations.

2. Minutes of the Accreditation Commission discussion in regard to applicant or member institutions.

Certain relationships yield information which legally cannot be disclosed without the consent of the person who provides it. Should such information or other information that is protected under law come into the hands of TRACS or an evaluation team, the information will not be disclosed without written consent of the party legally entitled to disclose the information or who has the privilege.
A. Notice of the following decisions of the Accreditation Commission regarding the accreditation of institutions will be provided in writing to the U.S. Secretary of Education, appropriate state and accrediting agencies no more than 30 days after the Accreditation Commission makes the decisions.

1. A decision to award initial accreditation or candidacy (pre-accreditation) to an institution or program.

2. A decision to renew an institution’s or program’s accreditation or pre-accreditation.

3. A decision to accept an institution’s withdrawal from membership.

B. Notice of the following decisions of the Accreditation Commission regarding the accreditation of institutions will be provided in writing to the U.S. Secretary of Education, appropriate state and accrediting agencies at the same time notice is sent to the institution, but no more than 30 days after the Accreditation Commission makes the decisions.

1. A final decision to take any adverse action against an institution, including placing an institution on probation.

2. A final decision to deny or terminate the accreditation status or candidate status of an institution. Notice with respect to any of these final decisions shall also:
   a. Include the specific reasons for its decision;
   b. Include any official response provided by the affected institution or program with regard to the decision or evidence that the institution had the opportunity to provide official comments; and
   c. Be disclosed no later than 60 days after the decision was made.

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

1. TRACS receipt of a request from a member institution to withdraw voluntarily from accreditation or candidacy (pre-accreditation). This notice shall be provided no more than 30 days from the date TRACS receives the written request which appears to have been authorized by the institution’s governing board.
2. TRACS determination that an institution allows its accreditation or pre-accreditation to lapse. This notice shall be provided no more than 30 days from the date TRACS determines that the institution’s accreditation or candidacy (pre-accreditation) lapsed.

D. The following information will be submitted to the U.S. Department of Education:

1. A copy of any annual report prepared by TRACS.

2. A copy, updated annually, of its directory of accredited and candidate (pre-accredited) institutions and programs.

3. A summary of the agency’s major accrediting activities during the previous year (an annual data summary), if requested by the Secretary to carry out the Secretary’s responsibilities related to accrediting agency monitoring.

4. Any proposed change in the agency’s policies, procedures, or accreditation or candidacy (pre-accreditation) standards that might alter its:
   a. Scope of recognition.
   b. Compliance with the criteria for recognition.

5. Any institution approved for the offering of distance education and/or correspondence education which experiences an increase in headcount enrollment of 50 percent or more within one institutional fiscal year.

6. The name of any institution or program TRACS accredits that the agency has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse, along with the agency’s reasons for concern about the institution or program.

7. If the Secretary requests, information that may bear upon an accredited or pre-accredited institution’s compliance with its Title IV, HEA program responsibilities, including the eligibility of the institution or program to participate in Title IV, HEA programs.

E. Upon request, TRACS will share with other appropriate recognized accrediting agencies and recognized State approved agencies information about the accreditation or pre-accreditation status of an institution or program and any adverse actions it has taken against an accredited or pre-accredited institution or program.

F. TRACS will respond to requests for information from the USDE, other recognized accrediting agencies, and State agencies no more than 30 days from the receipt of the request and earlier if required by state or federal laws or regulations. Requests should be addressed to The President of TRACS.
All necessary materials pertaining to the accreditation of institutions and for decisions concerning institutional eligibility are prepared in advance by the TRACS staff. Materials are provided one month in advance of the regularly scheduled semi-annual meetings of the Accreditation Commission to each Commission member to provide ample review time. Other materials, such as previous meeting minutes, are sent to each member of the Commission one month in advance of the meeting. The TRACS staff also prepares and provides supporting documentation for individual Commissioner’s review and places them in a reference room prior to each scheduled semi-annual Accreditation Commission meeting. Commissioners are expected to review all documents in the reference room prior to engaging in discussions about the institutions being considered or taking any actions regarding those institutions. Commissioners should note their review of an institution’s documents on the appropriate forms in the reference room.

The President of TRACS and the Chair of the Accreditation Commission develop the agenda for the semi-annual meeting. Based on the agenda, the President of TRACS and staff prepare materials to send to each Commission member. The materials to be sent normally will include the following:

- Agenda
- Minutes of previous meeting
- Standards and Review Committee Report
- Nominating Committee Report
- Special Committee Reports
- Reports on each institution under review
- Team Reports of institutional visits
- Annual Report on institutional compliance (Spring meeting)
- Financial Reports
- Budget Projections
The TRACS staff submits the annual budget to the Accreditation Commission at the spring meeting, and the Commission approves or modifies it as necessary. The budget is not subject to consideration or review by another entity or organization. The staff submits the Financial Reports and the audits to the Accreditation Commission at the fall meeting and any adjustments to the budget that are necessary are approved by the Accreditation Commission.
BP 109  Financial Support

Reference: None

Adoption Date: January 2011  Last Revision Date: January 2011

TRACS is supported primarily through the dues and fees of its member institutions. Although TRACS does not solicit donations, it does solicit grants for projects related to its mission and its institutions. All donations to TRACS will be noted in the reports of the President of TRACS with the sources noted. All financial reports are approved by the Accreditation Commission.
To assure that the Standards and Criteria of TRACS are reliable and valid, the Accreditation Commission is committed to continuing its Reliability-Validity Study. This Study involves the regular and systematic collection of data on reliability and validity for all member institutions. Data relating to the reliability and validity of the TRACS Standards and Criteria will be collected from each institutional evaluation team and each institution being evaluated. In addition, a session on the Study which seeks comments from member institutions will be conducted at least once every two years at the TRACS Annual Meeting.

Data Reports will be published at regular intervals for Accreditation Commission review. Other studies essential for maintaining quality control will be initiated as part of this continuing process. The Study will be conducted in five-year cycles with summary reports published at the end of each cycle. Reports will be provided to the U.S. Department of Education and state agencies as appropriate.
Each year, TRACS compiles data provided by each institution’s Annual Operational Report and Annual Financial Report to create the Annual Operational Report Institutional Summary. The Institutional Summary identifies institutional strengths and potential problem areas for candidate and accredited institutions. TRACS uses the Institutional Summary as part of its annual institutional review process.
If a member institution releases incorrect or unclear information regarding its accredited or candidate (pre-accredited) status, the contents of reports of visiting teams, or any action by 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. Failure by the institution to correct the problem identified will result in an adverse action.

Any non-member institution falsely claiming affiliation with TRACS (approved applicant, candidate or accredited status) is subject to legal action by TRACS.
BP 113  Conflicts Of Interest

Reference: None

Adoption Date: June 2000

Last Revision Date: December 2015

Definition: A conflict of interest includes, but is not limited to, having served for compensation during the prior three years as an employee of or consultant to an institution under consideration; being a stockholder or board member of the institution during the prior five years; or any other association or activity, including the appearance of a conflict of interest that an impartial person might reasonably conclude would compromise a person's capacity for objectively dealing with an issue concerning a particular institution.

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

A. Accreditation Commission

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

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

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

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

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

When an Accreditation Commission member is employed by, an appointee of, or a consultant to a member institution which is in any way involved in litigation with TRACS, the Accreditation Commission or both, it shall be a conflict of interest for that member to attend
any meeting of the Accreditation Commission or the committees of the Accreditation Commission until the litigation is concluded, including all appeals.

New members of the Accreditation Commission receive training concerning conflicts of interest as a part of the overall training provided to new Commissioners and are required to sign a “Conflict of Interest Form” upon their election to the Commission. Additionally, all members of the Accreditation Commission are required to sign a “Conflict of Interest Form” annually.

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

B. Appeals Pool and Appeal Committee Members

In addition to the stipulations outlined in the general Conflict of Interest definition above, the following guidelines are applied to members of the Appeals Pool (when determining what constitutes a conflict of interest and whether or not a member of the Appeals Pool is eligible to serve on an Appeal Committee) and to Appeal Committee members:

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

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

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

Upon agreement to serve in the Appeals Pool, individuals receive training concerning conflicts of interest as a part of the overall training provided to Appeals Pool members. These individuals sign a “Conflict of Interest Form” upon placement in the Appeals Pool. Additionally, all members of the Appeals Pool are required to sign a “Conflict of Interest Form” annually. Finally, when assigned as a member of an Appeal Committee which will hear the appeal of a specific institution, members receive additional training concerning conflicts of interest and are required to sign a “Conflict of Interest Form” specific to the appeal.

When institutions that are appealing an action by the Accreditation Commission are informed of the proposed Appeal Committee members assigned to hear the institution’s appeal, the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS in accordance with TRACS Board Policy - BP 219.

A member of the Appeals Pool may be removed from the Appeals Pool by the President of TRACS if he / she knowingly violates this policy.
If it is discovered after a decision by an Appeal Committee, that a situation involving a conflict of interest has significantly affected the decision, the Chair of the Accreditation Commission may place the matter on the Accreditation Commission agenda for consideration.

C. Peer Evaluators

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

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

1. Within the last five years has been an appointee (e.g., a board member) or employee of the institution, or has been recently a candidate for employment at the institution.
2. Is a graduate of the institution.
3. Has any other impediment (such as serving as an employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or pre-accredited by the agency or has applied for accreditation or preaccreditation) to rendering an impartial, objective professional judgment regarding the institution, such as a close personal or familial relationship with persons at the institution or a strong bias regarding the institution.

TRACS staff relies on the personal and professional integrity of Peer Evaluators, expects them to be sensitive to potential conflicts of interests in the peer review process, and assumes they will act accordingly.

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

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

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

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

Any Peer Reviewer who knowingly violates this policy will be removed from the Peer Evaluator Pool.
D. TRACS Staff and Other TRACS Representatives

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

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

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

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

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

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

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

E. Institutions

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

If in the course of any of its interactions with TRACS, an institution becomes aware of any potential conflicts of interest, it is the responsibility of the institution to report such potential conflicts to the President of TRACS.

When institutions are informed of any proposed Peer Evaluators assigned to the review of an institution (Evaluation Team members, Focus Team members or IFYR Peer Evaluators) the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS.

When institutions that are appealing an action by the Accreditation Commission are informed of the proposed Appeals Committee members assigned to hear the institution’s appeal, the institution will notify TRACS that there are no known conflicts of interest with the individuals utilizing the “Conflict of Interest Form” provided by TRACS in accordance with TRACS Board Policy - BP 219.
A. New Members

At the beginning of a new Commissioner's term, (July 1), newly elected Commissioners will be sent a packet of materials including, an Accreditation Commission Handbook, Accreditation Manual, Policies and Procedures Manual, and information regarding the next regular training session to be conducted by the Commission Chair prior to the opening session of the Fall Commission meeting.

B. Continuing Members

At each meeting of the Accreditation Commission, a continuing education training session shall be scheduled. The purpose of the training is the continuing education of the Commissioners concerning such topics as TRACS Standards, policies and procedures, changes in Federal Regulations, distance education, correspondence education, team functions, reliability and validity study outcomes, legal issues, annual institutional reporting and all effectiveness issues related to TRACS accreditation and evaluation of TRACS institutions that may affect the Commission in its work.
TRACS staff members, consultants, committee members, and others representing the Accreditation Commission should be prudent in their use of Commission and institutional funds while traveling on official Commission business. The general policy of fiscal prudence is reflected in the following guidelines for travel and committee visits. The visiting team member will be reimbursed for the most economical mode of transportation unless previous arrangements are approved by TRACS staff.

A. Air Travel

Every effort should be made to purchase airline tickets far enough in advance to take advantage of special fares. The Association works with a travel agency capable of providing the best rates. Individuals choosing to fly first or business class must assume the responsibility of paying the difference in rates. Persons on official business for TRACS will be reimbursed the current designated per mile rate to and from the airport. Those making approved international visits may be permitted to fly business class at the discretion of the TRACS President.

B. Ground Transportation

Institutions have the option of providing ground transportation from the airport to the institution and to the hotel where staff and visiting committee members are being accommodated. If visiting committee members need to rent automobiles, they should receive prior approval from the TRACS staff member participating in the visit.

Persons representing TRACS on official business using their personal vehicle will be reimbursed the current designated per mile amount with prior approval.

C. Hotel Accommodations

Whether reservations are made by the institution, the staff, or the Visiting Committee Chair, the following points are to be considered: (1) Access to the institution. (2) Reasonableness of rates. (3) Adequacy of facilities.

D. Personal Phone Calls

Individuals on official TRACS business are encouraged to keep phone calls to a minimum; however, calls home to acknowledge arrival and any changes in the schedule for returning home will be reimbursed.
TRACS not discriminate in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the basis of any area such as race, sex, age, color, national origin, handicap, marital status, and veteran status. As an organization with a well-founded religious mission, TRACS limits employment to those who agree with its doctrinal position.

Discrimination is unfair or unequal treatment of an individual or a group based on one or more characteristics of the person or group.

A. Actions to take if a person is the subject of discrimination

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

B. Response to Allegations of Discrimination

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

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

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

When it is determined that discrimination has occurred, TRACS will promptly eliminate the conduct and take appropriate disciplinary action against the harasser.

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

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

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

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

There are strict time frames in which charges of employment discrimination must be filed. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, adhere to the EEOC guidelines when filing a charge.
All employees should be able to enjoy a work environment free of harassment. This includes all areas protected by federal and state law such as race, sex, age, color, national origin, handicap, marital status, and veteran status.

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

A. Sexual Harassment

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

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

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

B. Actions to take if a person is being harassed

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

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

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

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

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

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

When it is determined that harassment has occurred, TRACS will promptly eliminate the conduct and take appropriate disciplinary action against the harasser.

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

D. Sexual Harassment Training

Beginning in 2011, all employees will be required to complete training designed to prevent sexual harassment. The training must be repeated at least every two years. The President of TRACS will arrange for the training.

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

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

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

There are strict time frames in which charges of employment discrimination must be filed. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, adhere to the EEOC guidelines when filing a charge.
TRACS reserves the right to make unannounced visits to member institutions. Unannounced visits will be at the discretion of the Accreditation Commission or the President of TRACS. They may be made for cause or to verify that the institution has the personnel, facilities, and resources it claimed to have in its Annual Report or any other report to the Accreditation Commission.

During the interval between reaffirmation and evaluation team visits to each institution that provides vocational education, the Accreditation Commission will make at least one unannounced on-site inspection for the purpose of determining whether the institution has the personnel, facilities, resources it claimed to have either during its previous on-site review or in subsequent reports to the Accreditation Commission. A list of majors and programs considered vocational education is available upon request from the TRACS office.

The costs of unannounced visits shall be paid by the institution being visited.
STATEMENT OF PURPOSE

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

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

APPLICABILITY

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

FILE INTEGRITY

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

RECORDS DEFINITIONS

Official Records:

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

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

**Unofficial Records:**

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

**Active Records:**

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

**Historical Records:**

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

**Accounting/Financial Records:**

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

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

RECORD RETENTION RESPONSIBILITIES

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

- Department & Committees:

All departments and committees of TRACS are responsible for properly managing their records and complying with this Policy.

- Employees & Volunteers:

Employees and volunteers are responsible for being familiar with this Policy and for managing records in their possession, custody, or control in accordance with this Policy.

RETENTION REQUIREMENTS SET FORTH BY FEDERAL REGULATION

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

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

1. its last full accreditation or pre-accreditation reviews of each institution or program including on-site evaluation team reports, the institution’s or programs’ responses to on-site reports, periodic review reports, any reports of special reviews conducted by the agency between regular reviews, and a copy of the institution’s or program’s most recent study; and
2. All decisions made throughout an institution’s or program’s affiliation with the agency regarding the accreditation and pre-accreditation and any institution of program and substantive changes, including all correspondence that is significantly related to those decisions.

This Policy has been established to adhere to these requirements.

GENERAL RECORDS REQUIREMENTS
Maintenance and disposal of records, as determined by the content, is the responsibility of those identified in the section above titled **RECORD RETENTION RESPONSIBILITIES**.

**DISPOSITION OF RECORDS**

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

Once a record has been uploaded to TRACS Network, hard copies of official records can be destroyed at any time. Duplicates of official records should not be retained on the shared server, a user's individual server or hard drive, or any secure intranet site beyond the timeframe for which the duplicate record's purpose served except as may be necessary for the use of the material for working purposes of individuals.
I. **Institutional File Records**: Institutional file records are maintained in the database on the TRACS Network. A paper file may be maintained on site while necessary and other elements may be maintained off-site (such as back-up copies). On-site paper files are *Confidential Materials* and are to be treated as such. Off-site records should be maintained in a manner which protects the integrity of both TRACS and the institution.

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application for Initial or Renewal of Accreditation</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Self-Study Report</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Team Summary Reports</td>
<td>Maintained Permanently</td>
<td>TRACS Network School File</td>
</tr>
<tr>
<td>On-site Evaluation Reports</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Commission Action Letters</td>
<td>Maintained Permanently</td>
<td>TRACS Network, TRACS Server</td>
</tr>
<tr>
<td>Institutional Change Proposals</td>
<td>Pertinent Elements Maintained</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Institutional Changes Not Requiring TRACS Approval</td>
<td>Pertinent Elements Maintained</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Commission Approval Letters</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Correspondence that has a Bearing on An Accreditation Action</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Financial Statements</td>
<td>Maintained for Five Years</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Complaints filed in Accordance with the TRACS Board Policy 104</td>
<td>Maintained for Five Years</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Inactive School Files</td>
<td>Maintained Permanently</td>
<td>TRACS Network</td>
</tr>
</tbody>
</table>
### II. Notes and Working Files:

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>On-Site Evaluation Notes and Working Papers – Both Staff and Volunteers</td>
<td>To be Discarded After the On-site Evaluation</td>
<td>Staff Files Until Destroyed</td>
</tr>
<tr>
<td>Commission Meeting Notes and Working Papers</td>
<td>Commissioners – To be Discarded After Commission Action is Ratified. Staff – May be discarded at any Time After Ratification as necessary to complete School Action Letter(s)</td>
<td>Staff and Commissioner Files</td>
</tr>
<tr>
<td>Institutional Compliance Summary for Adverse Actions</td>
<td>Maintained Until Commission Action Letter Sent to School</td>
<td>TRACS Network</td>
</tr>
</tbody>
</table>

### III. General Corporate Records

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Articles of Incorporation and Amendments</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Bylaws</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network</td>
</tr>
<tr>
<td>Recognition Petitions</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Standards of Accreditation</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Call for Comments</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network</td>
</tr>
<tr>
<td>Final Meeting Minutes</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network</td>
</tr>
<tr>
<td>Membership Ballots</td>
<td>Maintained Until Election is Finalized</td>
<td>Maintained on TRACS Network</td>
</tr>
<tr>
<td>Property Records and Leases</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Trademark and Copyright Registrations</td>
<td>Maintained Permanently</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Contracts (not otherwise specified)</td>
<td>Maintained for 5 years</td>
<td>Maintained on TRACS Network and Hard-Copy Files</td>
</tr>
<tr>
<td>Insurance Policies</td>
<td>Maintained for the Life of the Policy + 3 years</td>
<td>On Site – Accounting Offices</td>
</tr>
</tbody>
</table>
### IV. Accounting, Finance and Tax Records
Two to three years of these filings are kept on-site. Older records are maintained on TRACS Network.

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Income Tax Returns and Filings</td>
<td>Maintained Permanently</td>
<td>On Site Accounting Office</td>
</tr>
<tr>
<td>Audit Reports of Accounts</td>
<td>Maintained Permanently</td>
<td>On Site Accounting Office</td>
</tr>
<tr>
<td>Accounts Receivable Records</td>
<td>Maintained for 7 years</td>
<td>On Site Accounting Office</td>
</tr>
<tr>
<td>Accounts Payable Records</td>
<td>Maintained for 7 years</td>
<td>On Site – Accounting Office</td>
</tr>
<tr>
<td>General Ledger Records</td>
<td>Maintained for 7 years</td>
<td>On Site – Accounting Office</td>
</tr>
<tr>
<td>Bank Records (i.e. statements, reconciliations, canceled checks)</td>
<td>Maintained for 7 years</td>
<td>On Site – Accounting Office</td>
</tr>
<tr>
<td>Schedules, Ledgers and Other Supporting Documentation for Financial Statements and Tax Forms</td>
<td>Maintained for 7 years</td>
<td>On Site – Accounting Office</td>
</tr>
</tbody>
</table>

### V. Personnel Records and Payroll Documents
Current employee personnel records are kept on-site. Terminated employee records are kept on site as space is available. Two to three years of payroll documentation are kept on site while older records are routinely set to an off-site storage facility.

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee Handbook</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Employee Personnel Records (i.e. resume/application; evaluations; attendance records; compensation; exit information)</td>
<td>Maintained While Active + 7 years</td>
<td>On-Site – Office Manager Files</td>
</tr>
<tr>
<td>Employment Agreements and Independent Contractor Agreements</td>
<td>Maintained While Active + 7 years</td>
<td>On-Site – Office Manager Files</td>
</tr>
<tr>
<td>Employment Earnings and Payroll Records</td>
<td>Maintained While Active + 7 years</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Employee Insurance Records</td>
<td>Maintained While Active + 3 years</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>I-9 Forms</td>
<td>Maintained While Active + 3 years</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Job Postings, Advertisements, Non-Employee Applications and Documents Pertaining to Employees Not Hired</td>
<td>Maintained for Six months</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Discrimination or Harassment Complaints</td>
<td>Maintained While Active + 7 years</td>
<td>On-Site – Accounting Office</td>
</tr>
</tbody>
</table>
### VI. Pension Documents and Corresponding Employee Data:

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pension Plans, Amendments, and Summary Plan Descriptions</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Pension Plan Determination Letters Issued by Taxing Authorities</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Offices</td>
</tr>
<tr>
<td>Individual Employee Records (i.e. employee service; eligibility for pension; other related forms)</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Reports of Pension(s), Plans, and Forms Filed with the Department of Labor or the Internal Revenue Service (including Form 5500)</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Office</td>
</tr>
<tr>
<td>Memoranda, Notices, and Letters Provided to Pension Plan Participant(s)</td>
<td>Maintained Permanently</td>
<td>On-Site – Accounting Office</td>
</tr>
</tbody>
</table>

### VII. E-Mail and Other Correspondence / Records:

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>General E-mail Correspondence and Any Files Attached Thereto that Have No Bearing on or Express an Accreditation Action (unless other provisions of this policy apply)</td>
<td>May be discarded at any time. Retention not to exceed 180 days</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Routine Correspondence (no acknowledgment or follow-up required)</td>
<td>May be discarded at any time. Retention not to exceed 180 days</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>General Inquiries and Replies which Complete a Cycle of Correspondence and Have No Bearing on or Express an Accreditation Action</td>
<td>May be discarded at any time. Retention not to exceed 180 days</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Interdepartmental Correspondence Where Another Copy of Same Correspondence Kept in Originating Department’s File</td>
<td>May be discarded at any time. Retention not to exceed 180 days</td>
<td>TRACS Network</td>
</tr>
<tr>
<td>Employee Copies of Timesheets, Expense Reports, Purchase Orders and Leave Requests</td>
<td>Maintain for 90 days after TRACS’s fiscal year</td>
<td>On-Site – Accounting Office</td>
</tr>
</tbody>
</table>
VIII. Digital Storage Media and Other Electronic Information

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee hard drives and storage media</td>
<td>30 days after termination</td>
</tr>
<tr>
<td>Network hard drives</td>
<td>2 years from cessation of use; 5 years if programs contained are no longer used</td>
</tr>
<tr>
<td>Voicemail records (stored electronically)</td>
<td>90 days</td>
</tr>
<tr>
<td>Weekly System Back-Ups</td>
<td>1 week</td>
</tr>
<tr>
<td>Active Computer Inventory List</td>
<td>Until equipment is removed from Inventory</td>
</tr>
<tr>
<td>Web site (archive version and current version)</td>
<td>1 year</td>
</tr>
</tbody>
</table>

RECORDS MAINTENANCE AND RETENTION

I. Initial Distribution of Incoming Correspondence and Reports:

All incoming reports and correspondence for consideration by TRACS are processed through the office personnel designated by TRACS. These individuals are responsible for documenting receipt, placing documents into the TRACS Network, and for the timely distribution of documents or notification of staff.

II. On-site Evaluation

The following documents are maintained in accordance with the guidelines set forth in this policy to demonstrate that on-site evaluation procedures are followed:

A. Acknowledgement and approval from the Institution regarding the date of the on-site evaluation and the on-site evaluation team members.

B. Visiting Team Report: Original documents are not to be removed from the institution. Documents prepared and provided by an institution for the purpose of the on-site evaluation may be copied or taken by the TRACS staff representative for the purpose of completing the Visiting Team Report. All notes and documents are to be discarded after the Accreditation Commission action. Documents removed from the institution for such purposes are not considered an official record. Only documents submitted by an institution in accordance with this Policy are considered to be official records.

III. Actions Against Institutions

Once the Accreditation Commission has taken an action against an institution, all notes and working files are to be disposed of only after the date that the action becomes final. Only official records are maintained as of the final action date.
IV. Approval of Institutional Changes

Once the Commission has taken action on an institutional change, all notes and working files associated with the institutional Change Proposal are disposed of no later than the date that the action becomes final. Only official records pertaining to the institutional change are maintained as of the final action date.

V. Institutional Applications, Reports and TRACS Working Files

Institutional applications and reports are maintained as working files until Accreditation Commission Action. Procedures for maintaining and documenting staff-level reviews of various accreditation activities are as follows:

A. As staff completes the review of an institution’s request and generates a written report or response, a copy of this document will be placed on the TRACS Network. At that time, the responsible staff that all related documents are linked on the TRACS Network.

B. Institutional working files, such as Change of Ownership, Change of Name, etc., that are under review by staff may be retained on the staff member’s computer, but also placed on the TRACS Network. As staff members complete their review and finalizes their report the final copy should be linked in TRACS Network in a file with the original documents.

C. Once staff has completed the task, any unofficial records (including drafts and notes) will be discarded. Only the final staff report, original correspondence, and documents pertinent to the review will be maintained in the institution’s permanent file.

VI. Procedures for Letters Related to Institutional Actions Taken at Accreditation Commission Meetings

The filing of documents related to actions taken at Accreditation Commission meetings is handled differently than that of working file materials and staff-level approvals. The following documents considered by the Accreditation Commission at its meetings are included in the institution’s file:

A. Team Summary Reports
B. Institutional Response
C. Third Party Comment
D. Institutional Action Letters
   1. Approval of Candidacy
   2. Approval of Accreditation
   3. Approval of Reaffirmation
   4. Placement on Warning
   5. Placement on Probation
   6. Show Cause Order
   7. Deferral of Institution
   8. Denial of Institution
9. Approved Progress Reports
10. Program Approvals

Institutional Action Letters are placed on the TRACS Network once confirmation of its delivery is recorded and attached to a copy of the letter.

VII. Procedures for Materials Reviewed by the Accreditation Commission in Consideration of Institutional Actions Taken at Accreditation Commission Meetings

Materials considered by the Accreditation Commission at its meetings will be filed in the following manner:

A. All materials reviewed by the Accreditation Commission in consideration of Institutional Actions will be maintained on the TRACS Network under a file for the appropriate Accreditation Commission Meeting.

B. All materials in support of information items presented to the Accreditation Commission need not to be maintained longer than necessary to prepare the minutes of the meeting.

VIII. Litigation Holds

All documents, paper and electronic, will be retained if TRACS has been informed that those documents may be needed during the course of litigation related to an institution.

IX. Security of Records

A. Backup copies of electronic records are maintained off-site.

B. Copies of paper documents are maintained in a manner that minimizes the possibility of damage due to fire.
I. Response to Secretary Regarding Title IV Compliance

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

II. Notification to the Secretary of Fraud or Abuse

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

III. Default Rates

Institutions participating in the Title IV programs under the HEA and designating TRACS as their gate-keeping agency should demonstrate diligence in keeping loan default rates at an acceptably low level and must also comply with program responsibilities defined by the Department of Education. Institutions having a default rate requiring a default reduction plan will provide a copy of their plan to TRACS. TRACS staff will review the plan to determine its appropriateness, and to determine if any follow-up action is needed in accordance with the TRACS Board Policy # 207. Excessive default rates in the student loan program may be cause for an Institutional Staff Review - Financial (ISR-F) evaluation.

IV. Compliance with Title IV

During the course of the ISR-F, along with other factors, there will be a review of loan default rates and negative actions taken by the U.S. Department of Education regarding compliance of the institution with the requirements of Title IV. In addition, TRACS will include in the ISR-F information provided by the U.S. Secretary of Education when notified of negative action taken by the Department regarding responsibilities under Title IV. TRACS will determine if the information calls into question compliance with TRACS Standards 17.1 through 17.7 and whether an adverse action is required.
The financial funds of the organization serve both as a reserve to address unexpected financial events and as a resource to provide a financial base for future needs. As such, it is necessary to assure that the investments of the organization’s funds provide growth potential within a conservative environment. This policy serves to direct the administrators of the funds of the organization in these investments.

I. Short-Term Investments

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

II. Long-Term Investments

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

III. Donated Securities

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

IV. Cycle of Review

The investments of TRACS will be evaluated annually in conjunction with audit preparations and presented along with the Proposed Budget at the spring meeting to the Executive Committee. The discretionary authority given to the Vice President for
Business Services will be re-evaluated each time a new Vice President for Business Services is hired.
200 POLICIES AND PROCEDURES RELATED TO INSTITUTIONS
Accreditation of higher education institutions is unique to the United States. The key element of the accreditation process is the concept of peer review which involves professional individuals from one institution reviewing another institution with regard to that institution’s Self-Study Report and the level of compliance with Standards in the areas of expertise of the reviewer.

By agreeing to be accredited by TRACS each institution also agrees to participate in this peer-review process. As an institution being reviewed, the institution also accepts the responsibility for providing professional individuals for the review of other institutions. Each institution is to submit the names of professional individuals to the TRACS office for training as visiting team members and/or team chairs. The President of TRACS will regularly review the participation of institutions in this process and contact institutions which need to provide additional peer reviewers.

An additional concept of accreditation is that it is voluntary and focused on institutional improvement. This concept includes the idea of the self-reporting by an institution in instances when it becomes aware that it is non-compliant with one or more of the TRACS Standards. Each institution is responsible for notifying TRACS within 30 days of any instance of non-compliance and of its plan for coming into compliance. This includes notification of changes in the status of any position which is mandated by TRACS Standards.
BP 202  Institutional Official Representative to TRACS

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

At the time of application, an institution must designate two persons who will deal directly with TRACS. Normally, this will be the institution’s president, academic dean, vice president for academic affairs, or chair of the board. The institution must notify TRACS of any change of its designated representatives. No consultant or other institutionally-affiliated person should make direct contact with TRACS staff or members of the visiting team or Accreditation Commission.
BP 203  Annual Institutional Reporting

Reference: Federal Regulation §602.19(b)
Adoption Date: June 2013  Last Revision Date: December 2015

All member institutions are evaluated each year using data submitted in the required Annual Operational Report (AOR) and the institution’s certified external audit. The Annual Institutional Reports provide statistical data related to such matters as enrollment, finances, student learning and any significant developments at the institution in the year since the prior report. Member institution must complete and submit its report on-line by October 31 each year. The following items must also be included:

1. A letter from the governing board that includes detailed explanations for any changes in the institution not included in the content of the Annual Operational Report pertaining to government authorization, constitution and bylaws, location of administrative office, chief executive officers, Foundational Standards and/or Operational Standards. If no changes have occurred, other than those reported in the annual report, the institution should note this.

2. The institution’s most recent certified external audit.

3. The institution’s current budget.

4. The institution’s current catalog(s) or similar document, with all changes in administrative officers, faculty, and courses appropriately noted.

5. A statement, signed by the president, asserting that all the information included in or with the annual report is accurate and current.

6. Any other documents requested in the Annual Operational Report.

Failure to include the institution’s certified annual audit at the time of the submission of the Annual Operational Report puts the institution in violation of Standard 17.4, introduces the possibility of administrative action by the U.S. Department of Education regarding the institution’s Title IV eligibility and makes the institution subject to a possible adverse action at the next Commission meeting. Additionally, failure to submit the institution’s certified annual audit within 5 months of the close of the institution’s fiscal year may result in the imposing of an administrative fee of $500.00 per month for each month or portion of month that the audit is late.

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

Data gathered is used to:

- Monitor increases of 20% or more (minimum increase of 20 students) in any program or by any institution.
- Verify the appropriate number of full-time faculty contracted for each approved program.
- Verify the adequacy of learning resource materials for all new programs approved.
- Monitor success of institutions in meeting the Benchmarks for measuring Standard 19.6 (both undergraduate and graduate).
- Verify that all off-campus locations have been properly approved and are still operating.
- Monitor approval of all distance education and correspondence education programs.
- Monitor approved Branch Campus and Teaching Sites.
- Review the Annual Audit and other financial documents to verify continued Financial Stability of each institution and as the basis for initiating an Institutional Staff Review - Financial.
- Identify other accreditations held by TRACS accredited institutions.

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

All compiled data are confidential and are used by TRACS staff and, when appropriate, by the Accreditation Commission for consideration of Recommendations and decisions.
TRACS monitors an institution’s growth in overall enrollment, program enrollment, number of teaching sites, and number of branch campuses.

Any member institution which reports *total student enrollment growth* of more than 20 students which is at least 20% greater than it reported in the prior year must provide documentation of the changes it made to accommodate that increase. The President of TRACS may require a staff visit to the institution to verify that it is in compliance with TRACS Standards.

Any member institution which reports enrollment growth of more than 20 students *in any program* which is at least 20% greater than it reported in the prior year must provide documentation of the changes it made to accommodate that increase. The President of TRACS may require a staff visit to the institution to verify that it is in compliance with TRACS Standards.

Any member institution which receives permission from the Accreditation Commission to open 2 branch campuses or 3 teaching sites in one year will have a staff visit, which may be in conjunction with a visit required after Commission approval, to all locations of the institution to verify that the institution is providing all of the resources it claimed it was providing and that it is in compliance with TRACS Standards.
BP 206 Monitoring Student Achievement

Reference: None
Adoption Date: July 2012 Last Revision Date: October 2017

Rationale for Monitoring Student Achievement: BP 206 provides a framework for monitoring assessment as it relates to undergraduate retention rate, completion rate, and graduation rate. Establishment of the thresholds listed below and the use of monitoring as a follow up are founded on the following rationales:

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

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

1. Less than a 25% completion rate in certificate programs
2. Less than a 15% completion rate in associate degree programs
3. Less than a 25% graduation rate in bachelor’s degree programs
4. Less than a 35% retention rate in associate degree programs
5. Less than a 50% retention rate in bachelor’s degree programs

Required Institutional Action Plan Submitted to TRACS Staff: The staff will work with the institution to ensure that a plan is in effect to address the rate under review. The plan should be based on research and adhere to best practices and may consider the following components:

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

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

Once a plan has been submitted, the institution will be allowed adequate time for the plan to be effective. Generally adequate time will be based on the degree category in question and will be three to six years to allow for a full student cohort to complete a plan cycle. However, failure to submit a satisfactory plan or failure to demonstrate progress in meeting plan goals will result in the President of TRACS beginning the Institutional Staff Review (ISR) procedure detailed in BP 207. The ISR procedure is used when there is evidence that an institution may be out of compliance with a TRACS Standard.
BP 207  Institutional Staff Reviews

Reference: Federal Regulation §602.19(b)
Adoption Date: June 2013  Last Revision Date: April 2017

A. General Comments

The purposes of the Institutional Staff Reviews are to follow up on various areas of non-compliance which may be discovered as a result of reports from any source that an institution is out of compliance with any TRACS Standard (including information from the institution’s Annual Report) and/or to monitor institutional financial stability.

B. Institutional Staff Reviews

The specific purpose of the Institutional Staff Review (ISR) is to provide a process to formally address any possible or impending non-compliance with the TRACS Standards of an institution 1) discovered in the review of tracked items in the institution’s Annual Report documentation, 2) discovered in the review of any complaint against an institution or, 3) discovered in the review resulting from the receipt of information from any source asserting that an institution is out of compliance.

The ISR will be conducted whenever, after the formal review of documentation, the TRACS Staff believe that an institution is or may become out of compliance with any TRACS Standard and becomes the formal process of required reports from the institution, visits to institutions (when necessary), and the receipt of Progress Reports from the institution until deficiencies are corrected or compliance is reached. All normal timelines for coming into compliance detailed in the TRACS Adverse Action policies will be maintained.

C. Institutional Staff Reviews - Financial

The purposes of the Institutional Staff Review – Financial (ISR-F) are to ascertain the current financial condition of the institution, review the institution’s plan to reestablish or maintain financial stability into the future, consider the need for recommending an adverse action to the Accreditation Commission, and/or to offer such support and advice as may be helpful to the institution.

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

1. An Institution reporting a negative change in Unrestricted Net Assets or Total Net Assets for two out of five years.
2. A negative change in Total Net Assets.
3. An Enrollment decline of 20% or more.

4. An Institution receiving notification from the DOE that their composite score has fallen below 1.5 and they are not in compliance.

5. An Institution’s annual audit indicates that the required 10% line of credit has been substantially depleted.

6. The recording of Pledges in revenue or Pledges Receivable in assets.


8. Any combination of 1-7 above.

The ISR-F will usually necessitate a staff visit to the campus but may be conducted via either written or electronic communication. The staff visit and review will include all financial aspects of the institution.

The President of TRACS may recommend, after the consideration of all relevant financial information included in the ISR-F the following Commission Actions:

1. Financial Monitoring - when the institution reports a negative change in Unrestricted Net Assets or Total Net Assets for three out of five years. (Note: Institution is not out of compliance with Standards 17.1 or 17.4 at this point.)

2. Warning – when the institution reports a negative change in Unrestricted Net Assets or Total Net Assets for three out of five years and has not demonstrated improved Financial Stability since being placed on Financial Monitoring. (Note: Institution is not out of compliance with Standards 17.1 or 17.4 at this point.)

3. Probation – when the institution reports a negative change in Unrestricted Net Assets or Total Net Assets for four out of five years. (Institution may be continued on probation if progress is being made toward compliance, but has not yet met compliance.)

4. Show Cause – when the institution reports a negative change in Unrestricted Net Assets or Total Net Assets for five out of five years.
Institutions approved for participation in programs under the Higher Education Act of 1965, and the Federal student financial assistance program (Title IV, HEA programs); must have a copy of the Program Participation Agreement (PPA) available for review by the Visiting Team for Accreditation Status or Reaffirmation.

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

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

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

A. The requirements of applicable state law.

B. The specific refund standards established by any other accreditation agency with which the institution may be accredited.

C. A prorated refund amount for those whose withdrawal date is on or before the 40% point in the period of enrollment.
All candidate and accredited institutions must clearly state how they define a credit hour. TRACS considers a credit hour as being one hour of classroom or direct faculty instruction with a minimum of two hours of out-of-class work each week of an academic term. An institution which is on the semester or trimester system must have a minimum of 15 weeks of class. An institution which is on the quarter system must have a minimum of 10 weeks of class. An institution must include an explanation of how it determines credit hours for other academic activities for which credit is awarded such as laboratory work, practica, studio work, or distance education. Each course syllabus must include learning outcomes which are appropriate for the number of credit hours awarded for successful completion of the course and how student achievement will be measured.

If an institution does not adopt TRACS definition, it must provide evidence that its definition is equivalent to TRACS definition.

TRACS will evaluate the reliability and accuracy of an institution’s assignment of credit hours before granting candidacy status, granting accreditation, or reaffirming accreditation. TRACS evaluation will include a review of the institution’s published definition for a credit hour; whether qualified faculty determine the number of credit hours that are appropriate for individual courses; and whether the institution’s practice conforms to commonly accepted practices in higher education. If the institution offers distance education, the evaluation will include the manner in which credit hours are assigned to distance education courses. Normally, TRACS will sample course syllabi in its evaluation; however, TRACS may conduct a more extensive evaluation if irregularities are discovered. Should TRACS determine an institution has systemic noncompliance with this policy, in accord with federal regulations, it will notify the U.S. Secretary of Education.
A. Definitions and Guiding Principle.

TRACS considers denial, probation, show cause, and termination of accreditation to be adverse actions. TRACS does not consider warning to be an adverse action, but as a decision by the Accreditation Commission which notifies the institution that an adverse action will follow if the institution fails to address the issues identified within the designated period. The process of monitoring is not considered an adverse action, but rather part of the normal required oversight by TRACS, as required in the Institutional Staff Review (ISR) policy, of an institution which does not have a substantial level of non-compliance. All adverse actions are public. While federal regulations governing accrediting agencies define an adverse action as “the denial, withdrawal, suspension, revocation, or termination of accreditation or candidacy (pre-accreditation), or any comparable accrediting action an agency may take against an institution or program,” 34 CFR § 602.3, TRACS considers termination of accreditation as synonymous with withdrawal, suspension, and revocation of accreditation. Further, 34 CFR § 602.20(a), requires an agency to take specific action whenever an institution is found not to be in compliance with any standard.

The federal regulations require that TRACS immediately (1) initiate adverse action against the institution or program or (2) require the institution or program to take appropriate action to bring itself into compliance with the agency’s standards. If TRACS Accreditation Commission selects option 2, it must limit the time to the following:

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

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

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

Under 34 CFR § 602.20(b) “[i]f the institution or program does not bring itself into compliance within the specified period, the agency must take immediate adverse action unless the agency, for good cause, extends the period for achieving compliance.” This regulation means that extensions for “good cause” will not be the normal procedure and will not be used repeatedly.

B. Investigation, Recommendation, and Accrediting Commission Action.
When the President of TRACS determines from an institution’s annual report, the findings of an Evaluation Team, the findings of a staff visit, findings resulting from a complaint against an institution, or any other source available that an institution may not be in compliance with one or more of the Accreditation Standards, the President of TRACS will initiate a review of that institution. In addition, if the Accreditation Commission determines from any sources available to it that an institution may not be in compliance with the Accreditation Standards, it may direct the President of TRACS to initiate a review of that institution.

If the President of TRACS determines that an institution is aware that it is not in compliance with one or more of the Accreditation Standards and that institution is actively working to come into compliance with the relevant Standard(s), the President of TRACS may allow that institution time to come into compliance with the relevant Standard(s). If an institution has not come into compliance with any standard 2 years (or less if the institution’s longest program is less than 2 years) after the president of the institution learned that TRACS determined it is not in compliance with that Standard, the President of TRACS must recommend a federally recognized adverse action without further investigation. The President of TRACS must notify the institution of the recommendation for an adverse action in advance of the first meeting of the Accreditation Commission which is scheduled to begin 2 years (or less if the institution’s longest program is less than 2 years) or more after the institution learned of TRACS determination.

The President of TRACS will send written notice of a review to the institution within 30 days of the day the review begins or later, if additional information becomes available during the review which requires further review. The notice will identify any area which appears not to be in compliance with the Accreditation Standards. The institution must send a written reply which the President of TRACS must receive within 30 days of the date that the institution was notified of apparent non-compliance. At the discretion of The President of TRACS, a staff visit may be required within the 30 days allowed for the institution’s response.

In the institution’s response, each area of apparent non-compliance identified in the notice from the President of TRACS must be separately and fully addressed, including the anticipated time to bring each area of non-compliance into compliance. If the President of TRACS finds from the institution’s response that the institution is in compliance with the appropriate Accreditation Standards, the President of TRACS will send a written notice to the president indicating the review is concluded and no adverse action will be recommended to the Accreditation Commission. The President of TRACS will report on the review and findings to the Accreditation Commission; however, the review and findings will be kept confidential.

If, after reviewing the institution’s response, the President of TRACS finds that the institution is not in compliance with the appropriate Accreditation Standards, the President of TRACS will make a recommendation according to the general principles relative to the degree of non-compliance detailed in section G. below. The recommendation of the President of TRACS will specifically identify the Accreditation Standards with which the institution is not in compliance and request a specific adverse action. A copy of this recommendation will be sent to the institution.

The Accreditation Commission can only act on a recommendation for an adverse action when an electronic or written copy of the recommendation of the President of TRACS is received by the relevant institution at least 30 days before the Accreditation Commission’s
consideration of the recommendation. The exception is when (1) the President of TRACS determines that an institution’s non-compliance with the Accreditation Standards is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution; (2) the investigation could not be completed in time to make the recommendation at least 30 days before the Accreditation Commission’s meeting; (3) the President of TRACS notifies the institution of the possibility of such a recommendation at least 30 days before the Accreditation Commission’s meeting; and (4) the President of TRACS makes this recommendation at least 5 days before the Accreditation Commission’s meeting. The President of TRACS will provide all relevant information on the institution to the Accreditation Commission so that the Accreditation Commission can determine if the recommendation of the President of TRACS is still appropriate in light of the information submitted by the institution. The President of TRACS may require a staff visit to the institution to gather additional information which may be needed to prepare the report for the Accreditation Commission’s review.

In all instances where the Accreditation Commission will consider taking an adverse action against an institution, the institution will be given an opportunity to respond in writing to the President of TRACS’s recommendation and to appear before the Accreditation Commission to answer questions or to provide any information which became available only after the President of TRACS prepared the recommendation to the Accreditation Commission. The opportunity to appear applies to all meetings where the Accreditation Commission is scheduled to consider taking an adverse action against that institution. The Accreditation Commission will normally allow the institution no more than 15 minutes for presentation of new information. The Accreditation Commission may allow as much time to ask questions of the institutional representatives as the Accreditation Commission determines appropriate. The Accreditation Commission will determine if an adverse action is warranted after the institutional representatives are excused.

If no institutional representative was present to provide information to or answer questions from the Accreditation Commission, the President of TRACS will communicate the decision of the Accreditation Commission following the conclusion of the meeting of the Accreditation Commission. In all cases, the President of TRACS will send written notice of the decision of the Accreditation Commission to the institution within 30 days of the vote of the Accreditation Commission which specifies the Accreditation Standard(s) with which the institution is not in compliance.

At each regular meeting of the Accreditation Commission, the President of TRACS will report on each institution against which the Accreditation Commission has taken an adverse action and that action has not been removed. The report will include a summary of any actions the institution has taken to correct its deficiencies and come into compliance with the Accreditation Standards. The President of TRACS may include any other relevant information, including a recommendation that the Accreditation Commission remove the adverse action against the institution. At any meeting of the Accreditation Commission, if the Accreditation Commission determines that an institution is in compliance with the Accreditation Standards, the Accreditation Commission, on its own initiative, may remove the adverse action against that institution.

The various adverse actions are not sequential. Where circumstances warrant severe adverse action, the President of TRACS may recommend the Accreditation Commission consider any appropriate adverse action as the first action taken against an institution. The
Accreditation Commission may take any adverse action recommended against an institution by the President of TRACS or any less serious adverse action without further notice to the institution. At the meeting where the President of TRACS’s recommendation for adverse action is considered, the Accreditation Commission may not take an adverse action more serious than that recommended by the President of TRACS unless information has become available since the date of notification to the institution after the review of which the President of TRACS determines that the institution’s non-compliance with the Accreditation Standards is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution. In such exceptional cases the institution must be notified of the modified recommendation within 5 days of the Accreditation Commission’s consideration of the modified recommendation.

The Accreditation Commission can only take an adverse action against a member institution when at least fifty-one percent of the members present at the meeting affirmatively vote to take the action.

The Accreditation Commission or the President of TRACS may require staff or Evaluation Team visits to any institution against which the Accreditation Commission has taken an adverse action.

Any action taken by the Accreditation Commission which involves non-compliance with one or more accreditation standard is public and may be appealed according to the Appeals Procedure, unless the adverse action is specifically noted as being without recourse. During an institution’s appeal of an adverse action, the institution shall maintain the status it held at the time the Accreditation Commission imposed the adverse action. If the institution is appealing an adverse action which is public, any person inquiring about the accreditation status of the institution will be told what the institution’s status was prior to the action of the Accreditation Commission and that the Accreditation Commission has taken an adverse action which is being appealed. The time an institution has to remove its adverse action is not tolled by the filing of an appeal; the institution must comply with the time limits which apply to the specific adverse action being appealed (i.e., an institution will not be given additional time to respond to the Accreditation Commission and demonstrate it is in compliance with the Accreditation Standards simply because the institution appealed an adverse action of the Accreditation Commission). The time allowed for an institution to request a reconsideration of an adverse action taken by the Accreditation Commission begins on the date that institution receives written notice from the President of TRACS of the adverse action.

C. Final decision.

If an institution does not appeal a decision of the Accreditation Commission to impose an adverse action against it, the decision of the Accreditation Commission becomes final one day after the last day allowed for filing a notice of appeal. If an institution files a timely appeal, the decision becomes final as determined by the Appeal Policy. A voluntary request for withdrawal of recognition by the Accreditation Commission becomes final on the last day of the academic term during which it was received by TRACS, an earlier date requested by the institution, or an earlier date determined by the Accreditation Commission.

D. Public notification of adverse action.
No later than 30 days after a decision of the Accreditation Commission to impose and adverse action becomes final, the President of TRACS shall notify the institution and the U.S. Secretary of Education, appropriate state agencies, the appropriate accrediting agencies, and the public of the final decision.

In its public notice TRACS will inform the public of the specific reasons behind the basis for the final decision to deny accreditation or terminate accreditation accompanied by a response, related to the final decision, from the institution (provided that the institution provides a response within 30 days of receipt of the TRACS request to do so).

E. Time allowed for a response.

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

F. Notification.

The President of TRACS may notify an institution by either electronic or written means regarding an action taken by the Accreditation Commission. Any written notice that the President of TRACS sends to an institution shall be sent by any service which requires a signature at the time of delivery. The earlier of the dates of the electronic notification or when any representative of the institution signs accepting delivery of the written notice is deemed to be the date of notification. Institutional replies should be sent to the TRACS office by any service which requires a signature at the time of delivery. The date of receipt is determined as the date a representative of TRACS signs accepting delivery.

G. Degree of compliance or non-compliance with the Accreditation Standards.

After the review of possible non-compliance with one or more of the Accreditation Standards, the Accreditation Commission will determine the degree of compliance or non-compliance. The degree of compliance or non-compliance is grouped into one of the following categories during deliberations concerning possible actions by the Accreditation Commission:

1. An institution is in compliance with the Accreditation Standards but is in jeopardy of falling out or compliance.

   This reflects a level of compliance which requires some immediate action by the institution and an action by the Accreditation Commission, but does not require an adverse action. It is a level of compliance which, in the professional judgment of the members of the Accreditation Commission, the institution will correct within a reasonable time and which the institution has the resources to correct. This level would normally require the Accreditation Commission to place the institution on non-public Warning.

2. An institution’s non-compliance with the Accreditation Standards is not substantively significant, and does not rise to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.
This reflects a *non-compliance* which must be corrected. It is a *non-compliance* which, in the professional judgment of the members of the Accreditation Commission, the institution can correct within a period not to exceed two years (or less if the institution’s highest level of programs is two years or less) and which the institution has the resources to correct. This level does not require the Accreditation Commission to take an Adverse Action against the institution, but does require the institution to be monitored by TRACS staff to come into compliance with all Standards.

3. **An institution’s non-compliance** with the Accreditation Standards is substantively significant and rises to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.

   This reflects a *non-compliance* which must be corrected and requires an adverse action. It is a *non-compliance* which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution has, or can reasonably obtain the resources to correct. This level would normally require the Accreditation Commission to place the institution on Probation.

4. **An institution’s non-compliance** with the Accreditation Standards is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution.

   This reflects a *non-compliance* which must be corrected and requires an adverse action. It is a *non-compliance* which, in the professional judgment of the members of the Accreditation Commission, the institution must correct immediately and which the institution may not have the resources to correct. This level would normally require the Accreditation Commission to place the institution on Show Cause or, in the case of an institution which has already been placed on Show Cause, for accreditation to be Terminated.

H. Decision to Remove an Institution.

   The President of TRACS will provide written public notice within 30 days of its notice to an institution when a final decision by the Accreditation Commission has been to deny, withdraw, suspend, or terminate the accreditation or pre-accreditation of that institution.

I. Institutional Comments Regarding an Adverse Action.

   An institution which has been the subject of an adverse action may provide the President of TRACS with any official written comments it wishes to make with regard to the adverse action. The President of TRACS must receive these comments no later than 50 days after the date of the decision to impose an adverse action. TRACS will provide these comments to the Secretary, the appropriate State licensing or authorizing agency, and the public no later than 30 days after receipt.

   Notice of this policy shall be provided to the institution in the letter informing the institution of the adverse action.

J. Accredited Institutions
1. Warning

   a. *Warning* is imposed where an institution is not yet out of compliance with the Accreditation Standards and does not rise to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited postsecondary institution is in question.

   b. *Warning* is a non-public action and an indication that the institution is in jeopardy of being placed on public probation.

   c. In addition to its annual report, an institution on Warning must submit regular reports to TRACS specifically detailing its progress toward correcting any deficiencies, including the anticipated time required to correct each area.

   d. An accredited institution placed on *Warning* has no more than one year from the date of the meeting at which the institution was placed on *Warning* to correct any deficiency.

   e. If the institution corrects its deficiencies within the time allowed, the Accreditation Commission will remove the institution from *Warning*.

   f. If the institution has not corrected its deficiencies within the period allowed, the Accreditation Commission can:
      i. Grant an extension of Warning for no more than one additional year (This can only be granted one time and is not granted as a matter of right.); or
      ii. Place the institution on *Probation*.

   g. If the institution has not corrected its deficiencies within the period allowed, the institution falls into noncompliance with the Accreditation Standards, and the noncompliance is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution, the Accreditation Commission will require the institution to Show Cause why its accreditation should not be terminated.

2. Probation

   a. *Probation* is imposed where:
      i. An institution did not remove its *Warning* within the original period allowed of no more than one year;
      ii. An institution did not remove its *Warning* within any additional period allowed, if the Accreditation Commission granted the institution an extension of *Warning* of no more than one year; or
      iii. An institution’s non-compliance with the Accreditation Standards is substantively significant and rises to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution is in question.

   b. *Probation* is an appropriate first adverse action for an institution which has had a sudden or dramatic negative change such as loss of financial resources.
c. Probation is a public action. An institution placed on Probation will be so identified at www.tracs.org. In addition, any person inquiring about the accreditation status of an institution on Probation will be informed of the status and the institution must accurately present this status in all publications and communications including the web-site.

d. In addition to its annual report, an institution on Probation must submit regular reports to TRACS specifically detailing its progress toward removing its deficiencies and coming into compliance with the Accreditation Standards, including the anticipated time required to bring each area of non-compliance into compliance.

e. An institution placed on Probation has no more than one year from the date of the meeting at which the institution was placed on Probation to correct its deficiencies and come into compliance with the Accreditation Standards.

f. If the institution corrects its deficiencies and comes into compliance with the Accreditation Standards within the period allowed, the Accreditation Commission will remove the institution from Probation.

g. If the institution has not corrected its deficiencies and come into compliance with the Accreditation Standards within the period allowed, the Accreditation Commission can:
   i. Grant an extension of Probation for no more than one year (This can only be granted one time and is not granted as a matter of right.); or
   ii. Require the institution to Show Cause why its accreditation should not be terminated.

3. Show Cause

a. The requirement to Show Cause why an institution’s accreditation should not be terminated will be required when:
   i. An institution did not remove its Probation in the initial period allowed of no more than one year;
   ii. An institution did not remove its Probation in any additional period allowed, if the Accreditation Commission granted the institution an extension of Probation of not more than one year;
   iii. An institution fails to provide, in a timely manner, the reports required of an institution against which an adverse action has been taken;
   iv. An institution’s non-compliance with the Accreditation Standards is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited postsecondary institution; or
   v. An institution’s non-compliance with any Accreditation Standard has not been corrected within two years (or less if the institution’s longest program is less than two years).

b. Show Cause is an appropriate first adverse action for an institution in those limited circumstances where:
i. An institution has had a sudden or dramatic negative change which threatens its very survival;
ii. An institution ignores or refuses to respond to the President of TRACS or the Accreditation Commission;
iii. An institution fails to provide, in a timely manner, the reports required of an institution against which an adverse action has been taken;
iv. The President of TRACS determines from the totality of information available that an institution’s circumstances warrant such an action; or
v. An institution’s non-compliance with any Accreditation Standard has not been corrected within two years (or less if the institution’s longest program is less than two years).

c. Show Cause is a public action. An institution required to Show Cause will be so identified at www.tracs.org. In addition, any person inquiring about the accreditation status of an institution required to Show Cause will be informed of the status and the institution must accurately present this status in all publications and communications including the web-site.

d. An institution required to Show Cause must submit a written report which provides all of the institution’s reasons that the Accreditation Commission should not terminate its accreditation. This report is in addition to any other report specifically required by the Accreditation Commission. The Accreditation Commission may interpret a failure to submit this report on time as an indication that the institution knows it is not in compliance with the Accreditation Standards. The report must:

i. Address all of the actions it has taken to remedy its deficiencies and come into compliance with the Accreditation Standards;
ii. Include a Teach-Out Plan; and
iii. Be received by TRACS within 60 days of the day the notice of the requirement to Show Cause is delivered to the institution.

e. If the institution corrects its deficiencies and comes into compliance with the Accreditation Standards before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission shall remove all adverse action against the institution.

f. If the institution has not corrected its deficiencies and come into compliance with the Accreditation Standards before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission shall:

i. Terminate the institution’s accreditation; or
ii. Place the institution on Probation in extenuating cases where significant progress has been made toward correcting the identified deficiencies.

1) This can only be granted one time.
2) This cannot be extended for an additional year.

K. Candidate Institutions

Candidate (pre-accredited) institutions are approved on the basis of meeting the following definition:
**Basic Compliance:** A conclusion by the Accreditation Commission that an institution is in full compliance with all Standards related to the Institutional Eligibility Requirements (IERs) and has the ability to be in compliance with all of the Standards within the period of candidacy for accreditation.

Candidate Institutions must demonstrate reasonable progress toward achieving accreditation within the required five-year period and maintain compliance with all Standards related to the IERs. Failure to do so may result in an appropriate adverse action being taken by the Accreditation Commission.

1. **Warning**
   a. *Warning* is imposed where an institution is not yet out of compliance with the IER Related Standards and does not rise to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited postsecondary institution is in question.
   
   b. *Warning* is a non-public action and is an indication that the institution is in jeopardy of being placed on public probation.
   
   c. In addition to its annual report, an institution on *Warning* must submit regular reports to TRACS specifically detailing its progress toward correcting any deficiencies, including the anticipated time required to correct each area.
   
   d. A Candidate institution placed on *Warning* has no more than one year from the date of the meeting at which the institution was placed on Warning to correct any deficiency.
   
   e. If the institution corrects its deficiencies within the period allowed, the Accreditation Commission will remove the institution from *Warning*.
   
   f. If the institution has not corrected its deficiencies within the period allowed, the Accreditation Commission can:
      i. Grant an extension of *Warning* for no more than one additional year (This can only be granted one time and is not granted as a matter of right.); or
      ii. Place the institution on *Probation*.
   
   g. If the institution has not corrected its deficiencies within the period allowed, the institution falls into noncompliance with the IER related Standards, and the noncompliance with these Standards is substantively significant and immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an pre-accredited post-secondary institution, the Accreditation Commission will require the institution to Show Cause why its Candidate status should not be terminated.

2. **Probation**
   a. *Probation* is imposed where:
i. An institution did not remove its Warning within the original period allowed of no more than one year;

ii. An institution did not remove its Warning within any additional period allowed, if the Accreditation Commission granted the institution an extension of Warning of no more than one year;

iii. An institution fails to demonstrate reasonable progress toward achieving accreditation within the required five-year period; or

iv. An institution’s non-compliance with the Accreditation Standards is substantively significant and rises to the level where the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with a Candidate institution is in question.

b. **Probation** is an appropriate first adverse action for an institution which has had a sudden or dramatic negative change such as loss of financial resources.

c. **Probation** is a public action. An institution placed on Probation will be so identified at www.tracs.org. In addition, any person inquiring about the candidacy (pre-accreditation) status of an institution on **Probation** will be informed of the status and the institution must accurately present this status in all publications and communications including the web-site.

d. In addition to its annual report, an institution on **Probation** must submit regular reports to TRACS specifically detailing its progress toward removing its deficiencies and coming into compliance with the IER Related Standards, including the anticipated time required to bring each area of non-compliance into compliance.

e. An institution placed on **Probation** has no more than one year from the date of the meeting at which the institution was placed on **Probation** to correct its deficiencies and come into compliance with the IER Related Standards.

f. If the institution corrects its deficiencies and comes into compliance with the IER Related Standards within the period allowed, the Accreditation Commission will remove the institution from **Probation**.

g. If the institution has not corrected its deficiencies and come into compliance with the IER Related Standards within the period allowed, the Accreditation Commission can:

   i. Grant an extension of Probation of no more than one year (This can only be granted one time and is not granted as a matter of right.); or

   ii. Require the institution to Show Cause why its Candidate status should not be terminated.

3. Show Cause

   a. The requirement to Show Cause why an institution’s candidacy status should not be terminated will be required when:

   i. An institution did not remove its **Probation** within the initial period allowed of no more than one year;
ii. An institution did not remove its Probation in any additional period allowed, if the Accreditation Commission granted the institution an extension of Probation of not more than one year;

iii. An institution’s lack of reasonable progress toward accreditation is so severe that the institution’s non-compliance with the Accreditation Standards immediately threatens the institution’s ability to fulfill its mission or to provide a quality educational experience consistent with that associated with an accredited post-secondary institution;

iv. An institution has had a sudden or dramatic negative change which threatens its very survival;

v. An institution ignores or refuses to respond to TRACS or the Accreditation Commission;

vi. An institution fails to provide, in a timely manner, the reports required of an institution against which an adverse action has been taken; or

vii. An institution’s non-compliance with any IER Related Standard has not been corrected within two years (or less if the institution’s longest program is less than two years).

b. Show Cause is an appropriate first adverse action for an institution only in those limited circumstances where:

i. An institution has had a sudden or dramatic negative change which threatens its very survival;

ii. An institution ignores or refuses to respond to TRACS or the Accreditation Commission;

iii. An institution fails to provide, in a timely manner, the reports required of an institution against which an adverse action has been taken;

iv. The President of TRACS determines from the totality of information available that an institution’s circumstances warrant such an action; or

v. An institution’s non-compliance with any IER Related Standard has not been corrected within two years (or less if the institution’s longest program is less than two years).

c. Show Cause is a public action. An institution required to Show Cause will be so identified in the www.tracs.org. In addition, any person inquiring about the candidacy (pre-accredited) status of an institution required to Show Cause will be informed of the status and the institution must accurately present this status in all publications and communications including the web-site.

d. An institution required to Show Cause must submit a written report which provides all of the institution’s reasons that the Accreditation Commission should not terminate its candidacy (pre-accreditation) status. This report is in addition to any other report specifically required by the Accreditation Commission. The Accreditation Commission may interpret a failure to submit this report on time as an indication that the institution knows it is not in compliance with the IER Related Standards, the institution should consider the assistance of legal counsel in preparing this report. The report must:

i. Address all of the actions it has taken to remedy its deficiencies and come into compliance with the IER Related Standards;

ii. Resume making reasonable progress;
iii. Include a Teach-Out Plan; and
iv. Be received by TRACS within 60 days of the day the notification of the requirement to Show Cause is delivered to the institution.

e. If the institution comes into compliance with the IER Related Standards and resumes making reasonable progress before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission shall remove all adverse action against the institution.

f. If the institution has not come into compliance with the IER Related Standards and resumed making reasonable progress before the first regular meeting of the Accreditation Commission following the meeting where the Accreditation Commission voted to require the institution to Show Cause, the Accreditation Commission shall terminate the institution’s candidacy.
A. Request For Withdrawal Of Candidacy Or Accreditation.

1. An institution may send a written statement to the President of TRACS requesting that the Accreditation Commission withdraw its recognition of that institution.

2. The President of TRACS shall provide the Accreditation Commission with notice of the request and response at the next scheduled meeting of the Accreditation Commission.

3. The Accreditation Commission may accept the specific oral request from the president or other appropriate representative of an institution for withdrawal of recognition if the request is made in person at a meeting of the Accreditation Commission.

4. The request for withdrawal of recognition, whether oral or in writing, must be authorized by the institution’s governing board.

5. An institution which requests withdrawal of recognition does not have to provide any reason for the request to the Accreditation Commission.

6. The Accreditation Commission shall honor any request for withdrawal of recognition which it finds to be authorized by the institution’s governing board. A voluntary request for withdrawal of recognition by the Accreditation Commission becomes final on the last day of the academic term during which it was received by TRACS, an earlier date requested by the institution, or an earlier date determined by the Accreditation Commission. The President of TRACS shall inform the institution that TRACS has honored its request within 30 days of the date of Accreditation Commission action. The President of TRACS shall provide the Accreditation Commission with notice of the request and response at the next meeting of the Accreditation Commission.

7. Withdrawal of recognition is a public action and the request for voluntary withdrawal of recognition shall be published at www.tracs.org and the institution must accurately present this status in all publications and communications including the web-site.

8. A member institution that withdraws its membership or had its membership revoked may reapply through the normal application process one year after the withdrawal or revocation of its accreditation became final.
9. An institution which has any unpaid fees or reimbursements due to TRACS at the time of the request remains liable for those obligations.

10. An institution which requests withdrawal of recognition may not appeal the Accreditation Commission’s decision to accept the Request.
A. Failure To Pay

1. An institution which is recognized as an accredited or candidate institution is presumed to have the fiscal ability to pay in full any fee or reimbursement for expenses assessed by TRACS by the date the fee or reimbursement is due.

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

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

4. If the Accreditation Commission finds that the institution has not paid its fee or reimbursement in full, the Accreditation Commission shall:
   a. Grant the institution a specified additional amount of time to pay in full the fee or reimbursement; or
   b. Immediately terminate recognition of the institution’s accreditation or candidacy.

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

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

7. Any institution which has its candidacy or accreditation terminated for failure to pay a fee or reimbursement to TRACS may only reapply for candidacy after
   a. The fee or reimbursement is paid in full,
b. 6 months from the termination of status have passed, and

  c. A full, written explanation for the non-payment is provided to the President of TRACS.
C. Lapse Of Candidacy Or Accreditation

1. An institution which is recognized as a candidate or accredited institution must actively pursue accreditation or reaffirmation of accreditation at specified intervals. If an institution so recognized does not act in a timely manner to complete the tasks required for accreditation or a reaffirmation of its accreditation, the President of TRACS shall inform the Accreditation Commission that the institution has apparently chosen not to pursue accreditation or reaffirmation of its accreditation. In the notice to the Accreditation Commission, the President of TRACS shall request that the Accreditation Commission take a specific adverse action.

2. If the Accreditation Commission finds that the institution has not pursued the tasks required for a reaffirmation of its recognition, the Accreditation Commission shall:
   a. Grant the institution a specified additional amount of time to complete the tasks required for a reaffirmation of its recognition (the Accreditation Commission may only take this action if the institution provides a full explanation for its failure to act in a timely manner and if the explanation is acceptable to the Accreditation Commission; a decision by the Accreditation Commission not to accept an explanation is without recourse), or
   b. Terminate recognition of the institution’s accreditation or candidacy as of the date it is scheduled to expire.

3. If the Accreditation Commission grants an institution an additional amount of time to complete the tasks required for a reaffirmation of its recognition, and if the institution, for any reason, fails to complete the tasks by the revised due date, the institution’s accreditation or candidacy will terminate without recourse on the date the candidacy or accreditation is scheduled to expire.

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

5. Any institution which allows its candidacy or accreditation to lapse may only reapply for candidacy after:
   a. All fees or reimbursements are paid in full;
   b. 6 months from the termination of status have passed; and
   c. A full, written explanation for the reason the institution allowed the candidacy or accreditation to lapse is provided to the President of TRACS.
A. Decisions of a State Agency or Other Recognized Accrediting Agency

1. The Accreditation Commission will not consider an institution for candidacy, accreditation, or reaffirmation if that institution:

   a. Is the subject of a pending or final action by a state agency to suspend, revoke, withdraw, or terminate the institution’s legal authority to provide postsecondary education;
   b. Is the subject of a pending or final action by a recognized accrediting agency to terminate the institution’s accreditation or preaccreditation;
   c. Has been denied accreditation or preaccreditation by a recognized accrediting agency; or
   d. Has been placed on probation or an equivalent status by a recognized accrediting agency.

2. For any situation in Item 1, the Accreditation Commission shall:

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

3. If TRACS learns that a member institution is the subject of an adverse action by another recognized accrediting agency or has been placed on probation or an
equivalent status by another recognized agency, TRACS will promptly review its accreditation or preaccreditation of the institution or program.

4. For any situation in Item 3, the Accreditation Commission shall:
   a. Place the institution on probation;
   b. Require the institution to show cause why its accreditation should not be terminated;
   c. Continue the institution’s candidacy or accreditation (the written rationale for this option will be provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified); or
   d. Accept any alternate recommendation presented by the President of TRACS (the written rationale for this option will be provided to the U.S. Secretary of Education and the relevant recognized accrediting agency at the same time the institution is notified).

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

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

7. Institutions which are preaccredited or accredited by another recognized accrediting agency will submit, within 60 days of receipt, copies of the final visiting team report and any findings of non-compliance identified by the other agency. Institutions will be considered out of compliance with any TRACS standard which is equivalent to the other agency’s standards with which the institution was found out of compliance.
BP 216  Investigation of Allegations of Fraud

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

1. When an allegation that an institution has committed fraud is made known to TRACS, the President of TRACS shall determine if the allegation appears to be based in fact. If it does appear to be based in fact, the President of TRACS shall immediately notify the president of the institution and the U.S. Department of Education of the allegation and begin an investigation.

   a. An anonymous allegation that an institution has committed fraud will be reviewed only if it includes verifiable documentation supporting the allegation.
   b. The identity of a person alleging fraud will not be presented to the institution only if the President of TRACS believes there is a compelling reason not to disclose that person’s identity.
   c. The President of TRACS will review contacts from the U.S. Department of Education regarding allegations of fraud on a case by case basis to determine if there is a need for confidentiality of the contact. Upon a specific request by the Department, TRACS will consider that contact confidential.

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

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

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

5. The investigation shall determine answers to these questions:

   a. Did the institution commit fraud?
   b. Was the fraud intentional?
   c. Did the institution take an appropriate corrective action before being notified of the allegation?
   d. Did the institution take an appropriate corrective action after being notified of the allegation?
   e. Did the fraudulent action violate any of the Accreditation Standards?
6. At the conclusion of the investigation, the President of TRACS shall prepare a written report for the Accreditation Commission. This report will include a recommendation for a specific action by the Accreditation Commission. A copy of the report will be sent to the president of the institution.

7. Because of the serious nature of fraudulent acts by an institution, the Accreditation Commission can consider taking an adverse action against an institution at any meeting where the report of the TRACS investigation and recommendation for specific action is received by the institution at least 5 calendar days before the meeting of the Accreditation Commission begins.

8. If the Accreditation Commission finds that the institution did not commit a fraudulent act, the Accreditation Commission shall direct the President of TRACS to inform the president of its findings. No adverse action will be taken.

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

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

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

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

The institution may appeal the decision of the Accreditation Commission in accordance with the TRACS established Appeals Policy.
A member institution that withdraws its membership or had its membership terminated may reapply through the normal application process one year after the withdrawal or termination of its accreditation became final.
An appeal is a request for an independent reconsideration of an action of the Accreditation Commission. Any applicant, candidate, or accredited institution may appeal a decision of the Accreditation Commission which results in an adverse action. An institution may make only one appeal to an adverse action. Decisions of a non-public warning or to defer a vote of the Accreditation Commission are not appealable. When the Accreditation Commission takes an adverse action against an institution, the President of TRACS shall include a copy of the appeals procedure with the written notification of the Accreditation Commission’s action.

A. Grounds for an Appeal

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

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

B. Filing an Appeal

1. An institution’s appeal must be authorized by its governing board.

2. The request must be received by the President of TRACS within fourteen days of the date the institution received notice of the adverse action.

3. The request for an appeal must include payment in full for all outstanding fees and reimbursements due to TRACS and a deposit of $15,000 to cover TRACS expense for the appeal.
   a. A request for an appeal without payment in full for all outstanding fees and reimbursements due to TRACS and a check for $15,000 will be considered insufficient and will not be processed unless such payment is received within the fourteen day deadline.
   b. If payment in full for all outstanding fees and reimbursements due to TRACS and a check for $15,000 is not received within the fourteen day deadline, the
institution will be deemed to have waived its right to an appeal and the adverse action taken by the Accreditation Commission will become final.

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

   a. The Appeals Process will follow all of the steps below (C. through N.).

5. The institution must identify any dates when its president would not be able to appear before an Appeal Committee.

C. The Appeals Pool

1. TRACS shall have an Appeals Pool with at least fifteen members. Only members of the Appeals Pool can serve as members of an Appeal Committee.

2. Qualifications of Members

   a. Members shall either be full-time administrators of an institution accredited by TRACS, faculty members from either member or non-member institutions, or public representatives.
   
   b. Current Members of the Accreditation Commission may not serve as members of the Appeals Pool.
   
   c. Institutional members must have experience in higher education as an Academic*, Administrator*, or Educator*; and must have served as a member of a visiting team for an accrediting agency recognized by the U.S. Secretary of Education.
   
   d. A representative of the public must not be
      
      (1) An employee, member of the governing board, owner, shareholder in, or consultant to, an institution or program that either is accredited or preaccredited by TRACS or has applied for accreditation or preaccreditation;
      
      (2) A member of any trade association or membership organization related to, affiliated with, or associated with TRACS; or
      
      (3) A spouse, parent, child, or sibling of an individual identified in paragraph (1) or (2) of this definition.

3. The Appeals Pool shall have at least five members who represent the public. Only members who represent the public may receive an honorarium for their participation as a member of an Appeal Committee.

4. The Appeals Pool shall have at least three full-time faculty (Academic* or Educator*) who are included in the institutional representatives.

5. The President of TRACS, in consultation with the Executive Committee, shall appoint the members of the Appeals Pool.

6. TRACS member institutions shall recommend individuals to the President of TRACS to serve as members of the Appeals Pool who meet the requirements of an institutional member, including full-time faculty.
7. Members who represent the public shall be appointed by the President of TRACS, in consultation with the Executive Committee. Any member institution may recommend potential public representatives.

8. All members of the Appeals Pool shall receive initial training regarding TRACS appeals policies, procedures, standards, criteria, conflicts of interest, and the role of a member of an Appeal Committee. Appeals Pool members sign a “Conflict of Interest Form” when added to the pool and are expected to renew the form annually.

D. The Appeal Committee

1. An Appeal Committee shall consist of five members selected by the President of TRACS from the members of the Appeals Pool. At least one member of the Appeal Committee shall represent the public and at least one member of the Appeal Committee shall be a faculty member. When possible, two members shall represent the public.

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

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

4. Once chosen to serve on an Appeal Committee, the members shall receive detailed training specific to the appeal before the appeal process begins. This training includes information regarding TRACS appeals policies, procedures, standards, criteria, conflicts of interest, and the role of a member of an Appeal Committee. All members of an Appeal Committee will sign a “Conflict of Interest Form” before hearing the appeal.

5. The President of TRACS shall review any request to exclude a proposed member of the Appeal Committee and evaluate that request against TRACS Conflict-of-Interest Policy.
   a. If the President of TRACS accepts the request to exclude a proposed member, that person will not serve on the Appeal Committee.
   b. If at least five proposed members remain, the President of TRACS shall select the five who will serve on the Appeal Committee and appoint a Chair from among those members.
   c. If fewer than five proposed members remain, the President of TRACS shall identify additional proposed members of the Appeal Committee as are needed.
   d. The procedures detailed above will be used with additional proposed members of the Appeal Committee.
e. The President of TRACS shall follow the procedures in this section until there are five members of the Appeal Committee, including at least one member who represents the public and one member who is a faculty member.

f. If the President of TRACS does not honor an institution’s request to exclude a proposed member of the Appeal Committee, the President of TRACS shall provide a written explanation for that decision. Such a decision is not appealable.

E. Institutional Documentation

1. All supporting documentation which the institution wishes to have considered by the Appeal Committee must be submitted within sixty days of the date the institution received notice from the President of TRACS of the adverse action. The documentation must clearly show its relevance to the specific grounds for the appeal.

2. Only documentation of actions completed by this deadline will be presented for consideration in the appeal. Actions which are proposed to occur or will be completed after this deadline will not be considered in the appeal.

3. The documentation for each action completed must clearly state whether the institution’s actions occurred before or after the adverse action was imposed.

F. Time and Location of Meeting with the Appeal Committee

1. The President of TRACS will select a date for the meeting that is at least thirty days, but no more than sixty days from the last day the institution has to submit its documentation.

2. The date selected for the meeting shall not be a date identified in the notice of appeal as one when the President of the institution cannot be present, unless there is no alternative available within the limit.

3. The meeting will be scheduled for one day, with the members scheduled to arrive the day before the meeting and leave the day after the meeting.

4. The President of TRACS shall select the venue for the meeting which minimizes the institution’s expenses.

G. Procedures of Appeal Committees

1. The Chair of the Appeal Committee shall preside at the meeting of the Appeal Committee and make rulings regarding time limits; admissibility of evidence, and procedural matters.

2. The institution will bear the burden of proof.

3. Appeal Committee meetings are closed to the public.

4. The institution may have no more than six individuals present, one of whom is the CEO, and all who are present must be able to speak to the grounds for appeal. No consultants may be present.
5. The institution may be represented by counsel and counsel may participate in the institution’s presentation.

6. TRACS may have no more than six individuals present, other than the members of the Appeal Committee, and all who are present must be able to speak to the grounds for the adverse action.

7. TRACS may be represented by counsel and counsel may participate in TRACS presentation.

8. Presentations.
   a. The institution will make a presentation of no more than one hour and will be heard first followed by questions by the Appeal Committee.
   b. TRACS will make a presentation of no more than one hour followed by questions by the Appeal Committee.
   c. Counsel for the institution or TRACS may present or assist in the presentation.
   d. Only the representatives of the institution are present during the institution’s session and only TRACS representatives are present during the TRACS session.

9. Appeals are administrative hearings and not subject to the rules of evidence and procedure.

10. The institution may not challenge the competency of members of the Appeal Committee.

11. Only members of the Appeal Committee may ask questions.

12. The Appeal Committee will record the proceedings when the institution is present, but not when it is considering evidence or voting. The institution may have a transcript of the proceedings, with the cost of the transcript included in its costs for filing the appeal.

H. Decision of the Appeal Committee

1. The Appeal Committee shall consider the evidence presented after the representatives of the institution and TRACS have been excused.

2. The Appeal Committee shall review the evidence of the institution’s compliance with Institutional Eligibility Requirements (IERs), Standards, and Criteria as of the time the Accreditation Commission made the adverse action and the evidence that the institution has come into compliance with IERs, Standards, and Criteria up to the deadline for submission of institutional documentation.

3. The Appeal Committee shall give no weight to evidence showing partial compliance with any IER, Standard, or Criterion or indicating compliance which will occur after the deadline for submission of institutional documentation.
4. The Appeal Committee shall affirm the decision of the Accreditation Commission if it finds the institution has not demonstrated, as appropriate to the appeal that the action of the Accreditation Commission was:

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

5. If the Appeal Committee finds the institution has demonstrated, as appropriate to the appeal, that the action of the Accreditation Commission was:

   a. Based on misinformation;
   b. Based on factual error;
   c. Based on bias;
   d. Arbitrary;
   e. The result of the Accreditation Commission’s failure to follow its published procedures; or
   f. Based solely on financial information and the institution is able to produce verified information that the financial problems which led to the adverse action have been corrected; and the Accreditation Commission would not have issued an adverse action if the subsequently produced information had been available to the Accreditation Commission;

   the Appeal Committee shall amend or reverse the decision of the Accreditation Commission. An applicant institution which was denied candidacy by the Accreditation Commission must be found to be in compliance with all IERs (basic compliance) if the Appeals Committee chooses to amend or reverse the decision of the Accreditation Commission.

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

7. The Appeal Committee shall send its findings and decision to the President of TRACS, the institution’s chief executive officer, and the chair of the institution’s board within fourteen days of the date of the hearing. This notice shall be sent by electronic means, Express Mail or its equivalent.

I. Effect of the Appeal Committee’s Decision

   1. The decision of the Appeal Committee is final and not subject to further appeal.
2. The Accreditation Commission shall act in a manner which is consistent with the decision of the Appeal Committee.

   a. If the Appeal Committee affirms the decision of the Accreditation Commission, the adverse action imposed by the Accreditation Commission is in effect as of the date of the Appeal Committee's notice to the institution.
   
   b. If the Appeal Committee reverses the decision of the Accreditation Commission, the institution shall have the accreditation status it held before the adverse action was imposed by the Accreditation Commission.
   
   c. If the Appeal Committee amends the decision of the Accreditation Commission, the Accreditation Commission shall act on the decision at its first meeting following the notice of amendment and apply the amended adverse action as of the date of that meeting.
   
   d. If the Appeal Committee remands the decision of the Accreditation Commission for further consideration, the Accreditation Commission shall give consideration to the specific issues identified by the Appeal Committee at its first meeting following the notice of remand. The Accreditation Commission shall provide the Appeal Committee and the institution with its findings within fourteen days of the date of the meeting at which it was considered. The institution shall provide the Appeal Committee with any written response to the Accreditation Commission’s findings it determines appropriate within thirty days of the date it received the findings.

J. Costs of an Appeal

   1. If TRACS costs of the appeal exceed the $15,000 deposit paid by the institution, TRACS shall provide the institution with a statement of the amount of the additional costs. The institution is to pay these costs within thirty days of receiving the statement.
   
   2. If TRACS costs of the appeal are less than the $15,000 deposit paid by the institution, TRACS shall provide a refund of the unused amount. This refund shall be sent to the institution within 30 days of determining TRACS final costs of the appeal.
   
   3. The institution shall be responsible for its own costs.

K. Withdrawal of Appeal

   1. An institution may withdraw its request for an appeal at any time up to the start of the hearing.
   
   2. The institution’s governing board must authorize such a request.
   
   3. If the institution withdraws its request after the 14 day limit for filing an appeal has passed, the institution will not be able to refile the appeal and the adverse action being appealed will continue in force as a final decision with the effective date being the date of the written notice withdrawing the appeal.
   
   4. If the institution withdraws its request it will be liable for any expenses already incurred by TRACS for the process to that point.
L. Computation of Time

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

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

M. Notifications

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

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

3. Institutional replies should be sent either electronically with response requested or by any delivery method that requires a signature upon delivery.

4. The date a representative of TRACS signs the return receipt shall be deemed the date of notification.

N. Institutional Status During Appeal and Public Notice

1. During the appeal an institution shall maintain the status it held with TRACS prior to the adverse action.

2. Inquiries regarding the accreditation status of an institution which is being appealed shall be answered by explaining the adverse action the Accreditation Commission took against the institution and that the institution is appealing that action.

3. Public notice of an adverse action in accord with TRACS policy shall be made once an appeal is withdrawn or the Appeal Committee has issued its decision.

*NOTE: See definitions in TRACS BP 102.*
### BP 220 Choice of Law and Venue

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<td>Adoption Date:</td>
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<td>Last Revision Date:</td>
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As a condition of receiving any status with TRACS, each institution concedes that all agreements shall be deemed to have been entered into in Bedford County, Virginia, and shall be interpreted in accordance with the laws of the Commonwealth of Virginia. Also, each institution agrees that jurisdiction and venue for any action that might arise from any membership agreement between the institution and TRACS, regardless of which party initiates the action, will be exclusively in the United States District Court for the Western District of Virginia or the state courts of Bedford County, Virginia, whichever of these courts has proper subject matter jurisdiction.
An institution that takes legal action against TRACS regarding an accreditation decision and withdraws or loses its case is responsible for all costs incurred by TRACS in defending its position, including reasonable attorney fees.

An institution which does not pay TRACS required fees or reimburse TRACS for site visits or other services is responsible for all costs incurred by TRACS in collecting those debts, including reasonable attorney fees.
A decision to close an educational institution requires thoughtful planning and careful consultation with all affected constituencies. Every effort must be devoted to informing each constituency as fully as possible about the conditions compelling consideration of a decision of such importance, and all available information must be shared. As much as possible, the determination to close an institution must be made through a consultative process and only after alternatives have been considered, but responsibility for the final decision to close rests with the board of trustees. Since the immediate interests of current students and faculty are most directly affected, their present and future prospects require especially sensitive attention and involvement.

A. Closing an Institution

A decision to close requires specific plans for providing in appropriate ways for the students, faculty, administration, and support staff, and for the disposition of the institution’s assets. Many considerations bear upon closing an educational institution, and each situation will be unique. Nevertheless, the following must be considered by the board of an institution.

1. The Students

Students who have not completed their degrees must be provided for according to their needs. Arrangements for transfer to other institutions will require complete academic records and all other related information gathered in dossiers that can be transmitted promptly to receiving institutions.

Agreements made with other institutions to receive transferring students and to accept their records must be in writing. Where Financial Aid is concerned, particularly federal or state grants, arrangements must be made with the appropriate agencies to transfer the grants to the receiving institution. Where such arrangements cannot be completed, students must be fully informed. In cases where students have held institutional scholarships or grants, if there are available funds that can be legally used to support students while completing degrees at other institutions, appropriate agreements must be negotiated.

2. Academic Records and Financial Aid Transcripts

An institution contemplating or in the process of closing must adhere to state and federal regulations in regard to maintaining academic and financial records of its students. This must be completed prior to the liquidation of real assets.

Arrangements must be made with the relevant state agency for the filing and maintenance of student records. If there is no state agency which can receive records, arrangements must be made with a state university, with state archives, or with a private organization to preserve the records. Notification must be sent to every
current and past student indicating where the records are being stored and what the accessibility to those records will be. Where possible, a copy of a student’s record should also be forwarded to the individual student.

3. Completion of Instructional Obligations

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

B. The Teach-Out Plan

The institution must comply with the Teach-Out Plan Policy.

C. Provision for Faculty and Staff

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

D. The Final Determinations

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

Every effort must be made to develop defensible policies for dividing the resources equitably among those with claims against the institution. One of the best ways of achieving this goal is to involve potential claimants in the process of developing the policies. Time and effort
devoted to carrying the process to a judicious conclusion may considerably reduce the likelihood of lawsuits or other forms of confrontation.

It is impossible to anticipate all of the claims that might be made against the remaining resources of an institution, but the following three principles may help to sort out possible claims and to set priorities:

1. Students have the right to expect basic minimal services during the final semester not only in the academic division, but also in the Business Office, Financial Aid Office, Registrar’s Office, Counseling, and other essential support services. Staff should be retained long enough to provide these services.

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

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

E. The Closing Date

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

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

F. Disposition of Assets

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

G. Other Considerations

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

H. Conclusion

The closing of an educational institution may be rendered less traumatic by careful attention to the details of the legal and ethical obligations to 1) assure that the institution’s students, faculty, and staff will be optimally provided for, and 2) assets will be used in a way that will honor the intentions of the original donors.
A. When a Teach-Out Plan is Required

1. The U.S. Secretary of Education notifies TRACS that the U.S. Secretary of Education has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required.

2. TRACS requires an institution to Show Cause why its accreditation or preaccreditation should not be terminated.

3. TRACS takes any action against the institution which has the effect of suspending its accreditation or preaccreditation.

4. The institution notifies TRACS that it intends to cease operations entirely or close a location that provides 100% of at least one program.

5. The institution notifies TRACS that it intends to close a program.

6. A State licensing or authorizing agency notifies TRACS that an institution’s license or legal authorization to provide an educational program has been or will be terminated.

7. A teach-out plan is required to address any students remaining in a program when an institution proposes deleting that program.

B. Guidelines for the Teach-Out Plan

1. The plan must be approved by the institution’s governing board.

2. The plan must be detailed and consistent with applicable federal regulations. It must include how the institution will provide for all its instructional, student, financial, faculty, and operational obligations.

3. The plan must provide for the equitable treatment of all students.
   a. Students are provided, without additional charge, all instruction promised by the closed institution, prior to its closing, but not delivered to the students because of the closing.
   b. The proposed teach-out institution is geographically proximate to the closed institution, is accredited by an accrediting body recognized by the U.S. Secretary
of Education, and can demonstrate compatibility of its program structure and scheduling to that of the closed institution.

c. Should the plan require students to pay additional charges, those charges must be identified and the institution must provide notice of those charges to the students.

4. The plan must be backed by demonstrated adequate financing by the closing institution.

5. Although the institution does not have to submit a Teach-Out Agreement, it must demonstrate that it has identified other institutions which may enter into such an agreement.

6. The Teach-Out Plan must be submitted to TRACS for approval.

C. TRACS Review of the Teach-Out Plan

TRACS will not approve a teach-out plan unless the plan provides for the equitable treatment of students.

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

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

A. When a Teach-Out Agreement is required

1. An institution may submit a Teach-Out Agreement for approval as part of its Teach-Out Plan.

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

B. Guidelines for the Teach-Out Agreement

1. Requirements of the institution which is closing.

   a. The agreement must be approved by its governing board.
   b. The institution must devote sufficient resources to implement the agreement and provide for equitable treatment of all affected students.

2. Requirements of the teach-out institution.

   a. The agreement must be approved by its governing board.
   b. The institution must demonstrate that it has the necessary experience, resources, and support services to
      (1) Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and
      (2) Remain stable, carry out its mission, and meet all obligations to existing students; and
      (3) Provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.

3. Required form and content of the agreement.

   a. It must be detailed.
   b. It must be consistent with applicable federal regulations.

4. The Teach-Out Agreement must be submitted to TRACS for approval.
C. TRACS Review of the Teach-Out Agreement

TRACS will approve a teach-out agreement only after reviewing the following and concluding that the agreement provides for the equitable treatment of students:

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

D. TRACS Action when an Accredited Institution Closes without a Teach-Out Plan or Teach-Out Agreement

TRACS will work with the U.S. Department of Education and the appropriate State agency, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charge.
Institutional changes are differences in the institution from when it was last approved by the TRACS Accreditation Commission for accreditation or reaffirmation of accreditation and any substantive changes approved subsequent to that review. TRACS classifies institutional changes as substantive or non-substantive. Substantive changes require the TRACS Accreditation Commission’s approval before they are implemented by the institution. Non-substantive changes fall into two categories: 1) those requiring the approval of TRACS prior to implementation by the institution and, 2) those not requiring approval but only requiring that they be reported to TRACS not later than 30 days after institutional approval (See Appendix B of TRACS Proposed Institutional Change form).

All requests for institutional changes (substantive changes or non-substantive changes) and the reporting of changes not requiring approval should be submitted on the appropriate form. Only one request per form will be accepted.

Advance planning is essential because the processing and approval of either substantive changes or non-substantive changes takes time.

Only accredited institutions may request approval for substantive changes or changes which require the approval of TRACS. Institutions which are candidates for accreditation may only make changes which do not require approval.

Requests for approval of both substantive changes and non-substantive changes requiring approval can be submitted at any time. A request for a substantive change will be considered by the Accreditation Commission at its first regularly scheduled meeting following TRACS’ receipt of an Application with all required documentation, any required team or staff visits, and the opportunity for staff to review materials and make a recommendation to the Accreditation Commission. A request for a change which requires the approval of TRACS will be considered as soon as practicable following the receipt of the request, all required documentation, any required team or staff visits, and the opportunity for staff to review all documentation.

A. Substantive Changes

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

Definition of a Substantive Change: When compared to the scope approved by the TRACS Accreditation Commission for the institution in its most recent review for accreditation or reaffirmation of accreditation and any substantive changes approved subsequent to that review, a substantive change is:
1. Any change in the established mission or objectives of the institution including a name change resulting from such changes. (See D: Substantive Changes Requiring a New Comprehensive Evaluation) (C1)

2. Any change in the legal status, form of control, or ownership of the institution including a name change relating to changes. (See D: Substantive Changes Requiring a New Comprehensive Evaluation) (C2)

3. The addition of courses or programs that represent a significant departure from existing offerings of educational programs or method of delivery, from those that were offered when TRACS last evaluated the institution. (C3)
   a. The offering of Distance Education or Correspondence Education courses or programs.
   b. The offering of courses in a significantly different format from that currently approved.
   c. The offering of direct assessment/competency-based programs.

4. The addition of programs of study at a degree or credential level different from that which is included in the institution’s current accreditation. (C4)

5. A change from clock hours to credit. (C5)

6. A substantial increase in the number of clock hours or credit hours awarded for successful completion of a program. (C6)

7. The entering into a contract (written agreement) with another institution or organization which is either unaccredited, accredited by an accrediting agency not recognized by the U.S. Secretary of Education or accredited by an accrediting agency which is recognized by the U.S. Secretary of Education but not certified to participate in the Title IV, HEA programs where the students at the TRACS’ accredited institution can earn more than 25 percent of the credit hours required for their academic program at the contracted institution. (C7)

8. The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an education program (See TRACS’ Definition of a Branch Campus and E. Substantive Changes for the Addition of a Branch Campus). (C8)

Even though 34 CFR § 602.22(a)(2)(viii) allows an abbreviated procedure for an institution which meets specified criteria. TRACS will only approve an accredited institution to add a branch campus after a full review of the institution’s application to add a branch campus which is submitted in accordance with the TRACS’ Procedures for establishing a Branch Campus (E. Substantive Changes for the Addition of a Branch Campus) regardless of the number of Branch Campuses the institution has previously been approved to operate.
9. The acquisition of any other institution or any program or location of another institution. (C9)

10. The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study. (C10)

B. Substantive Changes involving Alternative Delivery Methods

Institutions desiring to initiate an Alternative Delivery Methods programs are required to complete and submit for each program area the Application for a Proposed Institutional Change Form (found on the TRACS website).

1. Address the applicable Prospectus Checklist items.
2. Follow the Standards under *Alternative Delivery Methods*.

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

Institutions will be required to *document* regular and substantive interaction between the students and the instructor.

Definition of Correspondence Education: Correspondence Education means education provided through one or more courses by an institution under which the institution provides instructional materials, by mail or electronic transmission, including examinations on the materials, to students who are separated from the instructor; interaction between the instructor and the student is limited, is not regular and substantive, and is primarily initiated by the student; correspondence courses are typically self-paced; and correspondence education is not distance education.

C. Substantive Changes Requiring a New Comprehensive Evaluation

The following substantive changes or proposed substantive changes require a comprehensive evaluation of the institution, including a Self-Study and report from a visiting team:

1. Any change in the established mission or objectives of the institution.
2. Change in ownership that results in a change of control.
3. Any change from an undergraduate *only* institution (Levels I and II) or graduate *only* institution (Level III) to an institution offering *both* undergraduate and graduate programs (Levels I, II, and III) or the addition of doctoral programs for the first time (Level IV).
4. A series of changes that would result in the institution becoming what is essentially a new and different institution than it was when the Accreditation Commission last acted on its accreditation.

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

   b. If the Accrediting Commission determines that the proposed substantive change and the prior approved substantive changes taken together appear to transform the institution to the extent that the institution is essentially a new institution from what it was at the last action of the Accreditation Commission, the institution must undergo a new comprehensive evaluation.

   c. After the Accreditation Commission determines that a new 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 in preparation for the new comprehensive evaluation, it must address specifically each of the substantive changes approved since the last action of the Accreditation Commission on the institution’s accreditation. It must include a discussion of the proposed substantive change which led to the decision for a new comprehensive evaluation even if that change was not approved.

   At its discretion, the Accreditation Commission may approve the proposed substantive change at the time it requires the new comprehensive evaluation.

   If a new comprehensive evaluation is required, the institution must submit its plan for a self-study no later than three months after the date of TRACS’ written notice of the required evaluation.

D. Substantive Changes for addition of a Branch Campus

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

An institution’s request for addition of a branch campus will follow the procedures below without regard to the number of branch campuses the institution has been approved to operate.

1. When submitting a *Proposed Institutional Changes* form to add a branch campus, the institution must respond to all prospectus checklist items designated.

2. Upon submission of the *Proposed Institutional Changes* form and required documents, the substantive change will be reviewed by TRACS staff for completeness.

3. Once the *Proposed Institutional Changes* form is complete and all documentation is received, a staff visit to the proposed branch campus will be conducted.
4. Following the staff visit, a staff report will be prepared including an analysis of the institution’s proposal and staff observations during the site visit. The institution will have the opportunity to correct any errors of fact in the report before the Accreditation Commission (AC) reviews the Application.

5. A copy of the final staff report and a staff recommendation will be forwarded to the Accreditation Commission. The Accreditation Commission will consider the request for INITIAL APPROVAL at the next, regularly scheduled meeting.

6. If the Accreditation Commission grants INITIAL APPROVAL for the institution to open a branch campus:
   a. That 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) and,
   b. 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 has all of the personnel, facilities, and resources the institution claimed in its initial request. The institution will receive a copy of a staff report on the visit and will have the opportunity to correct any errors of fact in the report before the submission to the Accreditation Commission for consideration.

7. Within two years after courses are initiated at the branch campus:
   a. The institution will prepare a Branch Campus Self-Study Report and, after the report is received by TRACS, will host an on-site Focus Team visit.
   b. The Focus Team will verify the institution’s substantive compliance with the TRACS Standards on branch campuses and will prepare a Focus Team Report. The institution will receive a copy of the Focus Team Report and will have the opportunity to correct any errors of fact before the submission to the Accreditation Commission for consideration.

8. Within six months after the final report is submitted to the institution, the institution must respond to all Recommendations and Suggestions included in the Focus Team Report, after which the request to add a branch campus will be forwarded to the Accreditation Commission for FINAL APPROVAL at the next regularly scheduled meeting.

9. In its deliberations for FINAL APPROVAL regarding the institution’s request to add a branch campus, the Accreditation Commission will consider the institution’s Branch Campus Self-Study, the Focus Team Report, the focus team’s recommendation(s), the institution’s written responses to the Focus Team Report, the staff analysis of institution’s responses, and any staff recommendation(s).

10. The approval of the branch campus is for a period of up to the time the institution will be reviewed for reaffirmation of its accreditation or five years, whichever is less.

If FINAL APPROVAL of the branch campus is given, the branch campus will be included in subsequent reaffirmations of the institution.

E. Substantive Change Procedures
1. Once the *Proposed Institutional Change* form is received in the TRACS office, the following verifications are completed:
   a. The institution is an accredited member (Candidate institutions may not make substantive changes).
   b. The form has been fully completed.
   c. The form has all the proper signatures.
   d. A copy of the minutes of the Board meeting at which the substantive change was approved is attached.
   e. Materials were received addressing all the *Prospectus Checklist* items identified for that particular type of substantive change.
   f. Determine whether the substantive change requires a new comprehensive evaluation of the institution. (See D. Substantive Changes Requiring a New Comprehensive Evaluation.)
   g. Determine if a staff visit or focus team visit is required.

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

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

4. TRACS Staff will prepare a recommendation to the Accreditation Commission regarding the proposed substantive change once the review is complete.
   a. The recommendation will be for one of the options identified in Step 7.
   b. If the proposed substantive change requires a new comprehensive evaluation of the institution. Staff will include in the recommendation whether the Substantive Change should be approved prior to the new comprehensive evaluation. (See D. Substantive Changes Requiring a New Comprehensive Evaluation.)

5. Staff will provide the Commission with all documentation regarding the request for substantive change.

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

7. The Accreditation Commission will consider the request for substantive change at the first regular meeting following the completion of the Staff review and preparation of the recommendation.

   a. If the documentation provided by the institution fully addresses the proposed substantive change and, if after implementing the proposed substantive change, the institution will continue to be in compliance with TRACS’ Standards, the Commission will approve the proposed substantive change;

   b. If the documentation provided by the institution does not fully address the proposed substantive change or, if after implementing the proposed substantive change, it is not clear that the institution will continue to be in compliance with TRACS’ Standards, the Commission may defer action on the proposed substantive change until such time as the institution provides the information requested in the President’s letter to the institution or a Commission requested staff or team visit is conducted and presents a final report which has been reviewed by the institution; or

   c. If the Commission determines that if the institution is permitted to implement the proposed substantive change it cannot continue to be in compliance with TRACS’ Standards, it will deny the proposed substantive change. The President’s letter will include the Commission’s basis for its determination.

      i. An institution can file a new Application for a substantive change which has been denied, but only after it has addressed fully the reasons for the denial identified in the President’s letter.

      ii. An institution may appeal a decision to deny a proposed substantive change to the Commission at its next regular meeting. The institution may only appeal if it can show the Commission’s decision was

           1) Based on misinformation;
           2) Based on factual error;
           3) Based on bias;
           4) Arbitrary; or
           5) The result of the Accreditation Commission’s failure to follow its published procedures.

      iii The Commission will only consider substantive documentation provided by the institution during or prior to the meeting where the Application was denied.
There is no charge for this appeal.

8. TRACS Standards require approval of a substantive change before it is implemented. If the request for a substantive change under consideration was implemented by the institution before Accreditation Commission approval was granted, the Commission may also consider whether to take an adverse action against the institution without the requirement to follow Adverse Action Policy regarding an investigation and advance notice from The President of TRACS before considering placing the institution on Warning or Probation.

9. The institution must be present to explain why it implemented the substantive change without prior approval from the Accreditation Commission and be prepared to respond to the possibility of an adverse action.

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

F. Changes Requiring the Approval of TRACS

Changes requiring TRACS approval must receive this approval prior to implementation of the requested change.

Definition of a Change Requiring the Approval of TRACS: When compared to what an institution reported to TRACS for its most recent review for accreditation or reaffirmation of accreditation by the Accreditation Commission, a non-substantive change is

1. The addition of courses or programs at a degree or credential level which is included in the institution’s current accreditation that do not represent a significant departure from existing offerings of educational programs or method of delivery, from those that were offered when TRACS last evaluated the institution. (T1)
2. The change to programs or courses of a degree or credential which is included in the institution’s current accreditation including deletion of an approved program or the addition or deletion of areas of emphasis within a program. (T2)
3. The change of the name of the institution not related to a substantive change requiring Accreditation Commission approval. (T3)
4. The establishment of an additional location geographically apart from the main campus at which the institution offers less than 50 percent of an education program (See the TRACS Definition of a Teaching Site and BP 225 G.) (T4)
5. The change of the location of a campus or teaching site. (T5)

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

G. Changes for Addition of a Teaching Site

Definition of a Teaching Site: a location geographically apart from the main campus at which the institution offers less than 50 percent of any educational program. No student can earn 50 percent or more of any educational program at any degree level at a teaching site.
1. 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.

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

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

c. A request for a teaching site must include documentation of board approval of the teaching site and the institution has addressed all appropriate Prospectus Checklist items.

d. After TRACS receives a request for a teaching site, a staff visit to the proposed teaching site may be conducted. The staff visit may also include time at the main campus. The institution will receive a copy of the report of the staff visit, which will include an analysis of the institution’s substantive change application.

e. If TRACS approves the request to open 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.

H. Procedures for Changes Requiring the Approval of TRACS

1. Once the Proposed Institutional Change form is received in the TRACS office, the following verifications are completed:

a. The institution is accredited.

b. The form has been fully completed.

c. The form has all the proper signatures.

d. A copy of the minutes of the Board meeting at which the substantive change was approved is attached.

e. Materials were received addressing all the Prospectus Checklist items identified for that particular type of change

f. Determine if a staff visit or 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.

3. If a staff visit or focus team visit is required:

a. The institution will be notified of what will be reviewed during the visit.

b. If a focus team visit is required, the selection of the members will follow the procedures for team member selection outlined in the current Policies and Procedures Manual.

c. The staff visit or focus team visit will be scheduled as soon as practicable.

d. A draft report will be prepared regarding the areas reviewed during any focus team visit.

e. The focus team visit may conclude with an exit interview with selected members of the institution.

f. The institution will be provided with a copy of the draft focus team report and an explanation of how to correct errors of fact in the report at the end of the exit interview or as soon thereafter as practicable.
g. An official copy of the final focus team report will be sent to the institution for comment from the TRACS office as soon as practicable following the visit.

h. The institution will have an opportunity to prepare a formal response to the focus team report.

4. TRACS Staff will prepare a recommendation to the President of TRACS regarding the proposed change once the review is complete.

5. Staff will provide the President of TRACS with all documentation regarding the request for change.

6. The President of TRACS may request additional clarifying documentation from the institution.

7. An institution may file a new request for change when a change has been denied, after addressing the reasons for the denial identified in the official notice of denial.

8. If the requested change was implemented by the institution before TRACS approval was granted, the President of TRACS may also consider recommending to the Accreditation Commission to take an adverse action against the institution.

9. The institution must explain why it implemented the substantive change without prior approval and prepare for the possibility of an adverse action.

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

I. Changes Not Requiring the Approval of TRACS

1. Changes not requiring the approval of TRACS include, but are not limited to, the following:

   a. The addition of new courses.
   b. The deletion of courses no longer offered.
   c. Changes to existing courses.
   d. Changes to graduation requirements.
   e. Changes to general education.
   f. The addition or deletion of a minor.
   g. Changes to requirements for a minor.
   h. The addition of new facilities on campus.
   i. The removal or sale of facilities no longer being used by the institution.

2. While the above changes do not require the approval from TRACS, the institution should complete the Notice of Change Not Requiring Approval form.

J. Effective Date of an Approved Institutional Change

1. The approval date of a Substantive Change will be the date of the Commission vote. TRACS will mail a notification letter to the institution.
2. Each change requiring the approval of TRACS shall be considered approved on the date of the written notice from TRACS. TRACS will mail a notification letter to the institution.

No institutional change will be approved retroactively, except that the effective date for a change in ownership will be the date of the actual change.
BP 227 Branch Campus

Reference: None
Adoption Date: June 2000 Last Revision Date: June 2015

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

Although a branch campus may have its own advisory board, it remains fully subject to the institution’s board and is accountable to comply with all policies of the institution. Accreditation is granted only to an institution (a specific corporation), and it can be applied to a branch campus of that institution.

1. Approval of a branch campus will be:
   a. Part of an institution’s consideration for candidacy for accreditation and subsequent consideration for accreditation or
   b. In an accredited institution’s request for a Substantive Change for the addition of a branch campus.

2. A branch campus will:
   a. Have its own catalog,
   b. Be referenced clearly in the institution’s catalog for its main campus, and

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

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

5. A branch campus will be fully integrated into the administration of the institution.

6. All appropriate institutional polices apply to a branch campus.

7. A branch campus must have a director who reports within the administrative structure of the home campus.

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

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

On any branch campus where the mode of education is in a language other than English,
appropriate documents and websites will be provided in that language for staff, faculty and
students. All such documents submitted to TRACS for review or for visiting team members
will be in English.

After approval, a branch campus will be evaluated as part of the institution’s schedule of
review for reaffirmation of accreditation or any considerations for adverse action. An
institution with a branch campus will include that branch campus in all Annual Reports and
Self-Study Reports. Team visits following an institutional self-study will include visits to the
branch campus(es). A separate Annual Report which shows the data just for the branch
campus is required.

TRACS will conduct a staff visit to each branch campus at least once every 5 years.
A teaching site is an additional location geographically apart from an institution’s main campus at which the institution offers less than 50% of any educational program. No student can earn 50% or more of any educational program at any degree level at a teaching site. If an institution is confirmed to have earned 50% or more of any educational program at a teaching site, the institution will be: 1) considered for an adverse action at the first meeting of the Accreditation Commission following such confirmation and, 2) immediately required to reduce its offerings so that no student can earn 50% or more of any educational program at any degree level at the teaching site.

Initial review of a teaching site must be: 1) as part of an institution’s consideration for candidacy for accreditation or, 2) in an accredited institution’s request for an institutional change.

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

A teaching site must be financially secure and cannot have an adverse impact on the institution’s ability to comply with the Standards. It must be fully integrated into the administration of the institution. All institutional polices must apply to a teaching site.

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

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

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

TRACS conducts staff visits to each teaching site at least once every 5 years.

An institution with a teaching site will include all of the data from that teaching site in its annual report to TRACS.
An institution which offers distance education must provide documentation that it has approval to offer its distance education courses in each state where it has enrolled students. This documentation is to be provided as part of its Annual Operational Report. If the institution is determined by a state to be exempt from registration or licensure, it must provide a copy of the written notice from that state. If the institution is prohibited from offering distance education courses to students in a state, it must provide a copy of the written notice.

The institution must identify the states where it has been approved to offer distance education 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 distance education. The link must be as prominent as all other links on that page.

This policy 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.

Institutions approved to offer distance education or correspondence education must verify the identity of students enrolled in any courses offered through alternative delivery methods.

- a. Institution uses a method of verifying the identity of students which reasonably assures that the student is the same person who registered for the course. (Among the most common methods are a secure login and password for electronic access and proctored examinations.),
- b. Institution provides students with a written rationale for the method or methods it employs,
- c. Students are notified of any charge related to the method of verification, at the time of registration or enrollment, and
- d. Institution provides a written statement of how it will protect the privacy of students enrolled in alternative delivery method courses.
An institution must provide TRACS with a copy of each written agreement it has with any other institution or consortium where the other institution or consortium provides part of the educational program for the institution’s students. The institution must notify TRACS each time it modifies or terminates any of its written agreements. The copy or notice must be provided to TRACS as soon as practicable, but no later than 30 days, after the agreement is final, is modified, or is terminated.

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

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

For an agreement that is treated as a substantive change, The Accreditation Commission will consider the reasons for the agreement; ensure that all statements or information specified in applicable federal regulations are included, and that it is consistent with national norms.
An institution that uses facilities owned by another organization must have a written lease detailing the institution’s right to use those facilities. The contract must ensure that the institution cannot be stopped from using those facilities without adequate time to secure alternate facilities which are acceptable to TRACS. Such a change in facilities would require the institution to request a substantive change.
An institution that has services supplied by another organization must have a written contract detailing the extent of the institution’s access to those services and the costs of those services. The costs should be no more than fair market value. If the institution and the organization are related, the costs should be reasonable under applicable transfer pricing policies and regulations.
BP 233  Records Management

Reference:  
Adoption Date:  June 2014  
Last Revision Date:  

(Moved to new BP 119)
All TRACS member Institutions are to keep copies of student complaints which are presented to the institution in compliance with its policy on student complaints as well as documentation of how it resolved those complaints. Evaluation Teams will review all student complaints presented to the institution in the five years immediately before the visit. The Evaluation Team will determine if the institution has addressed each complaint in compliance with the institution’s policy. The Evaluation Team will determine if the complaints reflect any systematic issues relating to the Accreditation Standards. The analysis and conclusions of the Evaluation Team will be included in the Team’s Report.
BP 235 Crime Reports

Reference: None
Adoption Date: June 2000 Last Revision Date: June 2015

Deleted by Accreditation Commission Action.
All member institutions are expected to give rigorous attention to the principles of good practice as part of its responsible self-regulation. The principles below are based on the Council on Higher Education Accreditation's (CHEA) Principles of Good Practice in Institutional Advertising and are intended to assist institutions in developing policies and practices in accordance with such principles.

A. Advertising, Publications, and Promotional Literature

1. The educational programs and services offered by the institution are the primary emphasis of all advertisements, publications, promotional literature, and recruitment activities.

2. All statements and representations are clear, factually accurate, and current. Supporting information must be kept on file and readily available for review.

3. Catalogs and other official publications are readily available and accurately depict:

   a. Institutional mission and objectives.
   b. Academic calendars.
   c. Entrance requirements and procedures.
   d. Comprehensive grading policies.
   e. Basic information on programs and courses, with required sequences and frequency of course offerings explicitly stated. The scope shall include, where appropriate, required general education.
   f. Degree and program completion requirements, including length of time required to obtain a degree or certificate of completion and the minimum and maximum number of credit hours required.
   g. Faculty (full-time and part-time listed separately) with degrees held, the conferring institution and the subject area(s) in which he or she teaches.
   h. Administrators with their degrees and conferring institutions.
   i. Members of the governing board including city and state of residence.
   j. Institutional facilities readily available for educational use, with a campus map.
   k. Rules and regulations for conduct.
   l. Tuition, fees, and other program costs.
   m. Opportunities and requirements for financial aid.
   n. Policies and procedures for refunding fees and charges to students who withdraw from enrollment.
   o. Clear statement of accreditation status.
   p. Statement on nondiscrimination.
   q. Other information appropriate about the institution.
4. College catalogs or other official publications clearly and accurately describe career opportunities and information is provided regarding:

a. National or state legal requirements for eligibility for licensure or entry into an occupation or profession for which education and training are offered.
b. Any unique requirements for career paths or for employment and advancement opportunities in the profession or occupation described.

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

B. Responsibility

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

A. Student Recruitment for Admission

1. Student recruitment is conducted by well-qualified admissions officers and trained volunteers whose credentials, purposes, and position or affiliations with the institutions are clearly specified.

2. The policies and procedures for admission are clearly stated in all recruiting materials.

3. Independent contractors or agents used by the institution for recruiting purposes shall be governed by the same principles as institutional admission officers and volunteers.

4. The following practices in student recruitment are to be scrupulously avoided:

   a. Assuring employment unless employment arrangements have been made and can be verified.
   b. Misrepresenting job placement and employment opportunities for graduates.
   c. Misrepresenting program costs.
   d. Misrepresenting abilities required to complete programs.
   e. Offering money or inducements other than educational services of the institution to agencies or individuals in exchange for student enrollment. (Except for awards of privately endowed restricted funds, grants or scholarships are to be offered only on the basis of specific criteria related to merit or financial need.)
All member institutions are expected to give rigorous attention to the principles of good practice as a part of responsible self-regulation. The principles below are based on the Council on Higher Education Accreditation’s (CHEA) Principles of Good Practice in Institutional Student Recruitment, and Representation of Accredited Status and are intended to assist institutions in developing policies and practices in accordance with such principles.

A. Representation of TRACS Status

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

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

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

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

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

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

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

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

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

- Consultants may not represent the institution officially as a third party in matters relating to accreditation and reaffirmation.
300 POLICIES AND PROCEDURES RELATED TO ACCREDITATION

The *Policies and Procedures Manual* is intended for institutions applying for candidate (pre-accredited) status, accredited status and those seeking reaffirmation of accredited status. Questions regarding the accreditation process (policies, procedures, or standards) should be directed to the TRACS office.
BP 301 Institutional Accreditation

Reference: None
Adoption Date: June 2000 Last Revision Date: June 2015

TRACS is an institutional accrediting agency. As such, it evaluates only total institutions by means of the peer evaluation process, guided by the standards and criteria approved by the Accreditation Commission.

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

The Accreditation Commission is solely responsible for all accreditation activities and has final authority regarding all accreditation actions. It formulates and implements all policies, procedures, standards, and evaluative criteria used in the accreditation process. The Accreditation Commission consists of up to eighteen elected commissioners, including institutional representatives, two faculty representatives, and at least three but not more than six public representatives as defined by 34CFR 602.3 and the TRACS Bylaws Article 7, Section 3. The Accreditation Commission is elected according to provisions of Article 7, Section 5 of the TRACS Bylaws (available on the TRACS website.) www.tracs.org

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

Institutional accreditation is comprehensive in nature. At a minimum, it covers finances, governance, faculty, instructional programs, facilities, student services, and student learning outcomes.
All standards established to guide the accreditation process are found in the Accreditation Manual.

The standards have been developed to represent expectations of good practice. The standards are the basis of the team’s analysis of an institution’s compliance with the quality required of an accredited institution. The standards are categorized under two areas:

a. The Foundational Standards are related to the mission (purpose) and objectives of the institution.

b. The Operational Standards are related to the operation, financing, and educational outcomes of the institutions, including distance education.
BP 303  Changes to Board Policies, Accreditation Standards, and IERs

Reference: §602.16, §602.20 and §602.21
Adoption Date: June 2000  Last Revision Date: June 2015

I. Regular Review and Update

The Accreditation Commission, through its standing Standards Review Committee, regularly reviews the TRACS Board Policies and Accreditation Standards. This review is to assure that the Board Policies and Standards are current with national norms and federal, state, and professional organizational requirements. This review includes a detailed analysis of the requirements of the various organizations, as well as the policies and standards of all other recognized accrediting agencies.

The Standards Review Committee’s examination is systematic, with all Board Policies being reviewed every 3 years and all Standards being individually reviewed at least once every 5 years. Periodically, TRACS staff review the Board Policies and Standards as a whole. The Standards Review Committee recommends to the Accreditation Commission any action to change Board Policies or Standards as soon as it determines changes are necessary, even if a Board Policy or Standard is being considered out of its regular sequence of review.

In addition, TRACS recognizes that the experience of institutions and evaluation teams provides continuous commentary on the quality of the criteria, policies and procedures and the usefulness of all publications. Comments, including suggestions for modifications and additions, from those involved directly in the accreditation process, are always welcome and are given careful and serious consideration as part of the review process.

II. Board Policies

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

The Standards Review Committee makes recommendations for consideration by the Accreditation Commission at each regular meeting. Once the Accreditation Commission has reviewed the recommendations and made any modifications, it approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Presidents of all member institutions for a 30 day period of request for comments.

After receipt of and consideration of all public comments, the Accreditation Commission, as soon as practicable, sets a teleconference meeting date where it approves the final changes
to the Board Policies. The changes to the Board Policies become effective on the date of the Accreditation Commission approval.

Immediately after Accreditation Commission approval, the changes are posted to the TRACS website at www.tracs.org, sent to the President of all member institutions, and sent to the U.S. Department of Education and any State or organization requiring notice.

III. Accreditation Standards

The Standards Review Committee considers changes to TRACS Accreditation Standards 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.

In addition, TRACS utilizes the expertise of member institutions, professional peer team members 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.

The Standards Review Committee makes recommendations for consideration by the Accreditation Commission at each regular meeting. Once the Accreditation Commission has reviewed the recommendations and made any modifications, it approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Presidents of all member institutions, all other DOE recognized accrediting agencies, twenty other accredited Christian colleges selected at random, and all State Secretary of Higher Education offices, for a 30 day period of request for comments.

After receipt of and consideration of all public comments, the Accreditation Commission sets a teleconference meeting date where it approves the final changes to the Accreditation Standards.

Changes to the TRACS Standards become effective as soon as practicable, but no more than 12 months, after the Accreditation Commission approval.

Immediately after Accreditation Commission approval, the changes are posted to the TRACS website at www.tracs.org, sent to the President of all member institutions, and sent to the U.S. Department of Education and any State of organization requiring notice.

IV. Institutional Eligibility Requirements

The Standards Review Committee considers changes to TRACS Institutional Eligibility Requirements (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 or the Accreditation Standards. The IERs serve as the basis for the determination that an institution has met basic compliance and is eligible for approval for Candidate Status. Member institutions falling out of compliance with the IERs will automatically be placed on Institutional Staff Review (ISR) and/or Institutional Staff Review Financial (ISR-F) as
appropriate until achieving compliance (period for coming into compliance is in accordance with Federal Regulation §602.20).

The Standards Review Committee makes recommendations for consideration by the Accreditation Commission at each regular meeting. Once the Accreditation Commission has reviewed the recommendations and made any modifications, it approves the changes for release for public comment. Within 30 days of the Accreditation Commission action to release the proposed changes, the proposed changes are sent to the Presidents of all member institutions for a 30 day period of request for comments.

After receipt of and consideration of all public comments, the Accreditation Commission, as soon as practicable, sets a teleconference meeting date where it approves the final changes to the IERs. Institutions filing an application are subject to the IERs which were in place at the time of their filing. The changes to the IERs become effective on the date of the Accreditation Commission approval.

Immediately after Accreditation Commission approval, the changes to the IERs are posted to the TRACS website at www.tracs.org, sent to the President of all member institutions, and sent to the U.S. Department of Education and any State or organization requiring notice.
I. General Processes

Institutions desiring to become accredited by TRACS are first required to go through the process of applying for accreditation and being approved by the Accreditation Commission for Candidate Status (pre-accreditation). The following sections detail the current processes.

II. Definitions

**Corresponding Institution**: an institution which has made initial contact with TRACS and is actively pursuing the process toward accreditation.

**Applicant Status**: an institution which has an Application approved by the Applicant Review Committee (ARC) after hosting a successful staff visit and responding positively to the staff report recommendations.

**Candidate Status**: indicates that the institution is in *basic compliance*. This means that the institution has met all the Standards and Criteria related to the TRACS Institutional Eligibility Requirements (IERs), has been evaluated by an on-site evaluation team, and in the professional judgment of the evaluation team and the Accreditation Commission, has provided the basic level of quality in instruction and student services required of a pre-accredited institution of higher education.

III. Moving from Corresponding to Applicant Status

1. Initial Communication and Orientation

   1.a. An interested institution contacts the TRACS Office and expresses desire to seek accreditation (Call: 434-525-9539 or email us at info@tracs.org).

   1.b. TRACS sends the Initial Contact Form which is completed by the institution and returned to the TRACS Office.

   1.c. TRACS Staff contacts the institution to schedule the required application orientation. (If this meeting is scheduled at the TRACS office the institution will have no costs. If it is held away from the TRACS office the institution will be responsible for all expenses for the Staff Visit. The required orientation is also available at the TRACS Annual Conference).
1.d. After completing the application orientation, the institution is given information which allows for the downloading of the application packet from the TRACS website (www.tracs.org).

2. Institutional Submissions

2.a. After the institution determines that it is in compliance with all Institutional Eligibility Requirements (IERs), the institution completes the Application and IER checklist.

2.b. The institution submits to the TRACS office:

   2.b.i. One hard copy of the Application, IER checklist, and all supporting documentation.
   2.b.ii. One electronic copy of the Application, IER checklist, and all supporting documentation.
   2.b.iii. The application fee.

3. Applicant Review Committee Procedures

3.a. Institution is assigned a TRACS representative.

3.b. The Applicant Review Committee (ARC) completes an initial review of the Application including the IERs and all supporting documents. Financial documentation is reviewed by the TRACS Vice President of Finance. If additional information is required, the institution will receive a communication detailing the outstanding items.

4. Staff Visit, Review, and Report

4.a. Once the ARC determines that the Application is complete, a staff visit to the institution is scheduled to verify documentation received.

4.b. Staff Visit Report is prepared

5. Review Committee Determination

5.a. The ARC completes the final review of the Application including the IERs and all supporting documents.

5.b. The ARC makes one of the following recommendations regarding the institution’s application:

   5.b.i. Approval as applicant
   5.b.ii. Deferring the institution as an applicant with recommendations (response required from institution)
   5.b.iii. Reject the institution as applicant with rationale

6. Notification by TRACS
6.a. The President of TRACS sends a notification letter to the institution that it may begin the Self-Study process.

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

All institutions must move to Candidate Status within 5 years of submitting an application. An institution that does not achieve Candidate Status within this period must wait a minimum of one year before reapplying. No extensions will be given beyond the five-year period.

IV. Explanation of Candidate Status

Candidate Status offers institutions the opportunity to establish an initial, formal, and publicly recognized pre-accredited status with TRACS. An institution seeking candidacy must provide evidence of sound planning, have adequate resources to implement these plans, and have the ability to achieve Accredited Status. This status does not guarantee the institution will become accredited.

The maximum time period for moving from Candidate Status to Accredited Status is five years. An institution that does not achieve Accredited Status within the five-year period will be removed from pre-accreditation and must wait a minimum of one year before reapplying.

An institution that has been deferred for Candidate Status may reappear before the Accreditation Commission when it can demonstrate that it has corrected any deficiencies in meeting the Standards and Criteria related to the TRACS IERs and any related conditions set by the Accreditation Commission.

V. Steps to Achieve Candidate Status

Institutions which are able to demonstrate basic compliance and have been approved for Applicant Status by the Application Review Committee may be considered for candidacy. After receiving Applicant Status, the TRACS staff will work with the institution on the remainder of the Accreditation Standards with the goal of strengthening any weak areas prior to moving forward to Candidate Status.

1. Initial Communication

1.a. Institution is notified that it has achieved Applicant Status and can proceed toward Candidate Status.

1.b. The institution downloads the TRACS Steps Toward Accreditation publication from the TRACS website at www.tracs.org under Downloads.

1.c. The institution completes and mails to the TRACS office the Self-Study Proposal, along with a proposed timeline, any required documentation, and the required Change of Status Review Fee (see Fee Schedule). When the institution mails the Self-Study Proposal and timeline it should include both a hard copy and an electronic copy (on a CD or jump drive) of all materials.
2. Institutional Review by the TRACS staff – Initial

2.a. Institution prepares documents for review at time of staff visit.

2.b. The TRACS staff visit takes place and all required documents are reviewed.

2.c. The Self-Study Proposal and timeline are reviewed and approved.

3. Self-Study Process

3.a. Institution completes the Self-Study Report according to the approved procedures and timelines.

3.b. The institution mails the Self-Study Report and supporting documents to the TRACS office at least six weeks prior to the scheduled Evaluation Team Visit. When the institution mails the Self-Study Report and supporting documents it should include both a hard copy and an electronic copy (on a CD or jump drive) of all materials.

3.c. The TRACS staff will review the Self-Study Report and make suggestions for any areas which require clarification, more review, or documentation. Any new or updated materials should be mailed to the TRACS office in both hard copy and electronic form.

4. On-Site Evaluation Team Visit

4.a. The Visit dates and team composition are confirmed.

4.b. The institution will send the final Self-Study Report and supporting documents to the evaluation team members at least four weeks prior to the scheduled Evaluation Team Visit and after addressing all items identified by the TRACS staff. It is the responsibility of the institution to contact each team member to determine whether he/she would prefer a hard or an electronic copy.

4.c. The Evaluation Team Visit is completed and draft Team Report is prepared.

4.d. The institution is given a copy of the draft Team Report and Errors of Fact sheet prior to the evaluation team exit interview.

4.e. Within 10 working days, the institution submits to the TRACS office any errors of fact which it finds in the draft copy of the Team Report.

5. Post Visit Follow-up

5.a. After the errors of fact are received, the final editing of the Team Report is completed by the TRACS staff and team chair.

5.b. The final Team Report is sent to the institution, along with the Institutional Response Matrix, with a date specified for the institution’s required response.
5.c. An invoice for outstanding fees (including expenses incurred for the evaluation team visit) is sent to the institution for payment prior to appearance before the Accreditation Commission.

6. Institution Appears before the Accreditation Commission (April or October)

6.a. The Institution appears before the Accreditation Commission to give an update of the status of the institution since the Evaluation Team Visit and is given the opportunity to answer any questions which the Accreditation Commission may have.

6.b. The Accreditation Commission will make one of the following determinations:

6.b.i. Grant Candidate Status without conditions
6.b.ii. Grant Candidate Status with conditions
6.b.iii. Defer Candidate Status to correct deficiencies (with or without conditions)
6.b.iv. Deny Candidate Status

6.c. The President of TRACS sends a Commission Action Letter notifying the institution of the decision of the Accreditation Commission (including any conditions), the Staff Analysis Matrix, and the final billing for the full-year or half-year annual dues.
Accreditation in the United States is voluntary and non-governmental in nature. It is a system of institutional self-regulation that is unique to the United States. TRACS provides accreditation for Christian liberal arts colleges, universities, graduate schools, seminaries, and Bible colleges and institutes that offer certificates, diplomas, associate degrees, bachelor degrees, and/or graduate degrees. TRACS provides Institutional Accreditation which means the institution as a whole is accredited rather than just the programs within the institution. TRACS geographic scope is international.

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

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

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

1. Self-Study and Self-Study Report

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

The TRACS Standards as presented in the Accreditation Manual are the basis of the Self-Study and the analysis of the Evaluation Team. These standards are categorized under two areas:

   a. The Foundational Standards: those related to the nature and mission (purpose) of the institution;
   b. The Operational Standards: those related to the operation, financing, and educational outcomes of the institutions, including distance education.

2. Evaluation Team Visit and Evaluation Team Report
The basic purposes of the Evaluation Team are to determine if the institution is in compliance with the TRACS Standards and evaluative criteria, 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 making Recommendations and Suggestions for improving its operations and programs. These Recommendations and Suggestions are found within the Evaluation Team Report that is prepared during the visit and provided to the institution at the conclusion of the visit.

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

3. Accreditation Commission Review and Action

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

Two Commissioners are assigned as readers for each institution being considered. These readers review all the institution’s materials in greater detail and prepare a series of questions to ask the institutional representative during their appearance before the Commission. All Commissioners certify by signature that they have reviewed the documents for each of the institutions under consideration. The 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 to address the Accreditation Commission and answer questions prior to the Accreditation Commission making a determination on the institution.

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

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 the Accreditation Commission decision, the deadline by which an institution must demonstrate compliance with all TRACS Standards, any conditions set by the Commission, any outstanding Recommendations and/or Suggestions contained in the Evaluation Team Report, and a Progress Report matrix for monitoring the institution’s progress toward full compliance with all TRACS Standards. The institution submits regular *Progress Reports in the form of the matrix*. These progress reports are-submitted to the
Accreditation Commission for review at each subsequent meeting until the institution demonstrates compliance with all TRACS Standards.
To ensure objective assessment of institutional compliance in various situations, TRACS utilizes peer evaluators (A) on Evaluation Teams, (B) on Focus Teams, and (C) as Peer Reviewers for Institutions participating in the Interim Fifth-Year Review (IFYR) process. Evaluation Team members, Focus Team members and/or IFYR Peer Reviewers are selected and appropriately assigned areas of review from a pool (Peer Evaluator Pool) of carefully screened individuals.

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

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

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

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

A. Evaluation Teams

Evaluation Teams are utilized in the review of an institution’s level of compliance with TRACS Standards as a part of the institution’s involvement in the Self-Study process and in conjunction with a certain accreditation status being sought by the institution.
At the appropriate time in the process, the Evaluation Team is formed. The team will vary in size depending on the institution to be evaluated and the type of visit to be conducted. Evaluation Teams include at least five peer evaluators (made up of professionals, administrative personnel, academic personnel, educators, and faculty members), including a team chair. If the institution to be reviewed offers DE and/or CE, an individual with expertise in these areas and who has participated in the DE/CE specific training will be assigned to the team to provide evaluation specific to these areas. A staff representative acts as a resource to the team for each visit. TRACS Accreditation Commission members may not serve on Evaluation Teams.

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

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

B. Focus Teams

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

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

C. IFYR Peer Reviewers

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

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

The IFYR includes four phases 1) Self-evaluation and self-rating by the institution using the Interim Fifth-Year Review Form, 2) Submission of documentation by the institution in support of each self-rating on the Interim Fifth-Year Review Form, 3) A review of the institution’s IFYRR by two independent IFYR Peer Reviewers, and 4) A staff visit to the institution for staff review and discussion of concerns raised by the Peer Reviewers and clarification on ways that the institution can address areas of concern prior to their preparation for the next reaffirmation cycle.

Each IFYR Peer Reviewer and the institution must indicate that there are no known conflicts of interest that exist between the reviewer and the institution before the details of the review are finalized. This is accomplished by the submission of forms supplied to all parties by TRACS.

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

Criteria for the Selection of Peer Evaluator Pool Members

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

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

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

3. **Student Services Evaluator:** Minimum of three years of experience in student affairs, student life, student services, or student ministry leadership in a postsecondary institution, master’s degree in an appropriate academic or professional discipline (doctorate preferred, required for graduate level evaluators), completion of applicable TRACS training.
4. **Finance/Business Evaluator:** Minimum of three years of experience in institutional finance or business affairs (CFO, vice president of finance, director of business affairs) in a postsecondary institution or corporation, business degree, completion of applicable TRACS training.

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

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

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

8. **Assessment / Institutional Effectiveness Evaluator:** Minimum of three years of experience in assessment of student learning, institutional effectiveness, and planning in a postsecondary institution; master’s degree in an appropriate academic or professional discipline (doctorate preferred); completion of applicable TRACS training.
TRACS encourages and solicits third-party comments regarding institutions it is considering for Candidate Status, Accredited Status, or Reaffirmation of Accreditation. In addition to the solicitation of written comments from interested parties, TRACS may solicit comments at a public hearing or at any relevant public hearing sponsored by a third-party. Comments may be in the form of the following:

A. A letter to the President of TRACS sent in response to a list of institutions being considered for Candidate Status, Accredited Status, or Reaffirmation of Accreditation.

B. A written response to the required posting in a local newspaper announcing a visit by a TRACS visiting team.

C. A personal appearance at the time the visiting team is on campus, provided the third party gives written notice of the desire to present comments regarding the institution and the notice is provided to the President of TRACS or the team chair in advance of the visit.
BP 308  Posting of Institutional Review Dates

Reference: None  Last Revision Date: June 2015
Adoption Date: June 2000

TRACS and each institution will make publicly available a notice regarding the year and month when each institution will be considered for Candidate Status, Accredited Status, or the next Reaffirmation of Accreditation: Following are the types of documents where this information should be available:

1. By TRACS, the current Directory for Candidate and Accredited institution,
2. By Institutions, local newspapers, before visit*, and
3. Both TRACS and the institution, on their websites.

*Institutions to be evaluated are required to place an ad in local newspaper in advance of the visit, listing the dates of the visit and the TRACS telephone number. A copy of this advertisement is provided to the chair of the visiting team at least 7 days before the start of the visit.

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

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

NOTE: Programs leading to licensure/ordination for the ministry do not meet this definition.
TRACS institutions that have been granted a ten-year reaffirmation status are required to undergo the Interim Fifth-Year Review (IFYR) process which includes the submission of an Interim Fifth-Year Review Report (IFYRR). This process occurs during the fifth year of their reaffirmation status.

The following components constitute the IYRR: (1) the completed Interim Fifth-Year Review Form (IFYRF), and (2) documentation in support of the data reported by the institution on the IYRF.

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

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

**The IYR Process:** The IYR process involves these general steps

**General:**

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

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

3. Once peer reviewers have returned their findings to the TRACS Office, TRACS Staff reviews the documentation and then conducts a visit to the institution to verify the documentation. This visit takes place before the end of the calendar year.

4. The TRACS Staff summarizes the institution’s submissions, the peer review, and staff findings and writes a draft report. A copy of the draft report is provided to the institution. The institution is provided the opportunity to report “Errors of Fact” within the draft report. Once appropriate changes have been made, a final version of the report, along with an IFYR Matrix containing any Recommendations and Suggestions is sent to the institution.

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

Accreditation Commission Review and Approval:

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

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

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

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

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

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