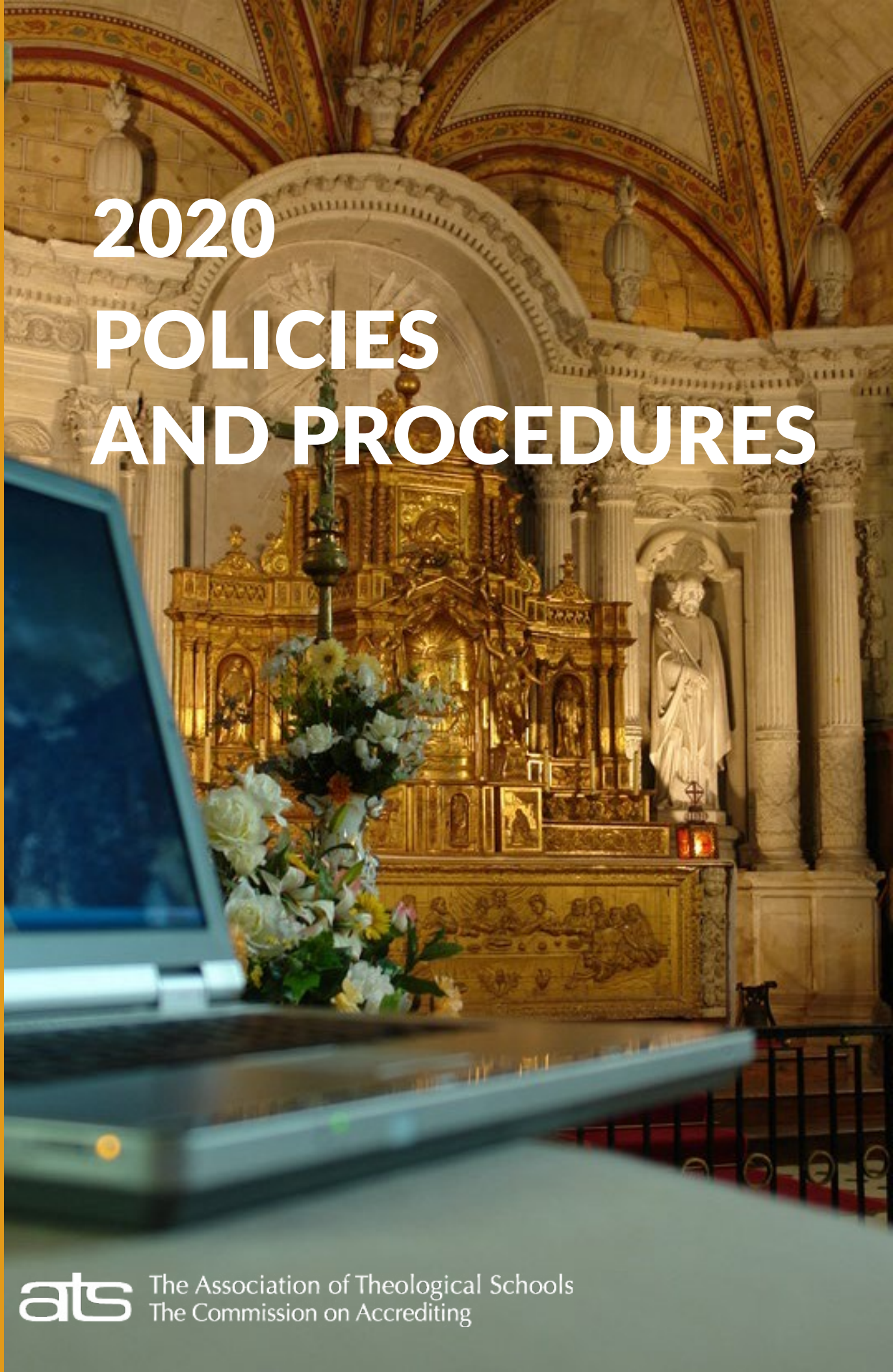
Commission on Accrediting

2020 POLICIES AND PROCEDURES



The Association of Theological Schools
The Commission on Accrediting

Commission Policies and *Board Procedures*

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NOTE: The *Commission Policies* are general, guiding statements on accreditation processes that are approved by the membership. For each policy, the Board of Commissioners (elected by the membership) has adopted one or more statements (*Board Procedures*) that help the Board implement and interpret that policy. The *Board Procedures* are too numerous to list here in the Table of Contents, but the [bracketed note] after each policy title indicates the number of procedures for that policy—a total of 103 procedures for 40 policies. The terms "policy" and "procedure" in this document are not meant to be rigidly exclusive but to clarify which sections are more general statements approved by the membership and which are more specific statements approved by the Board.

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Commission Policies and Board Procedures

Introduction

The following *Policies and Procedures* contain two important supplements and complements to the *Standards of Accreditation* of the Commission on Accrediting (Commission) of The Association of Theological Schools (Association or ATS). The *Commission Policies* in this document describe general policies for achieving and maintaining accreditation, for changing a school's scope of accreditation through substantive changes, and for how the Board of Commissioners (Board) operates, including how member schools receive and respond to Board decisions. The *Board Procedures* in this document describe specific procedures for how the Board implements and interprets those more general policies of the membership. Commission Policies are in green font and all their references end in a letter (e.g., III.A). Board Procedures are in black font and all their references end in a number (e.g., III.A.1).

The Commission membership has sole authority to approve or alter a policy, while the Board has sole authority to approve or alter a procedure that implements or interprets a membership-approved policy. In addition, the Board has the authority to adopt other documents that help implement or interpret the *Commission Standards* or *Commission Policies*. Those documents include the *Self-Study Handbook* and various guidelines and petition forms—all of which are posted publicly on the ATS website.

I. Commission Membership Criteria

I.A **Commission Policy on Membership Criteria**: The purpose of the Commission is "to contribute to the enhancement and improvement of theological education through the accreditation of schools that are members…" (*Commission Bylaws*, 1.2). Membership in the Commission is limited to schools that meet the membership eligibility criteria of ATS and are Full Members of the Association. A school that has ceased to be a member of the Association solely as a result of a Termination for Cause, as determined by the Association under *ATS Bylaws* 2.13, may continue as a member of the Commission, as required by *Commission Bylaws*, 2.13. Only the Board of Commissioners, not the Association, can remove a member of the Commission and only for reasons specified in *Commission Bylaws*, 2.13.

I.A.1 **Board Procedure on Membership Criteria**: The Commission consists of those schools who meet the ATS membership criteria and *Commission Standards*, follow these *Policies and Procedures*, and are accredited by the Board (see II and III). Those schools are designated as Full Members of the Association and Accredited Members of the Commission (see I.A. and II.A). The Board consists of peer and public Commissioners elected by the Commission membership to make all accreditation decisions on behalf of the membership and "for the benefit of communities of faith and the broader public" (*ATS Mission*; see also V).

I.B **Commission Policy on Accreditable Entity**: Accredited Members that are embedded in a college or university must have a defined accreditable entity that offers post-baccalaureate theological degree programs.

I.B.1 **Board Procedure on Accreditable Entity**: The Board's scope of accreditation authority is limited to free-standing seminaries (also called schools of theology or other similar names) and to academic units ("accreditable entities") of colleges or universities located in the US and Canada that offer post-baccalaureate degrees in professional and academic theological education. The Board does not accredit other types of schools or approve other types of educational programs.

I.B.2 **Board Procedure on Accreditation via Affiliation**: A school may be accredited "by virtue of its affiliation with" a cluster of accredited schools or by contractual arrangement with one or more accredited schools, or a school may have one or more of its degrees approved through a similar arrangement. In such cases, the Board will evaluate the school or program on the basis of the combination of resources and offerings provided by the affiliation. The school must state in its publications that it is "accredited by the Commission on Accrediting of The Association of Theological Schools by virtue of its affiliation with____," or it must state that any applicable degree is "approved by virtue of its affiliation with____."

II. Achieving Accreditation

II.A **Commission Policy on Pursuing Initial Accreditation**: Initial accreditation is granted only by the Board to Associate Members of ATS who meet all applicable *Commission Standards*, verified through an internal self-study process and report by the school and an external evaluation committee visit and report by peer and public reviewers. Associate Members who are granted initial accreditation automatically become Full Members of the Association and Accredited Members of the Commission. Accredited Members are required to follow all applicable *Standards* and these *Policies and Procedures*, as well as guidelines and other documents adopted and published by the Board on the ATS website. Associate Members seeking initial accreditation are not subject to any of those documents until they become Accredited Members.

II.A.1 **Board Procedure on Pursuing Initial Accreditation**: Procedures for how an Associate Member of ATS pursues initial accreditation with the Commission are found in the Board's Guidelines for Achieving Initial Accreditation and Writing Readiness Reports.

II.B **Commission Policy on Granting or Denying Initial Accreditation**: If initial accreditation is granted, the Board communicates that decision and any conditions to the school. If initial accreditation is denied, the Board communicates that decision and the reason(s) for denial to the school. Schools denied initial accreditation have four options: (1) appeal the decision; (2) resubmit, in consultation with the school's Commission staff liaison, an updated self-study report that addresses the reason(s) listed in the Board's decision, clearly documenting that it now meets all applicable standards; (3) petition the ATS Board of Directors to renew its five-year Associate Member term, if initial accreditation cannot be gained within the first term; or (4) voluntarily withdraw from Associate Membership by submitting a letter to that effect to the ATS Board of Directors.

II.B.1 **Board Procedure on Granting or Denying Initial Accreditation**: The Board has adopted specific procedures on how and when it communicates its decisions on granting or denying accreditation (see VII.A), as well as specific procedures on how and when a school may appeal a decision to deny initial accreditation (see VIII.B).

II.B.2 **Board Procedure on Achieving Accreditation During Five-Year Associate Membership Term**: Associate Members are expected to seek and gain initial accreditation during their five-year term of Associate Membership. If not, the school must either petition the ATS Board of Directors for one renewed term of five years or notify the ATS Board that it is withdrawing from Associate Membership (see ATS Guidelines for Renewing Associate Membership).

II.B.3 **Board Procedure on Voluntary Withdrawal of Associate Membership**: Any Associate Member school may withdraw from the process of seeking initial accreditation at any time by officially withdrawing from the Association. A school withdraws by submitting a letter to that effect, signed by the school's chief executive officer or designee, to the ATS Board of Directors. Any school that withdraws from Associate Membership and later decides to seek accreditation must reapply for Associate Membership and follow the policies and procedures listed in this chapter.

III. Maintaining Accreditation

III.A **Commission Policy on Membership Responsibilities**: Member schools maintain their accreditation by meeting the ATS membership criteria and following the Commission's *Standards* and *Policies and Procedures*. Member schools are also expected to abide by Board-approved documents that implement and interpret the membership-approved *Standards* and *Policies*. In addition, member schools must also complete the ATS Annual Report Forms and pay annual dues approved by the membership (per *Commission Bylaws*, 2.4).

III.A.1 **Board Procedure on Membership Responsibilities**: In fulfilling its accrediting responsibilities to member schools, the Board employs various procedures to ensure that schools continue to meet the *Standards* and follow the *Policies and Procedures*. Those procedures are described under each "Board Procedure" (see also Introduction).

III.B **Commission Policy on Comprehensive Evaluation Visits**: To maintain its accreditation, each school is periodically required to conduct a self-study, submit a self-study report, and host a comprehensive evaluation visit by a committee of peer and public reviewers. Board-approved fees are charged for all comprehensive evaluation visits (see ATS website).

III.B.1 **Board Procedure on Scheduling Comprehensive Evaluation Visits**: The period of accreditation is set by the Board and is not to exceed seven years for initial accreditation or ten years for reaffirmation of accreditation. For any period less than the maximum, the Board provides the school a written rationale for the lesser period. Comprehensive visits for reaffirmation of accreditation are typically scheduled several years in advance and occur in time for the Board to act before a school's current period of accreditation expires. Comprehensive visits for initial accreditation are authorized by the Board only after reviewing the school's self-study report (see II.A and III.B.4). Commission staff maintain a database of visits to ensure that all Board-scheduled visits occur on time. Joint visits between the ATS Commission and another accrediting agency are not allowed, though concurrent visits are (see *Self-Study Handbook* for details). On occasion and only for appropriate reasons, Commission staff may delay a school's visit by one semester, if requested by the school. Any longer delay requires a formal request to the Board and only for unusual circumstances. Any approved delay also extends the school's current period of accreditation accordingly. Comprehensive evaluation visits to schools with one or more additional locations that offer half or more of a degree (as defined in IV.E) will also include a site evaluation of those locations, as arranged by Commission staff. For schools with four or more approved additional locations and not subject to any public sanctions (see III.G-I) or recent Board actions raising any concerns about those locations, Commission staff may arrange to visit a representative sample of at least one-fourth of all additional locations, including a minimum of at least two.

III.B.2 **Board Procedure on Announcing Comprehensive Evaluation Visits**: At the beginning of each semester (and at least 45 days before the first visit), the Board will publish on the ATS website a list of all schools hosting comprehensive evaluation visits that semester, inviting anyone to comment on any of those visits regarding a school's ability to meet the *Commission Standards*. In addition, schools hosting a comprehensive evaluation visit (for reaffirmation of accreditation or for initial accreditation) must make a public announcement (e.g., on a prominent place on the school's website) of the date and reason for the visit at least 45 days before the visit. The

announcement must also include contact information for where to send comments on the school's ability to meet the *Commission Standards*. The contact information may include someone at the school; it must include the email address and phone number for the ATS Director of Commission Information Services (accrediting@ats.edu; 412-788-6505). The school must provide to the evaluation committee during the visit copies of all comments sent to it. Prior to the visit, the ATS Commission office will provide to the evaluation committee (but not to the school) copies of comments sent to it. The evaluation committee may also schedule an open session during the visit to which anyone (inside or outside) the school is invited to come and comment.

III.B.3 **Board Procedure on Preparing Schools for Comprehensive Evaluation Visits**: The Board provides self-study workshops for schools scheduled for comprehensive visits two years hence. These workshops help schools understand the Board's expectations for the self-study process, as well as for self-study reports, which must demonstrate how and how well each school meets all applicable *Commission Standards* (see III.B.4). Details about conducting a self-study process in preparation for a comprehensive evaluation visit are provided in the Board's *Self-Study Handbook*.

III.B.4 **Board Procedure on Self-Study Reports for Comprehensive Visits**: The Board requires every self-study report for a comprehensive evaluation visit to document how and how well the school meets the *Commission Standards*, especially those related to student achievement. The *Self-Study Handbook* provides details on Board expectations for self-study reports, including submission deadlines and instructions. In making decisions about comprehensive evaluation visits (see VII.A.1), the Board will review the school's self-study report and supporting materials, the evaluation committee report and recommendations (see III.B.8), and any response the school makes (in writing or in person; see VI.A.4).

III.B.5 **Board Procedure on Appointing and Evaluating Committee Members**: The Board delegates to Commission staff the appointment and support of all evaluation committee members for comprehensive and focused evaluation visits. Staff maintain a database of active evaluators that broadly represent the membership and the constituencies served, including peer institutional members and ministry practitioner members. All evaluators are expected to have experience or expertise in graduate theological education or in related vocations (see also III.B.7 for training requirements for all evaluators). Evaluators are also expected to be respectful of the range of religious traditions represented by the membership and to work collaboratively and effectively with other committee members. Schools are invited to evaluate committee members after their comprehensive evaluation visits. That input is recorded by Commission staff and used in appointing and training future evaluation committees.

III.B.6 **Board Procedure on Composition of Evaluation Committees**: Evaluation committees for comprehensive evaluation visits generally reflect the diversity of race, ethnicity, gender, nationality, and faith communities present in all member schools. For any given visit, the committee tries to reflect the needs and characteristics of that school. Comprehensive evaluation committees typically have three to five persons, depending on school size. Focused evaluation committees (see III.D) typically have one or two persons, chosen for their expertise in the subject(s) of the focused visit. All persons serving on any evaluation committee must verify that they do not have a conflict of interest (see VI.B.1). Each school hosting an evaluation visit is also given a proposed roster of evaluators well in advance of the visit to determine if the school sees

any conflict of interest (see VI.B.1). Comprehensive evaluation committees have at least one administrator, one academic/educator, and (for schools that participate in US federal student aid programs) one ministry practitioner. Comprehensive evaluation committees for schools offering distance education must include at least one person with experience and training in that delivery method. Commission staff provide support for all comprehensive evaluation visits.

III.B.7 **Board Procedure on Training Evaluation Committee Members**: The Board delegates to Commission staff the training of evaluation committee members. Training is required for those who serve as new evaluators, as chairs of evaluation committees, as evaluators of distance education, and as members of focused evaluation visit committees (see III.D). Training includes an overview of the *Commission Standards* and the *Policies and Procedures* for all evaluators. No person shall serve on an evaluation committee who has not completed the appropriate training.

III.B.8 **Board Procedure on Content of Evaluation Committee Reports**: The Board requires all comprehensive evaluation committee reports to evaluate how well the school meets all applicable *Standards*, especially standards related to student achievement. Committee reports include recommendations to the Board regarding the school's period of accreditation, accreditation status, approved degrees, any approved additional locations, any approved comprehensive distance education, distinctive strengths, and areas of concern, as well as any conditions to be imposed on the school (see III.D-J). The narrative of the report should also include suggestions for improvement for the school to consider. The *Self-Study Handbook* provides further details on Board expectations for comprehensive evaluation committee reports.

III.B.9 **Board Procedure on Timeline for Evaluation Committee Reports**: During the exit meeting at the end of a comprehensive evaluation visit, the committee will share with the school's chief executive officer (and/or anyone else that person invites) the committee's recommendations to the Board. Typically within two weeks of the end of the visit, the chair of the evaluation committee will provide the school's chief executive and academic officers (and any separately designated accreditation liaison officer) a draft copy of the committee's entire report, including the concluding recommendations shared at the exit meeting. The school has one week to send the chair any corrections of factual error. The chair has one week to consider these corrections and submit a final copy to the Commission office, which will then send an official copy of the committee report to the school's chief executive and academic officers (and accreditation liaison officer, if different). At least one month before the Board meets to act on the evaluation committee report and recommendations, the school is invited to submit any written response it wishes, including the right to send one or more representatives to meet with the Board if the school substantially disagrees with the evaluation committee recommendations (see VI.A.4).

III.B.10 **Board Procedure on Release of Evaluation Committee Reports and Recommendations**: The recommendations shared by the evaluation committee with the school at the end of the visit (see III.B.9) are not to be communicated publicly since they are only recommendations, not final actions. They may be shared internally at the discretion of the school's chief executive officer (i.e., the person so designated by the school on the ATS Annual Report Form). When the school receives an official copy of the report (including recommendations) from the Commission office, it may not share that report publicly, but it must share it with the governing body and with the full-time faculty (and with others internally at its discretion). After the Board meets and communicates its final decisions on the committee report and recommendations to the school, the school may then share the report publicly (in whole or in part) at its discretion. The Board

does not make public any evaluation committee reports or decision letters based on the committee recommendations (see VII.A.4 and VII.C.2 for exceptions). If a school makes public selected portions of the report or final actions in a way that distorts its overall import or if a school takes issue with the Board's action in a public forum (not including any announcement it intends to request a review of or appeal a Board action), the Board may make public the entire report.

III.C **Commission Policy on Special Comprehensive Visits**: A special comprehensive evaluation visit may be authorized any time when monitoring activities indicate significant problems at multiple levels or when schools initiate multiple substantive changes that threaten their abilities to meet the *Standards*. Board-approved fees are charged for all comprehensive evaluation visits, including special comprehensive visits (see ATS website).

III.C.1 **Board Procedure on Special Comprehensive Evaluation Visits**: The Board may authorize a special comprehensive evaluation visit whenever it deems that circumstances warrant a comprehensive review earlier than normally scheduled. Those circumstances include situations where a school triggers all of the Board's monitoring criteria (see list in III.M.1) and is not otherwise under review for any of those criteria, or if a school petitions for a change in mission and/or a change in control or legal status and at the same time petitions for any three other types of substantive changes (see IV.D-H). In these special circumstances, the Board does not expect a typical self-study process or report, but it does require the school to provide documentation that it meets all applicable standards. In authorizing such visits, the Board will communicate the reason(s) for the visit and the requirements for documentation for the evaluation committee, with sufficient notice that the school has time to prepare. Evaluation committees for special comprehensive evaluation visits are appointed, composed, and trained as described in III.B.5-7. The procedures for evaluating committee reports (described in III.B.8-10) also apply here.

III.D **Commission Policy on Focused Evaluation Visits**: A focused evaluation visit may be authorized to address one or more issues related to one or more standards. Focused visits are authorized for two reasons: (1) in response to substantive changes requested by member schools (e.g., for campus relocation), or (2) in response to substantive concerns about member schools (e.g., ongoing ability to meet one or more standards, formal complaints where onsite inquiry is needed, or changing circumstances that may adversely affect educational quality). Board-approved fees are charged for all focused evaluation visits (see ATS website).

III.D.1 **Board Procedure on Focused Evaluation Visits Responding to Substantive Changes**: When approving any substantive change petition regarding a new additional location (as defined in IV.E), campus relocation, or change in control or legal status, the Board will also authorize a focused evaluation visit to occur within six months of the effective date of the substantive change to confirm that appropriate resources are available for the new location (see also III.D.4 for exemptions to some focused visits) or to confirm that the school continues to meet the *Commission Standards* and the *Policies and Procedures* after the change in control or legal status. For any substantive change petition involving a new doctoral degree in a new category (see IV.D), the Board may authorize a focused evaluation visit prior to approving the degree to confirm the information provided in the school's petition. Following focused evaluation visits for new locations, campus relocations, and changes in control or legal status, the Board will review the focused evaluation committee report and either affirm the prior approval (with or without follow-up reports; see III.E) or reverse the prior approval if it determines that the prior approval

was based on significantly incorrect or misleading information contained in the petition. Following focused evaluation visits for new doctoral degrees in a new category, the Board will review the focused evaluation committee report and either approve (with or without follow-up reports) or deny the original petition.

III.D.2 **Board Procedure on Focused Evaluation Visits Responding to Substantive Concerns**: When the Board has one or more substantive concerns about a member school, it may authorize a focused evaluation visit if it determines that an onsite visit will provide more information than a report (alone) and/or if it determines an onsite visit will underscore the importance or urgency of the concern(s). The Board will notify the school of the date and reason(s) for the visit well in advance of the visit. Following the visit, the Board will review the focused evaluation committee report and any response by the school, as well as any materials supplied by the school, to decide if any additional action is warranted (see options in III.C-J).

III.D.3 **Board Procedure on Prospectus and Committee for Focused Evaluation Visits**: Approximately 60 days prior to any focused evaluation visit, Commission staff will provide the school with a prospectus citing the Board's original action letter that identifies the reason(s) and date for the visit (see III.D.1-2). The prospectus also lists persons to be interviewed or issues to be explored, as well as documents to be reviewed prior to and/or during the visit. The school is to use the prospectus as a guide to prepare for the review, and the evaluation committee will use the prospectus in conducting the onsite visit and making its recommendation(s) to the Board. The Board or Commission staff may also require a school hosting a focused evaluation visit to submit a report prior to the visit. Focused evaluation committees are typically composed of one or two peer members, though Commission staff may on occasion participate in a focused evaluation visit as either staff support or as a member of the committee.

III.D.4 **Board Procedure on Exemptions for Focused Evaluation Visits**: A school petitioning for a new additional location (see IV.E) may be exempted by the Board from a focused evaluation visit if it meets all of the following conditions: (1) has at least two approved locations offering half or more of a degree other than the main campus (or at least three such approved locations if the school has not completed at least one cycle of accreditation or has been the subject of a public sanction during the prior three years); (2) is accredited in good standing with the Commission (i.e., is not currently on warning, probation, or Show Cause; see III.G-I); and (3) has not been the subject of any recent Board actions regarding its ability to oversee effectively its additional locations.

III.D.5 **Board Procedure on Reports Written by Focused Evaluation Committees**: The Board requires all focused evaluation committee reports to evaluate the issue(s) specified in the prospectus (see III.D.3) in light of the Commission's *Standards* and the *Policies and Procedures*. The report is generally brief, focused on the issue(s) cited by the Board, and attends to any instructions in the prospectus (see III.B.3). In making any final decisions (see options in III.C-J), the Board reviews the focused evaluation committee report and any recommendation(s), along with any materials or responses provided by the school (see VI.A.4).

III.E **Commission Policy on Board-Required Reports**: In response to a comprehensive or focused evaluation visit or to some other information received (e.g., report or formal complaint), the Board may require one or more reports if it judges that an accredited school should supply additional information or needs to improve in one or more areas. Requiring a report is not an

indication that a school does not meet a standard, unless it is a report required in conjunction with a public sanction.

III.E.1 **Board Procedure on Board-Required Reports**: Whenever the Board requires a report, it will identify the standard(s) (or policy) where it needs information or where the school needs improvement. In that same action, the Board will set the report submission date(s), based on how much time it deems is necessary to provide the information or to make the improvement. The Board provides guidelines on the ATS website on how to write and submit reports. In acting on a Board-required report, the Board will decide either to "accept" the report, with no further action required, or to "receive (the report) and require" additional action. The additional action could be any action described in III.C-J. The Board will communicate its decision and rationale to the school in writing and, as appropriate, to the public and to other agencies (see VII.A.1-5).

III.F **Commission Policy on Private Letter of Concern:** The Board may issue a private Letter of Concern to a member school if it determines the school has not responded appropriately to issues the Board raised earlier or if it determines the school is facing issues that need immediate and serious attention.

III.F.1 **Board Procedure on Private Letter of Concern**: The Board's Letter of Concern will specify the exact nature of its concern(s), stipulate what standard(s) are involved, and include instructions on how and when the school is to respond to the concern(s). Failure to respond appropriately and timely to a Letter of Concern may result in the Board issuing a warning (if the school substantially meets the standards but is "at risk" of not meeting one or more standards; see III.G) or may result in the Board placing the school on probation (if the school is "not meeting" one or more standards; see III.H).

III.G **Commission Policy on Warning (Public Sanction)**: Issuing a warning is a public action (the lowest level of three public sanctions; see III.H-I for the other two) that is taken when the Board determines that an accredited school substantially meets the standards but is at risk of not meeting one or more standards. The Board may issue a warning based on information from an evaluation committee (for a comprehensive or focused visit), a required report, regular monitoring activities, or other appropriate sources. Issuing a warning is a reviewable action (see VIII.A).

III.G.1 **Board Procedure on Warning (Public Sanction)**: In issuing a warning, the Board will cite the standard(s) that the school is at risk of not meeting and stipulate any reports and/or visits required of the school, within a timeframe specified in the Board's action letter to the school. The timeframe may not exceed two years, unless the Board grants a one-year Extension for Good Cause at the end of two years. Such an extension is granted only rarely and only if the Board determines the school has made sufficient progress during the two-year warning period in addressing the Board's concern. If the school has not adequately addressed the Board's concern(s) at the end of a period of warning (or any Extension for Good Cause) and the school does not then meet the standard(s) cited in the warning, the Board will place the school on probation (a more serious public sanction than warning; see III.H), though it may issue a Show Cause first (see III.I). The Board will make public a warning but only after any review is resolved (see VII.A.4 and VIII.A.3).

III.H **Commission Policy on Probation (Public Sanction)**: Placing a school on probation is a more serious public sanction than warning (see III.G) and is imposed by the Board when it determines that an accredited school does not meet one or more standards. Probation is a reviewable action (see VIII.A).

III.H.1 **Board Procedure on Probation (Public Sanction)**: The Board will typically not place any school on probation without a prior onsite visit nor will it remove a school from probation without an on-site visit (but see III.L.4). Probation usually follows a warning, though the Board may impose probation at any time it determines a school is not meeting one or more standards. In placing a school on probation, the Board will stipulate the standard(s) not met and any reports or visits required of the school, within a specified timeline. The timeframe is normally two years, though the Board may grant a one-year Extension for Good Cause. Such an extension is granted only rarely and only if the Board determines the school has made sufficient progress during the two-year probation period toward meeting the standard(s) or has a credible plan to meet the standard(s) during the extension period. If the school has not met the standard(s) at the end of probation (or any Extension for Good Cause), the Board will withdraw the school's accreditation, though it may issue a Show Cause first (see III.I). The Board will make public a probation action but only after any review is resolved (see VII.A.4 and VIII.A.3).

III.I **Commission Policy on Show Cause (Public Sanction)**: Issuing a Show Cause—as to why accreditation should not be withdrawn—is the most serious of three public sanctions (see III.G-H). It is issued by the Board on those rare occasions when it not only determines an accredited school does not meet the standards but also deems the situation to be so serious and substantial that a relatively immediate response is required from the school to show evidence of why its accreditation should not be withdrawn. Show Cause is not a reviewable nor appealable action.

III.I.1 **Board Procedure on Show Cause (Public Sanction)**: In issuing a Show Cause, the Board will stipulate the standard(s) not being met, the information needed to ensure the school meets the standard(s), and the timeline for submitting that information to the Board (not to exceed twelve months). The Board will make public a Show Cause action when it notifies the school (since this action is not reviewable or appealable; see VII.A.4 and VIII.B.3). The Board may issue a Show Cause at any time, sometimes at the end of a warning or probation that has not been successfully addressed or at the end of an unsuccessful Extension for Good Cause (see III.G-H), though it is not required to issue a Show Cause before withdrawing accreditation.

III.J **Commission Policy on Withdrawal of Accreditation (Adverse Action):** If a school does not meet all applicable *Commission Standards* after an appropriate time (usually after probation or Show Cause), the Board will withdraw accreditation (deemed an adverse action), though it may do so anytime it believes this adverse action is warranted. A school may appeal an adverse action (see VIII).

III.J.1 **Board Procedure on Withdrawing Accreditation (Adverse Action)**: The Board will withdraw the accreditation of any school that does not meet the standards within a Board-specified timeframe (typically after probation or Show Cause actions; see III.H-I), though it may withdraw a school's accreditation anytime it believes such action is warranted. When withdrawing accreditation, the Board will communicate to the school the reason(s) and require the school to submit an appropriate teach-out plan to ensure that student interests are protected (see III.L). It will also make this information public but only after any appeal is resolved (see VII.A.4 and VIII.B.3; see

also VII.A.6 on the school's responsibility to the public). Once accreditation is withdrawn, any school desiring later to pursue accreditation must follow the policies and procedures described in II.

III.K **Commission Policy on Voluntary Withdrawal of Accreditation (Not an Adverse Action):** A member school may voluntarily withdraw from accreditation at any time and for any reason. The Board does not view the voluntary withdrawal of accreditation by a member school as an adverse action. Schools that voluntarily withdraw from the Commission and wish to continue in some formal relationship with the Association should contact the ATS office to see if they qualify. If a school voluntarily withdraws from the Association and later wishes to pursue accreditation with the Commission, it would normally begin by applying for Associate Membership with ATS.

III.K.1 **Board Procedure on Voluntary Withdrawal of Accreditation (Not an Adverse Action)**: To voluntarily withdraw its accreditation from the Commission, the school must notify the Board in an official letter (dated and signed by the chief executive officer or designee), stating the effective date of withdrawal. If the school will cease to offer accredited degrees after that date, it must include a teach-out plan for the Board to approve (see III.L). The Board will notify the public within 10 business days of the effective date that a member school voluntarily withdraws (see VII.A.2 and VII.A.4-5).

III.L **Commission Policy on Teach-Out Plans**: A member school must submit a teach-out plan to the Board for approval if any of the following occur: (1) if a school closes or relocates any site (additional location) that offers one hundred percent of a complete degree, including closing or relocating its main campus; (2) if the Board withdraws a school's accreditation; (3) if a school voluntarily withdraws its accreditation and will cease to grant accredited degrees; or (4) if the Board is notified by an authorizing agency that a school's legal authority to operate is being revoked. A teach-out plan is required to ensure equitable treatment for all affected students, reasonable opportunity for those students to finish, and notification to those students of any additional charges that may result from the teach-out arrangements.

III.L.1 **Board Procedure on Circumstances Requiring Teach-Out Plans**: In addition to the circumstances listed in III.L, a teach-out plan is required if the Board is notified by the US Department of Education that it placed a school participating in Title IV programs (or the larger institution of which a member school is a part) on the reimbursement method or on heightened cash monitoring status; that it has limited, suspended, or terminated a school's participation in any Title IV program; or that it has initiated an emergency action against a school (see also VII.A.5). A teach-out plan is also required if a school's independent audit includes a "going concern." A teach-out plan (which may include a teach-out agreement; see III.L.3) is required from any member school closing an approved location that offers a complete degree program. A teach-out plan is not required from any member school (a) closing or relocating an approved location that does not offer a complete degree program (but see IV.E.3), or (b) closing a degree program that does not involve closing or relocating an approved location. In situations involving (a) or (b), however, the school must notify Commission staff of the change, with a description of how the educational needs of affected students will be addressed. Commission staff maintain a record of all teach-out plans and closed degree programs not requiring teach-out plans.

III.L.2 **Board Procedure on Criteria for Evaluating Teach-Out Plans**: The Board will evaluate teach-out plans on the basis of the following five criteria: (1) *communications*—the plan must describe how students and other affected parties (e.g., faculty and staff) are informed of the closure and of options for students to complete the closed program(s), including the length of time such options might take (copies of notifications to students must be included with the teach-out plan); (2) *completion options*—the plan must list all affected students and their completed program requirements (as well as the names of other institutions that offer similar programs and could potentially enter into a teach-out agreement, if needed), with one or more completion options for each student, which could be as brief as noting that all students will finish before the closure or that all students will relocate to the new location; other options may also be necessary (e.g., offering online courses if appropriate and if approved to do so, helping students transfer to comparable programs, and/or establishing a teach-out agreement with another institution (see III.L.3); (3) *notification of charges*—the plan must document any additional charges that students may incur as a result of the closure, including how and when students are notified of those charges; (4) *anticipated timeline*—the plan must specify the dates for how the closure will unfold (including dates the last students are admitted, the first students will finish, the last students will finish, and the effective date of closure); if applicable, the timeline should also include when the institution or location will lose degree granting authority and/or access to Title IV funds; and (5) *list of other agencies involved*—if the program or location being closed is also accredited by one or more other agencies, the plan must list all of them, along with contact information, since the Board must notify them of any teach-out plan it approves. The plan must also provide contact information for any state or provincial agency to which the school is accountable. In addition, if the closure means the school will cease to operate, the plan must indicate where all existing student records will be stored, in keeping with any state or provincial requirements. A school may not implement a teach-out plan until it is approved by the Board.

III.L.3 **Board Procedure on Teach-Out Agreements**: A teach-out plan may also include a teach-out agreement with one or more institutions that have comparable offerings and are accredited by an agency recognized by the US Secretary of Education for US schools or approved by another appropriate authority for Canadian schools. A teach-out agreement can be part of any teach-out plan if the school so chooses, but it is required under any of these circumstances: (1) if the member school cannot provide through its own resources a reasonable opportunity for affected students to finish prior to closure, (2) if the loss of Title IV funds (for participating schools) will not allow some students to complete their program even if the school remains open, or (3) if the Board, on review of the teach-out plan, decides a teach-out agreement is also needed. For all approved teach-out agreements, the Board will notify other agencies that accredit schools involved in those teach-out agreements of its approval. The teach-out agreement(s) must include a list of students currently enrolled in each program and their completed program requirements, a plan to provide all potentially eligible students information about how to obtain a closed school discharge, a records retention plan that delineates the final disposition of teach-out records (e.g., student transcripts and billing and financial aid records), information on the number and types of credit the teach-out institution(s) is (are) willing to accept prior to the student's enrollment, and a clear statement to students of the tuition and fees they will be charged.

III.L.4 **Board Procedure on Closure of a School without an Approved Teach-Out Plan**: If a member school that participates in US Department of Education federal financial aid (Title IV) programs fails to submit a teach-out plan that is approved before closing a location described under III.L and III.L.1, the Board will impose probation (see III.H). If a member school that participatesin

Title IV programs closes without a Board-approved teach-out plan, the Board will work with the Department and other appropriate agencies, as feasible, to assist students in finding reasonable opportunities to complete their education without additional charge to the extent feasible.

III.M **Commission Policy on Monitoring Activities**: The Board regularly monitors member schools in selected areas, based on information provided by the membership on the ATS Annual Report Forms. These monitoring activities involve such areas as student enrollment, financial resources, and various indicators of student achievement. The Board's goal is to ensure that member schools continue to meet *Commission Standards* by regularly identifying any concerns, especially those related to financial stability and educational quality.

III.M.1 **Board Procedure on Monitoring Activities**: The Board regularly monitors members schools in various areas (typically each spring based on data reported by member schools each fall on the ATS Annual Report Forms). Those areas include (1) annual change in headcount enrollment of ± 50 percent, including total and distance education enrollment as separate categories; (2) overall placement rates that are below 50 percent or for which at least 50 percent are reported as unknown; (3) overall graduation rates that are below 25 percent; (4) reduction in unrestricted fund balance of 25 percent or more in one year; (5) cumulative losses in operations over the last three years; and (6) percentage of students admitted to the MDiv or MA degree without a bachelor's degree or educational equivalent (see Standard 7.4). When a significant change is noted, the Board delegates Commission staff to request the school to explain the factors that led to the change, if the school is not already under review in that area. The school may also be asked to indicate its understanding of the effect of the change on the school's conformity to the *Standards* and on the school's educational effectiveness. If a school's response suggests further action is necessary, the Commission staff will refer the matter to the Board (see III.C-J for possible actions).

III.M.2 **Board Procedure on Monitoring Due to Actions by Other Agencies**: Whenever the Board learns that an accredited member school (or the larger institution of which a member school is a part) has been placed on probation or is the subject of an adverse action (denial or withdrawal of accreditation) by another recognized agency, the Board will promptly review that school's accreditation to determine if it should also take an adverse action or place the school on probation. The prompt review will occur whether the other agency's action is pending or final. The review typically involves the Board authorizing a focused evaluation visit (see III.D) and/or requiring a report (see III.E). The Board will not reaffirm the accreditation of that school until the review confirms that the school meets all applicable *Commission Standards*. The Board will also not grant initial accreditation to a school that is subject to one of the actions described unless it confirms that the school meets all applicable *Commission Standards*. If the Board reaffirms or grants accreditation for a US school, it will provide within 30 days to the US Department of Education a thorough and reasonable explanation consistent with its standards why the action of the other agency does not preclude its decision. The Board will notify other appropriately recognized agencies if it grants or renews that school's accreditation, or if it takes an adverse action against or places on probation a member school (see VII.A.4-5).

IV. Changing Scope of Accreditation through Substantive Changes

IV.A **Commission Policy on Substantive Changes (Overview)**: Since accreditation is an ongoing relationship between the Board and an accredited member school, whenever an accredited member school introduces a change that represents a significant departure from what is currently approved, that is considered a substantive change requiring prior Board approval. Associate Members are not subject to the Commission's substantive change policy since they are not members of the Commission.

IV.A.1 **Board Procedure on Substantive Changes (Overview)**: Any substantive changes listed in IV.B-H require member schools to submit petitions for approval well in advance of any proposed implementation. The ATS website provides templates for each type of substantive change petition, including submission instructions. Schools are encouraged to consult with Commission staff if they have any questions about petitioning for a substantive change. Once submitted, the Board will evaluate that petition, along with any supporting materials, before deciding whether to approve the change. Accredited schools may not implement a substantive change without prior Board approval. In granting approval, the Board will specify a date, which cannot be retroactive, in which the change becomes effective. Approval for any change not implemented within two years automatically expires—unless the school requests and receives an extension for appropriate reasons. An accredited school that seeks multiple substantive changes simultaneously may be subject to a special comprehensive evaluation visit (see III.C).

IV.B **Commission Policy on Change in Primary Mission:** Any change in an accredited member school's primary mission or educational objectives that might risk its ability to meet the membership criteria or the Commission's *Standards* and *Policies and Procedures* is considered a substantive change and requires prior Board approval.

IV.B.1 **Board Procedures on Change in Primary Mission**: Any change in a school's primary mission or educational objectives that does not retain a fundamental focus on preparing persons for religious leadership or providing graduate study in various theological disciplines is considered a substantive change requiring prior Board approval (see also III.C.1). Changes in mission or objectives that retain that fundamental focus are not considered substantive changes and do not require Board approval.

IV.C **Commission Policy on Change in Control or Legal Status:** Any change in an accredited member school's form of control, ownership, or legal status (including mergers or acquisitions) is considered a substantive change and requires prior Board approval. Such changes also require a focused evaluation visit within six months of being implemented to determine that the change has not adversely affected the school's ability to meet the *Commission Standards*.

IV.C.1 **Board Procedure on Change in Control or Legal Status**: The Board considers this type of change to include mergers, acquisitions, formal federations, or partnerships where one or more partners change their forms of control or legal status (see also III.C.1), including a member school acquiring a non-member school. This type of change also includes converting from for-profit to non-profit status or the reverse. Restructuring a school's governance or revising its bylaws is not considered a substantive change, as long as there is no change of ownership, governing control, or legal status. Changing a school's legal name (including any new "doing business as"

designation) is not considered a substantive change but does require notification to, and acknowledgement by, the school's Commission staff liaison.

IV.D **Commission Policy on Change in Degrees**: Any change in an accredited member school's approved degree programs that includes either offering a degree in a new category or offering a degree that represents a significant departure from its currently approved degrees is considered a substantive change.

IV.D.1 **Board Procedure on Change in Degrees**: The Board considers "offering a degree in a new category" to include offering for the first time a master's or doctoral degree in a category in which it does not currently offer an approved degree. Standard 4 lists three categories of master's degrees: MDiv, MA, and ThM; Standard 5 lists three categories of doctoral degrees: DMin, Other Professional Doctorates, and PhD/ThD). Offering a doctoral degree in a new category may require a focused visit before approval, especially new PhD degrees (see III.D.1). The Board considers "offering a degree representing a significant departure from its approved degrees" to include offering a degree in a field outside of the school's current area(s) of expertise and/or requiring significant additions in faculty, facilities, or finances. Offering new degrees in the same category or changing the name of an already approved degree does not require prior approval from the Board. However, any such change does require notification to, and acknowledgement by, the school's Commission staff liaison at least 60 days before being implemented to ensure that it does not constitute a substantive change and to ensure accurate Commission records (see ATS website for notification forms and instructions; see III.L.1 to close a degree). Any school on probation must petition for approval to offer an approved degree through a new delivery method or to change by 25 percent or more the total credits or the content of an approved degree. All other schools must notify Commission staff within 30 days of offering an approved degree through a new delivery method or changing by 25 percent or more the total credits or content of an approved degree.

IV.E **Commission Policy on Change in Locations:** Any change in an accredited member school's approved location(s) that establishes a new additional location at which half or more of a degree program can be earned is considered a substantive change. This also includes relocating a school's main campus or an already-approved additional location offering half or more of a degree. Adding, relocating, or closing a location that offers less than half a degree is not considered a substantive change, nor is expanding an approved additional location to offer additional master's level degrees that are already approved by the Board. Expanding an already approved location to include a doctoral degree for the first time is considered a substantive change.

IV.E.1 **Board Procedure on Change in Locations**: In addition to the changes described in IV.E, the Board considers any of the following changes in location to be substantive changes requiring prior Board approval: (1) acquiring another school's additional location offering half or more of a degree, (2) adding a location at which the school is conducting a teach-out for students of another school that has ceased operating before all students have finished, or (3) adding a branch campus. A branch campus is defined as an institution that is geographically apart from and independent of the main campus, is permanent in nature, offers degrees, has its own faculty and administrative structure, and has its own budgetary and hiring authority. All such changes require prior Board approval and a focused evaluation visit within six months of the change to verify that the location has the resources, facilities, and personnel described in the school's

petition (see III.D.4 for exemptions to focused visits). Schools that add or close any location offering less than half but at least one-fourth of a degree program are to notify Commission staff beforehand. Schools that wish to expand an additional location that is approved to offer only master's degrees to include a doctoral degree must petition for a substantive change (using the appropriate petition form on the ATS website).

IV.E.2 **Board Procedure on Change Involving Site Closure or Relocation**: Schools planning to close or relocate an additional location (at which half or more of a degree may be earned) or to relocate their main campus must petition for a substantive change well in advance of that relocation, using the appropriate petition form on the ATS website. The Board will review the petition and, if approved, will authorize a focused evaluation visit to occur within six months of the change to verify that the new location meets all applicable *Commission Standards*. The school may also request an exemption for a focused visit involving a newly relocated site if it meets the Board's exemption criteria (see III.D.4). Campus relocations are not subject to visit exemptions, unless the relocation is for a school embedded on a university campus that is simply relocating to another part of campus. If the relocation for an additional location must be done rapidly due to unforeseen circumstances (e.g., natural disaster) or before the Board can meet to act on the petition, Commission staff have the authority to grant temporary authorization for a relocation until the Board meets. Schools that are changing only the mailing address (and not the physical location) of an approved location need only notify Commission staff.

IV.E.3 **Board Procedure on Change in Location Requiring Teach-Out Plan**: If a school closes or relocates a site at which a complete degree may be earned, it must petition for prior approval to close (or move) that location and include a teach-out plan that must be approved by the Board (see III.L). Closing an additional location that offers less than a complete degree does not require a teach-out plan (see also III.L.1).

IV.F **Commission Policy on Change Related to Distance (Online) Education:** The Commission requires Board approval of any distance (online) education offerings that meet a threshold set by the Board. Distance education here refers to any course where at least half of the instruction occurs when the instructor and the students are not in the same physical location. Types of distance education courses include online courses delivered asynchronously, online courses delivered synchronously (e.g., through interactive video), or hybrid courses where at least half of the instruction is offered online. However delivered, all distance (online) education courses must demonstrate regular and substantive interaction between instructors and students and among students, which eliminates any form of correspondence education.

IV.F.1 **Board Procedure on Change Related to Distance (Online) Education:** Whenever an accredited member school decides to offer distance (online) education courses that for the first time could constitute at least half of the credit requirements for any of its degree programs, that is considered a substantive change. Such change is called "comprehensive distance education" and requires prior Board approval, but only once—when a school first offers enough courses online that at least half of a degree program could be completed through distance education. After that initial approval, the school may offer as much and as many of its approved degrees through distance education as it wishes without any additional approval, except for the PhD/ThD degree (see IV.D.1). The first time a school plans to offer half or more of the coursework of an approved PhD/ThD degree program online, it must seek approval to do so (see IV.G), even if it has comprehensive distance education approval. Schools may offer distance education courses for

any program without prior approval if they do not constitute at least half of any degree, provided they notify the Board of those offerings each year on the appropriate ATS Annual Report Forms.

IV.F.2 **Board Procedure on Distinguishing Between Distance (Online) Education and Additional Locations**: The Board considers any course delivered synchronously via interactive video to a group of students at a location apart from the instructor to be distance education, not an additional location, but only if a majority of the instruction is delivered by the instructor from a distance. If most of the instruction is delivered by the instructor at that location, then the Board considers that course to be an additional location, not distance (online) education.

IV.F.3 **Board Procedure on Identity, Privacy, and Authorization in Distance (Online) Education**: Schools offering distance (online) education must have procedures to verify the identity and protect the privacy of students enrolled (e.g., secure login). Schools must also notify students in advance of any additional costs for distance education. All US schools and any Canadian schools participating in US-based Title IV programs offering distance (online) education to US residents not residing in the school's home state are to comply with all applicable laws and regulations in the state(s) in which those online students reside, which may include participating in national reciprocity agreements.

IV.G **Commission Policy on Changes Related to Experiments (Innovation)**: Whenever an accredited member school seeks to develop an innovative educational program or approach that is not addressed or not allowed in the *Standards*, that is considered a substantive change requiring prior approval. Such changes will be treated by the Board as experiments that, if approved, must be evaluated over several years to determine their effectiveness and ongoing status. In its petition, the school must demonstrate that the experiment ensures educational quality, congruence with the school's educational mission, and coherence with the values of theological education. Offering any educational program not based on courses or credits would be an example of a substantive change requiring approval as an experiment.

IV.G.1 **Board Procedure on Changes Related to Experiments (Innovation)**: The Board has developed a petition form for experiments that provides more details on what areas to address (see ATS website). The Board requires schools petitioning for an experiment to specify the length of the experiment (typically three to five years), during which time the school will evaluate the results and periodically report those results as directed by the Board when it approved the experiment. In its final report, the school must either notify the Board that it is terminating the experiment (if the results are negative) or request that the experiment be changed to an ongoing exception (if the results are positive). If the latter, the Board will review the results of the experiment to determine whether to terminate it or continue it as an ongoing exception. One example of an experiment would be offering a degree (in whole or in part) through competency-based education where students are not awarded credit and not required to take classes.

IV.H **Commission Policy on Other Types of Substantive Changes**: Other types of substantive changes by accredited member schools that require prior Board approval include changing from clock hours to credit hours, increasing substantially the number of clock or credit hours awarded for successful completion of a degree program, changing from quarters to semesters (or vice versa), or contracting with an unaccredited entity to offer more than one-fourth of a degree program.

IV.H.1 **Board Procedure on Other Types of Substantive Changes**: The Board has not developed petition forms for these other types of substantive changes, since they are so rare among member schools. Schools considering any of these types of changes are encouraged to consult with their Commission staff liaison.

IV.I **Commission Policy on Changes Involving Individual Exceptions**: Substantive changes do not include exceptions that an accredited member may choose to make for an individual student. Individual exceptions do not require Board approval.

IV.I.1 **Board Procedure on Changes Involving Individual Exceptions**: Schools with any questions about what constitutes an individual exception are encouraged to consult with their Commission staff liaisons.

V. Responsibilities and Composition of the Board

V.A **Commission Policy on Board Responsibilities**: The Board provides "general direction" to the Commission, including the authority to "administer, manage, preserve, and protect the property of the Commission" (*Commission Bylaws*, 3.1). A central purpose of the Board is to make accrediting decisions on behalf of the Commission that "contribute to the enhancement and improvement of theological education through the accreditation of schools that are members…" (*Commission Bylaws*, 1.2). The basic responsibilities of the Board are defined by the *Commission Bylaws* (especially Articles III and IV). Those responsibilities include the following: (1) overseeing the corporate work of the Commission, as authorized by the *Commission Bylaws*; (2) maintaining an official list of schools accredited in accordance with the *Standards*, including the authority to add schools to or delete them from the list; (3) reviewing on an ongoing basis accredited schools for continued inclusion in the Membership Directory (on the ATS website), including all aspects of accreditation pursuant to the *Standards* and *Policies*; and (4) evaluating periodically the *Standards* and *Policies* and bringing recommendations for any changes to Commission member schools. The Board also has the authority to adopt procedures, guidelines, and other documents that implement and interpret the Commission's *Standards* and *Policies* to ensure thorough and fair evaluation of schools, consistently applying the Commission's *Standards* and *Policies*.

V.A.1 **Board Procedure on Board Responsibilities and Authority**: The Board's authority to make accrediting decisions on behalf of the Commission includes not only the authority to maintain an official, public list of accredited schools with the authority to add or delete schools, but also the authority to approve substantive changes and to impose certain conditions on accredited schools based on the *Standards* and these *Policies and Procedures*. The Board serves as the final authority in interpreting and implementing the Commission's *Standards* and *Policies* (subject to any appeals described in VIII.B). The Board also periodically publishes guidelines and other documents, such as the *Self-Study Handbook*.

V.A.2 **Board Procedure on Additional Responsibilities**: In addition to the responsibilities described in V.A.1, the *Commission Bylaws* (3.1) list various other Board responsibilities. Those include (1) making all accreditation decisions related to member schools, (2) appointing task forces and committees needed to fulfill its responsibilities, (3) adopting and overseeing the Commission's budget, (4) approving auditors for the Commission, (5) establishing fees for various accreditation activities, (6) recommending to the membership any changes in annual dues, and (7) establishing and evaluating employment policies of the Commission through its agreement for contracted services with the Association (see V.C.7).

V.A.3 **Board Procedure on Responsibilities for Reviewing Commission Documents**: The Board also has the responsibility to review the Commission-approved *Standards*, *Policies*, and *Bylaws* not less than every five years. The review involves all relevant constituencies and provides adequate time and processes for their input. If the Board decides, based on the review and input, to recommend to the membership any changes in those documents, it will notify the membership and the public of those recommended changes within twelve months of making that decision. The Board will also consider any relevant input received regarding those recommended changes prior to the membership vote. The Board will also notify the US Department of Education of any proposed changes to the Commission *Standards* and *Policies* or to these Board *Procedures* that might alter its scope of recognition or its compliance with the criteria for recognition.

V.A.4 **Board Procedure on Limits to Board Authority**: The Board acts only on those matters assigned to it by the Commission and within the limits established by the Commission *Bylaws* and by the Commission *Policies*. The Board may initiate and carry through all steps leading to a decision on accredited membership and to decisions regarding substantive changes (*Commission Bylaws*, 3.1, on Authority). Member schools have the right to be creative and diverse in determining how best to organize themselves and use their resources, provided they continue to meet the Commission *Standards* and *Policies* and any applicable Board *Procedures*.

V.B **Commission Policy on Board Composition**: The Board consists of "a minimum of sixteen and a maximum of twenty Commissioners. No fewer than three and no more than five of the Commissioners shall be Public or Ministry Practitioner Commissioners. Remaining Commissioners shall be Institutional Commissioners" (*Commission Bylaws*, 3.2). Institutional Commissioners are persons employed by a member school at the time of their elections, including at least two who have significant teaching responsibilities. Public Commissioners are persons who are not students, employees, board members, or consultants at an accredited member school at the time of their elections, nor do they have any immediate family members who are. Ministry Practitioner Commissioners are public members who are active in (or recently retired from) vocational ministry at the time of their elections. New Commissioners are elected by the membership every two years (per *Commission Bylaws*, 3.3-4). Institutional Commissioners serve non-renewable, six-year terms. Public or Ministry Practitioner Commissioners serve two-year terms, renewable once.

V.B.1 **Board Procedure on Board Composition**: Commissioners are chosen for their knowledge of theological education, their experience in matters related to accreditation, and their respect for the diversity of theological and ecclesial perspectives represented among member schools. Members of the Board (and Commission staff) are listed publicly on the ATS website, along with their qualifications. Public Commissioners (including Ministry Practitioner Commissioners) must sign a form verifying that they meet public member qualifications.

V.B.2 **Board Procedure on Board Training**: All Commissioners are trained in the content and interpretation of the Commission's *Standards* and *Policies*, as well as the Board *Procedures*. That training begins with an orientation session held every other fall for newly-elected Commissioners. Commissioners are typically invited to participate in or chair at least one comprehensive or focused evaluation visit each year they are on the Board (see III.B-D and VII.A.3).

V.B.3 **Board Procedure on Board Officers**: Per *Commission Bylaws* (Article IV), the membership elects every two years the officers of the Board: chair, vice chair, and representative to the ATS Board of Directors (the only Commissioner who may also serve on the ATS Board). Collectively, they are known as the Officers Committee, delegated by the Board to act on its behalf between Board meetings, though they may not make any decisions affecting the accredited status of a member school (see V.C.3 for list of such decisions). The Officers Committee also includes the secretary of the Board (see VII.D.1), who is elected by the Board from among the Commission staff with voice but no vote on accreditation decisions. Any decision made by the Officers Committee between Board meetings must be reported to the Board at its next meeting.

V.C **Commission Policy on Board Business and Meetings**: The Commission delegates to the Board the authority to conduct its business and organize its meetings in ways that best fulfill its

responsibilities to the Commission and to the constituencies served by member schools.

V.C.1 **Board Procedure on Board Meetings**: The Board meets at least twice annually (typically for two days in early February and for two days in early June) at the ATS Commission office. All Commissioners are expected to attend, as are all Commission staff. Meetings are presided over by the Board chair, or by the vice chair if the chair is absent, recused, or has other duties in the meeting. The Board usually meets in plenary session the first morning and the second day of its semi-annual meetings, with separate work groups (see V.C.2) meeting the first afternoon. The first morning is typically devoted to administrative and other issues. The second day is typically devoted to making accreditation decisions for schools that are on the agenda. After each meeting, the Commissioners evaluate the effectiveness of their work, as well as the effectiveness of the work of Commission staff in supporting the work of the Board.

V.C.2 **Board Procedure on Board Work Groups**: Given the large number of actions that come before the Commission each year, the Board divides into four work groups of four or five Commissioners to distribute the work load. Each work group is assigned by staff in advance and often stays together as a group for two years. During the semi-annual, two-day Board meetings, each work group meets separately to review actions assigned to it (see V.C.1). Those assignments are made at least three weeks in advance by staff, with each action assigned a primary and a secondary reader, so Commissioners have adequate time to review the materials, along with the recommended action and rationale (see V.C.5). Each work group reviews its assigned actions to determine which may be placed on the consent agenda (see V.C.6) and which require full Board discussion. For actions requiring full Board discussion, prior to the vote, the primary reader gives a brief oral summary of the school, the recommended action (including any changes made by the work group), and a rationale (see V.C.5). The secondary reader may agree, disagree, or offer other perspectives after the primary reader's brief presentation.

V.C.3 **Board Procedure on Board Reader Panels***:* In addition to the semi-annual meetings of the full Board, work groups (see V.C.2) also meet via teleconference or videoconference as reader panels. Reader panels are typically scheduled four times over two years, with each of the four work groups usually meeting just once during those two years as a reader panel—typically for no more than ninety minutes. Action items for these reader panel conference calls are limited to (1) reports that do not result in a change in membership status (grant or deny initial accreditation; reaffirm or withdraw accreditation; or impose or remove a warning, probation, or Show Cause)—or reports that do not result in issuing a Letter of Concern (see III.F-J); and (2) petitions that do not request a change in control or legal status or approval of an experiment (see IV.B, IV.C, and IV.G and VI.A.2). Reader panel assignments (including primary and secondary readers) are made by staff and communicated to participants at least three weeks prior to a reader panel meeting (see V.C.5).

V.C.4 **Board Procedure on Special Board Meetings**: If needed, special meetings of the full Board may be called by the secretary on order of the chair, or at the written request of a quorum of Commissioners (see VI.A.2). The agenda for special meetings will be stated at the time the meeting is called. Special meetings may be conducted electronically (per *Commission Bylaws*, 3.6). One example of a special Board meeting would be to review a Board decision to impose a warning or probation (see VIII.A.3).

V.C.5 **Board Procedure on Board Agendas and Materials**: Agendas for all Board meetings are prepared by Commission staff in consultation with the chair. Materials related to agenda items are made available electronically to all Commissioners at least three weeks prior to the meeting via a secured website. Those materials include such documents as schools' accreditation histories, self-study reports, evaluation committee reports, school responses to committee reports, reports required from member schools, petitions for substantive changes, and various administrative items (e.g., minutes of previous meetings, summaries of staff actions, proposed changes to accreditation documents, task force reports, etc.). Any action involving an accreditation decision is accompanied either by a committee report and recommendation or by a staff rationale and recommendation for the Board to consider before making its own decision.

V.C.6 **Board Procedure on Consent Agenda**: Some actions at a Board meeting may be handled through a consent agenda, in which a group of actions are voted on by the Board in one motion. All agenda items are made available to the full Board beforehand (see V.C.5) and none may be placed on the consent agenda until it is reviewed by a work group of the Board (see V.C.2). Actions that may not be placed on a consent agenda include (1) any action related to a comprehensive evaluation visit or to a focused evaluation visit; (2) any petition for a change in control or legal status or for an experiment; (3) any report resulting in a change in membership status (granting or denying initial accreditation; renewing or withdrawing accreditation; imposing or removing a warning, probation, or Show Cause)—or resulting in issuing a Letter of Concern; or (4) any action recommended by an evaluation committee or by staff that is substantively changed by a work group. All other actions may be placed on the consent agenda at the discretion of each work group, though any Commissioner may request that any item placed on the consent agenda be instead discussed and voted on separately by the full Board.

V.C.7 **Board Procedure on Board Budget**: The Board establishes and adopts its own budget, which is based on revenue derived from (75 percent of) the annual membership dues, visit fees (see V.C.8), petition fees (see ATS website and IV.A.1), reimbursements for evaluator travel (see V.C.9), and, as appropriate, grants from foundations. The expenditures budget provides for all direct and indirect expenses for the Commission's work of accreditation as conducted by the Board. The Commission contracts through an annually renewable agreement with the Association to provide its personnel, facilities, and administrative needs.

V.C.8 **Board Procedure on Board-Approved Visit Fees and Expenses**: The Board periodically establishes the fees charged to schools receiving comprehensive or focused evaluation visits. Those fees support the costs of arranging evaluation committees, preparing committee reports and related materials for the Board agenda (see V.C.5), and performing other tasks necessary to support the onsite evaluation of member schools. In addition, the Board also invoices schools for travel costs incurred during accreditation evaluation visits that are reimbursed by the Commission (see V.C.9), which excludes those paid directly by the school (e.g., local lodging and local transportation). Travel costs for evaluation visits are determined by averaging the reimbursable travel expenses of all Board-appointed evaluators and Commission staff for a given semester and invoicing each school visited that semester the average of all those reimbursable travel costs. Board members and all Board-appointed committee members serve without honoraria or remuneration for their volunteer service to the Commission.

V.C.9 **Board Procedure on Board-Approved Reimbursements**: The Board reimburses appropriate out-of-pocket expenses incurred by Board or committee members that are submitted to the office in a timely manner on the appropriate reimbursement form. Air travel is reimbursed at regular air fare (i.e., not business nor first class), with receipts, including any for airport parking or early boarding. For anyone choosing to travel instead by vehicle, reimbursement may not exceed regular air fare. For private vehicles, reimbursement is based on the Board-approved mileage rate (no receipt needed); for rental vehicles, reimbursement is for rental cost plus gas (receipts needed). All reasonable meal expenses (excluding alcoholic beverages) are reimbursed by the Board with appropriate receipts.

VI. Making Board Decisions and Conflicts of Interest

VI.A **Commission Policy on Board Decisions**: Per *Commission Bylaws* (3.1), the Commission delegates to the Board all decisions related to the accreditation of member schools.

VI.A.1 **Board Procedure on Consistent and Fair Decisions**: All accreditation decisions that the Board makes are intended to fulfill the purposes of the Commission (see I.A) in ways that ensure consistent and fair decisions. Consistency and fairness do not require uniformity in all decisions, but they do assume conformity to all published standards, policies, and procedures. The Board determines consistency and fairness in its decision-making through these seven criteria: (1) decisions are based on the Commission's *Standards* and *Policies* and follow the Board's *Procedures*; (2) decisions respect each school's distinctive mission; (3) decisions are intended to help each school achieve its stated educational outcomes in its own context; (4) decisions are made in light of each school's resources, capacity to plan and evaluate, and its ongoing relationship with the Commission; (5) decisions are based on the reliability, relevance, and completeness of the information each school provides; (6) decisions are reviewed in light of relevant prior and current decisions of the Board; and (7) decisions are communicated promptly and clearly with a written rationale (see VII). At the end of each meeting, the Board reviews its accreditation decisions to ensure they meet these criteria.

VI.A.2 **Board Procedure on Majority Vote and Quorum**: Per *Commission Bylaws* (3.7), "the presence of a majority of Commissioners in office and entitled to vote" constitutes a quorum. All accreditation decisions are made by a simple majority vote. Each Commissioner has one vote (per *Commission Bylaws*, 3.8). The Board generally uses the current edition of *Robert's Rules of Order* to conduct its meetings and make its decisions. Board decisions made by reader panels (see V.C.3) are also made by majority vote of participating Commissioners (minus any abstentions or recusals, per VI.A.3), though any decisions on substantive changes must be ratified (electronically) by a majority of the full Board within two weeks (see VI.A.5 for effective dates of Board decisions).

VI.A.3 **Board Procedure on Abstentions and Recusals**: Any Commissioner may abstain from voting on any accreditation decision for any reason. A Commissioner must recuse himself or herself from any accreditation discussion or decision affecting a school with which he or she has been involved in any of these capacities: (1) service as a current or former employee or student of that school, (2) service on an evaluation committee whose recommendations about that school are being considered, or (3) recent service on a committee or commission for another accrediting agency that evaluated that school (typically within the past three years), or (4) any other relationship that could threaten a fair and objective review or evaluation. Recusals require the Commissioner to absent himself or herself from the room during the discussion and the decision. All abstentions and recusals are noted in the minutes (see VII.D.1). A negative vote is noted in the minutes if specifically requested by the Commissioner casting that vote.

VI.A.4 **Board Procedure on Members' Rights to Respond to Recommended Actions Prior to a Board Decision**: Schools that have accreditation actions before the Board that relate to comprehensive or focused evaluation visits are invited at least one month in advance of that meeting to provide a written response to the actions being recommended to the Board for those visits—either agreeing or disagreeing with the recommended actions. If the nature of the disagreement is

substantive, each school also has the right to send one or more representatives to meet briefly with the Board in person prior to a Board decision, though almost all schools choose only to submit a written response. If a school decides to send one or more representatives, it must notify the Board secretary at least two weeks in advance of the meeting of who will be attending. The school is responsible for any expenses incurred by its representative(s). No other accrediting actions allow for schools to send representatives to meet with the Board—only those involving evaluation committee recommendations related to comprehensive and focused evaluation visits. Schools, however, may request a meeting with the Board for other significant reasons, which the Board may accept if it determines a face-to-face meeting would be helpful.

VI.A.5 **Board Procedure on Effective Date of Accreditation Decisions**: Board decisions become effective at the time of the Board vote (see VI.A.2), which includes ratification votes for certain Board reader panel actions—except for Board decisions subject to reviews or appeals. Reviewable or appealable decisions do not become effective until either (1) the date allowed for requesting a review or making an appeal has expired without any action by the school (per VIII.A.1 or VIII.B.1); or (2) the date the school is notified that a review or an appeal it has requested has been resolved (see VIII for which decisions can be reviewed or appealed; see VII.A.4 for how and when the Board communicates decisions that are reviewable or appealable).

VI.A.6 **Board Procedure on Accreditation Decisions Delegated by the Board to Staff**: The Board has delegated a variety of low-risk, low-impact decisions to Commission staff, who work together collaboratively to make those decisions. All decisions made by staff are reported to the Board at the next Board meeting. Staff decisions are limited to certain reports, notifications, and requests. Regarding *reports*, staff may review and accept reports that (1) do not affect membership status (see list in V.C.3), (2) do not deal with difficult or controversial issues, and (3) do not require any further action (e.g., staff cannot require follow-up reports or visits). Regarding *notifications*, staff may review and acknowledge notifications from member schools regarding (1) adding new degrees that do not constitute substantive changes (see IV.D.1), (2) changing the name of an approved degree (see IV.D.1), (3) discontinuing a degree that does not involve closing a complete-degree granting location (see IV.E.3), and (4) changing an institution's name (see IV.C.1). Regarding *requests* (usually from schools for delays), staff may on occasion and for appropriate reasons, delay for one semester the due date for any report (not affecting membership status) or the visit date for any scheduled comprehensive or focused evaluation visit. Any request for a delay in a report or a visit beyond one semester (typically up to a maximum of one year) may be decided only by the Board and requires an official, written request from the school's chief executive officer (see III.B.1). Staff decisions, along with appropriate rationales, are communicated to the school within 60 days of receipt of any report, notification, or request that is within staff purview.

VI.B **Commission Policy on Conflicts of Interest**: Per *Commission Bylaws* (3.17), the Commission authorizes the Board to "adopt and implement policies prohibiting conflicts of interest in decisions regarding the accredited status of schools that are or seek to become Members of the Commission."

VI.B.1 **Board Procedure on Conflicts of Interest**: All members of the Board of Commissioners, as well as Appeals Panel members (see VIII.B.4) and Commission staff, must annually complete a conflict of interest form (per *Commission Bylaws*, 3.16). Every evaluation committee member must also complete a conflict of interest form before participating in any evaluation visit. A potential

conflict of interest includes any of the following relationships with a school being reviewed or evaluated (either for the person listed or for any of their immediate family members): current or former enrollment or denial of enrollment, current or former employment or denial of employment, current application for employment, current or former service on the governing board, current or former consultant or provider of goods or services, recipient of an award or honor, or any other relationship that could threaten a fair and objective review or evaluation (see also *Commission Bylaws*, 3.16). No Commissioner who has a potential conflict of interest shall be involved in an evaluation or accreditation decision, unless a majority of Commissioners who do not have a conflict in relation to the school determines that the potential conflict of interest has no bearing on the evaluation or decision. No Appeals Panel member, Commission staff member, nor evaluation committee member who has a potential conflict of interest shall be involved in an evaluation or accreditation decision.

VII. Communicating Board Decisions

VII.A **Commission Policy on Communicating Board Decisions:** The Commission delegates to the Board the authority to maintain a public membership directory (on the ATS website) to communicate the formal accredited status of each member school. That directory information includes all significant accreditation decisions. The Commission also authorizes the Board to communicate Board decisions to member schools and other appropriate parties at appropriate times, as well as maintain official Commission records. All communications to and from the Board are to be in English

VII.A.1 **Board Procedure on Communicating Board Decisions to Member Schools**: Each decision made by the Board regarding a school's accreditation is communicated officially to that member school in writing within 30 days of the effective date of the decision (see VI.A.5). The Board's communication includes the effective date of the decision and a rationale for the decision. Official Board communications are sent to the school's chief executive officer, chief academic officer, and accreditation liaison officer (if the school has designated a different person for that role).

VII.A.2 **Board Procedure on Communicating Board Decisions to the Public**: Decisions regarding granting or reaffirming accreditation are made public within 30 days of notifying the school of that decision, including reasons for those decisions (see II.B; see also VII.A.4). The Board makes those decisions public by updating the membership directory on the ATS website. Directory information includes each school's accreditation status, a rationale for that status, approved degree programs, any approved additional locations (those offering half or more of a degree), whether the school has comprehensive distance education approval, the year of initial accreditation, the dates of the last and next comprehensive evaluation visits, the dates and subjects of any reports or focused evaluation visits required during the current period of accreditation, and any approved ongoing exceptions or experiments (see IV.G.1). If a member school is on warning, probation, or Show Cause, that status and the reason(s) for it are disclosed, though not until any review or appeal is resolved (see VII.A.4). If a school is denied initial accreditation or has its accreditation withdrawn, that status and the reason(s) for it are disclosed, though not until any appeal is resolved (see VII.A.4). If a school voluntarily withdraws from accreditation, the Board will post that decision also in the public membership directory (for at least six months after the effective date of withdrawal; see also VII.A.4).

VII.A.3 **Board Procedure on Communicating Summary Information to the Public**: Within 30 days of each Board meeting, the Board discloses on the ATS website a summary of key accrediting actions it has taken. Those actions include any changes in membership status, such as public sanctions or adverse actions (see III.G-J), though not until any review or appeal is resolved (see VIII). The summary of those actions also includes approvals of substantive changes (see IV.B-H) or other significant changes (see VI.A.7). In addition, the Board shares key accreditation decisions with appropriate external agencies (e.g., for US schools, the US Department of Education, state agencies, or regional accrediting agencies; see VII.A.5). The Board also publishes a summary of its accreditation actions every year in an annual report and every two years in the program book for the ATS Biennial meeting.

VII.A.4 **Board Procedure on Communicating Reviewable and Appealable Board Decisions to the Public**: While most decisions of the Board are made public within 30 days of notifying the school (per VII.A.2), decisions that are reviewable or appealable (see VIII) are made public either (1) when the time period allowed for requesting a review or making an appeal has ended without any action by the school; or (2) when the Board notifies the school that a decision it requested to be reviewed or appealed has been resolved. The Board will make public the reasons for any decision to impose probation or withdraw accreditation by posting those action letters in the public membership directory for those schools. For decisions involving denial or withdrawal of accreditation, the Board will also make public within 60 days of final notification to the school any official comments that the school may wish to make regarding that decision. In addition, the Board will notify the public no later than 10 business days from the effective date that a member school voluntarily withdraws from the Commission (see also VII.A.2).

VII.A.5 **Board Procedure on Communicating Board Decisions to the US Department of Education and Other Agencies:** The Board provides written notice to the US Department of Education no later than 30 days from the effective date of any accreditation decisions involving a change in membership status or approval of a substantive change (see list in VII.A.2) for any US school. The Board will also notify state authorizing agencies and appropriate accrediting agencies. Regarding decisions that are reviewable or appealable, the Board will notify the Department and other appropriate agencies at the same time that it notifies the school that the reviewable or appealable decision is effective. In addition, the Board will notify the Department of the name of any member school participating in Title IV financial aid programs that the Board believes is failing to meet its Title IV responsibilities or believes is engaged in fraud or abuse. The Board's notification will include the nature of its concern and its reasons for that concern. In addition, the Board will notify the Department, appropriate state authorizing agencies, and appropriate accrediting agencies no later than 10 business days from the effective date that a member school voluntarily withdraws from the Commission. The Board will also provide the Department an electronic list of its members and, if so requested, a summary of the Board's major accreditation activities during the previous year, as well as any information that may bear on a member school's compliance with its Title IV responsibilities.

VII.A.6 **Board Procedure on Member Schools' Communication of Accreditation Status**: A member school must disclose its accreditation status publicly on its website and in appropriate documents such as its catalog. The following language is required: "[Name of school] is accredited by the Commission on Accrediting of The Association of Theological Schools (www.ats.edu) and is approved to offer the following degrees [list all approved degrees]" (see also II.B.4 for schools accredited by virtue of affiliation). If the school has any approved additional locations (offering half or more of a degree), comprehensive distance education approval, experiments, or ongoing exceptions, that information must also be included in the public accreditation status statement (see VII.A.2). If the school has been placed on public sanction or has received an adverse action, that information must be included as well in the school's public statement of accreditation within seven business days of being notified of the effective date of that action (see III.G-J and VI.A.5 and VIII). Commission staff regularly review member schools' websites to ensure that schools disclose accurately the information described. If not, the Board delegates Commission staff to contact schools to make any necessary corrections.

VII.B **Commission Policy on Member Schools' Public Statements of Educational Effectiveness**: A member school must disclose on its website summary information on the educational effectiveness of its degree programs to provide public accountability regarding student achievement. A school's public statement of educational effectiveness provides data on how well it is meeting the goals or outcomes for each of its degree programs, as well as data from more school-wide measures of educational effectiveness.

VII.B.1 **Board Procedure on Member Schools' Public Statements of Educational Effectiveness**: In the interests of public transparency, the Board requires member schools to publish and regularly update a public statement of educational effectiveness. That statement may begin with a school's program goals or outcomes, but it must also provide evidence of how well those are being achieved. That evidence should include evaluation data that are direct and indirect, quantitative and qualitative. For example, a school's public statement of educational effectiveness might include the following information for each degree program: graduation rates, placement rates, time to completion rates, numbers of completers, ratings from student satisfaction surveys and/or exit interviews, alumni/ae ratings, summary data from course evaluation forms, evaluation data from capstone projects and portfolios, and other relevant evaluation data. While voluntary, information from the ATS Graduating Student Questionnaire and Alumni/ae Questionnaire could also be helpful, as well as student and alumni/ae testimonies. Schools are also encouraged to use data from the ATS Strategic Information Report and the ATS Peer Profile Report sent to each member school every spring. The public statement of educational effectiveness should be reviewed and updated regularly, typically annually. Member schools must provide the web address for its public statement each fall on the ATS Annual Report Forms.

VII.C **Commission Policy on Confidentiality of Board Decisions:** The Commission delegates to the Board the responsibility to maintain the confidentiality of certain Board documents and decisions.

VII.C.1 **Board Procedure on Confidentiality of Accreditation Documents:** While the Board publicly discloses all significant accreditation decisions (see VII.A), it does not make public the documents that form the bases for those decisions (such as a school's self-study report, an evaluation committee report, a Board-required report, and the Board's action letter to a member school, including any other official correspondence with that school). Those documents are considered confidential because they include proprietary information from member schools or the private judgements of peer reviewers who are bound by protocols of confidentiality. The Board also records minutes of all its meetings, which are maintained permanently and considered confidential (see VII.D). The same is true for any meetings of the Appeals Panel. Specific exceptions to this policy on the confidentiality of accreditation documents are provided in VII.C.2.

VII.C.2 **Board Procedure on Exceptions to Confidentiality of Accreditation Documents:** Exceptions to the confidentiality policy (see VII.C.1) include the following situations: (1) the Board will share a member school's self-study report with other ATS members or qualified researchers with that school's written permission; (2) the Board will share official decisions from a comprehensive or focused evaluation visit with the chair of that visit; (3) the secretary of the Board will provide to a member school with a review or an appeal the section of the minutes from the meeting

dealing with that review or appeal if the school requests it; and (4) the Board will release accreditation documents to appropriate regulatory agencies as required by federal, state, or provincial regulations or law. In addition, the Board publishes in the public membership directory action letters involving probation or an adverse action, after any review or appeal is resolved (see VIII).

VII.D **Commission Policy on Board Documents**: The Commission delegates to the Board the responsibility to maintain official records of all accreditation-related meetings, decisions, and correspondence.

VII.D.1 **Board Procedure on Recording Board Minutes**: All accreditation decisions, as well as other official actions taken by the Board, are recorded by the Board secretary (see V.B.3). An initial draft of the minutes for each Board meeting is prepared by the secretary and emailed to members of the Board for any comment and correction. A corrected draft is included in the agenda for the following Board meeting, which must then be reviewed and approved by the Board. All minutes are stored permanently in a secure location at the Commission office and offsite. Board minutes contain confidential information and are, therefore, available only to members of the Board and to Commission staff (see VII.C.2 for exceptions).

VII.D.2 **Board Procedure on Other Accreditation Records**: The Board maintains permanent and secure records of all official accreditation correspondence with member schools, except that it maintains only the two most recent self-study reports from member schools. All official Board agendas and decisions are recorded and maintained permanently in a secure location (see VII.D.1), as are any member school responses to those decisions (e.g., complaints or requests for reviews or appeals; see VIII and IX). These Board records are confidential and available only to members of the Board and to Commission staff (see VII.C.2 for exceptions). A summary of each school's accreditation history (with all accreditation decisions made by the Board for that school, as well as those made by staff, per VI.A.6) is available to each member school on request. The procedures in this section are consistent with the Board's Records Retention and Disposal Policy (a copy of which is available in the Commission office).

VIII. Reviewing and Appealing Board Decisions

VIII.A **Commission Policy on Reviewing Board Decisions**: The Commission allows member schools to request the Board to review an action involving the imposition of warning or probation. No other actions of the Board are subject to review, though schools may appeal the denial or withdrawal of accreditation. A review involves a formal request from the school for the Board to review its decision to impose a warning or probation. The school must state its reasons for requesting a review and provide appropriate documentation supporting that request.

VIII.A.1 **Board Procedure on Initial Request for a Review**: A review involves a formal request from the school to the Board for it to review its decision to impose warning or probation. The school must state its reasons for requesting a review and provide documentation supporting that request (see VIII.A.2). The school has two weeks from the time it was notified of the Board's imposing a warning or probation to submit an official request for a review (signed by the school's chief executive officer or designee) and two more weeks to submit specific documentation supporting its request.

VIII.A.2 **Board Procedure for Reasons for Requesting a Board Review**: In making a request for a formal review, the school must cite one or more of the following reasons why it believes the Board's action may not be appropriate: (1) the Board misinterpreted or misunderstood the applicable *Commission Standards*; (2) the Board missed or misunderstood evidence the school previously provided to verify that it met the standard(s) in question; (3) the Board failed to follow Commission-approved policies or Board-approved procedures; or (4) the Board had a conflict of interest that was not known or stated prior to taking the action. The documentation in support of the reason(s) cited must be specific and germane to the reason(s) cited for the review. No new evidence is permitted, except new financial information—and only if the action was taken for financial reasons and only if the school has new financial information bearing on that action.

VIII.A.3 **Board Procedure on Resolving Reviews**: Within 60 days of receiving the review request and documentation, the Board will meet via teleconference or videoconference to review its earlier action in light of the school's reason(s) for the review and the supporting documentation. The school making the request for a review is invited to participate in part of that meeting, but no legal counsel may be present. At the end of that meeting the Board will decide either to uphold or to rescind its original action to impose a warning or probation, with or without any additional actions (e.g., requiring a follow-up report). Within 30 days of that meeting, the Board will communicate its decision (which is final) and its reason(s) to the school. No action subject to review will become final (or public) until the review is resolved (see VII.A.4).

VIII.B **Commission Policy on Appealing Board Decisions**: The Commission allows member schools to appeal any Board decision to deny or withdraw accreditation. No other actions of the Board are subject to an appeal, though schools may request a Board review of any decision to impose a warning or probation. An appeal involves a formal request from the school to the Board to convene the Appeals Panel. The school must state its reasons for the appeal and provide appropriate documentation supporting its request. The Appeals Panel has the authority to affirm, amend, or remand to the Board the original Board decision.

VIII.B.1 **Board Procedure on Initial Request for an Appeal**: An appeal involves a formal request from the school to the Board to convene the Appeals Panel (see VIII.B.3-4) to reconsider the Board's decision to deny or withdraw accreditation. The school must state its reasons for making an appeal and provide documentation supporting that appeal (see VIII.B.2). The school has two weeks from the time it was notified of the action to submit an official letter of appeal (signed by the school's chief executive officer or designee) and two more weeks to submit specific documentation supporting its appeal.

VIII.B.2 **Board Procedure on Reasons for Making an Appeal**: In making an appeal, the school must cite one or more of the following reasons why it believes the Board's action was not appropriate: (1) the Board misinterpreted or misunderstood the applicable *Commission Standards*; (2) the Board missed or misunderstood evidence the school previously provided to verify that it met the standard(s) in question; (3) the Board failed to follow Commission-approved policies or Board-approved procedures; or (4) the Board had a conflict of interest that was not known or stated prior to taking the action. The documentation in support of the reason(s) cited must be specific and germane to the reason(s) cited for the appeal. No new evidence is permitted, except new financial information—and only if the action was taken for financial reasons and only if the school has new financial information bearing on that action.

VIII.B.3 **Board Procedure on Resolving an Appeal**: All appeals are handled by a membership-elected Appeals Panel (see VIII.B.4) that may not include any current members of the Board of Commissioners. Within 60 days of receiving the appeal and supporting documentation, an Appeals Panel will meet via teleconference or videoconference to evaluate the Board's action in light of the school's reasons and supporting documentation. The school making the appeal is invited to participate in part of that meeting and has the right to have legal counsel present (at the school's cost), as does the Appeals Panel (at the Commission's cost). At the end of that meeting, the Appeals Panel will either affirm the Board's original action, amend the Board's original action, or remand the action back to the Board with an explanation of why it amended or remanded the original action and with specific instructions for the Board regarding its decision to amend or remand. If the Board's original action is affirmed, the Board Secretary will communicate the Appeals Panel's decision (which is final) and its reason(s) to the school and to the Board—within 30 days of that meeting. If the Board's original action is amended or remanded to the Board, the Board will act on that at its next meeting and notify the school and the Appeals Panel within 30 days of that decision. No action subject to appeal will become final (or public) until the appeals process is resolved (see VII.A.4).

VIII.B.4 **Board Procedure on Appeals Panel Composition**: The composition of the Appeals Panel, described in the *Commission Bylaws* (5.8), includes five persons, with at least one faculty member, one administrator, one ministry practitioner, and one public member. Appeals Panel members are subject to the same conflict of interest procedures and policies as apply to members of the Board and, on election, will sign the statement on conflict of interest (see VI.B.1). Public members of the Appeals Panel must also sign a form verifying that they meet the qualifications for public members (see V.B.1). Vacancies occurring on the Appeals Panel by death, resignation, refusal or inability to serve, or otherwise between Biennial Meetings shall be filled by majority vote of the Board. Each Appeals Panel member so appointed shall serve until the next Biennial Meeting and until the member's successor is elected and qualified or until such member's death, resignation, or removal. The removal of any Appeals Panel member shall be by the Board on the recommendation of a majority of the Appeals Panel members subject to the

same causes as articulated in the *Commission Bylaws* (3.14).

VIII.B.5 **Board Procedure on Appeals Panel Training and Decisions**: Appeals Panel members receive training in the content and interpretation of the Commission's *Standards* and *Policies* and the Board's *Procedures* (including the review and evaluation of distance education), as well as any concerns related to the specific issues of an appeal. The Appeals Panel shall elect from among its members a chair, vice chair, and secretary. The chair shall call meetings by providing notice of the date and time. The chair is responsible for determining the agenda for meetings of the Appeals Panel, convening the Appeals Panel, and chairing its meetings, which are typically held via videoconference. The vice chair convenes and chairs meetings of the Appeals Panel at the request of the chair. The Board secretary records the actions of the Appeals Panel and communicates the actions to the Board and to the school within 30 days of the Appeals Panel action (see VII.A.4).

IX. Complaints against the Board, Staff, or Member Schools

IX.A **Commission Policy on Complaints against the Board or Staff:** The Commission requires the Board to evaluate complaints regarding the Board itself or the Commission staff.

IX.A.1 **Board Procedure on Complaints against the Board or Staff**: The Board will review, at its first meeting following receipt, confirmed formal complaints regarding its own conduct in the context of the *Policies and Procedures* to determine if it has failed to function within the parameters established by those policies or procedures. If the Board determines that its action does not conform to those policies and procedures, it will correct its practice and review any decision related to the complaint. Confirmed formal complaints regarding Commission staff will be reviewed by the executive director and, at the request of the executive director, by the Board. The review will occur in the context of the *Policies and Procedures*.

IX.B **Commission Policy on Complaints against Member Schools:** The Commission requires the Board, which may act as a whole or through a designated committee, to consider responsibly complaints that may be made against any accredited member school. The complaint must be filed in writing, together with substantial documentation, as appropriate for the circumstance. The Board will determine if the complaint has standing with reference to any membership criterion or to any *Commission Standards* or *Policies*. If the complaint has standing, the Board will investigate and communicate its conclusions and actions in a timely manner to the school and to the party raising the complaint. The Board has no responsibility to adjudicate individual grievances.

IX.B.1 **Board Procedure on Addressable Complaints against a Member School**: The Commission's complaint policy (see IX.B) addresses only those situations where a complainant clearly describes and sufficiently documents perceived nonconformity by a member school with the Commission's *Standards* or *Policies* and/or with the membership criteria. Complaints that meet these criteria are understood to have standing in the complaint process. The *Commission Standards* require that schools have clearly defined processes for addressing faculty, employee, and student grievances. Potential complainants are, therefore, expected to exhaust a member school's own complaint or grievance policies before submitting a complaint to the Board. Complaints must be filed within a year after any applicable complaint or grievance procedure at the member school has been completed. Decisions of the Board related to complaints are not subject to review or appeal.

IX.B.2 **Board Procedure on Non-Addressable Complaints against a Member School**: The Board does not consider complaints that deal with individual grievances not related to the Commission's *Standards* or *Policies* or to the membership criteria. The Board does not arbitrate with a school on behalf of a complainant, nor is the Board authorized to seek compensation, damages, readmission, reemployment, or other forms of redress on behalf of a complainant. The Board's evaluation of complaints is limited to decisions regarding a school's accredited status. The Board does not consider anonymous complaints, but may, in exceptional circumstances, maintain the identity of the complainant in confidence.

IX.B.3 **Board Procedure on Initial Determination Regarding Complaints against a Member School**: Upon receipt of a complaint submitted on the ATS Commission formal complaintform (available

from the Director of Commission Information Services at accrediting@ats.edu or 412-788-6505), the complaint will be reviewed to determine if sufficient documentation exists for the complaint process to proceed and a determination regarding standing to be made. The complainant will receive confirmation of receipt of the complaint within 15 business days and, at that time, any additional information required to process the complaint will be identified and communicated to the complainant. After the receipt of all necessary information, one of two determinations will be made: (1) the complaint does not fall under the purview of the Commission's complaint policy and will not be pursued further; or (2) the complaint may or does fall within the purview of the Commission complaint policy and will be referred for further review to the Board. The complainant will be notified of which determination was made within 15 business days of making the determination.

IX.B.4 **Board Procedure on Initial Decision by Board Regarding Complaints against a Member School**: If a complaint is referred to the Board, one of the following decisions will be made within 30 business days: (1) determine that the complaint does not have standing (see IX.B.2) and take no further action, thereby closing the matter for further review; the complainant will be notified of that decision with an appropriate explanation within 15 business days of the action; or (2) determine that the complaint has standing (see IX.B.1), notify the member school of the complaint with appropriate description, and require the school to respond within 30 business days.

IX.B.5 **Board Procedure on Next Steps by Board Regarding Complaints against a Member School**: If the school has been asked to respond (per IX.B.4), a copy of the school's response will be provided to the complainant and to the Board. If the Board determines (within 30 business days) that additional information from the complainant and/or the school is needed before a final decision can be made, then the Board will notify the appropriate party of the additional information required to process the complaint. The complainant and/or the school will have 30 business days to respond prior to the Board's final decision (see IX.B.6).

IX.B.6 **Board Procedure on Final Decision by Board Regarding Complaints against a Member School**: Once the Board has the information needed, it will make one of the following three final decisions: (1) determine that the school's response satisfactorily addresses the issue(s) raised in the complaint and take no further action, thus closing the matter; (2) determine that sufficient reason exists to warrant further review by requiring an additional written report from the school and/or authorizing a focused visit to the school, in which case the visiting committee will prepare a report for consideration by the Board at the meeting immediately following the visit; or (3) determine that other action(s) should be taken (see options in III).

IX.B.7 **Board Procedure on Timeliness and Fairness of Board Decisions Regarding Complaints against a Member School**: After reaching a final decision (as described in IX.B.6), the Board will typically notify the complainant and the school within 15 business days of the action. The Board will process complaints in a timely manner, and in no case will its final decision (see IX.B.6) be made later than the second Board meeting following receipt of a complaint determined to have standing (see IX.B.3). The *Commission Standards* require schools to treat individuals in fair and ethical ways, and this includes the treatment of complainants. Commission staff will maintain a record of complaints, ensuring that all complaints received are addressed according to these Board-approved procedures.

X. Sharing Commission Data Collected from Member Schools

X.A. **Commission Policy on Collecting and Sharing Commission Data:** The primary purpose of the Commission is "to contribute to the enhancement and improvement of theological education through the accreditation of schools that are members…" (*Commission Bylaws*, Section 1.2). A secondary purpose is "to collect data from all members… for use in accrediting and to provide the data resources supporting applied research undertaken by ATS" (ibid.). On behalf of the Commission, the Board maintains a comprehensive institutional database on graduate theological schools in North America that are members. These data are provided by member schools on the ATS Annual Report Forms as a condition of membership. The database contains information related to a range of educational and accrediting issues and provides data central to the administrative and programmatic work of the Association. It also serves as a valuable resource for researchers and organizations that share an interest in theological education, for church and denominational bodies, for representatives of the media, and for the public. The Board shares all Commission data in the institutional database with the Association for its use. It shares with others per specific Board procedures.

X.A.1 **Board Procedure on Principles and Purposes for Sharing Commission Data**: On behalf of the Commission, the Board collects, protects, and shares data based on the principles and purposes described here. A key principle is protecting the confidentiality of sensitive data (e.g., salaries of ATS member school employees and non-public data collected by the Commission (see X.A.2). The Board delegates ATS staff to provide data to member schools and to others for these purposes: (a) to improve theological education; (b) to promote appropriate openness and transparency, (c) to cultivate more substantive and diverse conversations among member schools, their constituencies, researchers, and the broader public; and (d) to address key issues in theological education. All requests for sharing Commission data must be for one of these purposes.

X.A.2 **Board Procedure on Sharing Commission Data Publicly**: The Board considers the following information in the Commission database to be public: (a) data published in the ATS Annual Data Tables on the ATS website, and (b) data published in the ATS membership directory on the ATS website. The only public data in the ATS Annual Data Tables that are identified by individual schools are found in Annual Data Table 1.2 "Significant Institutional Characteristics of Each Member School" and in Annual Data Table 2.15 "Head Count and Full-Time Equivalent Enrollments by Degree Category in All Member Schools." Public data in the ATS membership directory that are identified by individual schools include personal contact information, selected statistics, and accreditation status (see VII.A.2).

X.A.3 **Board Procedure on Sharing Commission Data in Other Ways**: The Board delegates ATS staff to provide data on requests from member schools or from other parties, contingent on adequate ATS financial and human resources. The Board-approved *Principles and Procedures for Sharing Commission Data* on the Research and Data webpage on the ATS website has a list of what data are shared with what constituencies, under what conditions, and at what cost, if any.