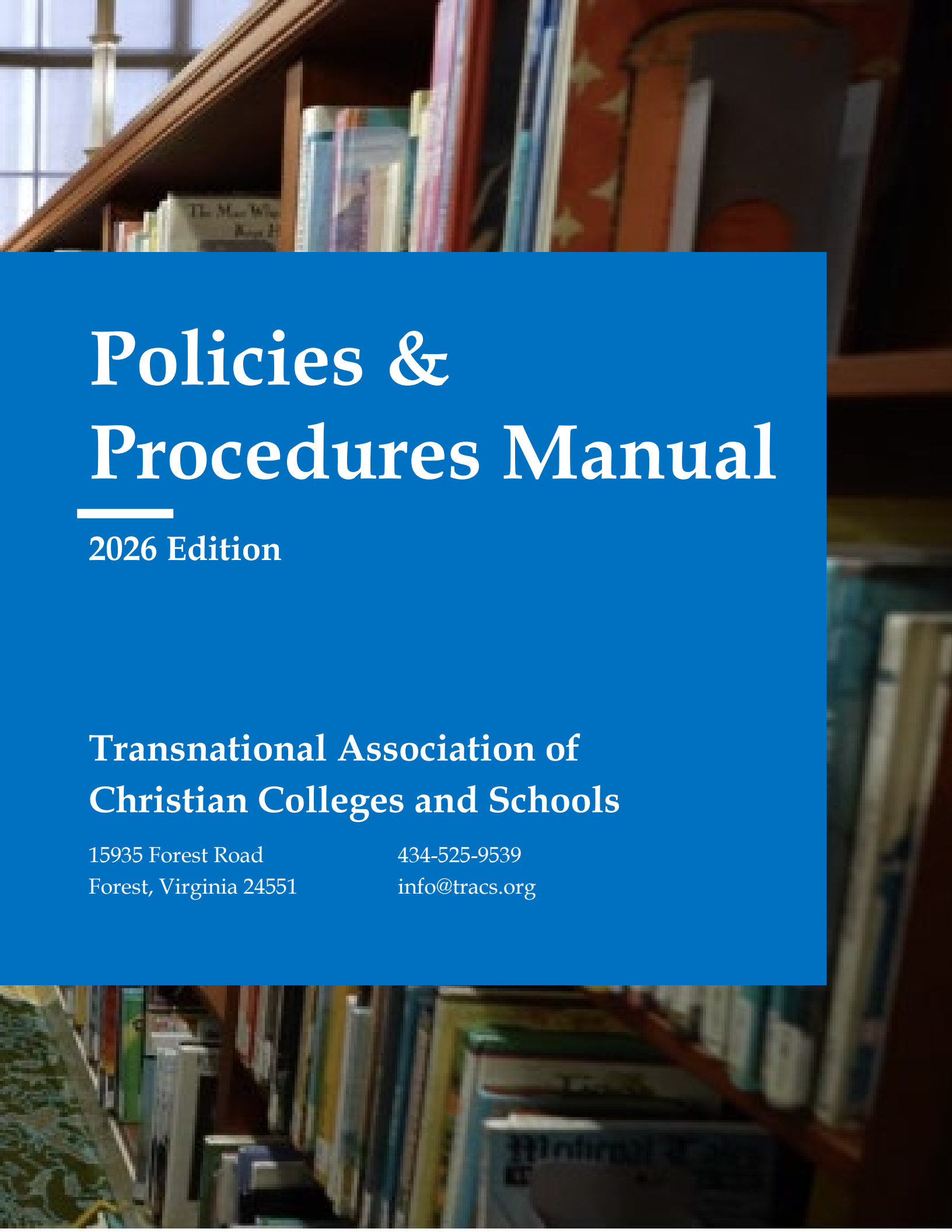


Policies & Procedures Manual

2026 Edition

Transnational Association of Christian Colleges and Schools

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Policies & Procedures Manual

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

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INTRODUCTION

This *Policies & Procedures Manual* serves as the comprehensive collection of policies and procedures for the Transnational Association of Christian Colleges and Schools (TRACS) and is intended to provide guidance to institutions (those seeking membership with TRACS and those already holding membership with TRACS), the TRACS Accreditation Commission, TRACS staff, peer evaluators and any interested parties regarding the policies and procedures that pertain to accreditation with TRACS and its related processes.

Specific questions regarding the accreditation process should be addressed to TRACS staff.

BP101 - Board Policies

Reference: None
Adoption Date: June 2000
Last Revision Date: December 2025

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

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

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

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

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

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

Editorial only revisions to Board Polices which do not impact the expectations or requirements of the policy may be made by TRACS staff at the discretion of the President of TRACS in consultation with the Executive Committee. Such editorial revisions may be made

to reflect TRACS office procedures that have changed since the policy was last approved, to provide clarity on any matter, or to bring the policy into alignment with Federal and/or state regulations in a timely manner.

BP102 - Definitions

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

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

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

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

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

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

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

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

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

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

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

- Licensed
- Approved or authorized to conduct audit services in the locale where the audited institution is domiciled
- Not sanctioned or under investigation
- Independent with respect to the institution (e.g., auditors are not members of the governing board, not employees of the institution, and not involved in the decision making activity, etc.).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Professionally Qualified Librarian: An individual who has earned a Master's in Library Science, or its equivalent, from an accredited institution and who is capable of leading library development and operations.
Sanctions – TRACS considers Warning, Probation, and Show Cause (listed in order of degree of non-compliance) to be Sanctions. Sanctions are public actions which may not be appealed. (see TRACS policy BP211)

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

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

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

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

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

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

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

BP103 - Use of the TRACS Logo

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

Use of the TRACS logo by any individual, organization, or institution is forbidden without written prior approval from TRACS.

BP104 - Complaints

Reference: 34 CFR 602.16(a)(1)(ix); 34 CFR 602.23(c)
Adoption Date: June 2000
Last Revision Date: December 2025

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

Complaints Against A Member Institution

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

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

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

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

The TRACS complaint procedures are not designed to involve TRACS either as an arbiter in irrelevant disputes between individuals and member institutions, or as a reviewing authority in individual matters concerning an institution's normal role in the daily functioning of the institution including disciplinary matters or contractual rights. TRACS does not act as an appeal panel for cases where the outcome of an institutional complaint/grievance process is unsatisfactory to a complainant.

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

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

Responsibilities of Institutions

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

Procedures for Filing a Complaint Against a Member Institution

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

15935 Forest Road
Forest, VA, 24551

3. Once a complaint has been received, TRACS will acknowledge receipt of the complaint within 15 working days
4. If the complaint was not submitted according to one of the methods prescribed in this policy, or if any relevant information is missing from the complaint, TRACS will contact the complainant with guidance that will allow the complainant to either refile the complaint or provide the necessary information.
5. Once an official complaint which meets all prescribed criteria has been received, by the end of 30 working days, TRACS will inform the complainant regarding one of the following initial determinations regarding the complaint:
    a. The complaint will not be processed further because the issue(s) raised in the complaint do not fall within the purview of TRACS (are not related to a TRACS Standard and/or TRACS policies and procedures) or because there is inadequate documentation to raise questions concerning the institution's compliance with TRACS Standards and/or TRACS policies and procedures.
    b. The issue(s) raised in the complaint fall within the purview of TRACS (are related to a TRACS Standard and/or TRACS policies and procedures) and the institution will be required to respond to the issue(s) raised in the complaint, via the Institutional Staff Review / Institutional Staff Review Financial (ISR/ ISRF) processes. (See TRACS Policy BP207 – Institutional Staff Reviews).
6. If the institution is required to respond to the issues raised in the complaint, TRACS will initiate a Compliance Report on the TRACS portal. The institution will be notified when the Compliance Report has been initiated. The Compliance Report will provide the mechanism by which the institution will respond to the issue(s) raised in the complaint and will allow the institution to submit supporting documentation in support of the response. The Compliance Report will be due within 30 working days of the initiation of the Compliance Report. A copy of the complaint and supporting documentation will be attached to the Compliance Report. If the complaint was filed anonymously, the name of the complainant and all information related to the complainant will be redacted in the copy of the complaint that is provided to the institution.
7. Within 30 working days of receipt of the institution's Compliance Report response, TRACS staff, in consultation with the President of TRACS, will make one of the following final determinations regarding the complaint and will notify the institution and complainant accordingly:
    a. There is insufficient evidence of significant non-compliance with TRACS Accreditation Standards and/or TRACS policies and procedures on the part of the institution and the complaint will not be processed further.
    b. TRACS is unable to determine the institution's compliance with TRACS Accreditation Standards and/or TRACS policies and procedures based on the information available and the matter will

either be included in any already scheduled visits to the institution or a Focus Team will be sent to the institution to make a determination regarding the institution's compliance with the matters in question.

c. If no response was received from the institution or if evidence suggests the institution is in non-compliance with one or more TRACS Standards and/or TRACS policies and procedures, the institution will be required to present the actions that will be taken to correct the non-compliance issues, or face possible sanction or adverse action.

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

Complaints Against TRACS

Complaints against TRACS are limited, in that:

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

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

<u>Procedures for Filing a Complaint Against TRACS</u>

1. Individuals making an inquiry to TRACS regarding complaint procedures or about issues and concerns that could be considered complaints against a member of the TRACS staff or Accreditation Commission will be directed to the appropriate page of the TRACS website. This webpage will provide a link to this policy (BP104) and access to the TRACS *Complaint Processing Form*. The *Complaint Processing Form* may be completed and submitted on-line or may be downloaded, completed, and mailed to the TRACS office. TRACS' response and its obligations to meet the specific timetables outlined

in this policy will begin only after the complainant has submitted all required documents.

2. A formal complaint is one that:
    a. Is submitted by either of the methods prescribed in this policy
    b. Includes all required supporting documentation.
    c. If mailed, is addressed to: (as appropriate)
        TRACS President/Commission Chair/Commission Vice-Chair
        Transnational Association of Christan Colleges and Schools
        15935 Forest Road
        Forest, VA, 24551
3. Once the complainant has filed a complaint against either a member of TRACS staff or the Accreditation Commission, the following procedures will be followed for review and consideration of the complaint:

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

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

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

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

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

Complaints and the News Media

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

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

Means of Communication

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

Retention of Records

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

Accessibility for Individuals with Disabilities

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

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

The *Web Content Accessibility Guidelines* (WCAG) defines requirements for designers and developers to improve accessibility for people with disabilities. It defines three levels of conformance: Level A, Level AA, and Level AAA. The TRACS website is fully conformant with WCAG 2.2 level AA. Fully conformant means that the content fully conforms to the

accessibility standard without any exceptions. In addition to WCAG 2.2, our website is compliant with the ADA and Section 508.

BP105 - Disclosure of Information

Reference:	§602.26 (f)(1-2)
Adoption Date:	June 2000
Last Revision Date:	December 2025

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

TRACS urges member institutions to make available to the public, information regarding their accreditation status and pertinent documents related to the accreditation process, including Evaluation Team Reports. Disclosure by TRACS of institutional accreditation documents in response to third-party requests for disclosure – by other agencies, institutions, or individuals – may be granted only upon the receipt of written approval of disclosure by the subject institution or after proper subpoena and/or court order. If disclosure is sought by subpoena and/or court order, the institution whose documents are being requested will be notified of the request immediately to enable the institution opportunity to file any objections with the appropriate court.

Information Made Available from TRACS

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

in writing to the U.S. Secretary of Education, and other appropriate governmental and accrediting agencies, within 24 hours of notifying the institution, but no more than 30 days after the Accreditation Commission accepts the withdrawal. (BP212)

d. A final decision to place an institution under Sanction (Waring, Probation, or Show Cause). Decisions involving such actions will be reported to the public within 24 hours of notifying the institution affected.
e. A final decision of Adverse Action (Denial, Withdrawal, Suspension, Revocation or Termination of Candidacy or Accreditation) taken against an institution. Such Adverse Actions will be reported to the public within 24 hours of notifying the institution affected. Notice with respect to any of these final decisions shall also:
    i. Include the specific reasons for the Accreditation Commission's decision.
    ii. Include any official response provided by the affected institution with regard to the decision or evidence that the institution had the opportunity to provide official comments.

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

Information Not Available for Dissemination

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

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

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

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

BP106 - Information Provided to Other Entities

Reference:	§602.26 (f)(1-2)
Adoption Date:	June 2000
Last Revision Date:	December 2025

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

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

TRACS shall provide written notice to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and other appropriate accrediting agencies at the same time it notifies the institution or program, but no more than 30 days after the Accreditation Commission takes any of the following actions:

1. A final decision to place an institution or program on probation or an equivalent status;
2. A decision to initiate an adverse action, defined as a formal action by the Accreditation Commission to place an institution or program into an adverse action process that may reasonably lead to the denial, withdrawal, suspension, termination, or revocation of Candidacy or Accreditation; or
3. A final decision to take adverse action, including, but not limited to, denial, withdrawal, suspension, termination, or revocation of Candidacy or Accreditation.

Such written notice shall be transmitted concurrently with institutional notification and shall identify the nature of the action and its effective date.

In all cases listed above, TRACS shall require the affected institution or program to disclose the probationary status, initiated adverse action, or final adverse action to all current and prospective students within seven (7) business days of receipt of notice from TRACS.

TRACS shall require the institution to maintain documentation of such disclosures and make such documentation available to TRACS upon request.

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

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

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

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

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

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

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

TRACS will respond to requests for information from the U.S. Department of Education, other recognized accrediting agencies, and state agencies no more than 30 days from the

receipt of the request and earlier if required by state or federal laws or regulations. Requests should be addressed to the President of TRACS.

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

BP107 - Documents Provided to the Accreditation Commission

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

All necessary materials pertaining to (1) the accreditation of institutions (2) information concerning possible sanctions or adverse actions against institutions, (3) proposed Institutional Changes requiring Commission action, and (4) any and all other materials that require Commission action and/or acknowledgement, are prepared and compiled by the TRACS staff in advance of each meeting of the Accreditation Commission meeting. Materials are made available to each Commissioner on the Commissioner's page of the TRACS website at least one month in advance of regularly scheduled meetings to provide the Commissioners ample time for review.

Commissioners are expected to review all documents prior to engaging in discussions about any actions being considered and before making any decisions regarding those actions. Commissioners should note their review of all relevant materials on the appropriate form.

The President of TRACS and the Chair of the Accreditation Commission develop the agenda for all Commission meetings. Based on the agenda, the President of TRACS and staff prepare the materials to be reviewed by Commissioners. The materials to be provided to the Commissioners will normally include, but may not be limited to the following:

- Meeting Agenda
- Minutes of previous Commission and/or committee meeting(s)
- Report of the TRACS President
- Financial Reports and Documents
- Executive Committee Report which may include committee recommendations for Commission action
- Standards Review Committee Report which may include committee recommendations for Commission action
- Nominating Committee Report which may include committee recommendations for Commission action
- Special Committee Reports which may include committee recommendations for Commission action
- All relevant materials for each institution under review (accreditation status, adverse action, proposed Institutional Changes, etc.)

  Financial reports including budget projections

BP108 - Budget and Financial Reports

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

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 TRACS 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.

BP109 - 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.

BP110 - Reliability / Validity Study

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

To assure that the TRACS Accreditation Standards and any evaluative criteria associated with these Standards are reliable and valid, the Accreditation Commission is committed to an on-going Reliability/ Validity Study process.

This process 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 Accreditation Standards and any associated evaluative 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 any of the regularly scheduled meetings of the Accreditation Commission.

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.

BP111 - Annual Report Summary

Reference: None
Adoption Date: January 2011
Last Revision Date: February 2024

Each year, TRACS compiles data provided by each institution's Annual Operational Report and Annual Financial Report to create an Annual Report Summary.

The Annual Report Summary identifies institutional strengths and potential problem areas for Candidate and Accredited institutions. TRACS uses the Annual Report Summary as part of its annual institutional review process.

BP112 - Institutional Misrepresentation

Reference:	None
Adoption Date:	January 2011
Last Revision Date:	April 2019

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

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

BP113 - Conflicts of Interest

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

General Conflict of Interest Definition
For TRACS purposes, a conflict of interest considerations apply to any individual and immediate family members of the individual, including any dependents living in the same household as the individual, and includes, but is not limited to any applicable party who:

- Has served for compensation during the prior five years as an employee of or consultant to an institution under consideration;
- Has been a stockholder or board member of the institution under consideration during the prior five years; or
- Has 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) Appeal Committee Members, (C) Peer Evaluators (Evaluation Team and/or Focus Team Members), (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.

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.

If an institution, or any Branch Campus, Teaching Site, Extension Site, or Instructional Site operated by an institution under consideration could be reasonably considered a competitor of an institution represented by a Commissioner; it may be a conflict of interest for that Commissioner to vote on or attempt to unduly sway the vote of other Commissioners regarding:

1. An accreditation action,
2. The consideration of a potential Sanction or Adverse Action, or
3. A proposed Institutional Change

The final determination of whether a conflict of interest is present in such situations will be made by the Chair of the Accreditation Commission.

A member of the Accreditation Commission with a conflict of interest or potential conflict of interest related to any institution or action being considered must decline an assignment as a reader, declare the conflict of interest 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 any Commission action, the Chair of the Accreditation Commission may place the action on the Accreditation Commission agenda for reconsideration.

If 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. Additionally, all members of the Accreditation Commission receive periodic training regarding conflicts of interest and are required to sign an Acknowledgement and Verification Form, which includes an acknowledgement of the TRACS Conflict of Interest policy, as a part of each meeting where the Commission renders any decision regarding institutions.

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.

Appeal Committee Members
In addition to the stipulations outlined in the General Conflict of Interest Definition above, the following guidelines are applied to Appeal Committee members:

Individuals with a conflict of interest related to any action of the Accreditation Commission being appealed must decline an assignment as a member of an Appeal Committee.

When an individual 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 individual 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 whose appeal will be considered by the Appeal Committee if the Peer Evaluator's review took place within five years of the Accreditation Commission meeting when the institution was placed on Adverse Action.

Upon agreeing to serve as a member of an Appeal Committee which will hear the appeal of a specific institution, members receive training concerning conflicts of interest and are required to sign and submit a *Conflict of Interest Form* specific to the appeal.

Institutions that are appealing an adverse action by the Accreditation Commission are informed of the proposed Appeal Committee members that may be assigned to hear the institution's appeal. 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 on the appeal, the institution will have seven days from the date it receives the names of the potential Appeal Committee members to request that any of the potential members be excluded from the Appeal Committee. The request for exclusion 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 cite the criteria detailed in this policy which would disqualify the individual from serving on the Appeal Committee.

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.

See TRACS Policy BP219 – Appeals, for more information regarding the appeal process

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 or Focus Team member:

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 recently been 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 pre-accreditation) 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 or Focus Team, 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.

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. Additionally, TRACS staff receive specific Conflict of Interest training regularly and are required to sign and submit a *Conflict of Interest Form* annually.

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.

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

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 or Focus Team members) 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 have seven days from the date it receives the names of the potential Appeal Committee members to request that any of the potential members be excluded from the Appeal Committee.

BP114 - Commissioner Training

Reference: None
Adoption Date: January 2000
Last Revision Date: February 2022

New Commissioner Training
Upon election to the Accreditation Commission, a fellow Commissioner is appointed to serve the newly elected Commissioner as a mentor. This mentor will make himself / herself available to the new Commissioner as needed and will work side-by-side with the new Commissioner before and at the new member's first meeting of the Accreditation Commission to ensure clarity on all matters related to the various responsibilities of Commissioners.

In addition, new Accreditation Commission members receive face-to-face orientation and training prior to the new member's first official meeting of the Accreditation Commission. This training is generally conducted by the Chair of the Accreditation Commission, the Chair of the Nominating Committee of the Accreditation Commission and the President of TRACS. Orientation will familiarize new Commissioners with their responsibilities regarding TRACS standards, policies, and procedures. Additionally, training will be provided on the application of TRACS policies in making accreditation decisions, including an understanding of the application of those standards to Distance Education.
The following publications will be provided to the new Commissioner and will be referenced as a part of the new Commissioner training process:

- *Bylaws*
- *Policies and Procedures Manual*
- *Accreditation Manual*
- *Resource Manual*
- *Accreditation Commission Handbook*
- *Evaluation Team Procedures Manual*

Commission Continuing Education
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 Accreditation Standards, policies and procedures, changes in Federal Regulations, Distance Education, peer evaluator functions, Reliability/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.

BP115 - Travel and Related Expenses

Reference:	None
Adoption Date:	January 2000
Last Revision Date:	April 2019

TRACS Staff, Peer Evaluators (Focus Team Members and/or Evaluation Team Members), and others representing TRACS and/or the Accreditation Commission should be prudent in their use of TRACS and institutional funds when traveling on official TRACS business.

The general expectation of fiscal prudence is reflected in the following guidelines for travel and related expenses.

Air Travel
Peer evaluators who are required to travel in fulfillment of their responsibilities will be reimbursed for the most economical mode of transportation unless previous arrangements are approved by TRACS staff. Every effort should be made to purchase airline tickets far enough in advance of an institutional visit in an effort to secure the lowest possible airfare. Individuals choosing to fly first or business class must assume the responsibility of paying the difference in rates between the same flights in economy class. Persons on official business for TRACS will be reimbursed at the current designated per mile rate for travel to and from the airport. Those making approved international visits may be permitted to fly business class at the discretion of the TRACS President and only with prior approval. Peer evaluators may make their own travel arrangements or may contact the TRACS office for assistance in making travel arrangements

Ground Transportation
Institutions hosting a visit from TRACS staff or peer evaluators have the option of providing ground transportation from the airport to the institution and to the location where staff and visiting peer evaluators are being housed during the visit. If visiting peer evaluators need to rent automobiles, they should receive prior approval from the appropriate TRACS staff member in advance of the visit.

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

Hotel Accommodations
Whether hotel reservations are made by the institution or by TRACS staff, the following factors should be considered: (1) access to the institution. (2) the reasonableness of the per night rates and (3) the adequacy and cleanliness of the facilities.

Meals
TRACS staff and visiting peer evaluators should be prudent in their use of TRACS and institutional funds when dining while on official TRACS business.

BP116 - Anti-Discrimination

Reference:	None
Adoption Date:	April 2011
Last Revision Date:	February 2019

TRACS does 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 race, sex, age, color, national origin, handicap, disability, marital status, or veteran status. As an organization with a well-founded religious mission, TRACS limits employment to those who agree with its doctrinal positions. Discrimination is unfair or unequal treatment of an individual or a group based on one or more characteristics listed in the preceding paragraph.

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.

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 person found in violation of this policy.

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

Filing a complaint with the U.S. Equal Employment Opportunity Commission (EEOC)
If an individual believes they have been a victim of discrimination by an employer when applying for a job or while on the job because of race, color, sex, national origin, age, or disability, or believe that they have been a victim of discrimination because of opposing a prohibited practice or participating in an equal employment opportunity matter, the individual 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 and to protect the right to file a private lawsuit, should it be necessary, the filing individual should adhere to the EEOC guidelines when filing a charge.

BP117 - Anti-Harassment

Reference:	None
Adoption Date:	April 2011
Last Revision Date:	February 2019

TRACS does not permit harassment. 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.

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 by a person of the same or other sex.

Harassment is not simple teasing, offhand comments, or isolated incidents determined to be not serious. These actions become harassment when they are so frequent or severe that it creates a hostile or offensive work environment or when they result 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.

Actions to be Taken if a Person Believes They are a Victim of Harassment:
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.

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 person found in violation of this policy.

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

Sexual Harassment Prevention Training
All employees are 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.

Filing a complaint with the U.S. Equal Employment Opportunity Commission (EEOC)
If an individual believes they have been a victim of harassment or believe that they have been a victim of harassment because of opposing a prohibited practice or participating in an equal employment opportunity matter, the individual may file a charge of harassment 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 and to protect the right to file a private lawsuit, should it be necessary, the filing individual should adhere to the EEOC guidelines when filing a charge.

BP118 - Unannounced Visit

Reference:	None
Adoption Date:	January 2000
Last Revision Date:	April 2019

TRACS reserves the right to conduct unannounced visits to member institutions.

Unannounced visits will be conducted at the discretion of the Accreditation Commission or the President of TRACS. Such visits may be made for cause, to verify that the institution maintains the personnel, facilities, and resources reported by the institution in its Annual Operational Report, or to verify institutional compliance in any area.

The costs of unannounced visits shall be paid by the institution visited.

BP119 - Records Management, Retention and Disposal

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

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 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 Definition

1. 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 BP105, an institution's Official Records are confidential and may only be shared as required by law or regulation.

2. 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.

3. 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.

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

5. 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.

6. Personal Records: 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.

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

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.

Records Retention Requirements Set Forth by Federal Regulations
TRACS is an accrediting agency recognized by the U.S. Department of Education (ED) 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 section 5. 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.

BP120 - TRACS Responsibilities for Title IV Compliance

Reference: 34 CFR §668
Adoption Date: June 2015
Last Revision Date: April 2019

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 a Candidate (pre-accredited) or Accredited institution's program responsibilities or eligibility to participate under Title IV of the Higher Education Act (HEA).

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 HEA, and the reasons for such concern. TRACS shall notify the institution if its name is submitted to the Secretary under this provision.

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 BP207. Excessive default rates in the student loan program may be cause for an Institutional Staff Review - Financial (ISR-F) evaluation.

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 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 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 applicable TRACS Standards and whether an adverse action is required.

BP121 - Investment Policy

Reference: §602.15, (a), 1.
Adoption Date: June 2015
Last Revision Date: April 2021

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.

1. **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.

2. **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 CFO 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. The investment goals of TRACS are to maximize return while limiting exposure to market risk and to realize a target, annualized return-on-investment of 4 to 6%.

3. **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 CFO 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.

4. 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 CFO will be re-evaluated each time a new CFO is named.

TRACS Investment Policy Statement (IPS)
Long-Term Investments

Part I. PURPOSE
This Investment Policy Statement is intended to assist the TRACS employees by establishing nonbinding guidelines for making investment-related decisions in a prudent manner. It

outlines the underlying philosophies and processes for the selection, periodic monitoring, and evaluation of the long-term investment account.

Specifically, this Investment Policy Statement:

- Defines the account's investment objectives.
- Describes the criteria and procedures for selecting the investment options.
- Establishes investment procedures, measurement standards and monitoring procedures.
- Describes potential corrective actions TRACS can take should investment options (or their respective managers) fail to satisfy established objectives, if TRACS determines that such actions are prudent and advisable given the circumstances.

The guidelines provided in this Investment Policy Statement do not constitute a contract. These guidelines are also not meant to be a statement of mandatory requirements. Rather, these guidelines are only an explanation of general principles and guidelines being currently applied for investment option selection, retention, and replacement. Furthermore, these guidelines are not the sole factors considered by the TRACS in the process. This Investment Policy Statement is not intended to and shall not be deemed to expand any duties of TRACS, or its individual employees, or to create duties that do not exist under applicable law.

This Investment Policy Statement will be reviewed periodically, and, if appropriate, may be amended by TRACS at any time to reflect changes in the capital markets, account objectives or other factors relevant to the account.

Part II. INVESTMENT OBJECTIVES

TRACS will select the account's investment options based on criteria deemed relevant, from time to time. These criteria may include, but are not limited to, the following:

- Maximization of return within reasonable and prudent levels of risk.
- Provision of returns comparable to returns for similar investment options.
- Provision of exposure to a wide range of investment opportunities in various asset classes and vehicles.
- Control administrative and management fees.
- Provision of appropriate diversification within investment vehicles.
- Investment's adherence to stated investment objectives and style.

Part III. SELECTION OF INVESTMENT OPTIONS

Set forth below are the considerations and guidelines that the TRACS may employ in fulfilling the responsibility of selecting investment options for the account.

TRACS intends to provide an appropriate range of investment options that, in the aggregate, will result in the construction of a portfolio consistent with its unique circumstances, goals, time horizons and tolerance for risk. The account intends to invest in broadly diversified investment options, each of which shall offer materially different risk and return characteristics and which in the aggregate are sufficient to materially affect the potential return and degree of risk in the account, as well as minimizing the risk of large losses within the range normally appropriate. TRACS shall be responsible for the investment selection

process, as set forth in this Investment Policy Statement, but cannot guarantee investment results for any selected investment option.

Major asset classes to be considered may include, but are not limited to:

Conservative Investments
Cash and liquid investments including, but not limited to, money market, stable value, and guaranteed interest accounts.

Income Investments
Income-oriented investments including, but not limited to, low, medium, and high-quality bond investments, with short, intermediate and/or long-term duration. Management styles may include indexed and actively managed international, global, and domestic styles.

Equity Investments
Investments that invest in equity securities, both domestic and foreign, including, but not limited to, small, medium, and large market capitalization, with value, blend, and growth investment objectives, which may be actively managed or indexed.

Asset Allocation Investments
Investments or accounts that invest in a combination of conservative, income, and equity investments, "fund of funds" accounts combining several of the above investments into one or a series of investments, and "manager of managers" accounts combining several different investment styles and fund managers into one account or a series of accounts.

Other Investments
In addition to the foregoing major asset classes, TRACS may also consider other appropriate investments in other styles or asset classes offered through vehicles such as individual securities, exchange traded funds, commingled trusts, separate accounts, and mutual funds. Notwithstanding the foregoing, the Committee may consider, but is not required, to include in the investment menu any specific investment asset class, option, or style.

After considering the desired asset classes, TRACS will evaluate and choose the appropriate investment(s). If an investment manager (responsible for the underlying investment portfolio), is chosen, the following minimum criteria should be considered:

1. The investment manager should be a bank, insurance company, investment management, mutual fund company or an investment adviser registered under the Investment Advisers Act of 1940.
2. The investment's manager should operate in good standing with regulators and clients, with no material pending or concluded legal actions against it; and
3. All relevant quantitative and qualitative information on the manager and investment should be made available by the manager and/or vendor.

In addition to the minimum criteria above, the TRACS should consider the following standards for selection of all investments:

1. Investment performance should be competitive with appropriate style-specific benchmarks and the median return for an appropriate, style-specific peer group (where appropriate and available, long-term performance of an investment manager may be inferred through the performance of another investment with similar style attributes managed by such investment manager);
2. Specific risk and risk-adjusted return measures should be reviewed by TRACS and be within a reasonable range relative to appropriate, style-specific benchmark and peer group;
3. Fees and fee structures should be competitive compared with similar investments reasonably available, which should be reviewed on a periodic basis;
4. The investment should exhibit attractive qualitative characteristics, including, but not limited to, acceptable manager tenure; and
- The investment should be able to provide performance, holdings, and other relevant information in a timely fashion with specified frequency.

Part IV. INVESTMENT MONITORING AND REPORTING

The ongoing monitoring of the account is a regular and disciplined process intended to ensure that a previously selected investment portfolio continues to satisfy the selection process and that the portfolio continues to be prudent. The process of monitoring investment performance relative to specified guidelines will be consistently applied. Frequent change of investments is neither expected nor desired.

TRACS will bear in mind all political, social, economic, or other changes that may potentially require more frequent review and consideration of investments. The following are some, but not all, general factors that may be considered in ongoing monitoring:

- Current regulatory environment,
- Current state of capital markets,
- Performance of investment alternatives,
- The prudent applicability of this Investment Policy Statement as written, considering prevailing facts and circumstances.

Monitoring will generally utilize the same investment selection criteria used in the original selection analysis, or such other criteria as deemed prudent by TRACS.

If overall satisfaction with the investment option is acceptable, no further action is required. If areas of dissatisfaction exist, TRACS will monitor whether the investment is taking appropriate and prudent steps to remedy the deficiency. If over a reasonable period the issue remains unresolved, removal of an investment option may result.

The foregoing investment monitoring criteria shall not, under any circumstances, be taken as definitive, conclusive. All determinations should be made by TRACS, in its sole discretion, taking into consideration all relevant facts and circumstances.

Part V. REVIEW PROCEDURES

This Investment Policy Statement will be periodically reviewed and may be amended, if appropriate, at any time and without notice, by action of TRACS.

It is not expected that this Investment Policy Statement will change frequently. Short-term changes in the financial markets should not require amendments to this Investment Policy Statement.

BP122 – Whistleblower Policy

Reference: N/A
Adoption Date: April 2025
Last Revision Date: April 2025

1. *Purpose.* TRACS is committed to maintaining the highest standards of ethical conduct and compliance with all applicable laws and regulations. This Whistleblower Policy (this "Policy") establishes procedures for the reporting, investigation, and resolution of concerns regarding illegal, unethical, or improper conduct within TRACS. TRACS recognizes the importance of fostering a culture of transparency, accountability, and integrity, and is dedicated to protecting from reprisal and retaliation those individuals who, in good faith, report suspected violations or participate in investigations.

2. *Scope.* This Policy applies to all employees, volunteers, and members of the Board of Directors (the "Board") of TRACS (collectively, "Personnel"). It is the responsibility of all Personnel to report any suspected violation of law, regulations, or TRACS' policies and procedures, whether or not personally involved in the relevant matter. This Policy is intended to complement and reinforce TRACS' other policies and procedures. Personnel with questions about the propriety of any practice under the TRACS policies and procedures should seek guidance from supervisors, the TRACS president (the "President"), or the chairman of the TRACS Accreditation Commission (the "Chairman").

3. *Reporting Procedures.* Good faith reports of suspected violations should be made to the reporting individual's supervisor or to the President, provided, however, that any report regarding suspected violations by the President should be directed to the Chairman.

4. *Reporting Content.* Reports should include:
   a) A detailed description of the suspected violation,
   b) Any supporting evidence or documentation,
   c) The name and contact information of the reporting individual (unless the report is made anonymously), and
   d) The date of the suspected violation or when the reporting individual became aware of the suspected violation.

5. *Investigations.* TRACS will promptly review all reports and, if warranted, initiate an investigation.

6. *Investigation Procedures.* TRACS will follow these procedures for all investigations:
   a) Document Preservation: Upon receipt of a report, TRACS will immediately implement measures to preserve all relevant documents, electronic records, and other evidence related to the alleged violation.

b) Witness Interviews: TRACS will conduct thorough interviews with relevant witnesses, maintaining detailed records.
c) Evidence Collection: TRACS will gather and analyze relevant evidence, including documents, electronic records, and physical evidence, as appropriate.
d) Interim Measures: If necessary, TRACS may implement interim measures to prevent further violations or protect individuals involved in the investigation.
e) Escalation: TRACS will provide regular updates to the Board on the progress of the investigation.

7. *Findings and Corrective Action.* Upon completion of an investigation, the findings will be reported to the Board. The Board will:
   a) Review the investigation findings and determine the appropriate corrective action, which may include disciplinary measures, policy or procedure changes, or other remedial steps;
   b) Document the rationale for the corrective actions taken, including any mitigating or aggravating factors considered; and
   c) Communicate the outcome of the investigation to the reporting individual, to the extent permitted by law.

8. *Anti-Retaliation Protections.* TRACS will take steps to protect reporting individuals from retaliation, including:
   a) Monitoring the work environment of reporting individuals for signs of potential retaliation,
   b) Promptly investigating any allegations of retaliation, and
   c) Taking immediate corrective action against any individual found to have engaged in retaliatory behavior.

9. *Confidentiality.* Information regarding reports and investigations will be shared only with those who have a legitimate need to know, as determined by TRACS, including, without limitation:
   a) Members of the Board / Accreditation Commission;
   b) Legal counsel advising TRACS on the matter;
   c) External investigators or auditors, if engaged; and
   d) Law enforcement agencies, if required by law or if criminal activity is suspected.

BP201 - Institutional Responsibilities in Accreditation

Reference: None
Adoption Date: January 2013
Last Revision Date: April 2019

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 TRACS Accreditation Standards in the areas of expertise of the reviewer.

In agreeing to pursue and hold accreditation with 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 to participate in the review of other institutions. Each institution is to submit the names of professional individuals to the TRACS office for training as peer evaluators. The President of TRACS will periodically review the participation of institutions in this process and may contact institutions which need to provide peer evaluators.

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 potentially 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 administrative and / or faculty position which is mandated by TRACS Accreditation Standards.

BP202 - Institutional Leadership Reporting to TRACS

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2023

At the time of application, an institution will identify the persons holding current institutional leadership positions. The institution must identify the persons serving in the following positions:

- Governing Board Chair
- Chief Executive Officer (CEO)
- Chief Academic Officer (CAO)
- Chief Financial Officer (CFO)
- Accreditation Liaison Officer (ALO) to TRACS *

The institution will notify TRACS of any changes to these designated positions. The institution is responsible for providing a current listing of the persons serving in these roles and providing appropriate documentation to verify the person, role/position, title, academic credentials, and contact information within 15 days of filling the position. (This includes persons serving on an interim basis.)

A *Leadership Change Reporting Form* for communicating changes of these key positions is available on the TRACS website (tracs.org).

* The Accreditation Liaison Officer (ALO) is appointed by the President of the institution and is responsible for initiating and coordinating any TRACS reporting processes, such as Institutional Changes, the Annual Operational Report, and the Self Study Report.

BP203 - Annual Reporting

Reference: 34 CFR §602.19(b)
Adoption Date: June 2013
Last Revision Date: June 2026

All member institutions are required to submit an **Annual Operational Report** (AOR) and an **Annual Financial Report** (AFR) via the TRACS portal, each year by the dates specified in notifications from TRACS.

Annual Operational Report
Institutions are evaluated each year using data submitted in the Annual Operational Report (AOR). The AOR provides data related to such matters as enrollment, assessment, student learning and any significant developments which have occurred at the institution since the submission of the previous year's AOR.

Upon receipt of the AOR and supporting documents, TRACS staff conducts a review of the materials and prepares an Annual Operational Report Summary The Annual Operational Report Summary includes both quantitative and qualitative data and focuses on institutional compliance with the Accreditation Standards.

Data gathered from AORs is used to:

- Monitor increases or decreases of 20% or more (minimum increase or decrease of 20 students) in any program or by any institution.
- Verify that the institution employs sufficient faculty for the programs offered.
- Monitor success of institutions in student achievement (both undergraduate and graduate).
- Verify that all Remote Locations have been properly approved, are still operating, and meet the designated definition.
- Verify Distance Education authorization.
- Identify other accreditations held by TRACS accredited institutions.

All compiled data submitted in the AOR is confidential and is used by TRACS staff and, when appropriate, by the Accreditation Commission for consideration of recommendations and decisions.

Failure to submit the institution's AOR when due will result in the imposing of an administrative fee of $500.00 per month for each month or portion of month that the AOR is late for the first three months and $1,000 per month or for any month or portion of month thereafter. Additionally, failure to submit the institution's AOR when due places the institution in non-compliance with Accreditation Standard 6.13.

Annual Financial Report
The Annual Financial Report (AFR) provides the data necessary for TRACS staff to evaluate the institution's financial stability and sustainability as well as the institution's compliance with Department of Education participation requirements and Internal Revenue Service filings.

Documents required with the AFR submission each year include:

- The institution's current certified audit report with management letters
- The institution's most recent tax return
- Other documents may be required in any given year.

The required submission date for the AFR will be determined by the fiscal year end of the institution.

Failure to submit the institution's certified annual audit within 6 months of the close of the institution's fiscal year will 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 for the first three months and $1,000 per month for any month or portion of month thereafter. Additionally, failure to submit the audit as required 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 an Institutional Staff Review - Financial (BP207), and the possible imposing of a sanction at the next Accreditation Commission meeting

Additionally, failure to submit the non-audit portions of the institution's AFR when due will result in the imposing of an administrative fee of $500.00 per month for each month or portion of month that the AFR is late for the first three months and $1,000 per month or for any month or portion of month thereafter. Additionally, failure to submit the institution's AFR when due places the institution in non-compliance with Accreditation Standard 6.13.

BP204 - Staff Visits

Reference: Various References Noted in Policy
Adoption Date: July 2022
Last Revision Date: N/A

For the purpose of this policy, a staff visit is defined as either (1) an on-site and in-person visit conducted by a member of the TRACS staff to an institution or one of its or instructional locations, (2) an on-site and in-person visit conducted by a member of the TRACS staff with an institution's personnel at any location outside of the institution's campus(s) for the purpose of conducting official TRACS business as it relates to that institution, or (3) a virtual visit (utilizing teleconferencing technology) conducted by a member of the TRACS staff with institutional personnel for the purpose of conducting official TRACS business as it relates to that institution.

Federally Required Staff Visits
Federal Regulations require TRACS to conduct on-site, in-person staff visits in the following instances:

- To institutions seeking Candidate status, Accredited status, or Reaffirmation of Accredited status. *§602.15(b)(1) and §602.17(e)* – TRACS utilizes staff-accompanied Evaluation Team Visits to fulfill this requirement.
- To institutions, Branch Campuses, or Teaching Sites that serve as a teach-out location for students of another institution that has ceased to operate before all students have completed their course of study. *§602.22(d)/(a)(1)(ii)(H)* – TRACS utilizes staff visits and / or staff-accompanied Focus Team Visits to fulfill this requirement.
- To an approved Branch Campus within at least 6 months of the establishment of that Branch Campus. *§602.22(d)/(a)(1)(ii)(I)* – TRACS utilizes staff visits and / or staff-accompanied Focus Team Visits to fulfill this requirement.
- To institutions that have undergone a change of ownership within at least 6 months of the effective date of that change in ownership. *§602.24(b)* – TRACS utilizes staff visits and / or staff-accompanied Focus Team Visits to fulfill this requirement.

Any exceptions to these federally mandated on-site, in-person staff visit requirements will be provided to TRACS by the U.S. Department of Education or other appropriate entities and will be observed, as applicable, by TRACS.

TRACS Policy / Procedures Required Staff Visits
TRACS Policies / Procedures require staff visits in the following instances:

- To institutions that have submitted a Self-Study Proposal prior to engaging in the Self-Study process. (see TRACS publication *Steps Toward Accreditation*)
- Institutions that have submitted an Institutional Change Form where the proposed change specifically requires either a staff visit or a staff-accompanied Focus Team Visit. (see *TRACS Policy BP226*)

Optional Staff Visits
TRACS Policies / Procedures may require, at the discretion of the President of TRACS or the TRACS Accreditation Commission, staff visits in the following instances:

- To institutions that are under either an Institutional Staff Review or Institutional Staff Review-Financial. (see *TRACS Policy BP207*)
- Institutions that have submitted an Institutional Change proposal where the proposed change may, at the discretion of the President of TRACS or the TRACS Accreditation Commission, require either a staff visit or a staff-accompanied Focus Team Visit. (see *TRACS Policy BP226*)

TRACS staff may conduct staff visits in the following instances:

- To institutions that have submitted documentation pertaining to the Interim Fifth-Year Review process if compliance cannot be verified otherwise. (see *TRACS Policy BP310*)
- To institutions participating in the Application Orientation when the institution requests that the orientation session take place on the institution's campus.
- To institutions requesting staff consultation on any matter.
- To institutions (announced or unannounced) for any reason deemed appropriate by either the TRACS Accreditation Commission, the President of TRACS, or TRACS staff, (see *TRACS Policy BP118*)

Methodology for Conducting Staff Visits

In an effort to prevent institutions from incurring unnecessary expenses for staff or staff-accompanied Focus Team member travel, accommodations, meals, etc., and to maximize staff time in the TRACS office, unless otherwise prescribed by Federal Regulations, the preferred methodology for conducting staff visits (including staff-accompanied Focus Team Visits when applicable) shall be virtual visits utilizing teleconferencing technology.

As is the case with on-site and in-person visits, virtual visits allow for the interviewing of necessary personnel at the institution being visited and for the examination of relevant documents which may not have been submitted and reviewed prior to the virtual visit. TRACS reserves the right to conduct on-site, in-person visits to institutions and / or any remote instructional sites (Branch Campuses or Teaching Sites) operated by the institution as deemed necessary and appropriate or if it is determined that the business to be conducted cannot be adequately accomplished virtually.

Documentation Associated With Staff Visits

Any documentation associated with a staff visit or staff-accompanied Focus Team Visit which is to be reviewed and considered as a part of that visit may be submitted (electronically or otherwise) to the TRACS staff member and the Focus-Team member (if applicable) prior to any visit (whether conducted on-site and in-person or virtually) to ensure a thorough review prior to the conducting of the visit.

All staff visits, regardless of the methodology utilized for conducting the visit, (on-site and in-person or virtual) and any process whereby the TRACS staff officially interacts with a TRACS member institution or an institution seeking membership with TRACS, should be placed on the TRACS master calendar to ensure an accurate accounting of all official staff visits and interactions.

Expense Reports Following Staff Visits

Regardless of the methodology utilized for conducting staff visits, (on-site and in-person or virtual), the staff member conducting the visit shall, at the conclusion of the visit, submit an

expense report to the TRACS business office to ensure that all visit related expenses are accounted for.

All staff visits, whether conducted on-site and in-person or virtually (with the exception of a staff visit involving an Application Orientation) shall incur the appropriate staff visit fee specified on the current TRACS fee schedule. This staff visit fee should be noted on the expense report submitted to the TRACS business office.

Regardless of the methodology utilized for conducting staff visits, (on-site and in-person or virtual), the institution being visited shall incur all expenses related to the TRACS business associated with the staff visit.

BP205 - Monitoring Institutional Growth

Reference: None
Adoption Date: January 2011
Last Revision Date: April 2019

By means of the Annual Operational Reports submitted by member institutions, TRACS monitors institutional growth in overall enrollment, program enrollment, and number and status of Remote Locations.

Any member institution which reports total student enrollment growth individual program of more than 20 students which is at least 20% greater than it reported in the prior year may be required to provide documentation of the actions taken by the institution to accommodate the increase. The President of TRACS may require a staff visit to the institution to verify that it is in compliance with TRACS Accreditation Standards.

Any member institution which receives permission from the Accreditation Commission to open 2 or more Remote Locations in one year may be required to host a staff visit, which may be conducted in conjunction with any visit(s) required after Commission approval, to all locations of the institution to verify that the institution is providing all of the resources claimed and that it is in compliance with TRACS Accreditation Standards.

BP206 - Monitoring Student Achievement

Reference: §602.16(a)(1)i ; TRACS Standard 17.11
Adoption Date: July 2012
Last Revision Date: October 2022

TRACS requires member institutions to collect and analyze retention 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.
Member institutions are required to submit the applicable student achievement data / rates to the TRACS office as a part of Annual Operational Report (AOR).

This policy provides a framework for how TRACS staff will monitor the institution's student achievement results.

The establishment of the benchmarks listed below and the use of these benchmarks for monitoring and, as appropriate, for follow up with the institution, are based on the following rationale:

1. The listed benchmarks are based on nationally recognized norms, including those used by other accrediting agencies recognized by the U.S. Department of Education.
2. Remediation for student achievement results that fall below these established benchmarks necessitates a period of time (generally three to six years) for the effect of implemented changes to demonstrate clear results.

Monitoring the Achievement of Benchmarks
The monitoring of institutional success in meeting specified benchmarks regarding student outcomes will be initiated based on the data / rates submitted as part of the AOR process. Rates should be calculated using the standard cohort definition provided in the AOR instructions, which will be (or will approximate) IPEDS definitions.
Staff monitoring and follow up (as necessary) in these areas will be based on the following benchmarks:

Required

- Retention Rates: Less than 25% retention rate for Associate and Bachelor programs.
- Graduation Rates: Less than 25% graduation rate for Associate and Bachelor programs.

Optional

- Pass Rates for State/Other Licensing Examinations: Less than 75% requires the institution to document its compliance status with the agency and/or state.
- Course Completion Rates, Job Placement Rates, Transfer Rates: No benchmark rates have been established by TRACS

Required Remediation

TRACS staff will work with institutions that fail to meet the above noted benchmarks to ensure that the institution develops and implements a remediation plan to address any rates that fall below the established benchmark(s). The plan should be based on research and adhere to best practices and may consider the following components:

1. The relationship of the rate(s) 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 rate(s)Comparison studies with peer institutions
4. Demonstration that a quantifiable plan has been implemented including intermediate goals
5. Demonstration that internal results are reviewed by the reporting institution and result in action
6. 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 for remediation has been submitted, the institution will be allowed adequate time for the plan to prove effective. Generally, adequate time will be based on the degree category in question and will normally be three to six years to allow for a full student cohort to complete a plan cycle. However, failure to submit a satisfactory remediation plan or failure to demonstrate progress in meeting plan goals will result in the President of TRACS initiating an Institutional Staff Review (ISR) as detailed in BP207. The ISR procedure is used when there is evidence that an institution may be out of compliance with a TRACS Accreditation Standard and/or policy requirement.

BP207 - Institutional Staff Reviews

Reference: §602.19(b)
Adoption Date: June 2013
Last Revision Date: December 2025

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

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

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

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

After receiving and reviewing the institution's response(s), the President of TRACS will make one of the determinations described in TRACS Policy *BP211* Section C.

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

Institutions undergoing an ISRF are automatically considered under Financial Monitoring. Financial Monitoring is not considered a Sanction as defined in TRACS policy BP211, and is

therefore not a public action requiring public, Department of Education, or other agency notification.

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

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

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

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

BP208 - Title IV Participation

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2022

Institutions approved for participation in programs under the Higher Education Act, 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 peer evaluators during Evaluation Team visits 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 (gatekeeper) 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 Secretary of Education.

Institutions approved for participation in Title IV programs must submit to the TRACS office, along with the required Annual Financial Report documentation, an annual audit which conforms with the level of audit report required by the U.S. Department of Education based upon their current regulations. This may include a Uniform Guidance or "Single Audit." The annual audit will be reviewed along with other financial documentation.

BP209 - Student Refunds

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2019

The institution must develop and publish a refund policy and the procedures for changes in or withdrawals from a degree program. The refund policy must provide for a clear, fair, and equitable refund of at least the larger of the following guidelines:

1. The requirements of applicable state law.
2. The specific refund standards established by any other accreditation agency with which the institution may be accredited.
3. A prorated refund amount for those whose withdrawal date is on or before the 40% point in the period of enrollment.

BP210 - Credit Hour

Reference: §600.2, §602.24(f)
Adoption Date: April 2011
Last Revision Date: April 2019

All Candidate and Accredited institutions must clearly state how the institution defines a credit hour. TRACS considers a credit hour as one hour of classroom or direct faculty instruction with a minimum of two hours of out-of-class work for each week of an academic term. Institutions on the semester or trimester system must have a minimum of 15 weeks of class (or its equivalent for module or intensive courses). Institutions on the quarter system must have a minimum of 10 weeks of class (or its equivalent for module or intensive courses).

Institutions must clearly explain how credit hours for other academic activities for which credit is awarded such as laboratory work, practica, studio work, or Distance Education are determined. 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 the institution does not adopt TRACS definition of a credit hour, the institution must provide evidence that its definition is equivalent to the TRACS definition.

TRACS will evaluate the reliability and accuracy of an institution's assignment of credit hours before granting Candidacy, Accreditation, or before reaffirming Accreditation.

TRACS' evaluation will include a review of:

1. the institution's published definition for a credit hour;
2. whether qualified faculty determine the number of credit hours that are appropriate for individual courses; and
3. 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 review a sampling of course syllabi in its evaluation; however, TRACS may conduct a more extensive review if irregularities are discovered. If TRACS determines that an institution is in systematic non-compliance with this policy, in accord with federal regulations, TRACS will notify the U.S. Secretary of Education.

BP211 - Sanctions and Adverse Action

Reference: §602.18 (d) and §602.20
Adoption Date: June 2000
Last Revision Date: June 2026

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

A. Definitions

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

B. Methods for Determining Institutional Non-Compliance

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

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

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

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

C. Recommendations for Sanctions or Adverse Action

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

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

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

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

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

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

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

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

in non-compliance and will be informed regarding the timeframe for the extension and the processes to be utilized by the institution for demonstrating compliance.

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

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

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

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

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

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

obtain, the resources needed to correct. Such a determination would normally require the Accreditation Commission to place the institution on **Probation**.

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

E. Accreditation Commission Action

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

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

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

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

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

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

At each regular meeting of the Accreditation Commission, the President of TRACS will report on each institution against which the Accreditation Commission has previously taken action in cases where that action has not been removed. The report will include a summary of any actions the institution has taken to correct its deficiencies and come into compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations. The President of TRACS may include any other relevant information, including a recommendation that the Accreditation Commission remove the previously imposed action against the institution. If the Accreditation Commission determines, at any time, that an institution is in compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations the Accreditation Commission, on its own initiative and without a recommendation from the President of TRACS, may remove the institution from previously imposed action.

F. Institutions Seeking Accreditation or Reaffirmation of Accreditation

Candidate institutions seeking Accreditation or Accredited institutions seeking Reaffirmation of Accreditation that are determined by the Accreditation Commission to be in non-compliance with one or more Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations at the time of their appearance before the Commission may be denied Accreditation or Reaffirmation of Accreditation. Such denial of Accreditation or Reaffirmation is, by definition, the imposing of an Adverse Action.
Institutional accreditation may not be granted or reaffirmed while an institution is under Sanction, but the institution's current status of recognition will be maintained. Denial of accreditation or reaffirmation of accreditation is appealable and will not affect the normal accreditation review cycle for that institution. Denial is a public action.

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

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

2. **Probation**
    a. In addition to its Annual Operational Report, an institution on Probation must submit regular reports to TRACS specifically detailing its progress toward demonstrating compliance with the specified Accreditation Standard(s), TRACS policies and procedures or any applicable Federal Regulations including the anticipated timeframe for bringing deficient areas into compliance.

b. If the institution demonstrates compliance with the Accreditation Standards, TRACS policies and procedures or any applicable Federal Regulations within the timeframe allowed, the Accreditation Commission will remove the institution from Probation.
c. If the institution has not corrected its deficiencies and demonstrated compliance with the issues in question within the timeframe allowed, the Accreditation Commission will either:
    i. Grant an extension of Probation for no more than one year. An extension may only be granted one time and is not granted as a matter of right and with the total time allowed for demonstrating compliance not to exceed the maximum timeframe allowed; or
    ii. Place the institution under a more severe Sanction (Show Cause) or under a less severe Sanction (Warning) as deemed appropriate, with the total time for demonstrating compliance not to exceed the maximum timeframe allowed; or
    iii. Take Adverse Action against the institution.

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

1) This can only be granted one time.
2) The total amount of time granted to the institution for demonstrating compliance may not exceed the maximum timeframe allowed.

4. **Adverse Action**
In the event that an institution's Candidacy or Accreditation is terminated, through Adverse Action, by the Accreditation Commission, the status held by the institution before the Adverse Action was taken will remain intact through the period allowable for the institution to file an appeal of the Adverse Action. If the institution does not appeal the Adverse Action within the allowable timeframe, the termination action will be effective as of the first business day after the appeal period has expired.
Institutions whose membership with TRACS is ultimately terminated, either by an un-appealed Adverse Action of the Accreditation Commission or by a final decision of an Appeal Committee to uphold the Adverse Action imposed by the Accreditation Commission, shall ensure that the TRACS office receives the following documents / information within 60 days of the date of a finalized termination action:
    - A Teach-Out Plan which meets the requirements of TRACS Policies BP222 and BP224.
    - Copies of any approved and signed Teach-Out Agreements with other institutions that meet the requirements of TRACS Policy BP225
    - A narrative which details the following: (1) the number of students enrolled in all programs at the institution at the time its membership with TRACS was terminated, (2) the number of students who completed their course of study at the institution, and (3) the number of students who either transferred to other institutions or choose not to continue their study.
    - Information regarding the name and contact information of the State agency, institution, or other entity which has agreed to act as the custodian of the institution's academic records in accordance with TRACS Policy BP222.

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

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

If the Accreditation Commission takes an Adverse Action (denial, withdrawal, suspension, revocation, or termination of Accreditation or Candidacy) against an institution, the

institution is required to disclose the decision to current and prospective students within seven business days of receipt of the Commission's decision

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

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

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

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

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

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

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

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

N. Means of Notification, Responses, and Comments
The President of TRACS may notify an institution on any matter noted in this policy by either electronic or hard copy means. Any hard copy notice that the President of TRACS sends to an institution shall be sent by any service which requires a signature at the time of delivery. The

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

BP212 - Voluntary Withdrawal

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

Institutions voluntarily withdrawing from Candidacy (preaccreditation) or Accreditation with TRACS must send written notification of their intent to withdraw to the President of TRACS. Upon receipt of the notification, the TRACS office shall send written confirmation of receipt of the notification.

The notification of intent to withdraw must provide evidence that the withdrawal has been authorized by the institution's Board. It is not required that withdrawing institutions provide a specific reason for the withdrawal.

Per TRACS Policy BP106, notification of an institution's voluntary withdrawal from Candidacy (preaccreditation) or Accreditation shall be sent to the U.S. Secretary of Education and other appropriate governmental agencies within 10 days of TRACS receiving the notification of withdrawal.

The President of TRACS shall provide the Accreditation Commission with notice of the institution's intent to withdraw at the next scheduled meeting of the Accreditation Commission.

The Accreditation Commission shall honor the withdrawal when it finds that the action has been authorized by the institution's Board. The withdrawal becomes final either on the last day of the academic term during which the notification was received by TRACS, an earlier date if so requested by the institution, or on an earlier date as determined appropriate by the Accreditation Commission. The President of TRACS shall inform the institution that TRACS has accepted the withdrawal within 30 days of the date of Accreditation Commission action.

Per TRACS Policy BP105, notification of a final decision by the Accreditation Commission to accept an institution's voluntary withdrawal will be:

1. reported to the public (including the basis of the decision) no more than 30 days after such decisions are made, and
2. provided in writing to the U.S. Secretary of Education, and other appropriate governmental and accrediting agencies, within 24 hours of notifying the institution, but no more than 30 days after the Accreditation Commission accepts the withdrawal.

The withdrawal of membership from TRACS is a public action and as such, notification of the withdrawal of any member institution shall be published on the TRACS website and shall be provided to the appropriate governmental agencies. Following the withdrawal, the institution must accurately present this status in all of its publications and communications including the institution's website.

A member institution that withdraws from membership with TRACS may reapply for TRACS recognition through the normal application process no earlier than one year after the date on which the Accreditation Commission determined the withdrawal became final.

An institution which has any unpaid invoices due to TRACS at the time of the withdrawal remains liable for those obligations.

Once the Accreditation Commission has taken action regarding an institution's intent to withdraw, the withdrawing institution may not rescind its notification nor may the institution appeal the Accreditation Commission's decision to honor the withdrawal except by specific action of the Accreditation Commission.

BP213 - Failure to Pay

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

When a TRACS member institution fails to pay any fee or reimbursement assessed by TRACS within 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 notice is received by the institution.

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 appropriate action per TRACS Policy BP211. The president of the institution is to receive a copy of the notice.

If the Accreditation Commission finds that the institution has not paid its fee or reimbursement in full, the Accreditation Commission shall:

1. Grant the institution a specified additional amount of time to pay in full the fee or reimbursement; or
2. Immediately terminate recognition of the institution's Accreditation or Candidacy.

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.

If the Accreditation Commission terminates recognition of the institution's Accreditation or Candidacy, that institution remains liable to TRACS for all outstanding fees and/or reimbursements.

Any institution which has its Accreditation or Candidacy terminated for failure to pay a fee or reimbursement to TRACS may only reapply with TRACS after:

1. All outstanding fees and/or reimbursements are paid in full,
2. Six months from the date the termination of status became active, and
3. A full, written explanation for the non-payment is provided to the President of TRACS.

BP214 - Lapse of Candidacy or Accreditation

Reference: §602.18, §602.20, §602.26 (f)(1-2)
Adoption Date: June 2000
Last Revision Date: December 2025 / Edited January 2026

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

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

Candidate Institutions - If the Accreditation Commission finds that the Candidate institution has not pursued the tasks required for Accreditation or that the institution is unable to demonstrate the necessary level of compliance with TRACS Standards before the institution's Candidacy expires, the Accreditation Commission shall terminate the institution's Candidacy as of the date the institution's recognition is scheduled to expire. Per Federal Regulations, Candidate institutions may not hold Candidate status any longer than five years and are thus not eligible for the granting of additional time for completing the Accreditation process beyond the allowable time period.

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

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

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

If the Accreditation Commission grants an Accredited institution an additional amount of time to complete the tasks required for obtaining Reaffirmation of its Accreditation, and if the institution, for any reason, fails to complete the tasks according to the revised timetable, the institution's Candidacy or Accreditation will terminate on the date the Accreditation is scheduled to expire.

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

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

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

BP215 - Decisions of Governmental or Other Accrediting Agencies

Reference:	34 CFR §602.28 and 34 CFR §600.11 (a)-(b)
Adoption Date:	June 2000
Last Revision Date:	December 2025 (edited June 2026)

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

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

BP216 - 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.
10. If the Accreditation Commission finds that the institution did commit a fraudulent act, the Accreditation Commission shall take the appropriate action in accordance with TRACS Policy BP211.
11. 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 Policy BP219.

BP217 - Unethical Conduct

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

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:

1. Discontinue relations with the institution if that institution is neither accredited nor a candidate for accreditation.
2. 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 Commission Action Against Institutions Policy will be followed.

The institution may appeal the decision of the Accreditation Commission in accordance with the TRACS established Appeals Policy.

BP218 - Reapplication After Withdrawal or Termination

Reference:	None
Adoption Date:	March 2004
Last Revision Date:	June 2015

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.

BP219 - Appeals

Reference: 34 CFR 602.15
Adoption Date: June 2000
Last Revision Date: October 2026

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

A. Grounds for an Appeal

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

B. Filing an Appeal

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

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

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

C. Composition of the Appeal Committee

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

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

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

D. Process for the Selection of Appeal Committee Members

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

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

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

E. Institutional Documentation

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

F. Time and Location of Meeting with the Appeal Committee

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

G. Procedures of Appeal Committees

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

d. Only the representatives of the institution are to be present in the hearing during the institution's presentation and only TRACS representatives are to be present in the hearing during the presentation by TRACS.

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

H. Decision of the Appeal Committee

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

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

1. If the Appeal Committee affirms the adverse action decision of the Accreditation Commission, an arbitration process is available to institutions that seek to contest such a decision by the Appeal Committee. TRACS Policy *BP221 – Arbitration* describes the arbitration process. Institutions desiring to contest a decision made by an Appeal Committee (by arbitration) must notify TRACS within thirty days of the Appeal Committee's decision, otherwise, the decision of the Appeal Committee shall become final at the end of the thirty day period.
2. If the Appeal Committee reverts the matter to the Accreditation Commission for further consideration, the Accreditation Commission shall consider the specific issues identified by the Appeal Committee at its first meeting following the notice of reversion. The Accreditation Commission shall then appropriately notify the institution of its final decision regarding the institution's status.
3. Once the appeal and any possible arbitration processes are concluded, the decision of the Appeal Committee or Arbitration Panel (if applicable) is final and not subject to further appeal or arbitration (except as allowed under section J of this policy due to new financial information.
4. The Accreditation Commission shall act in a manner which is consistent with the decision of the Appeal Committee or Arbitration Panel (if applicable).

J. Appeal Due to New Financial Information

1. An institution or program may, before the Commission reaches a final adverse action decision, seek review of new financial information if all of the following conditions are met:
    a. The financial information was unavailable to the institution or program until after the decision subject to appeal was made.
    b. The financial information is significant and bears materially on the financial deficiencies identified by the agency.
    c. Information is deemed significant and material if it meets these criteria:
        i. A subsequent Certified Audit that reports a positive change in Total Net Assets (not-for profit) or Total Equity (proprietary)
        ii. A subsequent Certified Audit that supports a Financial Responsibility Composite Score of 1.5 or greater.
    d. The only remaining deficiency cited by the agency in support of a final adverse action decision is the institution's or program's failure to meet an agency standard pertaining to finances.
2. An institution or program may seek the review of new financial information described in J.1.c only once any determination by the Commission made with respect to that review does not provide a basis for an appeal.

K. Costs of an Appeal

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

L. Withdrawal of Appeal.

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

M. Computation of Time

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

N. Notifications

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

O. Institutional Status During Appeal and Public Notice

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

BP220 - Choice of Law and Venue

Reference: None
Adoption Date: April 2010
Last Revision Date: April 2011

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.

BP221 – Arbitration / Litigation

Reference:	20 U.S.C. §1099b(e), 34 C.F.R. §602.20(e), and Federal Arbitration Act, , 9 U.S.C. §§1-16
Adoption Date:	April 2010
Last Revision Date:	December 2025

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

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

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

A. Arbitration and Governing Law

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

B. Arbitration Process

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

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

C. Financial Obligations Related to Litigation

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

BP222 - Closure of an Institution, a Branch Campus or a Teaching Site

Reference: None
Adoption Date: June 2000
Last Revision Date: February 2023

A decision to close an educational institution or one of its Teaching Sites or Branch Campuses 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 or one of its Teaching Sites or Branch Campuses 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 institution's Board. Since the immediate interests of current students and faculty are most directly affected, their present and future prospects require especially sensitive attention and involvement.

Institution's proposing to close entirely or to close a Teaching Site or Branch Campus must submit the appropriate Institutional Change Form on the TRACS portal.

Note: Institutions which close as a result of having the institution's Candidacy or Accreditation terminated by way of an Adverse Action (as defined in TRACS Board Policy BP211) imposed by the Accreditation Commission must meet the requirements outlined in Section G.4. of BP211.

A. Closing an Institution or a Branch Campus or Teaching Site

A decision to close an institution or one of its Teaching Sites or Branch Campuses requires specific plans for providing in appropriate ways for the affected students, faculty, administration, and support staff, and for the disposition of the institution's assets. The following factors must be considered by the institution's Board in this process:

1. 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 to be compiled in such a way that these records can be transmitted promptly to receiving institutions.

   Teach Out Agreements (see *BP225*) made with other institutions to receive transferring students and to accept student records must be in writing. 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 - The institution 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. When 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 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 and Teach Out Agreements

The institution must comply with the appropriate Teach-Out Plan and Teach Out Agreement Policies (BP224 and BP225).

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 should 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 institution's 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. 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 institution's Board must be a formal vote to close the institution or a Teaching Site or Branch Campus 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 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 or Teaching Site or Branch Campus may be rendered less traumatic by careful attention to the details of the legal and ethical obligations to assure that the institution's students, faculty, and staff will be optimally provided for, and that assets will be used in a way that will honor the intentions of the original donors.

BP223 - Dual Enrollment

Reference: None
Adoption Date: November 2019
Last Revision Date: November 2019 (edited June 2023)

For TRACS purposes, "Dual Enrollment" refers to courses taught to high school students for which the students receive both high school credit and college credit, regardless of location or mode of delivery. This would include courses and programs that may be offered under different names such as "Early College," "Dual Credit," or "Concurrent Enrollment."

The academic rigor of such coursework must match the quality of other institutional coursework, regardless of location or mode of delivery. Institutions must ensure that their dual enrollment courses and programs comply with TRACS Accreditation Standards. This expectation applies to all such educational programs and services, wherever located or however delivered. Institutions offering dual enrollment courses and programs must demonstrate clear institutional control over these courses and programs.

With the understanding that the TRACS Accreditation Standards apply to all courses and programs of the institution, regardless of mode of delivery, institutions, peer evaluators, TRACS staff and the Accreditation Commission should consider the following expectations when implementing, reporting on, evaluating, and/or approving of dual enrollment courses and programs.

1. **Notification -** Institutions offering dual enrollment courses and programs must notify TRACS of the dual enrollment instructional locations by submitting the appropriate Non-Substantive Institutional Change Form via the TRACS portal. The institution must demonstrate compliance with state and/or other applicable requirements for such offerings.
2. **Faculty -** The institution must ensure appropriate faculty qualifications for those who provide instruction for dual enrollment courses. These faculty members must possess the same academic credentials and/or documented professional experience required by the institution of all of its faculty. Graduate teaching assistants, if they are the instructor of record and providing direct instruction, should meet the same academic and/or professional criteria. In all cases, the institution bears responsibility for documenting and justifying the qualifications of its dual enrollment instructors, and these faculty members should be included on the institution's Instructional Staff Listing.
3. **Curriculum and Instruction -** For all dual enrollment courses offered, the institution must employ sound and acceptable practices for determining the amount and level of credit awarded. Course content and rigor of dual enrollment courses must be comparable to that of the same courses taught to the institution's other students. Dual enrollment courses that are delivered via Distance Education, as defined by TRACS, may only be offered by institutions already approved to offer Distance Education courses/programs by TRACS or by another accrediting agency recognized by the U.S. Department of Education.
4. **Institutional Effectiveness -** Dual enrollment students must be included in all applicable assessment processes used to ensure the effectiveness of campus-based courses and programs.

5. **Library and Learning Resources -** Dual enrollment students must have access to appropriate library/learning resources, and the institution must demonstrate that students are able to use such resources effectively. If the high school is the provider of these resources, the institution must determine the appropriateness of the collections for the courses and programs offered. The institution must ensure that its students have access to regular and timely instruction in the use of library/learning resources.
6. **Academic and Student Support Services -** Academic support services must prove appropriate for the courses and programs offered. Institutions must ensure that dual enrollment students are appropriately advised regarding the collegiate curriculum. Student support services must be appropriate for dual enrollment students. Institutions must have an adequate and published procedure for resolving written student complaints, and the institution must follow its policies and procedures. The institution must ensure that its dual enrolled students are appropriately oriented regarding their rights and responsibilities. Documented procedures assure that security of personal information is protected.
7. **Admissions and Transparency -** The institution must implement appropriate eligibility and placement procedures to ensure that potential dual enrollment students are prepared for college-level courses. Dual enrollment students are usually admitted under exceptions to an institution's published admissions policies, and the institution must follow commonly accepted practices in making such exceptions. Advertising, recruiting, and admissions information must adequately and accurately represent the programs, requirements, and services available to students. Statements and other representations regarding the ability to transfer credit earned in dual enrollment programs and courses must be accurate and complete. The institution must ensure that its registration and transcription practices for dual enrollment students are consistent with those in effect for all other students.
8. **Facilities -** Dual enrollment courses must be offered in adequate physical facilities, whether under the control of the institution or under the control of the high school where dual enrollment courses are taken.

BP224 – Teach Out Plans

Reference: §487(c)(1)(F), §602.23(f)(1)ii, §668.162(c), §668.162(d)(2)
Adoption Date: June 2000
Last Revision Date: June 2026

A Teach-Out Plan is Required When:

1. The U.S. Secretary of Education notifies TRACS that the U.S. Secretary of Education has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required.
2. The US Secretary of Education notifies TRACS that the institution is participating in title IV, HEA programs under a provisional program participation agreement and the Secretary has required a teach-out plan as a condition of participation.
3. The US Secretary of Education notifies TRACS of a determination by the institution's independent auditor expressing doubt about the institution's ability to operate as a going concern or indicating an adverse opinion or a finding of material weakness related to financial stability.
4. The US Secretary of Education notifies TRACS that it has placed the institution on the reimbursement payment method under 34 CFR 668.162(c) or the heightened cash monitoring (HCM2) payment method requiring the Secretary's review of the institution's supporting documentation under 34 CFR 668.162(d)(2). TRACS may require an institution placed on HCM1 to submit a Teach-Out Plan if the HCM1 status is combined with other financial stability issues or operational risks.
5. TRACS places the institution on Probation or requires an institution to Show Cause why its accreditation or pre-accreditation should not be terminated.
6. TRACS takes any action against the institution which has the effect of suspending its accreditation or pre-accreditation.
7. The institution notifies TRACS that it intends to cease operations entirely or close a remote instructional site (Teaching Site or Branch Campus) that provides one hundred percent of at least one program, including if the location is being moved and is considered by the U.S. Secretary of Education to be a closed school.
8. The institution notifies TRACS that it intends to close a program.
9. A State licensing or authorizing agency notifies TRACS that an institution’s license or legal authorization to provide an educational program has been or will be terminated.
10. An institution is granted initial Candidate (preaccredited) status.

Guidelines for the Teach-Out Plan

1. The plan must be approved by the institution’s governing board as demonstrated by Board meeting minutes or an official, signed attestation statement from the Board Chair.
2. The plan must be detailed and consistent with applicable federal regulations. It must include how the institution will provide for all its instructional, student, financial, faculty, and operational obligations.
3. The plan must provide for the equitable treatment of all students.

a. Students are provided, without an increase in tuition or fees, all instruction promised by the institution, prior to its closing or the closure of a remote instructional site, but not delivered to the students because of the closing.
b. The proposed teach-out institution is geographically proximate to the closed institution or remote instructional site, is accredited by an accrediting body recognized by the U.S. Secretary of Education, and can demonstrate compatibility of its program structure and scheduling to that of the closed institution.
c. Should the plan require students to pay additional charges, those charges must be identified and the institution must provide notice of those charges to the students.

4. The plan must be backed by demonstrated adequate financing by the closing institution.
5. The plan must include a listing of academic programs offered by the institution.
6. The plan must include a list of currently enrolled students and academic programs offered by the institution.
7. The plan must ensure students completing the teach-out would meet curricular requirements for professional licensure or certification, if any.
8. Although the institution may not have to submit a Teach-Out Agreement, the Teach-Out Plan must identify other appropriately accredited institutions that offer similar programs and that could potentially enter into a Teach-Out agreement with the institution.
9. Unless otherwise specified, the Teach-Out Plan, regardless of the triggering event, must be submitted to TRACS within 60 days of receiving official notification of the requirement from TRACS and must be approved by the Accreditation Commission within 6 months of the notification.
10. Teach-Out Plans that do not provide all required elements will not be approved by TRACS.

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

Additional Restrictions

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

1. The institution is subject to any of the conditions under section A. of this policy
2. The institution is under investigation, subject to an action, or being prosecuted for an issue related to academic quality, misrepresentation, fraud, or other severe matters by a law enforcement agency.
3. The institution is not accredited by an accrediting agency recognized by the U.S. Department of Education or other appropriate governmental bodies (for non-US based institutions.)

BP225 – Teach Out Agreements

Reference: § 602.24(c)(5)(6)((i-v) § 602.24(c)(8)
Adoption Date: January 2011
Last Revision Date: December 2025

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

When a Teach-Out Agreement is required

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

Guidelines for the Teach-Out Agreement

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

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.
5. Copies of all notifications related to the institution's closure which accurately represent the student's ability to transfer credits.

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

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

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

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

BP226 - Institutional Changes

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

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

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

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

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

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

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

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

For a Substantive Change proposal requiring the approval of the Accreditation Commission to be considered at a spring Accreditation Commission meeting, the proposal, all required visits, and subsequent institutional responses must be completed by March 1st. For a Substantive Change proposal requiring the approval of the Accreditation Commission to be considered at a fall Accreditation Commission meeting, the proposal, all required visits, and subsequent institutional responses must be completed by September 1st.

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

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

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

Because proposed Institutional Changes are time sensitive:

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

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

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

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

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

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

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

Non-Substantive Changes (Category 1)

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

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

1.2 Changes to general education requirements.

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

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

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

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

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

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

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

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

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

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

Non-Substantive Change Procedures

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

Substantive Changes (Categories 2-4)

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

2.1 Any change in the established Mission or Institutional Objectives including a name change related to these changes. *The rewording of the Mission or Institutional Objectives that does not change the actual content of the Mission or Institutional Objectives is not considered a change requiring approval but should be reported as a Non-Substantive change.*

This proposal may trigger a Comprehensive Evaluation. (See Note 1) **(Accreditation Commission Approval)**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.1 The addition of programs that represent a significant departure from the programs that are included in the institution's current scope of recognition. **(Accreditation Commission Approval)**

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

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

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

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

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

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

Substantive Change Procedures

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

e. Determine whether a staff visit or Peer Evaluation / Focus Team visit is required.

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

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

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

Note 1: Substantive Changes That May Require a Comprehensive Evaluation

The following Substantive Changes or proposed Substantive Changes may require a Comprehensive Evaluation of the institution. A Comprehensive Evaluation consists of a focused Self-Study, the hosting of an Evaluation Team or Focus Team, and institutional responses to any determinations noted in a report from the Evaluation Team or Focus Team.

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

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

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

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

in conjunction with any of the technologies listed above. Institutions will be required to document regular and substantive interaction between the students and the instructor.

Institutions desiring to initiate course and/or program delivery via Distance Education, whether Level 1 or Level 2, are required to complete and submit the appropriate *Institutional Change Form*. Per 34 CFR §602.22 (b)(1), Distance Education may be considered for institutions that have been placed on any Sanction by TRACS over the prior three academic years or are under a provisional certification with the US Department of Education at the time of consideration for Distance Education approval. The institution's proposal will follow the procedures below.

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

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

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

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

1. An institution that is subject to any sanction will not be authorized to open a Branch Campus until the sanction has been removed.
2. An institution that undergoes a change in ownership resulting in a change of control as defined in 34 CFR §600.31 will not be authorized to open a Branch Campus until the institution's business plan demonstrates that it will be in compliance with the Standards related to a Branch Campus.
3. When submitting an *Institutional Change Form* to add a Branch Campus, the proposal must address all prospectus checklist items designated.
4. Upon submission of the *Institutional Change Form,* the proposal will be reviewed by TRACS staff for completeness.
5. Once the *Institutional Change Form* is complete a Focus Team visit to the proposed Branch Campus will be conducted. The Focus Team will consist of TRACS staff and at least one peer reviewer well versed and experienced in matters related to the area(s) of review.
6. Following the Focus Team visit, a Focus Team Report will be prepared including an analysis of the institution's proposal and the Focus Team's observations during the visit. The institution will have the opportunity to correct any errors of fact which may be contained in the report.
7. Once finalized, a copy of the Focus Team Report, along with a Compliance Report containing the team's Determinations (Findings and Recommendations), will be submitted to the institution. The institution must respond to all Findings and Recommendations, utilizing the Compliance Report, by the date specified. Once the institution has submitted its responses to the Findings and Recommendations, all materials related to the proposal to add a Branch Campus will be forwarded to the Accreditation Commission for consideration at the next regularly scheduled meeting.
8. If the Accreditation Commission grants approval for the institution to open a Branch Campus, such approval will allow the institution to begin instruction at the Branch Campus within a time specified by the Accreditation Commission (not to exceed five years).
9. Upon approval by the Accreditation Commission, the institution must request Title IV funding approval by the Secretary of Education (via Federal Student Aid) if the institution desires the Branch Campus to be eligible for FSA.
10. Within six months of courses commencing at the Branch Campus, TRACS will conduct a follow-up staff visit to the Branch Campus to verify that the Branch Campus maintains all of the required personnel, facilities, and resources. If the Branch Campus receives approval with conditions, staff will confirm that these conditions have been met at the follow-up visit. The institution will receive a draft copy of a follow-up staff report which may contain Findings and Recommendations. The institution will have the opportunity to correct any errors of fact which may be contained in the follow-up report before the report is finalized.
11. The institution will be required to submit Compliance Reports addressing any outstanding Determinations until any outstanding areas of non-compliance have been satisfactorily addressed.

12. As long as the Branch Campus remains in operation, it will be included in the institution's annual reporting data as well as in all subsequent reaffirmation processes.

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

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

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

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

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

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

9. If TRACS approves the request to operate a Teaching Site, that approval will allow the institution to begin instruction at the Teaching Site within a specified time which is not to exceed 1 year. A letter of notification of approval of the proposed Teaching Site will be mailed to the institution.
10. As long as the Teaching Site remains in operation, it will be included in the institution's annual reporting data as well as in all subsequent reaffirmation processes and will be reflected in the institution's scope of recognition with TRACS.

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

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

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

Note 6: Prison Education Programs (PEP)

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

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

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

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

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

d. If applicable, the institutional response to the relevant DOC's Request for Information (RFI) or application.
e. The approval document from the DOC, which may include a Memorandum of Understanding between the institution and DOC and related documents.
f. The budget for the PEP.
g. Any other institutional or State approvals for the proposed PEP.

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

BP227 - Branch Campuses

Reference: 34 CFR §600.2
Adoption Date: June 2000
Last Revision Date: December 2025

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

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

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

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

Although instruction at a Branch Campus may be offered in a language other than English, all communications with TRACS will be in English. Any document submitted to TRACS as part of an Institutional Change request, Self-Study Report, or other required reports will be prepared in English. The institution will certify that any document which has been translated is accurate, identify the person who made the translation, and identify that person's qualifications for translating the documents. If a submitted document is not

translated or if the qualifications of the translator are inadequate, TRACS may have the document translated and the institution will bear the cost of the translation.

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

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

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

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

BP228 – Teaching Sites

Reference:	34 CFR § 600.2; 34 C.F.R. §668.13; 34 CFR § 668.237
Adoption Date:	June 2000
Last Revision Date:	December 2025

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

Teaching Site are approved:

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

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

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

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

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

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

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

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

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

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

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

BP229 - Distance Education

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

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

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

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

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

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

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

1. The institution uses a method of verifying the identity of students which reasonably assures that the student is the same person who registered for the course. (Among the most common methods are a secure login and password for electronic access and proctored examinations.),

2. The institution provides students with a written rationale for the method or methods it employs,
3. Students are notified of any charge related to the method of verification, at the time of registration or enrollment, and
4. The institution provides a written statement of how it will protect the privacy of students enrolled in alternative delivery method programs / courses.
5. Institutions are required to demonstrate compliance with all TRACS Standards and Federal regulations related to Distance Education.

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

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

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

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

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

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

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

Meeting or exceeding the 50 percent threshold for Distance Education is considered a significant departure from the existing offerings or educational programs, or method of delivery for **Level 1** approval, and therefore requires the institution to obtain **Level 2** approval. Institutions may be granted **Level 2** approval as an initial action if the institution's Distance Education offerings meet or exceed the 50 percent threshold upon initial consideration and is not required to obtain **Level 1** approval first.

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

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

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

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.

BP230 - Agreements Between Institutions

Reference: §602.22(a)(2)(ii)
Adoption Date: June 2000
Last Revision Date: December 2025

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 50percent of the credit hours required for their academic program at the contracted institution. In all other cases, the agreement will be considered a substantive change which requires approval from TRACS in accordance with the Institutional Change Policy.

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

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

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

BP231 – Using the Facilities of Another Institution

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

An institution that uses facilities owned by another organization must have a written lease or Memorandum of Understanding detailing the institution's right to use those facilities. The agreement 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 submit a Non-Substantive Change (notification only) to TRACS.

BP232 – Using the Services of Another Organization

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

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.

BP233 – (Unassigned)

Reference: None
Adoption Date: None
Last Revision Date: None

Unassigned

BP234 – Records of Student Complaints

Reference: None
Adoption Date: April 2011
Last Revision Date: 2011 2011

All TRACS member institutions are required to maintain 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 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 Evaluation Team Report.

BP235 – (Unassigned)

Reference: None
Adoption Date: None
Last Revision Date: None

Unassigned

BP236 - Best Practices in Advertising

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

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.

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.

Institutional Responsibilities

Institutions are required to maintain copies of advertising and marketing materials and provide these materials, as requested, during staff and Evaluation Team visits. These materials are to be regularly reviewed for consistency with TRACS Policies, Procedures, and Standards.

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.

BP237 - Best Practices in Student Recruiting

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

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 regarding the institution's student recruitment.

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.)

BP238 - Best Practices in Representation of TRACS Status

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

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 regarding the institution's representation of its status with TRACS.

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*.

BP239 – Use of Consultants

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

TRACS Accreditation 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 when using consultants or purchasing materials:

1. 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.
2. 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.
3. 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.
4. Consultants may not represent the institution officially as a third party in matters relating to accreditation and reaffirmation.

BP301 – Institutional Accreditation

Reference: None
Adoption Date: June 2000
Last Revision Date: June 2019

TRACS is an institutional accrediting agency. As such, it evaluates all aspects of the institution by means of the peer evaluation process, guided by the TRACS Accreditation Standards 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, 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, and Accreditation Standards 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. The Accreditation Commission is elected according to provisions of the TRACS Bylaws

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.

BP302 – Accreditation Standards and Institutional Eligibility Requirements

Reference: None
Adoption Date: June 2000
Last Revision Date: June 2019

TRACS Accreditation Standards and Institutional Eligibility Requirements (IERs) are established to guide the accreditation process and are specified in the Accreditation Manual**.**

The Accreditation Standards, and IERs have been developed to represent expectations of good practice and serve as the basis for analysis by the Accreditation Commission, TRACS Staff and Peer Evaluators (Focus Teams, Evaluation Teams, Interim Fifth-Year Review evaluators) of an institution's compliance with the quality required of an accredited institution.

Modifications to Accreditation Standards and IERs may be made only by official action of the Accreditation Commission.

The process for the modification of Accreditation Standards and IERs will follow the procedures outlined in BP303.

BP303 – Changes to Accreditation Standards and Institutional Eligibility Requirements

Reference: 34 CFR §602.16, §602.20, and §602.21
Adoption Date: June 2000
Last Revision Date: December 2025

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

The Standards Review Committee's examination is systematic, with all Accreditation Standards and IERs being reviewed at least once every 5 years. If TRACS' renewal of authorization with the Department of Education coincides with the 5 year Standards review cycle, the Departmental renewal process will serve as the 5 year Accreditation review process for TRACS since all TRACS Accreditation Standards are reviewed and, as necessary, modified to ensure compliance with federal requirements as a part of the Departmental renewal process.

The Standards Review Committee recommends to the Accreditation Commission any action to modify Accreditation Standards and IERs as soon as it determines modifications are merited, even if an item is being considered out of its regular sequence of review.

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

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

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

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

or modified Accreditation Standard or IER for public comment.

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

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

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

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

BP304 – The Application Process

Reference: 602.18(c)
Adoption Date: June 2000
Last Revision Date: December 2025 (edited June 2026)

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

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

2. **Institutional Submissions** - The application process includes the completion and submission of the following via the TRACS portal:
   a. The *Application Compliance Checklist* (ACC) along with all required supporting documents
   b. The non-refundable Application Fee according to the current fee schedule

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

3. **Application Review Committee Procedures and Determination**
   a. The Application Review Committee (ARC) will conduct an initial review of the application materials. Financial documentation is reviewed by the TRACS Vice President of Finance.
   b. The ARC makes one of the following determinations regarding the institution's application. The institution will be notified of the ARC's determination via a comment to the ACC on the TRACS portal.

- Approve the institution's application – If after the ARC's initial review of the application materials the ARC determines that the institution has demonstrated compliance in all required areas, the institution's application will be approved. Once the application is approved, the institution is considered an "Applicant" institution and may begin the Self-Study process toward Candidate status. Applicant institutions must gain Candidate status within three years of the date the application is approved or must submit a new application.

- Defer the institution's application - If after the ARC's initial review of the application materials, the ARC determines that the institution has not demonstrated compliance in all required areas, the institution's application will be deferred for approval and will be reverted to the institution, along with staff comments, citing areas that need to be clarified and noting any additional documentation that is needed. If the application is initially deferred by the ARC, the institution will be allowed no more than two additional opportunities to submit clarifying information and / or additional documentation.

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

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

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

4. **Alternative Means for Demonstrating Compliance**

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

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

BP305 – The Accreditation Process

Reference: 34 CFR §602.15(a), §602.18, §602.20(a)(4)(c), §602.22(b)
Adoption Date: June 2000
Last Revision Date: December 2025 (Edit Jan 2026)

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

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

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

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

1. Self-Study and Self-Study Report

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

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

2. Evaluation Team Visit and Evaluation Team Report

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

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

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

3. Accreditation Commission Review and Action

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

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

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

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

The various categories of recognition in the accreditation process are:

- Corresponding Institution: an institution that has made initial contact with TRACS and is actively pursuing the process toward accreditation. This status does not require Commission consideration and action.
- Applicant Status**:** an institution that has submitted, via the TRACS portal, an Application Compliance Checklist which has been approved by the Application Review Committee (ARC). This status does not require Commission consideration and action.
- Candidate (Pre-Accredited) Status: this status is granted by the Accreditation Commission when an institution has demonstrated compliance with all of the TRACS Standards related to the Institutional Eligibility Requirements (IERs), has submitted a Self-Study Report and supporting documentation via the TRACS portal, and has been evaluated by an Evaluation Team, and when, in the professional judgment of the Evaluation Team and the Accreditation Commission, the institution provides the basic level of quality in instruction and student services required of a pre-accredited institution of higher education. The maximum time period allowed for an institution to progress from Candidate Status to Accredited Status is five years. If a Candidate institution is denied Accredited status, TRACS will maintain the

institution's Candidate status until the institution has had a reasonable time to complete the activities in its teach-out plan to assist students in transferring or completing their program, but for no more than 120 days unless approved for good cause.

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

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

- Determinations of the other agency regarding the institution's compliance with the standards of that agency that are comparable to TRACS Accreditation Standards. Such standards will include, but may not be limited to, those related to financial stability and sustainability.
- The institution's compliance with the Accreditation Standards that are unique to TRACS and are thus not required by the other agency.
- A Focus Team and / or Evaluation Team visit to the institution will be required to verify the institution's compliance with TRACS Accreditation Standards.
- The institution will have the opportunity to respond to the determinations detailed in the report that is generated as a part of the visit, prior to the consideration by the Accreditation Commission.
- At a minimum, after a complete application is submitted, the Application Review Committee must approve any request by the institution to seek immediate

Accredited status prior to the applicant institution's appearing before the Accreditation Commission for consideration. The Commission may grant the request for Accredited status with or without requirements as it would any other accreditation request, grant Candidate status, or Defer the institution. The granting of Candidate status shall not work as an appealable "denial of accreditation".

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

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

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

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

> *The Department will now permit agencies to establish a retroactive accreditation date that goes back no farther than the beginning of the initial accreditation review process to ensure that credits and credentials awarded to students who were enrolled or completed a program during the formal initial accreditation review, or a review following a change in ownership or control, are from an accredited program.*
>
> *The initial accreditation review process begins on the date on which the accreditor completes its review of the program' s initial application for accreditation or change of ownership or control review and places the program on the pathway for accreditation or reinstatement of accreditation. Some accreditors use the term applicant status, candidacy status or pre-accreditation status to describe the point at which the program is officially recognized as being on the pathway to accreditation, but this terminology is not required as long as the accreditor has a process in place to receive, review and approve initial or change of ownership or control applications, and upon an affirmative application review decision (which can be made by agency staff, an agency decision body or a subcommittee of an agency decision body), consider the program to be in the process of seeking accreditation or reinstatement of accreditation. The initial accreditation review process does not begin the day an application is submitted by the program or the date on which the application was received by the accreditor, but instead on the date on which the application was approved and the program was permitted to pursue accredited status, or on the date on which ownership or control changed.*
>
> *In the event that the initial application review is extended by the accreditor, including to provide additional time for the program to graduate an initial cohort or come into full compliance based on a good cause determination by the accreditor, then the initial review period extends to the date*

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

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

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

This means, in most cases:

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

agency completed the review of the program's application and officially recognized the program as being in the accreditation review process.

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

In accordance with Federal regulations, the Accreditation Commission establishes the deadline by which an institution must demonstrate compliance with all TRACS Standards. Following the meeting of the Accreditation Commission wherein a decision regarding an institution's accreditation status is made, a letter is sent from the TRACS office to the institution. This letter contains (1) the Accreditation Commission decision, (2) the deadline by which an institution must demonstrate compliance with all TRACS Standards and any outstanding Findings and Recommendations contained in the Evaluation Team Report, and (3) a Compliance Report for monitoring the institution's progress toward full compliance with such Findings and Recommendations. The institution is required to submit regular updates to the Compliance Report, via the TRACS portal, for review at each subsequent meeting until the institution demonstrates compliance with all TRACS Standards.

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

BP306 – Peer Evaluators

Reference: None
Adoption Date: June 2000
Last Revision Date: October 2026

To ensure objective assessment of institutional compliance with TRACS Accreditation Standards in various situations, TRACS utilizes peer evaluators on Evaluation Teams, Focus Teams, as remote reviewers for proposed Institutional Changes, as members of Appeal Committees, or for any other matters requiring peer review. Peer evaluators are selected and appropriately assigned areas of review from a pool (Peer Evaluator Pool) of carefully trained and screened individuals. Peer evaluators serving on Appeal Committees are subject to the processes prescribed in TRACS policy BP219.

Before being placed in the Peer Evaluator Pool and thus be eligible to serve as a peer evaluator on any matter, individuals are required to receive Peer Evaluator Training provided by TRACS. Training is provided at each TRACS Annual Conference and on the TRACS website. TRACS staff may provide other training sessions as needed.

As part of the training, each participant becomes familiar with the contents of the *Accreditation Manual, Benchmarks for Excellence*, the *Evaluation Team Procedures Manual* and other relevant publications. 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 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 who desire to serve as evaluators in these areas are required to complete specific training for Distance Education evaluators 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 generally 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 Distance Education, an individual with expertise in this area and who has participated in the specific training will be assigned to the team to provide evaluation specific to this area. 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 Accreditation 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, 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. Remote Reviewers

Peer Evaluators serving as remote reviewers for proposed Institutional Changes are subject to the stipulations outlined in TRACS Policy BP226 – Institutional Changes.

D. Appeal Committees

Peer Evaluators serving on Appeal Committees are subject to the stipulations outlined in TRACS Policy BP219 – Appeals.

E. 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:

1. 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 Evaluator: Minimum of three years of experience teaching distance education courses, developing distance education curriculum, and/or administrating a distance 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.

BP307 – Third-Party Comments

Reference: None
Adoption Date: June 2000
Last Revision Date: April 2023

Third-Party Comments Regarding Evaluation Team Visits

TRACS encourages and solicits third-party comments regarding institutions scheduled to host an Evaluation Team Visit for consideration 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. A list of the member institutions scheduled to host Evaluation Team Visits is posted on the TRACS website.

At least one month before an Evaluation Team Visit is scheduled to take place, the host institution must notify the public of the pending visit on the institution's website. The notification should provide guidance for the submission of third-party comments regarding the visit.

Sample wording for the notification is as follows:

> *(Institution's Name) is scheduled to host an Evaluation Team from the Transnational Association of Christian Colleges and Schools (TRACS) from (dates of the visit). This visit concerns the granting of (status sought).*
>
> *Constituents and members of the public are invited to submit third-party comments concerning (Institution's Name)'s qualifications for (status sought). Third-party comments should be submitted to thirdpartycomments@tracs.org. TRACS will receive third-party comments on this matter until 14 days before the scheduled Evaluation Team Visit.*
>
> *TRACS shares third-party comments with members of the Evaluation Team prior to the visit, but at no time during the review process will third-party comments be shared with (Institution's Name). During its review, the Evaluation Team considers third-party comments only as they relate to the TRACS Accreditation Standards.*
>
> *TRACS is approved by the U.S. Department of Education as a nationally recognized institutional accrediting agency and appears on the DOE Secretary's List of Approved Accrediting Agencies, which is provided in the Higher Education Directory. TRACS is also recognized by the Council for Higher Education Accreditation (CHEA).*

Third-Party Comments Regarding Institutional Compliance, TRACS Procedures and / or Actions of the Accreditation Commission

TRACS recognizes the value of information provided by members of the public regarding a member institution's compliance with TRACS Accreditation Standards and whether TRACS maintains appropriate procedures, exhibits procedural fairness, and applies its policies 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 Accreditation Standards as presented in the TRACS *Accreditation Manual.*

Unsolicited third-party comments regarding the TRACS Accreditation Commission are limited, in that individuals may only submit comments regarding the 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.

Procedures for Filing a Third-Party Comment

Any individual may file a third-party comment regarding a scheduled Evaluation Team Visit, a member institution's compliance with a TRACS Accreditation Standard, the TRACS Accreditation Commission, or a TRACS staff member. The names of all member institutions, TRACS Accreditation Commissioners and TRACS staff are posted on the TRACS website.

TRACS has established the following procedures for submitting a third party comment.

1. Third-party comments should be submitted to *thirdpartycomments@tracs.org and* should include the commenter's name, and a clear statement describing the issue to be addressed.
2. TRACS will acknowledge receipt of the comment within 15 working days of its receipt.
3. 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.
4. All third-party comments should be accompanied by appropriate supporting documentation. TRACS will not consider unsupported comments.
5. 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:
    a. If there is adequate documentation in support of the comment.
    b. 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 or whether the TRACS Commission or Staff has failed to follow a TRACS Policy or Procedure.
6. 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.
7. 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:
    a. Sending the information to the institution for its input and follow up.

b. Referring the information or a summary of issues to a future Evaluation or Focus Team with instructions to verify information contained in the comment with other sources in order to determine its validity.
c. Holding the information in a file for future reference.
d. Dismissing the comment for lack of evidence of non-compliance.
e. Forwarding the matter to the Accreditation Commission for appropriate action.

8. For comments regarding the TRACS Accreditation Commission or TRACS staff, The President of TRACS will prepare a report for the next scheduled meeting of the Accreditation Commission which includes recommendations for resolving the issue(s) identified in the third-party comment.

Third-Party Comments and the News Media

TRACS believes that it is in the best interest of TRACS, 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 and privacy of both the 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, any member of the Accreditation Commission, or any TRACS staff member or offer responses to hypothetical situations.

Media shall be directed by the President of TRACS to the appropriate location on the TRACS website for information regarding third-party comments and TRACS Standards.

BP308 – Posting of Institutional Review Dates

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

TRACS and institutions will make publicly available a notice regarding the year and month when the institution will be considered for Candidate status, Accredited status, or the next Reaffirmation of Accreditation: This information should be published in the following ways:

1. By TRACS, in its listing of member institutions and by specifically notifying appropriate state agencies
2. By institutions before an Evaluation Team Visit*, and
3. By TRACS and the institution, on their respective websites.

*At least one month before an Evaluation Team Visit is scheduled to take place, the host institution must notify the public of the pending visit no more than one click away from the homepage of its website. The notification should provide guidance for the submission of third-party comments regarding the visit.

Below is the wording to be used in the announcement:

> *(Name of Institution) is scheduled to host an Evaluation Team from the Transnational Association of Christian Colleges and Schools (TRACS) from (dates of the visit). This visit concerns the granting of (status).*
>
> *Constituents and members of the public are invited to submit third-party comments concerning (Name of Institution)'s qualifications for (status) Third-party comments should be submitted to thirdpartycomments@tracs.org. TRACS will receive third-party comments on this matter until 14 days before the scheduled Evaluation Team Visit.*
>
> *TRACS shares third-party comments with members of the Evaluation Team prior to the visit, but at no time during the review process will third-party comments be shared with (Name of your Institution). During its review, the Evaluation Team considers third-party comments only as they relate to the TRACS Accreditation Standards.*
>
> *TRACS is approved by the U.S. Department of Education as a nationally recognized institutional accrediting agency and appears on the DOE Secretary's List of Approved Accrediting Agencies, which is provided in the Higher Education Directory. TRACS is also recognized by the Council for Higher Education Accreditation (CHEA).*

TRACS notifies the appropriate state educational agency of any institutional visits scheduled to take place within its jurisdiction.

BP309 – Professional Programs

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

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 ministry do not meet this definition.

BP310 – Interim Fifth-Year Review

Reference: None
Adoption Date: December 2015
Last Revision Date: December 2025

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

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

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

The IFYR process involves the following steps:

1. In January of the year in which the institution's IFYR occurs, TRACS notifies the institution and provides the necessary instructions and guidance.
2. The institution completes and submits the *Interim Fifth-Year Review Compliance Checklist* and supporting documentation via the TRACS portal by April 30th.
    a. The institution should ensure that irrelevant personal information has been redacted from supporting documentation.
    b. The payment of the appropriate *Interim Fifth-Year Review* fee (according to the current *Fee Schedule*) will be processed as a part of the TRACS portal submission process.
3. Once the *Interim Fifth-Year Review Compliance Checklist* and supporting documentation have been submitted, TRACS staff will review the narratives and supporting documents and make an initial determination regarding the acceptability of the institution's responses
4. TRACS staff will then contact the institution to coordinate an on-site, one-day visit. The notification will include the identification of a peer evaluator and require the institution to submit a conflict-of-interest notice. Peer evaluators will also submit a conflict-of-interest notice.
5. TRACS Finance Staff or an approved peer evaluator will conduct the review of Finance related IERs.
6. TRACS Staff and the peer evaluator will conduct the visit on a date agreeable to the institution to review the submission, interview relevant individuals, and clarify any questions. (Peer evaluators may participate virtually.)
7. Following the visit, TRACS staff will produce a report noting any areas of non-compliance identified by the peer evaluator requiring institutional response.
8. A Compliance Report will be created based on the report, requiring the institution's response by September 1.

9. Once the Compliance Report is submitted, staff will review the response for completeness, write a report and recommendation regarding the totality of the IFYR process for consideration by the Accreditation Commission at their October meeting.
10. A Commissioner will be assigned to review the IFYR in its totality and determine compliance for all items resulting in a recommendation to the entire Commission.
11. An institution will be allowed up to 18 months after the initial Commission review to bring all items into full compliance. The institution will be expected to submit periodic reports on compliance activities to the Commission until full compliance is demonstrated.

BP311 – Annual Dues

Reference: None
Adoption Date: January 2018
Last Revision Date: January 2018

TRACS is a voluntary association supported by the annual dues of its member institutions.

1. Annual Dues are assessed on a sliding scale established by the Accreditation Commission each year at the April meeting.
2. Annual Dues are based on total institutional headcount (not FTE) at the end of the drop/add period for the fall semester (or quarter).
3. Annual Dues are for the period of the TRACS fiscal year: July 1 through June 30.
4. Annual Dues are due in the TRACS office no later than October 31 each year.
5. Late fees of 5% will be assessed for each month or partial month after October 31 if Annual Dues payment is not received. When Annual Dues are more than 60 days late, BP 213 – Failure to Pay will be applied.
6. Institutions achieving initial candidacy are assessed a pro-rated amount of Annual Dues calculated from the first day of the month of the effective date of the Accreditation Commission vote granting candidate status through the next June 30th. These Annual Dues are to be paid upon receipt of the notification letter.
7. Institutions achieving Accredited Status will pay the accredited rate the year subsequent to achieving status.
8. Institutional requests for withdrawal cannot be brought to the Accreditation Commission until all invoices and fees, including current year Annual Dues, are paid in full.
9. Institutional withdrawals or the loss of accreditation will not create a partial refund of Annual Dues.
10. Only the Accreditation Commission may grant a reduction or refund of Annual Dues.

BP312 – Multiple Accreditors

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

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

Changing Primary Accreditor or Obtaining Multiple Accreditations

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

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

Designation of Primary/Secondary Accreditor

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

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

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

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

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

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

BP313 – Good Cause Extensions / Extenuating Circumstances

Reference:	§ 602.18(d)
Adoption Date:	October 2025
Last Revision Date:	Edited January 2026)

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

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

Institutions holding Candidacy with TRACS are not eligible for good cause extensions which would permit the institution to hold Candidate status beyond the allowable five year Candidacy period.