

Policy Manual

of the
Board of Commissioners

The procedures adopted by the Commission on Accrediting (“Commission”) state: “In the context of its duties to make decisions regarding accreditation, the Board of Commissioners (“Board”) is responsible for adopting and overseeing policies and procedures that ensure thorough and fair evaluation of schools and for consistently applying the Commission’s procedures and accrediting standards” (*Bulletin*, part 1, Procedures Related to Accreditation and Membership, VIII.A.3).

The *Policy Manual of the Board of Commissioners* (“*Policy Manual*”) contains all the policies adopted by the Board. The policies address matters of Board procedure and interpretation; they also contain the formally adopted guidelines the Board has prepared for schools to use in petitioning the Board for approval of a variety of institutional initiatives.

The *Policy Manual* is published by the Board and is available on the ATS website at www.ats.edu.

1. Authority and duties

- 1.1 The authority of the Board is derived from the Commission Bylaws (Article III, Section 3.1), and its duties are prescribed in the Bylaws and in the Procedures adopted by the Commission (Bulletin, part 1, Procedures, VIII).
- 1.2 Duties
 - 1.2.1 Exercise responsibility for all decisions related to the accreditation status of members.
 - 1.2.1.1 Maintain a list of accredited theological schools under standards and procedures determined by the Commission.
 - 1.2.1.2 Investigate, review, and grant candidacy for accredited member status to applicant members of The Association of Theological Schools in the United States and Canada (“ATS”).
 - 1.2.1.3 Investigate, review, and grant initial accreditation to candidate institutions.
 - 1.2.1.4 Evaluate new degree programs for inclusion in institutional accreditation.
 - 1.2.1.5 Provide for the periodic evaluation of institutions for reaffirmation of accreditation not less frequently than each ten years.
 - 1.2.1.6 Prepare self-study guides, report forms, and other documentation that will assist the schools in meeting their responsibilities in relation to accreditation.
 - 1.2.1.7 Respond to complaints brought against members or the Commission.
 - 1.2.2 Review and evaluate the accrediting standards and procedures in a regular and continuous manner and bring recommendations for appropriate changes for consideration for adoption by the members.
 - 1.2.3 Adopt and oversee policies and procedures that ensure thorough and fair evaluation of schools.
 - 1.2.4 Make such information public about accreditation status as serves the public interest and meets the requirements of governmental and nongovernmental entities that recognize the Commission on Accrediting of ATS.
 - 1.2.5 Propose to the members amendments to the Bylaws and the Articles of Incorporation of the Commission, subject to the approval of ATS as provided in Article IX, Section 9.1, and Article XI, Section 11.1.
 - 1.2.6 Appoint task forces and accreditation committees deemed necessary for fulfilling its responsibilities.
 - 1.2.7 Designate one commissioner to serve as the Commission representative to ATS.

- 1.2.8 Adopt and oversee the Commission's budget.
 - 1.2.8.1 Establish fees to be assessed in the conduct of accreditation activities.
 - 1.2.8.2 Recommend changes to the dues structure.
- 1.2.9 Evaluate the personnel and administrative and other services secured by contract.
- 1.2.10 Establish the employment policies of the Commission.
- 1.2.11 Oversee the Corporation's assets and approve the auditors employed by the Corporation.
- 1.2.12 Monitor changes in accreditation and patterns of higher education quality improvement in the United States and Canada, including consultations with appropriate governmental and nongovernmental entities.

2. Composition

- 2.1 The Board shall consist of not fewer than twelve nor more than sixteen persons, of whom not fewer than three nor more than four shall be public representatives. At least two of the members shall be practitioners, and two from accredited institutions shall carry significant teaching responsibilities in their institutions.
- 2.2 Terms of service: Members from accredited institutions for six years, ineligible for immediate reelection. Public members for two years, eligible for reelection.
- 2.3 Eligibility: The members in each six-year class must be from accredited schools; a public member may not be a person who is (a) enrolled as a student in or who is an employee or member of the governing board of or a consultant to an institution that is either accredited or a candidate for accreditation by the Commission or has applied for accreditation or candidate status; or (b) a member of any association or membership organization affiliated with the Commission; or (c) a spouse, parent, child, or sibling of an individual identified in (a) or (b). No member may simultaneously serve on the Board of Commissioners and on the Board of Directors of ATS (excepting the Commission representative to ATS).
- 2.4 Chair, vice chair, and Commission representative to ATS (normally the third member of the Officers Committee): Elected by the Board from its membership. Secretary: Elected by the Board from among the director staff members who support the work of the Commission.

3. Powers

- 3.1 Powers defined
 - 3.1.1 May initiate and carry through all steps leading to a decision on accredited membership or candidate for accredited membership and to decisions regarding individual degree programs. (See *Bulletin, part 1*).

3.1.2 May require reports or visits as necessary to implement the standards or to determine the conformity of schools to the standards, as prescribed by the procedures of the Commission.

3.2 Powers limited

3.2.1 No act of the Board shall be held to control the policy or line of action of any institution belonging to the Commission. Member schools have the right to be creative and diverse in determining how best to organize themselves and use their resources in conformity with Commission standards and procedures.

3.2.2 The Board shall take no action initiating procedures to examine an institution for candidacy for accredited status or initial accreditation except at the specific request of the chief administrative officer of the institution.

3.2.3 The Board shall act only on those matters assigned to it by the Commission and within the guidelines established by the procedures of the Commission and the *Policy Manual* of the Board.

3.2.4 No officer of the Commission or its director or administrative staff, consultant, or any other Commission representative, including evaluation team members, shall be interested, directly or indirectly, in any contract relating to operations conducted by the Commission, unless authorized by the concurring vote or written approval of a majority of the Commissioners who do not have a conflict in relation to the relevant transaction or arrangement.

4. Meetings

4.1 The Board normally meets twice each year, in February and June.

4.2 The Board will normally meet during the working hours of three days or as may be required.

4.3 Normally, the Board meets at the offices of the Commission.

4.4 If needed, special meetings shall be called by the secretary upon order of the chair or at the written request of a quorum of the commissioners. The agenda items for a special meeting shall be stated at the time the meeting is called. The Officers Committee may authorize a vote by mail.

4.5 Commissioners are expected to attend all meetings.

4.6 The elected chair presides at all meetings; the elected vice chair presides if the chair is absent, or when the chair has other duties in the meeting, or when the chair has recused himself/herself.

4.7 Agenda for meetings are prepared by staff in consultation with the chair. An agenda book containing all materials is normally mailed to Commissioners at least two weeks before each meeting.

- 4.8 Reports submitted to the Board by evaluation committees shall be reviewed by Commission staff for clarification and by the chief administrative officer of the institution for factual corrections according to established procedures.
- 4.9 Each meeting of the Board will include plenary sessions at which the full Board takes action, working sessions during which subcommittees consider reports and recommend actions, and an executive session. To effectively conduct its business, the Board of Commissioners may use a consent agenda. The following actions may not be placed on a consent agenda: the granting of candidate for accredited status, granting of initial accreditation, granting of accreditation, denial of accreditation, withdrawal of accreditation, imposing or removing probation or notation(s), and show cause related to probation or notation(s). The consent agenda permits any Commissioner to have an action item removed for deliberation and action in a plenary session.
- 4.10 The Board may authorize subcommittees meeting at other times to consider and act upon reports and petitions from member schools that do not affect the school's accredited status.
- 4.11 Representatives from institutions that have agenda items before the Board may address the Board or its subcommittees. Representatives from schools with pending decisions regarding the overall accredited status of the institution will typically address the full Board. Representatives from schools with pending decisions regarding degree programs, extension programs, or similar issues will typically address the appropriate Board subcommittee.
- 4.12 Minutes of meetings are prepared by staff in draft form, sent to the Commissioners for correction, and revised for consideration for adoption at the succeeding Board meeting.
- 4.13 When any matter directly affecting an individual commissioner or school with which the Commissioner currently serves or has previously served will arise for discussion, that Commissioner will absent himself/herself from the room until the discussion is concluded and action taken. The minutes shall indicate such absence. Commissioners who have served on evaluation committees to institutions will abstain from voting on actions regarding those institutions arising from the visit.
- 4.14 The Board will take time toward the end of each meeting to review its actions to assure both the internal consistency of actions in the application of standards and the reliability of standards and procedures. Once in each biennium, the Board will monitor the quality of its work by devoting time to a comprehensive review of its policies, procedures, and practices. The opening plenary session of the January meeting will include, during the review of protocols and meeting procedures, a presentation of significant issues arising, relative to the standards and procedures, during the past year.
- 4.15 All actions of the Board must be communicated to the schools affected by the actions within thirty days of the date of the action. Schools have thirty days from receipt of the communication of Board action to appeal decisions regarding failure to approve new degrees, extension sites, or distance education programs; the imposition of a notation; the imposition of probation; or an adverse action. Such

actions become final after the deadline for appeals. All other actions are final upon initial Board action.

- 4.16 The chair and vice chair of the Board, together with a third commissioner (normally the Commission representative to ATS), constitute the Officers Committee of the Board and are authorized to make necessary decisions, not affecting the accredited status of institutions, between Board meetings. All such actions must be reported to the Board at its next meeting.

5. Accreditation evaluation visits

- 5.1 The Board, through its staff, oversees the conduct of all accreditation evaluation visits to Commission-related schools.
- 5.2 Commissioners will normally be invited to participate in or chair at least one accreditation evaluation visit each year of their term of service. In preparation for this service on accreditation evaluation committees and in support of their responsibilities as members of the Board, it is the policy of the Board that new members will receive training in the bylaws, standards of accreditation, policies, and procedures in advance of their first meeting of the Board as well as receiving specialized training when serving as a chair and the regular training that occurs for visitors.
- 5.3 When a member school petitions for a program change that requires a site evaluation, the Board requires that the evaluation be conducted within one calendar year of its authorization. Every effort will be made to schedule the evaluation visit in the semester following the Board's authorization, if possible.
- 5.4 Members of Commission accreditation visiting committees will be appointed according to the following guidelines:
 - 5.4.1 Director staff of the Commission will be responsible for the enlistment and independent appointment of qualified evaluators for committees, the maintenance of a roster of active evaluators, overseeing an evaluation process of personnel to ensure that persons who remain on the active evaluator roster function effectively, and reporting regularly to the Board on the roster of active evaluators.
 - 5.4.2 Normally, an evaluation committee will consist of three to five members and include theological school administrators, faculty members, and ministry practitioners. The Board expects individuals who serve on evaluation committees to reflect the following characteristics: expertise in aspects of theological education and higher education, capacity to evaluate an institution on the basis of the Commission standards of accreditation, openness to the range of confessional and religious traditions represented by the schools in the Commission, and capacity to work effectively as a member of an evaluation team. Individuals appointed as evaluation committee members should reflect the diversity of race, ethnicity, gender, nationality, and ecclesial communities present in member schools. Evaluation committees conducting visits to institutions offering distance education programs shall include members who have experience and expertise in distance education. Evaluators will generally be appointed from among member

schools. Persons not employed by member schools, however, who have particular expertise and experience that could prove valuable for member schools and the Board will be eligible to serve on evaluation committees in order that each evaluation committee will include as a member a person who is active in some aspect of ministry. In preparation for this service on accreditation evaluation committees, it is the policy of the Board that new evaluators will receive training in the bylaws, standards of accreditation, policies, and procedures in advance of their first evaluation visit.

- 5.4.3 Institutions receiving evaluation committees have the right to object to individuals nominated to serve on committees for the following reasons: (1) the individual has attended the institution as a student; (2) the individual has previously been employed by the institution; (3) some clear evidence exists that a conflict of interest may threaten balanced and objective judgments.
- 5.5 Whenever possible, Commission director staff should be present during at least part of accreditation evaluation visits to interpret standards on behalf of the Board, provide guidance and counsel to committees, and provide background information about the evaluation to the Board as requested.
- 5.6 Normally, the Board authorizes accreditation evaluation committees, either for a special evaluation or for a comprehensive evaluation at the end of an approved period of accreditation. In cases of special institutional need, Commission staff, in consultation with the Commission's Officers Committee, may authorize a focused evaluation.
- 5.7 All comprehensive evaluation committee reports should include an assessment of the school's performance with respect to the educational achievement of students. Reports shall be written in gender neutral language.
- 5.8 While the Board may call for a focused evaluation in response to any notification of substantive change, it must require a focused evaluation within six months of the change in the case of a change in ownership that results in a change of control. The Board will review the ownership change to determine the identity of the new ownership or control and assure itself that the school's educational quality is sustained.
- 5.9 The Board may authorize a comprehensive review of a member institution when changes in institutional purpose, educational programs, or financial capacity are associated with a change of ownership.
- 5.10 The effective date of Board action regarding substantive change is the date of the Board's action, except that action on a substantive change in ownership may be effective retroactively for as much as thirty days.
- 5.11 The Board, for purposes of granting initial approval of extension sites and branch campuses, will require an evaluation of any site at which as much as 50 percent of the course work for a Board-approved degree is to be offered. This visit will occur within six months of the site beginning to offer as much as 50 percent of the course work necessary for a degree. An evaluation visit is not required, but may be authorized, when a member school seeks approval to offer 50 percent

or more of an additional approved degree at a site already approved to offer 50 percent or more of an approved degree at the same level as the additional degree. The Board does not grant preapproval for extension sites or branch campuses. Upon consideration of a petition to establish an extension site or branch campus to offer as much as 50 percent of a Board-approved degree, the Board may authorize the school to begin operation of the extension site or branch campus and prepare for the required site visit. Final approval of the site will be based upon the report and recommendations of the evaluation committee. Extension sites offering ongoing courses will be excused from an initial site visit if all the following conditions pertain:

- a. The site is offering four or fewer courses during a calendar year.
- b. The institution can demonstrate that the extension site conforms to Commission standards and procedures.

Instructional sites within three miles of an institution's main campus are considered to be part of the main campus. The Board will monitor the growth of extension sites and branch campuses by individual member schools to ensure the maintenance of educational quality.

- 5.12 The Board, for purposes of reaffirming institutional accreditation, will require an evaluation of all extension sites or branch campuses offering as much as 50 percent of the course work of a Board-approved degree. The Board may authorize an exemption to this requirement if the institution meets the following criteria:
- a. Has requested an exemption nine months or more prior to the scheduled evaluation date
 - b. Has been accredited for at least ten years
 - c. Has operated at least three approved extensions sites or branch campuses offering as much as 50 percent of an approved degree for the prior ten years
 - d. Has operated the prior five years without the imposition of a notation or probation

If an exemption is authorized, a representative sample of extension sites or branch campuses will be evaluated. Commission director staff will select the representative sample in consultation with the institution. The representative sample will include at least 25 percent and not fewer than two of the approved extension sites or branch campuses.

- 5.13 As part of preparation for a Board evaluation committee, a school must advertise to its constituencies that it is receiving a Commission committee and invite comment in writing concerning the institution's qualifications for accreditation. These comments will be available to the evaluation committee. A Commission evaluation may also include an open hearing scheduled during the course of the visit.
- 5.14 The Board requests evaluation committees to assess the self-study report in terms of its thoroughness, as well as its reflection of the institution's capacity critically to evaluate itself, to make prudent recommendations based on its self-evaluation, and to address the standards by which the Board makes its accreditation decisions. This evaluation of the self-study report should be included in the introduction of each evaluation committee's report.

- 5.15 In order to provide appropriate historical background to its work, the Board requires the retention and preservation of materials related to the last full accreditation or preaccreditation reviews of each institution, including on-site evaluation team reports, the institution's responses to on-site reports, periodic review reports, any reports of special reviews conducted between regular reviews, a copy of the institution's most recent self-study, and a copy of all preaccreditation and accreditation decisions, including all adverse actions. In addition, this records management policy requires a record of all formal interactions regarding the accreditation and preaccreditation of any institution or program, including all correspondence (written, telephone, and email) that is significantly related.
- 5.16 The Board will evaluate any teach-out plan or agreement to ensure that it provides affected students the ability to complete their studies without moving or traveling a substantial distance and at reasonable cost. Students should be able to complete their studies in a program of acceptable quality and with reasonably similar content, structure, and scheduling. The teach-out plan or agreement should provide for timely notification to students of the terms of the teach-out plan or agreement and information about any additional charges or costs. The Board may require a member institution to enter into a teach-out agreement with another institution accredited by a recognized agency as part of the institution's teach-out plan. If the teach-out plan or agreement involves another institution accredited by a recognized agency, the Board will within thirty days notify the other accrediting agency of its action.
- 5.17 If a member institution required by federal regulations to submit a teach-out plan fails to submit an acceptable teach-out plan or agreement, the Board will impose probation. If a member institution closes without a teach-out plan or agreement, the Board will work with the US Department of Education and the appropriate provincial or state agencies, to the extent feasible, to assist students in finding reasonable opportunities to complete their education without additional charge.
- 5.18 Commission staff will monitor accredited schools to ensure continued conformity with Commission accrediting standards. This monitoring will include indicators of financial strength, enrollment trends, establishment of extension sites, changes in distance education offerings, degree completions, and placement of graduates. As part of its monitoring, Commission staff will review enrollment in approved distance education programs and notify the Board when a member school experiences a head count enrollment increase in distance education of more than 25 percent. The Board may request additional monitoring information or authorize a required report or a focused evaluation visit if it determines a review of educational quality is warranted.
- 5.19 The Board is responsible for implementing the Commission procedures as published, including all adverse actions of the Board.
- 5.20 Normally, the Board will impose a notation or probation or take an adverse action only after a member institution has an opportunity to provide additional information. Evaluation of reports and focused evaluation committee recommendations provided to the institution shall be understood as providing such opportunities.

- 5.21 Before the Board takes a final adverse action decision or an appeals panel takes a final action to sustain an adverse decision on appeal, any new financial information available at the time the decision is made should be reviewed, if all of the following conditions are met:
- a. The financial information was unavailable to the institution until after the decision subject to appeal was made.
 - b. The financial information is significant and bears materially on the financial deficiencies identified by the Board.
 - c. The only remaining deficiency cited by the Board in support of a final adverse action decision is the institution's failure to meet the standard pertaining to financial resources.

6. Reimbursement for expenses

- 6.1 Out-of-pocket expenses for meetings of the Board, subcommittees, task forces, or accreditation evaluation visits are paid by the Commission. No honoraria are paid for service in such groups.
- 6.2 Travel is paid at air coach rate, unless it is impossible to secure other than first class.
- 6.3 If an automobile is used for travel, reimbursement will be on the basis of coach air fare or the current mileage rate of the Board, whichever is lower.
- 6.4 Hotel expenses will be reimbursed for accommodations in the area of the meeting.
- 6.5 All reasonable meal expenses will be reimbursed; alcoholic beverages should not be charged to the Board.
- 6.6 Child care expenses are reimbursable.

7. General responsibilities for the standards

- 7.1 The Board is responsible for the ongoing review of the accrediting standards and the recommendation of changes of the standards to the membership of the Commission.
- 7.2 The Board will maintain a formally adopted plan for the ongoing evaluation of the standards, with reference to their validity in content and use and their reliability as a means of determining institutional viability and educational effectiveness. This plan ensures that, in addition to the general and comprehensive review of the standards flowing from the survey that every school undergoing a comprehensive evaluation receives, each standard is formally and specifically evaluated not less frequently than every five years.
- 7.3 The Board should review the validity of the standards by addressing questions such as: Are the standards sufficiently comprehensive as to provide principles by which the institutional integrity and educational effectiveness can be assessed? Are the standards sufficiently current that they reflect changing trends, needs, and practices in theological education? Do the standards address reasonably and comprehensively those practices of theological education that most influence its effectiveness?

- 7.4 The Board should review the reliability of the standards by addressing questions such as the following: Are the standards appropriate across the range of Commission member schools? Do the standards provide a basis for evaluating schools consistently over time so institutional improvement can be noted? Do the standards provide a basis by which different evaluation committees could arrive at similar accrediting recommendations for the same school? Do the standards support consistent interpretation and decision making by the Board over time?
- 7.5 If the Board determines, in the course of its systematic review of the standards, or in other ways, that it needs to make changes to the standards or procedures, it will initiate action to make the changes within twelve months, according to the requirements of the Constitution.

8. Policy on disclosure and confidentiality

8.1 Accredited members

- 8.1.1 Institutions shall disclose their complete accredited status in their bulletins, calendars, or catalogs and provide the Commission's mailing address and phone number. References shall comply with the designations in the *Membership List*, as to accredited status, approved degree programs, and approved locations for offering degrees if other than the institution's primary location. If the institution is on probation, this status shall also be disclosed.
- 8.1.2 The *Membership List*, reports the formal accredited status of schools and will not be published until the constitutional period for receiving appeals of Board actions has expired. No adverse accrediting action will be published while it is undergoing review.

8.2 Candidate members

- 8.2.1 The institution shall publish its formal status with the Commission.
- 8.2.2 The Board will publish a list of schools that have been granted candidacy for accredited status in the *Membership List*.

8.3 Self-study reports

- 8.3.1 An institution may release for internal or public distribution the contents of its self-study.
- 8.3.2 The Board may permit representatives from member institutions access to another institution's self-study report to aid in the self-study process. This access will be permitted only if an institution has given prior approval for use of its self-study in this way. The Board may also approve the use of self-study reports by educators who are conducting research, the purpose of which is the improvement of the accrediting process. The entities that formally recognize the Commission on Accrediting may be allowed access to self-study reports in conjunction with the process of petitioning for continued recognition.

8.4 Evaluation committee reports

- 8.4.1 As part of the accreditation process, reports prepared by Commission evaluation committees shall be made available to governing boards and faculties by the chief executive officers of schools.
- 8.4.2 An institution may make public the report of an evaluation committee, although this is not mandatory, but it is not advisable prior to formal Board action. If the institution makes a report public, it must make clear that the document is a report of the evaluation committee to the Board and is not an action of the Board.
- 8.4.3 The recommendations of the evaluation committee to the Board may not be published by the institution. Only the actions of the Board comprise the formal accreditation.
- 8.4.4 If, in the judgment of the Board, a school publishes selected portions of an accrediting committee report in such a way as to distort the overall import of that report, the Board has the authority to release the full text of the report in question.
- 8.4.5 The Board will not release evaluation committee reports to the public. With the approval of the institution, the Board may approve access to a report to those conducting research that contributes to the improvement of the accrediting process. Evaluating committee reports may be examined by the entities that recognize the Commission on Accrediting only in the context of reviews of the Commission on Accrediting by those agencies for the purpose of recognition. Evaluation committee reports will also be shared with regional accrediting agencies in the case of dually accredited schools.
- 8.4.6 If a school publishes, or makes public, inaccurate information related to its accredited status or relationship with the Commission, the Board shall require the school to publicly correct the inaccurate information, or the Board will issue correct information.

8.5 Other accrediting documents

- 8.5.1 Minutes of the Board are available to the members of the Board. A summary report of all actions of the Board is published biennially in *Bulletin, part 3*.
- 8.5.2 An institution that has officially appealed an adverse action of the Board may request those sections of official minutes pertaining to the adverse action.
- 8.5.3 Correspondence between the Board and a member or applying institution must be treated confidentially by both parties.
- 8.5.4 Institutional progress and follow-up reports will not be released to the public by the Board. These reports, however, may be released by the institution after action has been taken by the Board.

- 8.5.5 The Board will share its correspondence to member schools with the appropriate regional accrediting agencies; with the Council for Higher Education Accreditation and the US Department of Education in conjunction with the recognition process; and, as required, with appropriate state or provincial authorities.
- 8.6 Public statements by institutions
 - 8.6.1 If an institution uses the public forum to take issue with an action of the Board relating to that institution, the chair of the Board may make available to the public any information pertinent to the action. Taking issue in a public forum does not include an announcement by an institution that it intends to appeal an action of the Board.
 - 8.6.2 Press releases and news items that may become necessary as the result of the Board's actions shall be made only by the executive director after consultation with the Board chair.
- 8.7 Commission disclosure of information about member or applying institutions
 - 8.7.1 Upon inquiry, the Board will release the following information about member or applying institutions:
 - 8.7.1.1 Membership and accredited status.
 - 8.7.1.2 The dates when associate membership, candidacy, and initial accreditation were obtained.
 - 8.7.1.3 The dates of the last comprehensive evaluation and of the next scheduled comprehensive evaluation.
 - 8.7.1.4 The date of the next scheduled focused evaluation and formal reasons for it.
 - 8.7.1.5 The date a formal application for candidacy began and the estimated date a decision on the application will be made.
 - 8.7.1.6 The date of denial of candidacy or removal from candidacy.
 - 8.7.1.7 The submission date of and action taken on the most recent written report required by the Board.
 - 8.7.1.8 The Board's action subsequent to the last evaluation visit regarding accreditation.
 - 8.7.1.9 Whether an institution has appealed an adverse accrediting action of the Board and the status and outcome of such appeal.
 - 8.7.1.10 Actions of the appropriate appeal bodies with reasons for the actions.
 - 8.7.2 The Board maintains several policies regarding the disclosure of accrediting-related information and actions to regional accrediting agencies, governmental authorities, the membership of the Commission, and the public.

- 8.7.2.1 Within thirty days of the deadline for appeals of Board actions, the Board will notify the US Secretary of Education, appropriate state postsecondary review entities, and regional accrediting bodies of all actions related to the formal accredited status of Commission member schools. In the case of a final Board action to deny, withdraw, or suspend accreditation of a US institution, the Board will notify the secretary at the same time it notifies the institution of this action, and it will report this decision on the Commission website within twenty-four hours. The Board will provide within sixty days a brief statement summarizing the reasons for the action to deny, withdraw, or terminate the accreditation or preaccreditation of the institution, and it will include the comments of the affected institution with regard to the decision. The statement, including reasons for the action and comments by the affected institution, will be available to the public upon request.
- 8.7.2.2 The Board will notify in writing the Office of Federal Student Aid concerning actions on substantive changes, as appropriate, within thirty days of final action.
- 8.7.2.3 The Board will notify the secretary, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public if an accredited or candidate-status institution (a) decides to withdraw voluntarily from accredited or candidate status, within thirty days of receiving notification from the institution or program that it is withdrawing voluntarily from accredited or candidate status or (b) lets its accreditation or candidate status lapse, within thirty days of the date on which accredited or candidate status lapses.
- 8.7.2.4 Commission personnel will notify both the appropriate recognized accrediting agency and appropriate state agency regarding Board actions concerning dually accredited institutions.
- 8.7.2.5 Commission staff will notify the US Secretary of Education when reasonable evidence suggests that an institution may be failing to meet its Title IV program responsibilities or is engaged in fraudulent activities with regard to Title IV program responsibilities. The Board will also provide information, upon request by the US Secretary of Education, regarding compliance of a candidate or accredited institution with Title IV responsibilities. The Board will not notify the institution of any notification to the US Secretary of Education pursuant to this policy.
- 8.7.2.6 The Board's summary report, published biennially, will identify institutions denied membership, or removed from candidacy or accredited membership, or placed on probation, or withdrawing from candidate or accredited membership during the period of that report.

- 8.7.2.7 In all cases of adverse accrediting actions, a public statement about the action will be prepared in consultation with the institution for response to inquiries. The Board reserves the right to make final determination of the nature and content of the public statement. The Board will identify the reasons for the adverse accrediting action in the public statement.
- 8.7.2.8 The *Membership List (Bulletin, part 2)* will identify all currently accredited and candidate members as well as institutions removed from candidate or accredited membership, placed on probation, or withdrawing from candidacy or accredited membership during the year preceding the publication of the *Membership List*. A copy of the *Membership List* will be submitted annually to the US Secretary of Education.
- 8.7.2.9 The Board shall make a report on its work to each Biennial Meeting.
- 8.7.2.10 The Board requires all member schools to publish the following information in their catalogs regarding their accredited status with the Commission:
 - (1) their category of membership—accredited or candidate member; (2) approved degrees; and (3) the name, address, and telephone number of the Commission on Accrediting of the Association of Theological Schools.
- 8.7.2.11 The Board understands General Institutional Standard 7.1.2 regarding the school's making institutional information available to potential students to include the institution making public information regarding its educational effectiveness. This information should include completion and graduation rate information as well as qualitative evaluation information indicating educational effectiveness. Information regarding educational effectiveness may be provided in summary form as determined by the school.

9. Policy regarding complaints

- 9.1 The Commission requires the Board to evaluate complaints regarding member institutions, the Board itself, or its staff.
- 9.2 Complaints regarding member schools
 - 9.2.1 Upon receipt of a complaint, the Board's senior staff will write the party within thirty days to determine if the letter should formally be considered as a complaint and will determine whether issues identified in the complaint are specifically related to Commission standards or procedures of accreditation.
 - 9.2.2 If it is determined that the complaint pertains to possible neglect or violation of a Commission standard of accreditation or procedure, then the

Board's senior staff will write the member school within thirty days of confirmation that a formal complaint is intended, explaining the complaint that has been received, and requesting the school to respond within thirty days to the complaint in terms of its understanding of the action or policy under question.

- 9.2.3 If determination is made by the staff, in consultation with the officers of the Board, that a complaint suggests a serious violation of accrediting standards, the Board shall authorize staff either (1) to conduct a staff evaluation to assess the situation and prepare a report for consideration at the earliest practicable Board meeting following receipt of the formal complaint or (2) to appoint a focused evaluation committee that will prepare a report for consideration at the earliest practicable Board meeting following receipt of the formal complaint. If the first scheduled meeting of the Board occurs more than ninety days from the receipt of the confirmed formal complaint, the Officers Committee of the Board shall consider the complaint and report its decision to the Board at its next meeting.
- 9.2.4 If staff determine that the complaint has standing (in light of the accrediting standards and the school's response), the complaint and the school's response will be included on the Board agenda at the first meeting of the Board following receipt of the formal complaint. If the school's response is judged to address adequately the complaint in the context of Commission accreditation, staff will report that a complaint and the school's response have been received and may recommend that the school's response be considered as adequate. The Board is not bound by the staff recommendation. If the first scheduled meeting of the Board occurs more than ninety days from the receipt of the confirmed formal complaint, the Officers Committee of the Board shall consider the complaint and report its decision to the Board at its next meeting.
- 9.2.5 Any action beyond assimilation of information and assessment of standing of the complaint must be taken by the Board, and the Board can request a review of staff actions regarding complaints at any time.
- 9.2.6 The Board will process complaints in a timely manner, and in no case will its response occur later than the second Board meeting following receipt of the complaint.

9.3. Complaints regarding the Board or its personnel

- 9.3.1 The Board will review, at its first meeting following receipt, confirmed formal complaints regarding its own conduct in the context of the Commission procedures (*Bulletin, part 1*) and the policies the Board has established in the *Policy Manual of the Board of Commissioners* to determine if it has failed to function within the parameters established by the procedures or policies. If the Board determines that its action does not conform to these procedures and policies, it will correct its practice and review any decision related to the complaint. Confirmed formal complaints regarding staff will be reviewed by the executive director within thirty days following receipt, and, at the request of the executive director, by the Board. The

review will occur in the context of the procedures of the Commission and the policies of the Board.

10. Policies regarding Commission procedures with governmental authorities and other accrediting agencies

- 10.1 In decisions regarding a grant of candidacy or initial accreditation, the Board will consider actions of other recognized accrediting bodies and state agencies with regard to the institution.
- 10.2 If an accredited or candidate for accredited member receives an adverse accrediting action, or is on probation or equivalent status, from another recognized institutional accrediting agency, the Board will review its own accreditation of the institution to determine if it should consider an adverse action.
- 10.3 If the Board determines that an institution is in compliance with Commission standards and proceeds with appropriate action (i.e., granting initial or renewed accreditation or candidacy, even though it knows, or has reasonable cause to know, that the institution is the subject of a decision by another Department of Education recognized accrediting body to deny accreditation or preaccreditation, impose probation, or equivalent status, or of an adverse accrediting action by another Department of Education recognized accrediting body, or of a pending or final action brought by a state agency leading to suspension, revocation, withdrawal, or termination of its legal authority to provide postsecondary education in the state), the Board will provide the secretary, within thirty days, a thorough written explanation as to why the action of the other body does not preclude the Board's action.
- 10.4 The Board will notify the US Department of Education of any proposed change to Board policies and Commission procedures, and preaccreditation or accreditation standards that might alter its scope of recognition or compliance with the criteria for recognition.
- 10.5 If the Board reaffirms accreditation or grants initial accreditation to a US institution that is the subject of an interim action by another recognized accrediting body or a state agency, or whose accreditation has been withdrawn by another recognized accrediting body, the Board will formally notify the US Secretary of Education as well as appropriate state and recognized accrediting agencies as to the reason for its actions.
- 10.6 Commission staff will notify both the appropriate recognized accrediting agency and the appropriate state agency regarding Board actions concerning dually accredited institutions.

11. Guidelines for institutional petitions to the Board of Commissioners

The following guidelines are formally adopted policies of the Board, which are published separately for ease of distribution to schools preparing petitions.

- 11.1 Guidelines for Petitioning the Board of Commissioners for Approval of New or Revised Degree Programs (*Handbook of Accreditation, Section Six*)

- 11.2 Guidelines for Petitioning the Board of Commissioners regarding Multiple Locations (Extension Sites) and Distance Education (*Handbook of Accreditation, Section Six*)
- 11.3 Guidelines for Petitioning the Board of Commissioners for Candidacy for Accredited Membership (*Handbook of Accreditation, Section Six*)
- 11.4 Guidelines for Evaluation of Proposals for Programs of International Theological Education (*Handbook of Accreditation, Section Six*)
- 11.5 Guidelines for Conducting an Institutional Self-Study (*Handbook of Accreditation, Section Two*)
- 11.6 Guidelines for Members of Accreditation Committees (*Handbook of Accreditation, Section Four*)

12. Policies regarding the operating budget of the Commission

- 12.1 The Commission receives as dues 75 percent of the membership fee charged to all ATS associate, candidate, and accredited member schools.
- 12.2 The Board is responsible for establishing and adopting its budget, which is based on revenue derived from dues, assessment fees, reimbursement for visitor travel, and as appropriate, grants from foundations. The expenditures budget shall provide for all direct and indirect expenses for the Commission’s work of accreditation as conducted by the Board.
- 12.3 The Board establishes the amount of the assessment fee charged to schools receiving an accreditation evaluation visit. The fee shall be set annually by the Board to support the costs incurred by Commission staff for accreditation-related travel, the costs of hosting evaluation committees, office costs related to preparation of committee reports and Board agenda books, and other such direct costs as necessary to support the on-site evaluation of member schools.
- 12.4 The Board determines travel reimbursement costs to be charged to schools receiving a Commission evaluation committee according to the following policy: the Board averages the travel expenses of all Board-appointed visitors and staff for a given semester and invoices that average travel cost for each evaluator who was part of the evaluation committee.
- 12.5 Board-appointed committee members serve without honoraria or remuneration.

13. Policies regarding the appeals panel

- 13.1 The appeals panel members are subject to the same conflict of interest procedures and policies as apply to members of the Board of Commissioners.
- 13.2 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, time, and place. The chair is responsible for determining the agenda for meetings of the appeals panel, convening the appeals panel, and chairing its meetings. The vice chair convenes and chairs meetings of the appeals panel at the request of the

chair. The secretary records the actions of the appeals panel and communicates the actions to the Board of Commissioners.

- 13.3 The Board of Commissioners is to report appeals panel actions to schools no later than thirty days after it is notified of the date of the action.
- 13.4 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 of Commissioners. 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 of Commissioners upon the recommendation of a majority of the appeals panel members subject to the same causes as articulated in Commission bylaws, Section 3.14.
- 13.5 In the event that a matter enters into any level of appeal, the Board and moving party/parties shall have the right to representation in person and by counsel, if desired and at cost to the party/parties represented by counsel.