

Name: Transnational Association Of Christian Colleges and Schools	Meeting Date: 06/23/2016	Response Submit Date: 05/16/2016	Status: Final Review	Type: Renewal Petition
--------------------------------------------------------------------------	------------------------------------	--------------------------------------------	-----------------------------	-------------------------------

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
2. **Action Item:** Renewal Petition
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:** June 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.

Part II: Summary Of Findings

602.10 Link to Federal programs

The agency must demonstrate that--

- (a) If the agency accredits institutions of higher education, its accreditation is a required element in enabling at least one of those institutions to establish eligibility to participate in HEA programs; or**
- (b) If the agency accredits institutions of higher education or higher education programs, or both, its accreditation is a required element in enabling at least one of those entities to establish eligibility to participate in non-HEA Federal programs.**

The agency is requested to provide a response to this section.

Analyst Remarks to Response:

In the draft staff analysis, the agency was requested to provide information regarding its link to federal programs and whether its recognition enables its institutions to participate in Higher Education Act (HEA) or non-HEA programs.

In response to the draft analysis, the agency states that its continued recognition enables its schools to participate in both HEA and non-HEA programs. Its schools participate in ED's Title IV Student Financial Assistance programs and Title III Historically Black Colleges and Universities (HBCU) programs, as well as Veterans Affairs (VA) programs. As documentation, the agency provided sample HEA program participation agreements for two of its institutions (Exs. 91 and 92).

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

602.11 Geographic scope of accrediting activities.

The agency must demonstrate that its accrediting activities cover--

- (a) A State, if the agency is part of a State government;**
- (b) A region of the United States that includes at least three States that are reasonably close to one another; or**
- (c) The United States.**

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.12(a) Accrediting Experience Initial

NOTE: An agency that is seeking renewal of recognition for its current scope of recognition and not seeking at the same time an expansion of its scope of recognition does not need to submit any response to '602.12.

(a) An agency seeking initial recognition must demonstrate that it has--

(1) Granted accreditation or preaccreditation--

- (i) To one or more institutions if it is requesting recognition as an institutional accrediting agency and to one or more programs if it is requesting recognition as a programmatic accrediting agency;**
- (ii) That covers the range of the specific degrees, certificates, institutions, and programs for which it seeks recognition; and**
- (iii) In the geographic area for which it seeks recognition; and**

(2) Conducted accrediting activities, including deciding whether to grant or deny accreditation or preaccreditation, for at least two years prior to seeking recognition.

(NOTE: Only agencies seeking initial recognition need to respond.)

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.12(b) Expansion of Scope

(b) A recognized agency seeking an expansion of its scope of recognition must demonstrate that it has granted accreditation or preaccreditation covering the range of the specific degrees, certificates, institutions, and programs for which it seeks the expansion of scope.

(NOTE: Only recognized agencies seeking an expansion of scope need to respond.)

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.13 Acceptance of the agency by others.

The agency must demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by--

(a) Educators and educational institutions; and

(b) Licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions or programs within the agency's jurisdiction prepare their students.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.14(a) Category of Agency

(a) The Secretary recognizes only the following four categories of agencies:

The Secretary recognizes...

(1) An accrediting agency

- (i) Has a voluntary membership of institutions of higher education;
- (ii) Has as a principal purpose the accrediting of institutions of higher education and that accreditation is a required element in enabling those institutions to participate in HEA programs; and
- (iii) Satisfies the "separate and independent" requirements in paragraph (b) of this section.

(2) An accrediting agency

- (i) Has a voluntary membership; and
- (ii) Has as its principal purpose the accrediting of higher education programs, or higher education programs and institutions of higher education, and that accreditation is a required element in enabling those entities to participate in non-HEA Federal programs.

(3) An accrediting agency for purposes of determining eligibility for Title IV, HEA programs--

- (i) Either has a voluntary membership of individuals participating in a profession or has as its principal purpose the accrediting of programs within institutions that are accredited by a nationally recognized accrediting agency; and
- (ii) Either satisfies the "separate and independent" requirements in paragraph (b) of this section or obtains a waiver of those requirements under paragraphs (d) and (e) of this section.

(4) A State agency

- (i) Has as a principal purpose the accrediting of institutions of higher education, higher education programs, or both; and
- (ii) The Secretary listed as a nationally recognized accrediting agency on or before October 1, 1991 and has recognized continuously since that date.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.14(b) Separate and Independent

(b) For purposes of this section, the term separate and independent means that--

- (1) The members of the agency's decision-making body--who decide the accreditation or preaccreditation status of institutions or programs, establish the agency's accreditation policies, or both--are not elected or selected by the board or chief executive officer of any related, associated, or affiliated trade association or membership organization;
- (2) At least one member of the agency's decision-making body is a representative of the public, and at least one-seventh of that body consists of representatives of the public;

(3) The agency has established and implemented guidelines for each member of the decision-making body to avoid conflicts of interest in making decisions;

(4) The agency's dues are paid separately from any dues paid to any related, associated, or affiliated trade association or membership organization; and

(5) The agency develops and determines its own budget, with no review by or consultation with any other entity or organization.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.14(c) Joint Use of Personnel

(c) The Secretary considers that any joint use of personnel, services, equipment, or facilities by an agency and a related, associated, or affiliated trade association or membership organization does not violate the "separate and independent" requirements in paragraph (b) of this section if—

(1) The agency pays the fair market value for its proportionate share of the joint use; and

(2) The joint use does not compromise the independence and confidentiality of the accreditation process.

(NOTE: An agency must respond to this section only if it is required to meet the "separate and independent" requirement and there is some type of joint use of personnel, services, equipment, or facilities by the accrediting agency and a related, associated, or affiliated trade association or membership organization.)

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.14(d)(e) Separate & Independent Waiver

(d) For purposes of paragraph (a)(3) of this section, the Secretary may waive the "separate and independent" requirements in paragraph (b) of this section if the agency demonstrates that--

(1) The Secretary listed the agency as a nationally recognized agency on or before October 1, 1991 and has recognized it continuously since that date;

(2) The related, associated, or affiliated trade association or membership organization plays no role in making or ratifying either the accrediting or policy decisions of the agency;

(3) The agency has sufficient budgetary and administrative autonomy to carry out its accrediting functions independently; and

(4) The agency provides to the related, associated, or affiliated trade association or membership organization

only information it makes available to the public.

(e) An agency seeking a waiver of the "separate and independent" requirements under paragraph (d) of this section must apply for the waiver each time the agency seeks recognition or continued recognition.

(NOTE: An agency must respond to this section only if it is requesting a waiver of the "separate and independent" requirement.)

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.15(a)(2) Competency of Representatives

(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.

602.15(b) Recordkeeping

(b) The agency maintains complete and accurate records of--

- (1) Its last full accreditation or preaccreditation reviews of each institution or program, including on-site evaluation team reports, the institution's or program's 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 self-study; and**
- (2) All decisions made throughout an institution's or program's affiliation with the agency regarding the accreditation and preaccreditation of any institution or program and substantive changes, including all correspondence that is significantly related to those decisions.**

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.16(a)(1)(i) Student Achievement

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if -

- (1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:**

(i) Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.

Student achievement is addressed in the agency's Standard H: Institutional Assessment under academic and student learning (Ex. 13, pp. II.H-1 thru II.H-3) under sections 19.5 thru 19.10. Institutions must conduct a systematic evaluation of whether student learning and program outcomes are appropriate to the institution's mission. The evaluation should include an analysis of retention rates, completion rates, graduation rates, job placement rates, and pass rates on state and other licensing exams. Result of the evaluation must be publicly available in an easily understandable format. The institution must regularly review its curriculum and revise it based upon the assessment results when necessary.

The agency has developed a benchmarks document as an outcome of a validity/reliability study that is intended to ensure the consistent application of its standards and provide a frame of reference for on-site reviewers to use in evaluating an institution's compliance with the agency's standards. The document provides examples of how an institution would exceed the agency's standards, meet the standards, fall below the standards, or fail the standards. The document includes a section that addresses the institutional assessment standards (Ex. 14, pp. 30-32).

The agency has also set specific outcomes measures for certificate, associate, bachelor, and graduate programs for use in evaluating compliance with its student achievement standard 19.6, both during the course of the on-site review and for the review of annual reports (Ex. 41). Certificate programs must have a completion rate of at least 60%. Associate degree programs must have retention rates of 70%, completion rates of 50%, and placement rates of 70%. Bachelor degree programs must have retention rates of 70%, graduation rates of 50%, and job placement rates of 70%. Graduate programs must have a completion rate of 50% and job placement rates of 70%. Failing to meet the agency's thresholds requires submission of a plan for coming into compliance. The agency notes that few of its institutions' graduates sit for licensing exams and therefore benchmarks have not been set for this area. Instead, institutions whose graduates sit for these exams are reviewed by comparing the institutions to each other for comparability.

ED staff notes that the agency has established student outcomes benchmarks for retention, completion/graduation, and placement rates. However, ED staff has a concern that the 50% completion/graduation rates established as thresholds for the agency's various certificate/degree level programs seem particularly low. Additional information is requested as to the agency's rationale for establishing the 50% completion/graduation rate benchmark.

As documentation, the agency provided copies of its standards, benchmark documents, procedures manuals, self-study guidelines, self-studies, on-site review reports, and summaries and worksheets.

As noted above, ED staff requests additional information regarding the agency's rationale for establishing 50% completion/graduation rate benchmarks for its programs.

Analyst Remarks to Response:

In the draft staff analysis, ED staff requested that the agency provide additional information regarding its rationale for establishing 50% completion/graduation rate benchmarks for its programs.

In response to the draft staff analysis, the agency provided additional information regarding its benchmarks for completion and graduation rates. The agency states that many of its schools are open-enrollment and serve non-traditional students, especially minorities and low-income students, as well as many first generation students. The agency notes that such students tend to have higher drop-out rates than traditional students. Additionally, the agency states that its schools have higher than normal transfer rates, as many students undertake their first year of studies at TRACS schools in order to obtain a foundation in religious studies, then transfer to more secular programs once the religious studies have been completed.

The agency provided information related to the White House Score Card that shows that its institutions' average retention rate, which is 69%, is actually higher than the national average, which is 67% (Ex. 94). The document also shows that the agency's institutions have an average graduation rate of 42%, which is only one point below the national average of 43%.

The agency notes that the most expedient way of raising its institutions' rates in these areas would be to move away from the less selective open enrollment approach, but that would appear to be antithetical to its institutions' guiding philosophies. Instead, the agency is working with its institutions to encourage additional student mentoring and face time with faculty members, additional student preparation for adjusting to the college experience, increased emphasis on tutoring and remediation, and additional agency review of institutions' program requirements in an effort to reduce unnecessary course requirements.

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

602.16(a)(2) Preaccreditation Standards

(a)(2) The agency's preaccreditation standards, if offered, are appropriately related to the agency's accreditation standards and do not permit the institution or program to hold preaccreditation status for more than five years.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.16(b)(c) Distance/Correspondence Education

(b) If the agency only accredits programs and does not serve as an institutional accrediting agency for any of those programs, its accreditation standards must address the areas in paragraph (a)(1) of this section in terms of the type and level of the program rather than in terms of the institution.

(c) If the agency has or seeks to include within its scope of recognition the evaluation of the quality of institutions or programs offering distance education or correspondence education, the agency's standards must effectively address the quality of an institution's distance education or correspondence education in the areas identified in paragraph (a) (1) of this section. The agency is not required to have separate standards, procedures, or policies for the evaluation of distance education or correspondence education;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.17(b) Self-Study

(b) Requires the institution or program to prepare, following guidance provided by the agency, an in-depth self-study that includes the assessment of educational quality and the institution's or program's continuing efforts to improve educational quality;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.17(c) On-Site Review

(c) Conducts at least one on-site review of the institution or program during which it obtains sufficient information to determine if the institution or program complies with the agency's standards;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.17(d) Response to Site Review

(d) Allows the institution or program the opportunity to respond in writing to the report of the on-site review;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.17(e) Agency Analysis of Information

(e) Conducts its own analysis of the self-study and supporting documentation furnished by the institution or program, the report of the on-site review, the institution's or program's response to the report, and any other appropriate information from other sources to determine whether the institution or program complies with the agency's standards; and

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.17(g) Student Verification

(g) Requires institutions that offer distance education or correspondence education to have processes in place through which the institution establishes that the student who registers in a distance education or correspondence education course or program is the same student who participates in and completes the course or program and receives the academic credit. The agency meets this requirement if it--

(1) Requires institutions to verify the identity of a student who participates in class or coursework by using, at the option of the institution, methods such as--

(i) A secure login and pass code;

(ii) Proctored examinations; and

(iii) New or other technologies and practices that are effective in verifying student identity; and

(2) Makes clear in writing that institutions must use processes that protect student privacy and notify students of any projected additional student charges associated with the verification of student identity at the time of registration or enrollment.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.18(a) Standards Respect Mission, Ensure Quality & Are Clearly Written

(a) Has written specification of the requirements for accreditation and preaccreditation that include clear standards for an institution or program to be accredited;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.18(b) Consistent Application of Standards

(b) Has effective controls against the inconsistent application of the agency's standards;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.18(c) Decisions Based on Published Standards

(c) Bases decisions regarding accreditation and preaccreditation on the agency's published standards;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.18(d) Reasonable Assurance of Accurate Information

(d) Has a reasonable basis for determining that the information the agency relies on for making accrediting decisions is accurate; and

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.18(e) Report Clearly Identifies Deficiencies

(e) Provides the institution or program with a detailed written report that clearly identifies any deficiencies in the institution's or program's compliance with the agency's standards.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.19(a) Reevaluation

(a) The agency must reevaluate, at regularly established intervals, the institutions or programs it has accredited or preaccredited.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.19(c) Annual Headcount

(c) Each agency must monitor overall growth of the institutions or programs it accredits and, at least annually, collect headcount enrollment data from those institutions or programs.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition

and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.19(d) Significant Growth

(d) Institutional accrediting agencies must monitor the growth of programs at institutions experiencing significant enrollment growth, as reasonably defined by the agency.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.19(e) Distance/Correspondence Headcount Increase

(e) Any agency that has notified the Secretary of a change in its scope in accordance with §602.27(a)(5) must monitor the headcount enrollment of each institution it has accredited that offers distance education or correspondence education. If any such institution has experienced an increase in headcount enrollment of 50 percent or more within one institutional fiscal year, the agency must report that information to the Secretary within 30 days of acquiring such data.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.21(a)(b) Systematic Review of Standards

(a) The agency must maintain a systematic program of review that demonstrates that its standards are adequate to evaluate the quality of the education or training provided by the institutions and programs it accredits and relevant to the educational or training needs of students.

(b) The agency determines the specific procedures it follows in evaluating its standards, but the agency must ensure that its program of review--

(1) Is comprehensive;

(2) Occurs at regular, yet reasonable, intervals or on an ongoing basis;

(3) Examines each of the agency's standards and the standards as a whole; and

(4) Involves all of the agency's relevant constituencies in the review and affords them a meaningful opportunity to provide input into the review.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.21(c) Revision of Standards

(c) If the agency determines, at any point during its systematic program of review, that it needs to make changes to its standards, the agency must initiate action within 12 months to make the changes and must complete that action within a reasonable period of time. Before finalizing any changes to its standards, the agency must--

- (1) Provide notice to all of the agency's relevant constituencies, and other parties who have made their interest known to the agency, of the changes the agency proposes to make;**
- (2) Give the constituencies and other interested parties adequate opportunity to comment on the proposed changes; and**
- (3) Take into account any comments on the proposed changes submitted timely by the relevant constituencies and by other interested parties.**

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(a)(2)(viii) Other Locations Needing Approval

(viii)(A) If the agency's accreditation of an institution enables it to seek eligibility to participate in title IV, HEA programs, the establishment of an additional location at which the institution offers at least 50 percent of an educational program. The addition of such a location must be approved by the agency in accordance with paragraph (c) of this section unless the accrediting agency determines, and issues a written determination stating that the institution has--

- (1) Successfully completed at least one cycle of accreditation of maximum length offered by the agency and one renewal, or has been accredited for at least ten years;**
- (2) At least three additional locations that the agency has approved; and**
- (3) Met criteria established by the agency indicating sufficient capacity to add additional locations without individual prior approvals, including at a minimum satisfactory evidence of a system to ensure quality across a distributed enterprise that includes--**
 - (i) Clearly identified academic control;**
 - (ii) Regular evaluation of the locations;**
 - (iii) Adequate faculty, facilities, resources, and academic and student support systems;**
 - (iv) Financial stability; and**
 - (v) Long-range planning for expansion.**

(B) The agency's procedures for approval of an additional location, pursuant to paragraph (a)(2)(viii)(A) of this section, must require timely reporting to the agency of every additional location established under this approval.

(C) Each agency determination or redetermination to preapprove an institution's addition of locations under paragraph (a)(2)(viii)(A) of this section may not exceed five years.

(D) The agency may not preapprove an institution's addition of locations under paragraph (a)(2)(viii)(A) of this section after the institution undergoes a change in ownership resulting in a change in control as defined in 34 CFR 600.31 until the institution demonstrates that it meets the conditions for the agency to preapprove additional locations described in this paragraph.

(E) The agency must have an effective mechanism for conducting, at reasonable intervals, visits to a representative sample of additional locations approved under paragraph (a)(2)(viii)(A) of this section.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(a)(2)(ix-x) Approving Additional Locations

(ix) The acquisition of any other institution or any program or location of another institution.

(x) 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.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(a)(3) When New Evaluation Required

(3) The agency's substantive change policy must define when the changes made or proposed by an institution are or would be sufficiently extensive to require the agency to conduct a new comprehensive evaluation of that institution.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(b) Substantive Change Procedures

(b) The agency may determine the procedures it uses to grant prior approval of the substantive change. However, these procedures must specify an effective date, which is not retroactive, on which the change is included in the program's or institution's accreditation. An agency may designate the date of a change in ownership as the effective date of its approval of that substantive change if the accreditation decision is made within 30 days of the change in ownership. Except as provided in paragraph (c) of this section, these procedures may, but need not, require a visit by the agency.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(c) Fiscal and Administrative Capacity Determination

(c) Except as provided in (a)(2)(viii)(A) of this section, if the agency's accreditation of an institution enables the institution to seek eligibility to participate in Title IV, HEA programs, the agency's procedures for the approval of an additional location where at least 50 percent of an educational program is offered must provide for a determination of the institution's fiscal and administrative capacity to operate the additional location. In addition, the agency's procedures must include--

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(c)(1) Approval of Additional Locations

(c)(1) A visit, within six months, to each additional location the institution establishes, if the institution--

- (i) Has a total of three or fewer additional locations;
- (ii) Has not demonstrated, to the agency's satisfaction, that it has a proven record of effective educational

oversight of additional locations; or

(iii) Has been placed on warning, probation, or show cause by the agency or is subject to some limitation by the agency on its accreditation or preaccreditation status;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(c)(2) Approval Procedures for 3+ Locations

(c)(2) An effective mechanism for conducting, at reasonable intervals, visits to a representative sample of additional locations of institutions that operate more than three additional locations; and

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(c)(3) Approval Procedures for Rapid Growth

(c)(3) An effective mechanism, which may, at the agency's discretion, include visits to additional locations, for ensuring that accredited and preaccredited institutions that experience rapid growth in the number of additional locations maintain educational quality.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.22(d) Purpose of Visits

(d) The purpose of the visits described in paragraph (c) of this section is to verify that the additional location has the personnel, facilities, and resources it claimed to have in its application to the agency for approval of the additional location.

The agency states that ED did not request that the agency respond to this section. That is not the case. The

agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(a) Public Information

(a) The agency must maintain and make available to the public written materials describing--

- (1) Each type of accreditation and preaccreditation it grants;
- (2) The procedures that institutions or programs must follow in applying for accreditation or preaccreditation;
- (3) The standards and procedures it uses to determine whether to grant, reaffirm, reinstate, restrict, deny, revoke, terminate, or take any other action related to each type of accreditation and preaccreditation that the agency grants;
- (4) The institutions and programs that the agency currently accredits or preaccredits and, for each institution and program, the year the agency will next review or reconsider it for accreditation or preaccreditation; and
- (5) The names, academic and professional qualifications, and relevant employment and organizational affiliations of--
 - (i) The members of the agency's policy and decision-making bodies; and
 - (ii) The agency's principal administrative staff.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(b) Opportunity for 3rd-party Comments

(b) In providing public notice that an institution or program subject to its jurisdiction is being considered for accreditation or preaccreditation, the agency must provide an opportunity for third-party comment concerning the institution's or program's qualifications for accreditation or preaccreditation. At the agency's discretion, third-party comment may be received either in writing or at a public hearing, or both.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(c) Complaint Procedures

(c) The accrediting agency must--

- (1) Review in a timely, fair, and equitable manner any complaint it receives against an accredited institution or program that is related to the agency's standards or procedures. The agency may not complete its review and make a decision regarding a complaint unless, in accordance with published procedures, it ensures that the institution or program has sufficient opportunity to provide a response to the complaint;**
- (2) Take follow-up action, as necessary, including enforcement action, if necessary, based on the results of its review; and**
- (3) Review in a timely, fair, and equitable manner, and apply unbiased judgment to, any complaints against itself and take follow-up action, as appropriate, based on the results of its review.**

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(d) Public Disclosure of Accreditation Status

(d) If an institution or program elects to make a public disclosure of its accreditation or preaccreditation status, the agency must ensure that the institution or program discloses that status accurately, including the specific academic or instructional programs covered by that status and the name, address, and telephone number of the agency.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(e) Public Correction of Inaccurate Information

(e) The accrediting agency must provide for the public correction of incorrect or misleading information an accredited or preaccredited institution or program releases about —

- (1) The accreditation or preaccreditation status of the institution or program;
- (2) The contents of reports of on-site reviews; and
- (3) The agency's accrediting or preaccrediting actions with respect to the institution or program.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.23(f) Proviso for additional procedures

(f) The agency may establish any additional operating procedures it deems appropriate. At the agency's discretion, these may include unannounced inspections.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(a) Branch Campus

If the agency is an institutional accrediting agency and its accreditation or preaccreditation enables those institutions to obtain eligibility to participate in Title IV, HEA programs, the agency must demonstrate that it has established and uses all of the following procedures:

(a) Branch campus.

(1) The agency must require the institution to notify the agency if it plans to establish a branch campus and to submit a business plan for the branch campus that describes--

- (i) The educational program to be offered at the branch campus;
- (ii) The projected revenues and expenditures and cash flow at the branch campus; and
- (iii) The operation, management, and physical resources at the branch campus.

(2) The agency may extend accreditation to the branch campus only after it evaluates the business plan and takes whatever other actions it deems necessary to determine that the branch campus has sufficient educational, financial, operational, management, and physical resources to meet the agency's standards.

(3) The agency must undertake a site visit to the branch campus as soon as practicable, but no later than six months after the establishment of that campus.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(b) Change in Ownership

(b) Change of ownership.

The agency must undertake a site visit to an institution that has undergone a change of ownership that resulted in a change of control as soon as practicable, but no later than six months after the change of ownership.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(c)(1) Teach-out Plan Triggers

(c) Teach-out plans and agreements.

(1) The agency must require an institution it accredits or preaccredits to submit a teach-out plan to the agency for approval upon the occurrence of any of the following events:

(i) The Secretary notifies the agency that the Secretary 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.

(ii) The agency acts to withdraw, terminate, or suspend the accreditation or preaccreditation of the institution.

(iii) The institution notifies the agency that it intends to cease operations entirely or close a location that provides one hundred percent of at least one program.

(iv) A State licensing or authorizing agency notifies the agency that an institution's license or legal authorization to provide an educational program has been or will be revoked.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(c)(2) Treatment of Students

(2) The agency must evaluate the teach-out plan to ensure it provides for the equitable treatment of students under criteria established by the agency, specifies additional charges, if any, and provides for notification to the students of any additional charges.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(c)(3) Notifying Other Agencies

(3) If the agency approves a teach-out plan that includes a program that is accredited by another recognized accrediting agency, it must notify that accrediting agency of its approval.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(c)(4) Requiring Teach-out Agreements

(4) The agency may require an institution it accredits or preaccredits to enter into a teach-out agreement as part of its teach-out plan.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(c)(5) Approving Teach-out Agreements

(5) The agency must require an institution it accredits or preaccredits that enters into a teach-out agreement, either on its own or at the request of the agency, with another institution to submit that teach-out agreement to the agency for approval. The agency may approve the teach-out agreement only if the agreement is between institutions that are accredited or preaccredited by a nationally recognized accrediting agency, is consistent with applicable standards and regulations, and provides for the equitable treatment of students by ensuring that--

(i) The teach-out institution has the necessary experience, resources, and support services to--

(A) 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;

(B) Remain stable, carry out its mission, and meet all obligations to existing students; and

(ii) The teach-out institution demonstrates that it can 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.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(d) Closed Institution

(d) Closed Institution.

If an institution the agency accredits or preaccredits closes without a teach-out plan or agreement, the agency must work with the Department and the appropriate State agency, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charges.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(e) Transfer of Credit Policies

(e) Transfer of credit policies.

The accrediting agency must confirm, as part of its review for initial accreditation or preaccreditation, or renewal

of accreditation, that the institution has transfer of credit policies that--

(1) Are publicly disclosed in accordance with §668.43(a)(11); and

(2) Include a statement of the criteria established by the institution regarding the transfer of credit earned at another institution of higher education.

(Note: This criterion requires an accrediting agency to confirm that an institution's teach-out policies are in conformance with §668.43(a)(11). For your convenience, here is the text of 668.43(a)(11): "A description of the transfer of credit policies established by the institution which must include a statement of the institution's current transfer of credit policies that includes, at a minimum –

- (i) Any established criteria the institution uses regarding the transfer of credit earned at another institution; and
- (ii) A list of institutions with which the institution has established an articulation agreement."

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(f)(2) Credit Hour Review

(2) In reviewing and evaluating an institution's policies and procedures for determining credit hour assignments, an accrediting agency may use sampling or other methods in evaluation, sufficient to comply with paragraph (f)(1)(i)(B) of this section.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(f)(3) Actions of Deficiencies

(3) The accrediting agency must take such actions that it deems appropriate to address any deficiencies that it identifies at an institution as part of its reviews and evaluations under paragraph (f)(1)(i) and (ii) of this section, as it does in relation to other deficiencies it may identify, subject to the requirements of this part.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.24(f)(4) Credit Hour Notifications

(4) If, following the institutional review process under this paragraph (f), the agency finds systemic noncompliance with the agency's policies or significant noncompliance regarding one or more programs at the institution, the agency must promptly notify the Secretary.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.25(a-e) Basic Due Process Requirements

The agency must demonstrate that the procedures it uses throughout the accrediting process satisfy due process. The agency meets this requirement if the agency does the following:

- (a) Provides adequate written specification of its requirements, including clear standards, for an institution or program to be accredited or preaccredited.
- (b) Uses procedures that afford an institution or program a reasonable period of time to comply with the agency's requests for information and documents.
- (c) Provides written specification of any deficiencies identified at the institution or program examined.
- (d) Provides sufficient opportunity for a written response by an institution or program regarding any deficiencies identified by the agency, to be considered by the agency within a timeframe determined by the agency, and before any adverse action is taken.
- (e) Notifies the institution or program in writing of any adverse accrediting action or an action to place the institution or program on probation or show cause. The notice describes the basis.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.25(f) Specific Appeals Requirements

(f) Provides an opportunity, upon written request of an institution or program, for the institution or program to appeal any adverse action prior to the action becoming final.

(1) The appeal must take place at a hearing before an appeals panel that--

(i) May not include current members of the agency's decision-making body that took the initial adverse action;

(ii) Is subject to a conflict of interest policy;

(iii) Does not serve only an advisory or procedural role, and has and uses the authority to make the following decisions: to affirm, amend, or reverse adverse actions of the original decision-making body; and

(iv) Affirms, amends, reverses, or remands the adverse action. A decision to affirm, amend, or reverse the adverse action is implemented by the appeals panel or by the original decision-making body, at the agency's option. In a decision to remand the adverse action to the original decision-making body for further consideration, the appeals panel must identify specific issues that the original decision-making body must address. In a decision that is implemented by or remanded to the original decision-making body, that body must act in a manner consistent with the appeals panel's decisions or instructions.

(2) The agency must recognize the right of the institution or program to employ counsel to represent the institution or program during its appeal, including to make any presentation that the agency permits the institution or program to make on its own during the appeal.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.25(g) Basis for Appeal Outcome Provided

(g) The agency notifies the institution or program in writing of the result of its appeal and the basis for that result.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.25(h) New Financial Information

(h)(1) The agency must provide for a process, in accordance with written procedures, through which an institution or program may, before the agency reaches a final adverse action decision, seek review of new financial information if all of the following conditions are met:

(i) The financial information was unavailable to the institution or program until after the decision subject to appeal was made.

(ii) The financial information is significant and bears materially on the financial deficiencies identified by the agency.

(iii) 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.

(h)(2) An institution or program may seek the review of new financial information described in paragraph (h)(1) of this section only once and any determination by the agency made with respect to that review does not provide a basis for an appeal.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.26(a) Notifications: Positive Decisions

The agency must demonstrate that it has established and follows written procedures requiring it to provide written notice of its accrediting decisions to the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public. The agency meets this requirement if the agency, following its written procedures--

(a) Provides written notice of the following types of decisions to the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public no later than 30 days after it makes the decision:

(1) A decision to award initial accreditation or preaccreditation to an institution or program.

(2) A decision to renew an institution's or program's accreditation or preaccreditation;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.26(b) Notifications: Negative Decisions

(b) Provides written notice of the following types of decisions to the Secretary, the appropriate State licensing or authorizing agency, and the appropriate accrediting agencies at the same time it notifies the institution or

program of the decision, but no later than 30 days after it reaches the decision:

- (1) A final decision to place an institution or program on probation or an equivalent status.
- (2) A final decision to deny, withdraw, suspend, revoke, or terminate the accreditation or preaccreditation of an institution or program;
- (3) A final decision to take any other adverse action, as defined by the agency, not listed in paragraph (b) (2) of this section;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.26(c) Notice to Public w/in 24 hours

(c) Provides written notice to the public of the decisions listed in paragraphs (b)(1), (b)(2) and (b)(3) of this section within 24 hours of its notice to the institution or program;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.26(d) Brief Summary w/in 60 Days

(d) For any decision listed in paragraph (b)(2) of this section, makes available to the Secretary, the appropriate State licensing or authorizing agency, and the public, no later than 60 days after the decision, a brief statement summarizing the reasons for the agency's decision and the official comments that the affected institution or program may wish to make with regard to that decision, or evidence that the affected institution has been offered the opportunity to provide official comment; and

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.26(e) Notifications: Voluntary Withdrawal

(e) Notifies the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public if an accredited or preaccredited institution or program--

(1) Decides to withdraw voluntarily from accreditation or preaccreditation, within 30 days of receiving notification from the institution or program that it is withdrawing voluntarily from accreditation or preaccreditation; or

(2) Lets its accreditation or preaccreditation lapse, within 30 days of the date on which accreditation or preaccreditation lapses.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.27(a)(1-5) Other Information to be Provided

(a) The agency must submit to the Department--

(1) A copy of any annual report it prepares;

(2) A copy, updated annually, of its directory of accredited and preaccredited institutions and programs;

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

(4) Any proposed change in the agency's policies, procedures, or accreditation or preaccreditation standards that might alter its--

(i) Scope of recognition, except as provided in paragraph (a)(5) of this section; or

(ii) Compliance with the criteria for recognition;

(5) Notification that the agency has expanded its scope of recognition to include distance education or correspondence education as provided in section 496(a)(4)(B)(i)(I) of the HEA. Such an expansion of scope is effective on the date the Department receives the notification;

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.27(a)(6-7),(b) Fraud and Abuse

(a)(6) The name of any institution or program it accredits that the agency has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse, along with the agency's reasons for concern about the institution or program; and

(a)(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.

(b) If an agency has a policy regarding notification to an institution or program of contact with the Department in accordance with paragraph (a)(6) or (a)(7) of this section, it must provide for a case by case review of the circumstances surrounding the contact, and the need for the confidentiality of that contact. Upon a specific request by the Department, the agency must consider that contact confidential.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.28(a) Regard for the Legal Authorization of an Institution

(a) If the agency is an institutional accrediting agency, it may not accredit or preaccredit institutions that lack legal authorization under applicable State law to provide a program of education beyond the secondary level.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.28(b) Regard for Negative Actions by Other Accreditors

(b) Except as provided in paragraph (c) of this section, the agency may not grant initial or renewed accreditation or preaccreditation to an institution, or a program offered by an institution, if the agency knows, or has reasonable cause to know, that the institution is the subject of--

(1) A pending or final action brought by a State agency to suspend, revoke, withdraw, or terminate the institution's legal authority to provide postsecondary education in the State;

(2) A decision by a recognized agency to deny accreditation or preaccreditation;

(3) A pending or final action brought by a recognized accrediting agency to suspend, revoke, withdraw, or terminate the institution's accreditation or preaccreditation; or

(4) Probation or an equivalent status imposed by a recognized agency.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into

noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.28(c) Explanation of Over-riding Decision

(c) The agency may grant accreditation or preaccreditation to an institution or program described in paragraph (b) of this section only if it provides to the Secretary, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards, why the action of the other body does not preclude the agency's grant of accreditation or preaccreditation.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.28(d) Requirement to Initiate Review

(d) If the agency learns that an institution it accredits or preaccredits, or an institution that offers a program it accredits or preaccredits, is the subject of an adverse action by another recognized accrediting agency or has been placed on probation or an equivalent status by another recognized agency, the agency must promptly review its accreditation or preaccreditation of the institution or program to determine if it should also take adverse action or place the institution or program on probation or show cause.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

602.28(e) Information-Sharing with Other Accrediting/Approval Bodies

(e) The agency must, upon request, share with other appropriate recognized accrediting agencies and recognized State approval agencies information about the accreditation or preaccreditation status of an institution or program and any adverse actions it has taken against an accredited or preaccredited institution or program.

The agency states that ED did not request that the agency respond to this section. That is not the case. The agency is requested to state whether there have been any changes to the agency's policies and/or practices since its last NACIQI review (of a petition and/or compliance report) that could bring the agency into noncompliance with any of the requirements of this section of the Secretary's Criteria for Recognition.

Analyst Remarks to Response:

The agency has provided an attestation to clarify that it has had no changes related to the requirements of this section since its last review. ED staff accepts the agency's attestation, and no additional information is requested.

Part III: Third Party Comments

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