

## U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

### Recommendation Page

1. **Agency:** Transnational Association Of Christian Colleges and Schools ( 1991 / 2016)  
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Petition for Continued Recognition
3. **Current Scope of Recognition:** The accreditation and preaccreditation ("Candidate" status) of Christian postsecondary institutions in the United States that offer certificates, diplomas, and associate, baccalaureate, and graduate degrees, including institutions that offer distance education.
4. **Requested Scope of Recognition:** The agency is not requesting any change in its current scope of recognition.
5. **Date of Advisory Committee Meeting:** 06/23/2016
6. **Staff Recommendation:** Continue the agency's recognition as a nationally recognized accrediting agency at this time, and require the agency to come into compliance within 12 months with the criteria listed below , and submit a compliance report due 30 days thereafter that demonstrates the agency's compliance
7. **Issues or Problems:** It does not appear that the agency meets the following sections of the Secretary's Criteria for Recognition. These issues are summarized below and discussed in detail under the Summary of Findings section.

-- The agency is requested to provide evidence that it has updated all applicable printed materials, including its on-site review documents, to reflect its current definition of distance education. It is also requested to document that its on-site review team pool members have received training on the implementation of its revised definition of distance education.  
[§602.15(a)(2)]

### Executive Summary

#### PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Transnational Association of Christian Colleges and Schools (TRACS) is an institutional accreditor. Its current scope of recognition is the accreditation and pre-accreditation ("Candidate" status) of Christian postsecondary institutions that offer certificates, diplomas, and associate, baccalaureate, and graduate degrees, including institutions that offer distance education. TRACS accredits or pre-accredits 54 institutions in 22 states. TRACS accredits or pre-accredits 67 institutions in 22 states and 5 foreign countries. TRACS' accreditation provides a link to Title IV funding for 43 of its institutions and a link to Title III funding for four of its Historically Black Colleges and Universities (HBCU) institutions.

According to the Accreditation Group's records, the Department has not received any complaints about the agency during the current recognition cycle.

#### Recognition History

TRACS received initial recognition in July 1991 and has maintained continued recognition since that time. The agency's last petition for continued recognition was reviewed at the Spring 2011 NACIQI meeting. At that time, the Committee considered the agency's petition for renewed recognition, continued the agency's current grant of recognition, and requested that the agency submit a compliance report on several issues identified in the staff report. That compliance report was reviewed and accepted by the NACIQI at its Fall 2013 meeting. The agency's current submission is its next regularly scheduled petition for continued recognition.

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#### PART II: SUMMARY OF FINDINGS

##### 602.15 Administrative and fiscal responsibilities

**(2) Competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its**

**accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education;**

**Commissioners**

The commissioners serve as the agency's decision-making body and policy development body. The agency's bylaws (Ex. 22, pp. 3-7) address the qualifications of the commissioners, who are required to be qualified by experience and training. The bylaws specify that there be between nine and 18 commissioners, with at least three (or not more than one-third) of the commissioners being public members. Two commissioners must be full-time faculty members, and the remaining members must be academics, administrators, or educators. The commission must also include at least one member who has experience in distance education. Members serve staggered three-year terms and may serve successive terms. Nominations for commissioner may come from any source and are submitted to the agency's president, who forwards the nominations to a nominating committee, which evaluates the nominations and develops a slate that is voted on at the agency's spring meeting. New commissioners are assigned to an experience mentor commissioner, are given a copy of the agency's commissioners handbook, and are required to attend new commissioner training. In addition to the new commissioner training, each commission meeting includes a training session on topics related to the agency's standards, policies and procedures, data, legal issues, and other commission-related topics. As documentation, the agency provided information related to its bylaws (Ex. 22), sample resumes of commissioners (Ex. 23), its commissioner handbook (Ex. 24), and information on training sessions (Ex. 25). Although not attached to this section, the agency provided a list of its current commissioners (Ex. 88), which indicates that the current commission has 18 members, with three "classes" whose terms end in successive years. The commission includes 13 administrators, two faculty members, and three public members.

**On-site Reviewers**

The agency's peer reviewers serve as on-site evaluators. Prior to being added to the on-site reviewer pool, potential evaluators must complete in-person or online training workshops. During the training, participants review the agency's accreditation manual, benchmarks, and on-site review manual. Following training, the person may submit a peer evaluation form and resume to the agency's office for review by staff. Staff will determine if the person is qualified and identify areas of expertise related to the agency's standards. The agency provided a copy of its current site visitor pool, which includes approximately 225 names (Ex. 11). Sample resumes for on-site reviewers indicate that the evaluators are well-qualified for their positions (Ex. 17). The selection of on-site reviewers is addressed in the agency's policies and procedures manual (Ex. 21, pp. 306-1 thru 306-4).

**Appeals Panel**

The agency provided a list of its 15-member appeals panel pool (Ex. 26), which includes academics, administrators, educators, and public members. Commissioners may not serve as appeals panel members, and at least one member of the panel must be a public member. Appeals, including the appeals panel pool, are addressed in the agency's policies and procedures manual (Ex. 21, pp. 219-1 thru 219-8). Initial training is provided using the agency's appeals pool training manual (Ex. 28). Additional specialized training is provided before pool members serve on actual panels.

ED staff accepts the agency's narrative and supporting documentation, and no additional information is requested.

**Analyst Remarks to Response:**

Background: In March 2015, the Accreditation Group was contacted by the U.S. Department of Education's Federal Student Aid (FSA) San Francisco/Seattle School Participation Division regarding concerns that were noted during program reviews of TRACS institutions. FSA found that TRACS had modified ED's definition of distance education to state that distance education "usually" involves regular and substantive interaction among students, content, peers, and instructors by electronic means, whereas the original ED definition did not include the word "usually." As a result of TRACS's modified definition, it appeared that schools were offering programs that were being incorrectly classified as distance education programs, whereas in reality they were instead correspondence programs. This had the potential to impact the schools' eligibility for Title IV funding. As a result of FSA's concerns, the Accreditation Group contacted the agency. The agency subsequently revised its definition of distance education to conform to ED's definition and published the revised definition in its accreditation manual. The Accreditation Group reviewed and accepted the agency's revision of its definition of distance education. Current Issue: In June 2016, after the draft staff analysis had been completed and the agency had provided its response, FSA contacted the Accreditation Group and noted that a February 2016 TRACS on-site review team draft site visit report referenced the agency's previous definition of distance education, rather than the revised definition that is printed in the agency's current accreditation manual. Therefore, it appears that the agency has not updated its on-site review documents or retrained the members of its on-site review pool to reflect its revised definition of distance education. As a result of the recent information provided by FSA to the Accreditation Group, a finding is being added to the final staff analysis despite the fact that it was not included in the draft staff analysis. As a result of the information that was recently provided by FSA, the agency is requested to provide evidence that it has updated all applicable printed materials, including its on-site review documents, to reflect its current definition of distance education. It is also requested to document that its on-site review team pool members have received training on the implementation of its revised definition of distance education.

### PART III: THIRD PARTY COMMENTS

The Department did not receive any written third - party comments regarding this agency.