Institutional Eligibility Requirements for Institutions Seeking Applicant Status with TRACS

The Institutional Eligibility Requirements (IERs) are (1) the Standards associated with The TRACS Accreditation Requirements (IERs #1 - #16) and (2) the Standards noted as Federal Requirements (IER #17) with which an in institution must demonstrate compliance in order to be approved as an Applicant and subsequently authorized to begin the Self-Study process for consideration by the Accreditation Commission for Candidate status. *(Note: Some Federal Requirements may not pertain to all applying institutions, i.e. Title IV Participation – If a Federal Requirement does not apply to your institution, simply note such when submitting the application documents.)*

Compliance with these IERs is considered Basic Compliance and indicates that the institution has demonstrated compliance with the TRACS Standards supporting the IERs. The IERs are listed below along with the TRACS Standards that support them.

Once an institution desiring to apply for membership with TRACS has participated in a required Application Orientation session, the institution is eligible to submit an Application Compliance Checklist (ACC) / Application via the TRACS portal. The required documentation that must be submitted with the Application Compliance Checklist is listed as well.

IER #1 - Faith Statement

1.1 - The institution has a Faith Statement which is approved and periodically reviewed by the institution's Board, readily available and included in appropriate official publications.

Required Documentation:

1. The Faith Statement of the institution (within narrative).
2. Publications containing the Faith Statement (i.e. catalogs, faculty manual, student handbook, etc.)
3. Evidence of board review and approval
4. The URL to the Faith Statement on the website.

IER #2 - Mission and Name

2.1 - The institution has a Mission Statement which is current and comprehensive, an accurate guide for the institution's operations, approved and periodically reviewed by the institution's Board, communicated to the institution's constituencies, and accurately reflective of its Faith Statement.

Required Documentation:

1. The Mission Statement of the institution (within narrative).
2. Publications containing the Mission Statement (i.e. catalogs, faculty manual, student handbooks, etc.)
3. Board minutes demonstrating review and approval.

IER #3 - Institutional Objectives

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

Required Documentation:

1. The Institutional Objectives of the institution (within narrative).
2. Publications containing the Institutional Objectives.
3. Board Minutes indicating review and approval.

IER #4 - Institutional Integrity

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

Required Documentation:

1. Evidence (policies, statements in publications, disclosures, etc.) demonstrating the institution's operational integrity and honesty.

IER #5 - Operational Authority

5.1 - The institution has legal authorization to operate from all appropriate governmental agencies (state, federal, territory, country) in which it is located and has filed copies of such authorizations with TRACS. If a governmental requirement conflicts with a TRACS Standard, the institution will be deemed in compliance with the TRACS Standard as long as it is in compliance with the governmental requirement.

5.2 - If the institution offers courses and/or programs via Distance Education, the institution has legal authorization to offer such courses and/or programs in US States and territories in which the Distance Education student declares his/her residency. Further, the institution's Distance Education offerings meet all applicable TRACS Accreditation and Federal Requirements. (IER)

Required Documentation:

1. Documentation of the institution's authority to operate (including Remote Locations) from all applicable entities.
2. Documentation of institution's authority to offer Distance Education from all applicable entities.

IER #6 - Organizational Structure

6.1 - The institution's Board, of not less than 5 voting members, is the legally constituted body that exists without conflicts of interest, holds the institution in trust, exercises appropriate oversight in matters of policy, and evaluates its own effectiveness. At proprietary institutions, the Board provides a list of all shareholders and adopts a detailed succession plan regarding the holdings in the event of the death or incapacitation of any one shareholder who controls 33% or more of the shares.

6.2 - The institution's Board appoints and periodically evaluates a full-time Chief Executive Officer (CEO) who is not the Chair of the institution's Board or a Chair of any

of its subcommittees, and who is granted the legal authority to fulfill the tasks defined in the written job description for this position as the individual responsible for carrying out published Board policies and procedures.

6.3 - A full-time Chief Academic Officer (CAO) is in place who has the credentials, experience, and competence to lead the institution's educational programs toward quality outcomes and the CAO is periodically evaluated.

Required Documentation:

All Institutions:

1. Listing of all Board members, noting their positions on the Board, addresses and occupations.
2. Appropriately signed copy of the contract for the institution's full-time CEO.
3. Copy of most recent CEO evaluation.
4. Copy of the institution's organizational chart.
5. Copy of the institution's Bylaws.
6. Job descriptions for all administrators and staff.
7. Appropriately signed copy of the contract for the institution's full-time CAO
8. Documentation of the CAO's academic credentials.
9. Most recent CAO evaluation.
10. Listing of all administrative personnel noting qualifications.

For Profit Institutions:

1. Listing of all shareholders and percentage of shares held.
2. Board approved succession plan for holdings.

IER #7 - Publications and Policies

7.1 - The institution's publications are periodically reviewed and approved by the institution's Board, administration, or other appropriate entities within the institution. (IER)

Required Documentation:

1. Copies of all core publications.
2. Board minutes or evidence of administrative review indicating approval of the publications.

IER #8 - Educational Programs

8.1 - The institution has at least one academic Certificate, Diploma, or Degree (Associate, Baccalaureate, Graduate, or Postgraduate). All degree programs offered are based on at least 60 semester credit hours or equivalent at the Associate level, at least 120 semester credit hours or the equivalent at the Bachelor level, or at least 30 semester credit hours or the equivalent at the Graduate or Postgraduate level.

8.2 - The curriculum clearly relates to the mission and objectives of the institution.

8.3 - Academic programs have adequate enrollment to facilitate student interaction appropriate to quality instruction and to financially sustain the program.

8.4 - Undergraduate academic degree programs offered include an appropriate general education core. General education courses are not narrowly focused nor are they directed toward a specific occupation or profession. Undergraduate bachelor degree programs include a minimum of 30 semester hours in general education, with at least 3 semester hours, in each of the humanities/fine arts, behavioral/ social sciences, and natural science/math. Associate degree programs include a minimum of 15 semester hours in general education.

Required Documentation:

1. Listing of all programs offered by the institution including the number of units required for program completion.
2. Listing of student headcount (including Remote Locations and Distance Education students) for each program for the past three years (if applicable).
3. Listing of General Education requirements (undergraduate only) by category.

IER #9 - Faculty

9.1 - The institution employs a sufficient number of full-time and part-time, academically, and spiritually qualified faculty for the programs it offers to teach and perform related duties.

Required Documentation:

1. Listing of all program areas offered by the institution noting all qualified faculty assigned to each program area.
2. Completed Instructional Staff Listing (ISL). *(available on the TRACS website)*

IER #10 - Student Services

10.1 - The institution offers an array of student services that are appropriate to its mission and objectives, and which address the needs of its students regardless of location or the mode of delivery of educational programs.

Required Documentation:

1. Description of the various student services provided by the institution.

IER #11 - Financial Operations

11.1 - The institution's finances are adequate to support the staffing, facilities, equipment, materials, and support services for the approved programs.

11.2 - A certified external audit of the institution's financial statements is conducted each year under the standards applicable to financial audits contained in the Government Auditing Standards and in accordance with auditing standards generally accepted in the United States of America or comparable auditing standards for institutions located in foreign jurisdictions. Final audit reports along with all management letters are submitted to the TRACS office annually according to the timeline prescribed in TRACS Policy BP203. (See definition of *Certified External Audit*.) Audits demonstrate a recent history of

financial stability. (See Definition of *Financial Stability.*)

Institutions organized as non-profit or not-for- profit entities must have their audits prepared using the "net asset" model of accounting consistent with the policies and procedures provided by the American Institute of Certified Public Accountants (AICPA) in its document, *Audit and Accounting Guide: Not-for-Profit Organizations: 2017,* or any later enacted version, or comparable international guidance for such audits. (IER)

11.3 The institution demonstrates credit lines or other liquid reserves adequate to ensure operations at all times. Proprietary institutions demonstrate a pattern of cash distributions to shareholders of no more than 25% of net income.

Required Documentation:

1. Non-profit institutions: Provide completed audit reports for the last three fiscal years, with the most recent two fiscal years showing a positive change in Unrestricted Net Assets and Total Net Assets and no increase in Pledges Receivable or Contributions Receivable. Submission must include all management letters. For-profit institutions: (A.) Provide completed audit reports for the last three fiscal years, with the most recent two fiscal years showing a positive change in Retained Earnings and cash. Submission must include all management letters. (B.) A schedule of the cash distribution(s) to owners and the corresponding percentage of net income for the last three fiscal years.
2. Verification of the auditor's current valid CPA license
3. Provide Composite Score calculation based on audit report from most recently completed fiscal year. Analysis of the most recent audit must result in a Composite Score of 1.5 to 3.0 in order to demonstrate Financial Stability. Composite Scores of less than 1.5 will require additional documentation of Financial Stability and Sustainability.
4. Utilizing the TRACS supplied Salary Worksheet, provide information indicating salaries of all full-time personnel required by TRACS Standards and indicate the line items in the Audit Report where the salary expenses are included. Required full-time personnel include: the CEO, the CAO, and evidence of sufficient faculty for each program / program area offered.
5. Provide a copy of the institution's five-year financial plan indicating positive changes in Unrestricted Net Assets and Total Net Assets (nonprofit institutions) or Retained Earnings (for-profit institutions).
6. Provide documentation that the institution has credit lines or other liquid reserves adequate to ensure operations at all times. (An unused or available amount equal to 10% or more of the institution's annual operating budget will be considered to demonstrate compliance. Amounts less than 10% will require a detailed explanation of how cash flow needs will be met along with accompanying financial documentation.)
7. The three most recently filed tax returns (Federal and state(s)) as required by the IRS and/or other agencies or an explanation for no-filing.

IER #12 - Institutional Assessment

12.1 - The institution has developed and implemented a comprehensive Assessment Plan which includes all aspects of the institution.

12.2 – The institution has adopted clearly defined learning outcomes at the institution, program, and course levels that are appropriate to its educational mission, reflective of Institutional Objectives, systematically assessed, and used to guide planning and priorities.

Required Documentation:

1. A copy of the institution's current comprehensive *Assessment Plan*
2. A listing of the outcomes for each program offered by the institution.
3. Evidence of usage for planning.

IER #13 - Strategic Planning

13.1 - The institution has developed and implemented a comprehensive Board-approved Strategic Plan which is based on both internal and external factors.

Required Documentation:

1. A copy of the institution's current *Strategic Plan*
2. Board minutes indicating approval of the *Strategic Plan*.

IER #14 - Library and Learning Resources

14.1 - The institution furnishes library and learning resources and related services appropriate to support the institution's mission, academic programs, and administrative functions. These resources and services are made available to all students regardless of location or mode of course delivery.

14.2 - The institution employs an adequate number of professionally qualified staff who oversee the institution's library and learning resources and related services.

Required Documentation:

1. A comprehensive summary of all library and learning resources the institution makes available (either by ownership or other arrangements and/or agreements) to students regardless of location or mode of course delivery.
2. Listing of all library and learning resources staff, including their status.
3. Documentation of appropriate credentials for library and learning resource staff.

IER #15 - Facilities and Equipment

15.1 - The institution provides, maintains, and controls adequate facilities and equipment, (both on and off-campus) that appropriately serve the needs of the educational programs, support services, and other mission related activities.

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

Required Documentation:

1. List and description of the institution's facilities and equipment which demonstrates adequacy.

IER #16 - Health and Security

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

Required Documentation:

1. Description of the institution's policies and procedures (including an Emergency Plan) related to health and security matters.
2. Copies of all appropriate approvals, inspections and permits related to occupancy and health and security matters.

IER #17 - Federal Requirements

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

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

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

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

Required Documentation:

1. Description of institution's definition of a credit hour.
2. Evidence (ex. meeting minutes) of appropriate review of credit hour assignments to courses.

17.2 - Program Length and Cost: The institution's programs must be appropriate to the institution's mission and objectives and must demonstrate that program lengths are comparable to accredited institutions of higher education.

Program-specific fees and tuition must be published and appropriate for the program length and objectives.

Required Documentation:

1. Description of program lengths and evidence of publication of program lengths and costs.
2. Evidence establishing comparability of programs with other accredited institutions.

17.3 - Student Complaints: Institutions must record student complaints. Records must be kept of student complaints received, the process for addressing the student complaints, and the manner in which the student complaint was handled in accordance with the institution's policies and procedures. The institution's student complaint policy must include, at a minimum: a method for receiving confidential student input, clear step-by-step procedures for due process, an appropriate office that securely maintains all information and records of complaints, appeals, proceedings, and instructions for filing a complaint with TRACS and any other relevant government agencies.

Required Documentation:

1. Copy of policies and procedures related to student complaints.
2. Evidence that student complaints have been processed appropriately (if no complaints have been filed, upload an attestation document).

17.4 - Transfer of Credit Policies: The institution has published policies and procedures for accepting transfer of credits. Published policies include criteria for evaluating, awarding, and accepting credit transfer, credit by examination, experiential learning, prior learning assessment, advanced placement, and professional certificates. Policies and practices must ensure that course work is at the collegiate level. The institution is responsible for the quality of course work and credit given on the transcript. The policies and procedures must be published and communicated to those who administer the policies. Articulation agreements must be disclosed, and the institution listed with which the agreement is made.

Required Documentation:

1. Publications containing policies and procedures related to the transfer of credits.
2. Include full Transfer of Credit policy within the narrative.

17.5 - Distance Education and Correspondence Education: The institution demonstrates that programs and courses offered via Distance Education and Correspondence Education are in compliance with the Federal definition of Distance Education and Correspondence Education (Title IV funds are available for Distance Education only): Distance Education Definition: Education that uses one or more of the technologies listed to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include the internet;

one-way and two- way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices; audio conferencing; or other media, if used in a course in conjunction with any of the technologies listed above.

Required Documentation:

1. Complete description of the institution's Distance Education and/or Correspondence Education processes which demonstrates compliance with all aspects of the requirement.
2. Sample syllabi for recent Distance Education courses.

17.6 - Verification of Student Identity: An institution offering Distance Education as stated in Federal definitions must have a process to verify that the student who registers for a Distance Education program or course is the same student who participates in, completes, and receives credit. Methods to verify the student include but are not limited to: a secure login or passcode, proctored examinations, or new or other technologies and practices that are effective in verifying the identity of the student. Institutions must notify the student at the time of registration of any additional charges associated with the verification of student identity.

Required Documentation:

1. Description of the processes used to verify the identity of students enrolled in Distance Education and/or Correspondence Education courses /and or programs.

17.7 - Student Privacy: The institution has a written procedure for protecting the privacy of students specific to their enrollment in Distance Education programs or courses.

Required Documentation:

1. Description of the processes used to protect the privacy of students specific to their enrollment in Distance Education and/or Correspondence Education courses /and or programs.

17.8 - Public Information: The institution makes the following information available to students and the public through the institution's Catalog(s), website and other methods: academic calendar, grading policies, refund policies, admission policies, program requirements, and information regarding tuition and fees. Advertising and recruitment materials must accurately represent the institution's practices and policies.

Required Documentation:

1. Evidence that the institution makes all required elements available via its relevant publications.
2. Evidence that the institution's advertising and recruitment materials accurately represent the institution's practices and policies.

17.9 – Admissions and Recruitment: The institution has clearly established guidelines for admissions decisions which are consistently applied. Recruitment activities are conducted in accordance with established guidelines.

Required Documentation:

1. Evidence of admissions guidelines including published standards and policy/procedures for admissions staff.
2. Policy and procedure statements regarding appropriate recruitment activities.
3. Examples of recruitment materials.

17.10 - Fraud and Abuse: The institution must not engage in fraud or abuse and practices or procedures that are designed to deceive students or falsify information to students.

Required Documentation:

1. Evidence (ex. policies, description of how complaints or lawsuits are/have been handled) that the institution does not engage in practices that are fraudulent, abusive, deceptive or false.

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

Required Documentation:

1. Evidence that the institution collects and compiles data relative to student achievement that includes the required components.
2. URL to Student Achievement Data on the institution website (one-click from homepage)

17.12 - Title IV Participation: The institution maintains and demonstrates compliance with its program responsibilities under Title IV of the most recent Higher Education Act as amended. The institution monitors and maintains acceptable cohort default rates and responds appropriately to program reviews.

In evaluating the institution's compliance with Title IV program responsibilities, the TRACS Accreditation Commission will rely on documentation forwarded to TRACS by the U.S. Secretary of Education supported by letters of authorization on file from relevant agencies indicating certification of eligibility and Federal Aid audits. Holding Candidacy or Accreditation with TRACS does not grant the institution Title IV authorization.

Required Documentation:

1. Evidence, as applicable, that the institution maintains compliance with Title IV expectations.
2. The most recent cohort default rate report
3. Documentation related to any program reviews.