

Board of Commissioners

POLICY MANUAL

Of the Board of Commissioners

TABLE OF CONTENTS

Preface	. 1
I. General	. 2
A. Authority and duties	. 2
B. Composition and terms	. 4
C. Powers	. 4
II. The Board of Commissioners	. 6
A. General responsibilities for the Standards	. 6
B. Meetings	. 6
C. Operational policies	. 9
D. Operating budget	. 12
E. Reimbursement for expenses	. 13
F. Work product	. 13
III. Accredited Members	. 14
A. Accreditation evaluations	. 14
B. Guidelines for institutional petitions and other matters	. 19
IV. Appeals Panel	. 20
V. Disclosure and Confidentiality	. 21
A. Accredited members	. 21
B. Candidate members	. 21
C. Self-study reports	. 21
D. Evaluation committee reports and recommendations	. 22
E. Other accrediting documents	. 22
F. Public statements by institutions	. 23
G. Commission disclosure of information about members or applying institutions	. 23
VI. Complaints	. 29
A. General statement	. 29
B. Complaints regarding member schools	. 29
C. Complaints regarding the Board or its personnel	. 30
Appendixes	
Appendix 1: List of Approved Administrative Practices	. 31
Appendix 2: Time Frame for Responding to Committee Reports	. 33
Appendix 3: Guidelines Regarding Petitions for Change	. 34
Appendix 4: Evaluative Guideline for Special Comprehensive Evaluations	. 37
Appendix 5: Criteria for Evaluating Teach-Out Plans and Agreements	. 38
Appendix 6: Policy on Approving New Extension Sites	. 40
Appendix 7: Policy on Board Reader Panels and Reports to Staff	. 41
Appendix 8: Guidelines for Candidacy Petitions	. 42
Appendix 9: Policy on Use and Release of Data from the Institutional Database	. 43

Preface

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 Commission *Policies and Procedures* and Standards of Accreditation (ATS Commission [Policies and Procedures](#), VIII.A.3). For brevity, the Commission Standards of Accreditation (“Standards”) and the Commission *Policies and Procedures* (“Procedures”) hereafter may be referred to as “Standards and *Procedures*.”

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 reference the formally adopted guidelines the Board has prepared for schools to use in conducting self-studies and 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.

I General

I.A Authority and duties

I.A.1 The authority of the Board is derived from the Commission [Bylaws](#) (3.1), and its duties are prescribed in the *Bylaws* and in the *Policies and Procedures* adopted by the Commission (ATS Commission [Policies and Procedures](#), VIII).

I.A.2 Duties

I.A.2.a Exercise responsibility for all decisions related to the accreditation status of members.

I.A.2.a(1) Maintain a list of accredited theological schools under the Standards and *Procedures* determined by the Commission.

I.A.2.a(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").

I.A.2.a(3) Investigate, review, and grant initial accreditation to candidate institutions.

I.A.2.a(4) Evaluate new degree programs, extension sites, and distance education programs for inclusion in institutional accreditation.

I.A.2.a(5) Provide for the periodic evaluation of institutions for reaffirmation of accreditation not less frequently than each 10 years.

I.A.2.a(6) Prepare self-study guides, report forms, and other documentation that will assist the schools in meeting their responsibilities in relation to accreditation.

I.A.2.a(7) Respond to complaints brought against members or the Commission.

I.A.2.a(8) Adopt and oversee policies and procedures that ensure thorough and fair evaluation of schools.

I.A.2.a(9) 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.

I.A.2.a(10) 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.

I.A.2.a(11) Assess each institution's continuing conformity to the Commission's Standards of Accreditation through a review by the ATS Commission staff of the information provided by member schools in the Annual Report Forms to monitor key indicators as outlined in Appendix 1, "List of Approved Administrative Practices." The Board will review at each summer meeting any significant results of this monitoring and take appropriate action.

I.A.2.a(12) Establish administrative procedures ("List of Approved Administrative Practices") that ensure that appropriate policies and practices are properly implemented and documented.

I.A.2.b Review and evaluate the accrediting Standards and *Procedures* in a regular and continuous manner and bring recommendations regarding appropriate changes for consideration for adoption by the members.

I.A.2.c 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 the *Bylaws* (9.1 and 11.1).

I.A.2.d Appoint task forces and accreditation committees deemed necessary for fulfilling its responsibilities.

I.A.2.e Adopt and oversee the Commission's budget.

I.A.2.e(1) Establish fees to be assessed in the conduct of accreditation activities.

I.A.2.e(2) Recommend changes to the dues structure.

I.A.2.f Evaluate the administrative and other services secured by contract with the Association and establish and evaluate the employment policies of the Commission through its agreement for contracted services with the Association.

I.A.2.g Oversee the Corporation's assets and approve the auditors employed by the Corporation.

I.B Composition and terms

I.B.1 The Board shall consist of not fewer than 12 nor more than 20 persons, of whom not fewer than three nor more than five shall be public representatives. At least two of the public members shall be ministry practitioners, and two from accredited institutions shall carry significant teaching responsibilities in their institutions. The Board shall include members knowledgeable in aspects of theological education (including distance education), who will receive training in the content and interpretation of the *Bylaws*, *Standards of Accreditation*, *Policies and Procedures*, including the review and evaluation of distance education.

I.B.2 Terms of service: Members from accredited institutions serve for six years and are ineligible for immediate reelection. Public members serve for two years and are eligible for reelection.

I.B.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 ATS Board of Directors (excepting the Commission representative to ATS).

I.B.4 The chair, vice chair, and Commission representative to ATS (normally the third member of the Officers Committee) are elected by the Commission membership. The secretary is elected by the Board from among the ATS Commission staff members who support the work of the Commission.

I.C Powers

I.C.1 Powers defined

I.C.1.a The Board 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 (ATS Commission [Bylaws](#), 3.1).

I.C.1.b The Board may require reports or evaluations as necessary to implement the Standards or to determine the conformity of schools to the Standards, as prescribed by the *Policies and Procedures* of the Commission.

I.C.2 Powers limited

I.C.2.a 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*.

I.C.2.b The Board shall take no action initiating procedures to examine an institution for Candidate for Accredited Membership status or initial accreditation except at the specific request of the chief administrative officer of the institution.

I.C.2.c The Board shall act only on those matters assigned to it by the Commission and within the guidelines established by the *Policies and Procedures* of the Commission and the *Policy Manual* of the Board.

I.C.2.d Commissioners, Appeals Panel members, and ATS Commission staff shall annually complete a conflict of interest form. Evaluation committee members and consultants shall complete a conflict of interest form prior to any engagement in the evaluation of a school. A potential conflict of interest includes the following relationships with a school undergoing evaluation, whether the relationship involves that person or an immediate family member: employment (including past employment or prior/current application for employment); current employment at a school in a consortial relationship; enrollment as a student (past or present, including denial of admission); recipient of an award or honor; provision of goods or services; service as a trustee (past or present); regular recruitment of prospective students or staff; or any other relationship that could threaten a fair and objective evaluation. No Commissioner, Appeals Panel member, or ATS Commission staff member who has a potential conflict of interest shall be involved in an evaluation or accrediting decision, unless a majority of Commissioners who do not have a conflict in relation to the school determine that the potential conflict of interest has no bearing on the evaluation or decision. No evaluation committee member or consultant who has a potential conflict of interest shall be involved in an evaluation or accrediting decision.

II The Board of Commissioners

II.A General responsibilities for the Standards of Accreditation

II.A.1 The Board is responsible for the ongoing review of the Standards of Accreditation and the recommendation of changes of the Standards to the membership of the Commission.

II.A.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.

II.A.3 The Board should review the validity of the Standards by addressing questions such as the following: 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?

II.A.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?

II.A.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 12 months, according to the requirements of the *Bylaws* (3.1).

II.B Meetings

II.B.1 The Board normally meets twice annually, in February and June.

II.B.2 The Board will normally meet during the working hours of two days or as may be required.

II.B.3 Normally, the Board meets at the offices of the ATS Commission.

II.B.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.

II.B.5 Commissioners are expected to attend all meetings.

II.B.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 or herself.

II.B.7 Agendas for meetings of the Board are prepared by ATS Commission staff in consultation with the Board chair. Materials related to matters coming before the Board are made available to Commissioners three weeks in advance of the meeting. These materials include self-studies, evaluation committee reports and school responses thereto, required reports from member schools, and substantive change petitions. These materials shall be posted on the Board's secure website according to the "List of Approved Administrative Practices" (see Appendix 1).

II.B.8 Reports submitted to the Board by evaluation committees shall be reviewed by ATS Commission staff for clarification and by the chief administrative officer of the institution for factual corrections according to the "List of Approved Administrative Practices" (see Appendix 1).

II.B.9 Each meeting of the Board will include plenary sessions at which the full Board takes action, working sessions during which committees of the Board consider reports and recommend actions, and an executive session (see also Appendix 7). To effectively conduct its business, the Board of Commissioners may use a consent agenda. The consent agenda permits any Board committee to have an action item removed from deliberation in a plenary session. Recommended actions placed on the consent agenda by a Board committee are seen by the full Board before being ratified in plenary session in one vote. Any Commissioner for good reason may request any consent agenda item be discussed by the full Board before final action. Consent agendas will not be finalized until each Board committee has reviewed thoroughly the action items assigned to it. Any recommended action seen by the full Board and then changed by a Board committee may not be placed on the consent agenda, unless the change is minor in nature (e.g., change in report date or minor editorial change). Actions that may not be placed on a consent agenda include any involving membership status (e.g., candidacy, initial or continued accreditation, notations, probations,

withdrawals or denials of accreditation, and issuing a letter of concern or show cause order) or any involving an educational experiment or exception.

II.B.10 The Board may authorize subcommittees to meet at other times to consider and act upon reports and petitions from member schools that do not affect the school's accredited status.

II.B.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.

II.B.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.

II.B.13 A 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 as a current employee of a school in a consortium with that school, (3) service on an evaluation committee whose recommendations about that school are being considered, or (4) recent service on a committee or commission for another accrediting agency that evaluated that school (typically within the past three years). Recusals require the Commissioner to absent himself or herself from the room during the discussion and the decision. All abstentions and recusals will be noted in the minutes.

II.B.14 The Board will take time toward the end of each meeting to review its actions to assure the consistency and fairness of its accrediting decisions. These two concepts do not require uniformity in all decisions, but do assume conformity to all published standards, procedures, and policies. The Board determines consistency and fairness through these criteria:

II.B.14.a Decisions are based on the Commission's Standards and *Procedures* and follow the Board's Policy Manual.

II.B.14.b Decisions respect each institution's unique mission and help achieve its stated educational outcomes in its own context.

II.B.14.c Decisions are made in light of each institution's resources, capacity to plan and evaluate, and its ongoing relationship with the Commission, as well as the reliability, relevance, and completeness of the information it provides.

II.B.14.d Decisions are reviewed in light of relevant prior decisions of the Board, as well as relevant current decisions.

II.B.14.e Decisions are communicated promptly and clearly with a written rationale.

II.B.15 Once in each biennium, the Board will evaluate the quality of its work by devoting time to a comprehensive review of its policies, procedures, and practices. The opening plenary session of the February meeting will include a presentation of significant issues arising, relative to the Standards and *Procedures*, during the past year.

II.B.16 The chair and vice chair of the Commission, 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.

II.C Operational policies

II.C.1 The Board is responsible for implementing the Commission *Policies and Procedures* as published, including all adverse actions of the Board.

II.C.2 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 review of each institution, including on-site evaluation committee 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 accreditation decisions, including all adverse actions. In addition, the "List of Approved Administrative Practices" (Appendix 1) requires a record of all decisions made throughout an institution's affiliation regarding the accreditation of the institution and any substantive changes, including all correspondence that is significantly related to those decisions.

II.C.3 The Board will evaluate any teach-out plan or agreement, using Board-adopted criteria (see Appendix 5), 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 an agency recognized by the US Secretary of Education for United States schools, or another appropriate authority for Canadian schools, as part of the institution's teach-out plan. When a teach-out plan or agreement involves another institution accredited by an agency recognized by the US Secretary of Education for United States schools, or another appropriate authority for Canadian schools, the Board will evaluate the capacity of the other institution to provide the education required by the teach-out agreement. In order to determine if the other institution is qualified to provide the teach-out program necessary, the Board will (a) assess the resources, experience, and support services of the other institution; (b) evaluate its ability to provide a program of acceptable quality that is reasonably similar in content, structure, and scheduling to the discontinued program; (c) determine if the other institution is stable and able to carry out its mission and meet all obligations to existing students; and (d) determine if the institution is capable of providing a program to teach-out students that does not require substantial travel or additional charges. If the other institution is not accredited by the ATS Commission on Accrediting, the Board will notify the other accrediting agency within 30 days of its action to approve a teach-out agreement that involves a school accredited by that agency.

II.C.4 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.

II.C.5 ATS Commission staff will monitor accredited schools to ensure continued conformity with Commission Standards of Accreditation. This monitoring will include items described in Appendix 1, section 6. The Board may request additional monitoring information or authorize a required report, a focused evaluation visit, or a special comprehensive evaluation review, if it determines a review of educational quality is warranted.

II.C.6 All actions of the Board must be communicated to the schools affected by the actions within 30 days of the date of the action. Schools have 30 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.

II.C.7 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. Comprehensive and focused evaluation committee reports and recommendations, with an invitation to respond, shall be understood as providing such an opportunity.

II.C.8 The Board of Commissioners defines “good cause” as a circumstance in which the institution has shown significant progress on the issue of the notation or probation and there is reason to anticipate that a one-year extension of time will enable the institution to rectify the deficiency indicated by the notation or probation.

II.C.9 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:

II.C.9.a The financial information was unavailable to the institution until after the decision subject to appeal was made.

II.C.9.b The financial information is significant and bears materially on the financial deficiencies identified by the Board.

II.C.9.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.

II.C.10 The effective date of Board action approving a substantive change is the date of the Board’s action, which shall be noted explicitly in the letter communicating the action. The Board is responsible for reviewing its actions at each meeting to ensure that substantive change actions were not taken retroactively and that the minutes of the meeting indicate the Board’s attention to this policy.

II.C.11 The Board of Commissioners shall give due attention to substantive change petitions submitted by member schools. The ATS Commission staff shall provide guidance to assist member schools in the preparation of substantive change petitions. The “List of Approved Administrative Practices” (Appendix 1) shall contain criteria for determining and terminology for characterizing substantive change thresholds (i.e., a guideline to determine when a school action is simply making a minor adjustment and when an adjustment becomes a substantive change).

II.C.12 The Board of Commissioners, when making a determination regarding a special comprehensive review, shall use the Board-adopted “Evaluative Guideline for Special Comprehensive Evaluations” in its deliberation. (See Appendix 4.)

II.C.13 When a focused evaluation visit or a special comprehensive evaluation review is required, the Board of Commissioners will provide the school with a prospectus for the focused evaluation visit or special comprehensive review. The prospectus will identify the reasons for the focused evaluation visit or special comprehensive review, provide the date for the site visit, and require the school to provide evidence of the school's conformity to the applicable Standards of Accreditation (in the case of a special comprehensive review, all of the Standards of Accreditation). 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 recommendations to the Board of Commissioners.

II.C.14 In addition to the conditions listed in the ATS Commission [Policies and Procedures](#), VII.B.1, a focused visit may be required whenever the Board believes any of these conditions are present:

- A series of on-site, face-to-face conversations with multiple parties at a school will provide information and context that a single report, often written by a single individual, may not;
- A series of on-site, face-to-face conversations will highlight the importance of, and/or help give a school guidance in, one or more areas of improvement in ways that a written report may not.
- A series of on-site, face-to-face conversations will underscore the timeliness and/or urgency of the need for the school to provide additional information and/or help a school improve significantly (e.g., when a serious and/or public controversy has arisen that could impact the school's ability to meet one or more Standards).

II.D Operating budget

II.D.1 The Commission receives as dues 75 percent of the membership fee charged to all ATS associate, candidate, and accredited member schools.

II.D.2 The Board is responsible for establishing and adopting its budget, which is based on revenue derived from dues, assessment fees, reimbursement for evaluator 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.

II.D.3 The Board establishes the amount of the assessment fee charged to schools receiving an accreditation evaluation. The fee shall be set annually by the Board to support 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.

II.D.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 evaluators and ATS Commission staff for a given semester and invoices that average travel cost for each of these who was part of the evaluation committee.

II.D.5 Board-appointed committee members serve without honoraria or remuneration.

II.E Reimbursement for expenses

II.E.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.

II.E.2 Travel is paid at air coach rate, unless it is impossible to secure other than first class.

II.E.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.

II.E.4 Hotel expenses will be reimbursed for accommodations in the area of the meeting.

II.E.5 All reasonable meal expenses will be reimbursed; alcoholic beverages should not be charged to the Board.

II.E.6 Child care expenses are reimbursable.

II.F Work product

The Board shall review the work product provided by its memorandum of agreement with the Association on an annual basis with the findings of the review to be available by the time that the Board considers extending the agreement in the first Board meeting of each year.

III Accredited Members

III.A Accreditation evaluations

The Board, through its ATS Commission staff, oversees the conduct of all accreditation evaluations to Commission-related schools.

III.A.1 Schedule

III.A.1.a ATS Commission [Policies and Procedures](#), VII.A.1, authorize accreditation evaluation committees for a comprehensive evaluation at the end of an approved period of accreditation. In cases of special institutional need, the Board or the Commission's Officers Committee may authorize a focused or comprehensive evaluation.

III.A.1.b 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 will be sustained.

III.A.1.c 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.

III.A.1.d The Board, for purposes of granting approval of substantive changes related to extension sites and branch campuses, will require a focused evaluation of any site within six months of the site beginning to offer as much as 50 percent of the course work necessary for a degree. An evaluation 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, so a member school must petition well in advance of the initiation of any such sites. 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 approve the petition and authorize a required site evaluation to corroborate the claims made in the petition. If the required site evaluation does not corroborate the claims made in the petition, approval for that site may be withdrawn.

III.A.1.e The Board, for purposes of reaffirming institutional accreditation, as well as granting initial approval for a new extension site, will require an evaluation of all extension sites or branch campuses offering at least 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:

III.A.1.e(1) Has requested an exemption with its petition or self-study report

III.A.1.e(2) Has been accredited for at least 10 years

III.A.1.e(3) Has operated in adherence to the Standards at least three approved extensions sites or branch campuses offering as much as 50 percent of an approved degree

III.A.1.e(4) 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 during any reaffirmation process. ATS Commission 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. Exemptions granted for initial approval for a new extension site do not require any evaluation of a representative sample of sites.

III.A.1.f The closing or relocation of an approved extension site (or main campus) requires one of the following actions, depending on the level of approval granted that site and on whether the closing site will be relocated:

III.A.1.f(1) If the extension site being closed is approved to offer less than a complete degree program, then the school must simply notify ATS Commission staff before closing that site, indicating how the educational needs of affected students will be appropriately met.

III.A.1.f(2) If the extension site being closed is approved to offer a complete degree program, then prior to its closing, the school must submit a [Petition for Closing a Complete Degree Site](#) to the Board of Commissioners. The petition includes information regarding a formal teach-out plan for all affected students (see guidelines in Appendix 5).

III.A.1.f(3) If the extension site (or main campus) being closed is being relocated to another site, then prior to the relocation, the

school must submit a [Petition for Relocating an Approved Extension Site \(or campus\)](#). If the new extension site will offer less than half a degree, the petition may be approved by ATS Commission staff (per ATS Commission [Policies and Procedures](#), VII.C.3). If the new extension site will offer at least half a degree or a complete degree, the petition must be approved by the Board of Commissioners (per ATS Commission [Policies and Procedures](#), VII.C.2). The Board will also authorize a site visit to be conducted within six months of the new site's establishment, unless an exemption based on the four criteria in III.A.1.e above is requested and granted. A school relocating a main campus is not exempt from a site visit, but the Board may grant an exemption for an embedded school located on the campus of a larger institution that is simply moving to a different part of the larger campus or within the same community.

III.A.1.f(4) If the relocation discussed in the preceding paragraph occurs quickly due to unforeseen circumstances beyond the school's control (e.g., natural disaster or sudden loss of rented facilities), then the school should contact ATS Commission staff as soon as possible. The same [Petition for Relocating an Approved Extension Site \(or campus\)](#) is required, but staff may temporarily authorize courses to begin at the new location until the Board of Commissioners can meet and act officially on the relocation.

III.A.1.g When a member school petitions for another type of substantive change or a degree program approval 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 within six months of the Board's authorization, if possible.

III.A.2 Evaluation Committees

III.A.2.a Commissioners will normally be invited to participate in or chair at least one accreditation evaluation each year of their term of service. The training that Commissioners receive, as outlined (I.B.1), prepares them for this service on accreditation evaluation committees. In addition, they will receive specialized training when serving as a chair and the regular training that occurs for evaluators.

III.A.2.b Members of Commission accreditation evaluation committees will be appointed according to the following guidelines:

III.A.2.b(1) ATS Commission staff 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.

III.A.2.b(2) The Board expects individuals who serve on evaluation committees to reflect the following characteristics: expertise in aspects of theological education or higher education (including distance education for evaluations of those institutions that offer distance 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 committee. Evaluation committees should reflect the diversity of race, ethnicity, gender, nationality, and ecclesial communities present in member schools.

III.A.2.b(2)(a) Evaluators will generally be appointed from member schools and/or persons actively engaged in the practice of ministry. Persons not employed by member schools or actively engaged in the practice of ministry who, having particular expertise and experience, could provide valuable expertise, may serve on evaluation committees. In preparation for service on evaluation committees, first-time committee members will receive training in the content and interpretation of the Commission Standards of Accreditation and *Policies and Procedures*, including the review and evaluation of distance education, in advance of their service on an evaluation committee. Other evaluation committee members will periodically receive refresher training on the content and interpretation of the Standards of Accreditation and *Policies and Procedures*, including the review and evaluation of distance education.

III.A.2.b(2)(b) A comprehensive evaluation committee shall include theological school administrators, educators or faculty members, and ministry practitioners. If the school receiving a comprehensive evaluation committee conducts distance education, the committee shall have a member with experience and expertise in distance education. Focused evaluation committees will consist of members with expertise related to the focused evaluation.

III.A.2.b(3) Institutions receiving evaluation committees have the right to object to individuals nominated to serve on committees for the following reasons: (a) the individual has attended the institution as a student; (b) the individual has previously been employed by the institution; or (c) some clear evidence exists that a conflict of interest may threaten balanced and objective judgments. A more detailed statement of possible conflicts may be found above in I.C.2.d.

III.A.2.b(4) Whenever possible, ATS Commission staff should be present during at least part of accreditation evaluations to interpret the Standards of Accreditation and *Policies and Procedures* on behalf of the Board, to provide guidance and counsel to committees, and to provide background information about the evaluation to the Board as requested.

III.A.2.b(5) 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 evaluation. In addition, the Commission on Accrediting will publish on the Accrediting section of the ATS website all schools scheduled to receive a comprehensive evaluation committee in each semester. The list will be posted no later than two months prior to the beginning of the semester. The web page will include an invitation for respondents to reply with comments about any school directly to the Board. The Board will forward all comments received to the comprehensive evaluation committee evaluating the school.

III.A.3 Reports

III.A.3.a The written report should include the following sections: (1) a brief introduction/history of the school, (2) a section on each of the *General Institutional Standards*, (3) a section on the *Educational Standard*, (4) a section on each of the degree programs offered by the institution, and (5) the committee's formal recommendations to the Board. Reports shall be written in gender-neutral language.

III.A.3.b All comprehensive evaluation committee reports shall include an assessment of the school's performance with respect to the educational effectiveness of the institution's degree programs and the criteria used by the

school to determine educational effectiveness. This assessment shall include the committee's judgment with respect to indicators such as the percentage of students who complete degree programs and the placement rate of graduates.

III.A.3.c 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 to evaluate itself critically, 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.

III.B Guidelines for institutional petitions and other matters

The following guidelines are formally adopted policies of the Board, which are published separately for ease of distribution to schools preparing petitions and other matters. All original documents submitted to the Board must be in English or accompanied by English translations. Please note that most petitions have formal templates (available on the Accrediting section of the ATS website) that must be used. The Board will review all petitions for substantive changes that are described in the ATS Commission [Policies and Procedures](#), VII.C.1. ATS Commission staff will review petitions that are described in the ATS Commission [Policies and Procedures](#), VII.C.3.

III.B.1 Conducting an Institutional Self-Study ([Self-Study Handbook, Chapter Two](#))

III.B.2 Evaluation of Proposals for Programs of International Theological Education ([Self-Study Handbook, Chapter Six](#))

III.B.3 Members of Accreditation Evaluation Committees ([Self-Study Handbook, Chapter Four](#))

III.B.4 Petitioning the Board of Commissioners for Approval of New or Revised Degree Programs ([Policies and Procedures](#), V; [Policy Manual](#), Appendix 3)

III.B.5 Petitioning the Board of Commissioners for Candidacy for Accredited Membership ([Policies and Procedures](#), II)

III.B.6 Petitioning the Board of Commissioners for Educational Experiments and Exceptions

III.B.7 Petitioning the Board of Commissioners regarding Multiple Locations (Extension Sites) and Distance Education ([Policies and Procedures](#), VI [Policy Manual](#), II.A.1, Appendix 3, Appendix 6)

III.B.8 Regarding Comprehensive Evaluation Logistics ([Self-Study Handbook, Chapter Three](#))

III.B.9 Regarding the Submission of Teach-out Plans and Agreements ([Policies and Procedures](#), III.E; [Policy Manual](#), Appendix 5)

IV Appeals Panel

IV.A The Board requires the Nominating Committee to nominate to the Appeals Panel at least one person in each of the following primary roles: a faculty member, an administrator, a ministry practitioner, and a public member.

IV.B Appeals Panel members are subject to the same conflict of interest procedures and policies as apply to members of the Board of Commissioners and, upon election, will sign the statement on conflict of interest. Appeals Panel members shall receive training in the content and interpretation of the Standards of Accreditation, *Policies and Procedures* (including the review and evaluation of distance education), and any concerns related to the specific issues of an appeal.

IV.C 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.

IV.D The Board of Commissioners is to report Appeals Panel actions to schools no later than 30 days after it is notified of the date of the action.

IV.E 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 the *Commission Bylaws* (3.14).

IV.F 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.

V Disclosure and Confidentiality

V.A Accredited members

V.A.1 Institutions shall disclose their complete accredited status as required by the [Policies and Procedures](#), X.A.2. If an inadequate or inaccurate description is published, the Board authorizes staff to contact the school and require a correction of the published statement. If the school fails to correct the issue, staff will refer the issue to the Board for action.

V.A.2 The *Membership List* reports the formal accredited status of schools and will not be published until the stated period for receiving appeals of Board actions has expired (cf. [Policies and Procedures](#), XI.A). No adverse accrediting action will be published while it is undergoing review.

V.A.3 If a school has not corrected inaccurate public disclosure of its accredited status with the Commission on Accrediting, after requested by ATS Commission staff, the Board will impose Notation 2.d until the appropriate correction is made and, if the correction is not made within the required time period, impose an adverse accrediting action.

V.B Candidate members

V.B.1 The institution shall publish its formal status with the Commission.

V.B.2 The Board will publish a list of schools that have been granted Candidate for Accredited Membership status in the *Membership List*.

V.C Self-study reports

V.C.1 An institution may release for internal or public distribution the contents of its self-study.

V.C.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.

V.D Evaluation committee reports and recommendations

V.D.1 As part of the accreditation process, reports and recommendations prepared by Commission evaluation committees shall be made available to governing boards and faculties by the chief administrative officers of schools.

V.D.2 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.

V.D.3 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.

V.D.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.

V.D.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.

V.D.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.

V.E Other accrediting documents

V.E.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 the *Bulletin*.

V.E.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.

V.E.3 Correspondence between the Board and a member or applying institution must be treated confidentially by both parties, though official actions from a visit will be shared with the chair of that visit.

V.E.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.

V.E.5 In conjunction with the recognition process, 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; and, as required, with appropriate state or provincial authorities.

V.F Public statements by institutions

V.F.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.

V.F.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.

V.G Commission disclosure of information about member or applying institutions

The Commission discloses required information promptly and is prepared to disclose certain information upon request according to the following policies:

V.G.1 Required by governmental authorities and other accrediting agencies

V.G.1.a 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.

V.G.1.b The Board will notify the US Department of Education of any proposed change to the Board *Policy Manual*, *Commission Policies and Procedures*, or *Commission Standards of Accreditation* that might alter its scope of recognition or compliance with the criteria for recognition.

V.G.1.c Board policy on the communication of Board accrediting decisions requires that all actions must be communicated to the schools affected by the actions within 30 days of the date of the action. Schools have 30 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 (the "appeal

date”). All other actions are final upon the initial Board action (the “decision date”).

V.G.1.d Within 30 days of the deadline for appeals of Board actions, the Board will notify the US Secretary of Education, appropriate state licensing or authorizing agencies, 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 (the appeal date), and it will report this decision on the web page for that member school in the Member Schools section of the ATS website within 24 hours. The Board will provide within 60 days a brief statement on the web page for the member school in the Member Schools section of the ATS website summarizing the reasons for the action to deny, withdraw, or terminate the accreditation of the institution, and it will include the comments of the affected institution with regard to the decision.

V.G.1.e The Board will notify in writing the Office of Federal Student Aid concerning actions on substantive changes, as appropriate, within 30 days of final action (the decision date).

V.G.1.f The Board will notify the US Secretary of Education, the appropriate state licensing or authorizing agency, the appropriate accrediting agencies, and the public if an Accredited Member or Candidate for Accredited Membership institution (a) decides to withdraw voluntarily from accredited or candidate status, within 30 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 30 days of the date on which accredited or candidate status lapses.

V.G.1.g ATS 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 an 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.

V.G.1.h The [Membership List](#) will identify all institutions whose status is listed as Accredited Members and Candidate for Accredited Membership as well as institutions whose membership has been removed from Accredited

Member or Candidate for Accredited Membership status, 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.

V.G.1.i If an accredited or candidate for accredited member receives an adverse accrediting action, or is placed on probation or equivalent status by another recognized institutional accrediting agency, or if the larger institution of which the member is a part receives an adverse accrediting action or is placed on probation by its accrediting agency, the Board will authorize a focused evaluation committee to visit the institution to determine if the Board should consider an adverse action on the member institution.

V.G.1.j 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 (1) a decision by another US Department of Education-recognized accrediting body to deny accreditation or preaccreditation, impose probation, or equivalent status; or (2) an adverse accrediting action by another US Department of Education-recognized accrediting body; or (3) 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 to the US Secretary of Education, within 30 days, a thorough written explanation as to why the action of the other body does not preclude the Board's action.

V.G.1.k If the Board reaffirms accreditation or grants initial accreditation to a US institution that is the subject of an adverse action (i.e., denial, withdrawal, suspension, or revocation of accreditation) or is placed on probation by another recognized accrediting body or a state agency, 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.

V.G.1.l The Board of Commissioners will communicate the following positive accrediting decisions to the US Department of Education, relevant state agencies, and any accrediting agencies that accredit the institutions within 30 days of the decision (the decision date; see V.G.1.c–d): grant of candidacy, grant or reaffirmation of accreditation, new extension sites that offer at least half of a complete degree program, and change of name or ownership. It will also post this information on the web page of the member school in the

Member Schools section of the ATS website for the public within 30 days of the decision date.

V.G.1.m The Board of Commissioners will communicate the following negative accrediting decisions to the US Department of Education, relevant state agencies, and any recognized accrediting agencies that accredit the institution within 30 days of the final appeal date (appeal date; see V.G.1.c–d): impose a notation, place an institution on probation, deny initial accreditation, or withdraw accreditation, including any voluntary withdrawal or lapsing of accreditation. The Board will notify the public within 24 hours of notifying the institution of any final decision (after the appeal process) to deny, withdraw, or suspend accreditation (per V.G.1.c–d). It will do so by posting this information on the web page of the member school in the Member Schools section of the ATS website.

V.G.2 Responsive disclosures

V.G.2.a The Board routinely releases the following information on the Member Schools section of the ATS website (and upon inquiry will release information on those items so noted below):

V.G.2.a(1) Membership and accredited status

V.G.2.a(2) The dates when associate membership, candidacy, and initial accreditation were obtained

V.G.2.a(3) The dates of the last comprehensive evaluation and of the next scheduled comprehensive evaluation

V.G.2.a(4) The date of the next scheduled focused evaluation, if any, and the formal reasons for it

V.G.2.a(5) Upon inquiry, the date a formal application for candidacy began and the estimated date a decision on the application will be made

V.G.2.a(6) The date of denial of candidacy or removal from candidacy

V.G.2.a(7) Upon inquiry, the due date of and action taken on the most recent written report required by the Board during the current grant of accreditation

V.G.2.a(8) The Board's action subsequent to the last evaluation regarding accreditation

V.G.2.a(9) Upon inquiry, whether an institution has appealed an adverse accrediting action of the Board and the status and outcome of such appeal

V.G.2.a(10) Actions of the appropriate appeal bodies with reasons for the actions

V.G.2.b In all cases of adverse accrediting actions, a public statement about the action will be posted on the web page for the member school in the Member Schools section of the ATS website, including any response the institution may choose to make. 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. This statement may be the same one identified in V.G.1.d.

V.G.2.c The Board of Commissioners will share information regarding any accrediting action, including adverse actions, at the request of an appropriately recognized accrediting agency for that information.

V.G.3 Other disclosures

V.G.3.a The Board shall make a report on its work to each Biennial Meeting.

V.G.3.b 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.

V.G.3.c The Board of Commissioners understands section ES.6.4.4 of the *Educational Standard* to require schools to make public a statement of educational effectiveness in order to address concerns about public accountability regarding student achievement. A school's public statement of educational effectiveness should provide data on how well it is meeting the goals or outcomes for each of its degree programs, as well as data from more institution-wide measures of educational effectiveness. The 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 assessment data that is 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, assessment data from capstone projects and portfolios, and other relevant assessment 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. The public statement of educational effectiveness should be reviewed and updated regularly, preferably annually. Member schools must provide the web address for its public statement each fall on the ATS Annual Report Form.

VI Complaints

VI.A General Statement

The Commission requires the Board, which may act as a whole or through a designated committee, to evaluate complaints regarding member institutions, the Board itself, or its ATS Commission staff.

VI.B Scope

VI.B.1 The Commission's complaint policy addresses only those situations where a complainant clearly describes and sufficiently documents perceived non-conformity with the Commission's Standards of Accreditation and/or membership criterion by a member school. Complaints that meet these criteria are understood to have standing in the complaint process.

VI.B.2 The Commission's Standards of Accreditation require that institutions 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 ATS Commission on Accrediting. 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 appeal.

VI.B.3 The Board of Commissioners does not consider complaints that deal with individual grievances not related to the Commission's Standards of Accreditation, does not arbitrate with a school on behalf of a complainant, nor is it authorized to seek compensation, damages, readmission, or other forms of redress on behalf of a complainant. The Board is limited to decisions regarding an institution's accredited status.

VI.B.4 The Board does not consider anonymous complaints, but may, in exceptional circumstances, maintain the identity of the complainant in confidence as provided for by the process.

VI.C Complaints regarding member schools

VI.C.1 Upon receipt of a complaint submitted on the ATS Commission formal complaint form, 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 working days and, at that time, any additional information required to process the complaint will be identified and communicated to the complainant.

VI.C.2 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 of Commissioners. The complainant will be notified which determination was made within 15 working days.

VI.C.3 If a complaint is referred to the Board, one of the following actions will be taken within 30 working days:

VI.C.3.a Determine that the complaint does not have standing and take no further action, thereby closing the matter for further review. The complainant will be notified of the decision with an appropriate explanation within 15 working days of the action.

VI.C.3.b Determine that the complaint has standing with reference to standards of accreditation, notify the member school of the complaint with appropriate description, and require the school to respond within thirty working days.

VI.C.4 If the school has been asked to respond, a copy of the school's response will be provided to the complainant and to the Board. One of the following actions will typically be taken by the Board within 30 working days:

VI.C.4.a Determine that additional information from either the complainant and/or the school is needed before a decision can be made. In such instances, any additional information required to process the complaint will be identified and communicated to the complainant and/or the school. The complainant and/or the school will have 30 working days to respond prior to the Board taking action as noted in VI.C.4b.

VI.C.4.b Determine that the school's response is sufficient and take one of the following three actions:

VI.C.4.b(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;

VI.C.4.b(2) Determine that sufficient reason exists to warrant further review, and to require an additional written report from the school and/or to authorize a staff or focused visit to the school, in which case the visiting committee will prepare a report for consideration by the Board of Commissioners at the meeting immediately following the visit; or

VI.C.4.b(3) Determine that other action(s) should be taken as described in Commission Policies and Procedures, section VII.

VI.C.5 The complainant and the school will typically be notified of the Board's decision within 15 working days of the action.

VI.C.6 The Board will process complaints in a timely manner, and in no case will its response (see VI.C.4.b) occur later than the second Board meeting following receipt of a complaint determined to have standing (see VI.C.3).

VI.C.7 The Commission standards require schools to treat individuals in fair and ethical ways, and this includes the treatment of complainants.

VI.D Complaints regarding the Board or its personnel

VI.D.1 The Board will review, at its first meeting following receipt, confirmed formal complaints regarding its own conduct in the context of the ATS Commission Policies and Procedures 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 ATS Commission 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 Commission Policies and Procedures and the Board Policy Manual.

Appendix 1

List of Approved Administrative Practices

1. Archived Accrediting Records

ATS Commission staff members are responsible for maintaining accrediting records according to the Board of Commissioners' ("Board") policy (*Policy Manual*, II.C.2) and for maintaining an inventory of these records.

2. Visit Cycle Checklist

ATS Commission staff members are responsible for maintaining a log of activity for each school receiving a comprehensive evaluation visit. This log should note both the activity and, in those cases where Board policy requires a mandatory time interval, a note should be made that these intervals have been maintained (see *Policy Manual*, II.B.8) See also Appendix 2, "Time Frame for Institutions Responding to Committee Reports."

3. Posting of Self-Studies, Institutional Accreditation Histories, and Evaluation Committee Reports

ATS Commission staff members are responsible for posting self-studies, institutional accreditation histories, and evaluation committee reports to the secure website of the Board of Commissioners. Staff members are responsible for notifying first and second readers as these materials are posted for the schools they will present (see *Policy Manual*, II.B.7).

4. Comprehensive Evaluation Targeted Issue Checklist

Comprehensive evaluation committees are responsible for completing the Targeted Issue Checklist (TIC) to ensure that specific issues related to the Standards of Accreditation and the *Policies and Procedures* have been assessed during the visit. The TIC shall be submitted with the committee's final report. ATS Commission staff members will include the TIC in the material sent to schools and as part of the material provided on the secure website of the Board of Commissioners (see *Policy Manual*, III.A.3.b).

5. Substantive Change Guideline

ATS Commission staff shall provide guidance to assist member schools in the preparation of substantive change petitions. Please see Appendix 3, "Guidelines Regarding Petitions for Change" to determine when a school action is simply making a minor adjustment and when an adjustment becomes a substantive change. The guideline shall contain criteria for determining and terminology for characterizing substantive change thresholds (see *Policy Manual*, II.C.11).

6. Monitoring Continuing Implementation

The Board of Commissioners authorizes ATS Commission staff members to monitor year-to-year changes in enrollment, placement, graduation rates and financial strength, as reported on the Annual Report Forms.

For the purpose of this monitoring the following thresholds will be used to determine if a change is significant (with allowance made for percent changes that reflect small actual numbers):

- a. Headcount enrollment of \pm 50 percent (including total institutional and distance education enrollment as separate categories)
- b. Overall placement rates (in appropriate positions within one year of graduation) that are below 50 percent or for which at least 50 percent are reported as unknown
- c. Overall graduation rates (for all degrees combined) that are below 25 percent
- d. Unrestricted fund balance reduction by 25 percent or more in one year
- e. Cumulative losses in operations over the last three years

When a significant change is noted, the ATS Commission staff will ask the school to explain the factors that led to variation and indicate its understanding of the effect of the change on the school's conformity to the Commission's Standards of Accreditation and on its educational effectiveness. If a school's response suggests further followup is necessary, the ATS Commission staff will refer the matter to the Board of Commissioners for action. The Board of Commissioners may require a report, a focused evaluation, or a special comprehensive evaluation review (see *Policy Manual*, II.C.5).

7. Regular Review of Commission Member Schools

ATS Commission staff will undertake and document a regular review of the ATS website of each member school to document each school's disclosure of its complete accredited status and the provision of the Commission's mailing address and telephone 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 school is on probation, this status shall also be disclosed (see ATS Commission [Policies and Procedures](#), X.A.2 and X.A.3).

8. Teach-Out Plans

ATS Commission staff members will maintain a cumulative record of teach-out plans that involve closing an extension site, or branch campus, or when the institution itself closes and will assess whether each teach-out plan, as proposed and approved, has been implemented effectively (see *Policy Manual*, II.C.3 and II.C.4). The Board of Commissioners will evaluate any teach-out plan or agreement, using Appendix 5, "Criteria for Evaluating Teach-Out Plans and Agreements."

9. Complaint Policy

ATS Commission staff will maintain a cumulative record of complaints, ensuring that complaints received are managed according to the Board's revised complaint policies. The cumulative record will include a complaint procedures checklist for each complaint received (see *Policy Manual*, VI.B).

Appendix 2

Time Frame for Responding to Committee Reports

- An evaluation committee is to provide the school reviewed with its recommendations during an exit session at the conclusion of the visit.
- An evaluation committee is to provide the school reviewed with a complete draft of its report for a check of factual errors. The school has two weeks to conduct this check for factual errors. Any factual errors discovered are reported to the evaluation committee for correcting the committee report.
- Upon the submission of the final committee report, the Commission office provides the school with the final report. After the receipt of the final committee report, the school then has an additional two weeks (beyond the two weeks noted above when it first received the committee report) to submit additional materials and/or challenge the committee's findings. Materials submitted by the school are provided to the Board of Commissioners along with the self-study report and the evaluation committee report. A school may elect to reduce this total four-week period by formally notifying the Commission office earlier that it is satisfied with the committee report.

This time line does not limit the right for school representatives to address the Board of Commissioners or appropriate Board subcommittees in person. That face-to-face opportunity provides the school with at least another four weeks—beyond the original four weeks described above—to present additional materials and/or challenge the committee's findings.

Appendix 3

Guidelines Regarding Petitions for Change

The Board of Commissioners has adopted the following policy regarding petitions for change (see also ATS Commission [Policies and Procedures](#), VII.C).

1. Substantive changes that require petitioning for Board approval include the following: change in an institution's fundamental mission, legal status, ownership, name, location, or governing control; change in location(s) at which an institution offers at least 50 percent of an educational program (see ATS Commission [Policies and Procedures](#), VI); introduction of six or more distance learning courses (see ATS Commission [Policies and Procedures](#), VI); the offering of a new degree program (see ATS Commission [Policies and Procedures](#), V); a change in type of educational units; a new contract or major changes in existing contracts for educational or administrative services that would affect the school's conformity to the Standards of Accreditation (including any contract for educational offerings with an entity not eligible to participate in Title IV programs); the acquisition of any other institution or any program or location of another institution; and the addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study.
2. In addition to substantive changes that require petitioning the Board for approval, certain other significant but nonsubstantive changes require either a petition or notification to ATS Commission staff.

Changes requiring a petition to and approval by ATS Commission staff include (1) change in degree nomenclature and (2) opening of an extension site that offers less than 50 percent of a degree program (i.e., one not requiring a site visit).

Changes that require notification to and acknowledgement by ATS Commission staff include (1) the termination of a degree program at a location (main campus or extension site) that will continue in operation (i.e., one not requiring a teach-out plan or agreement) and (2) the closing of an extension site that offers less than 100 percent of a degree program (i.e., one not requiring a teach-out plan or agreement).

In addition, schools considering a major revision to an approved degree program that could affect its continued adherence to Commission Standards should consult with ATS Commission staff to determine if the revision constitutes a change significant enough to require formal approval (see 3.e–g below for further guidance).

3. To assist member schools, the following interpretive statements further clarify when a substantive change requires a petition and formal approval by the Board of Commissioners.

- a. The expansion of institutional mission or objective beyond preparing persons for ministry or providing graduate study in the various theological disciplines requires formal action by the Board of Commissioners. Revisions or restatements of institution mission or objective, which retain a primary focus on preparing persons for ministry or providing graduate study in the various theological disciplines are changes that do not require a substantive change petition.
- b. The change of legal status requires a petition and approval by the Board of Commissioners. These include changes from a non-profit corporation to a for-profit corporation or the reverse action, or reincorporating an institution in a different jurisdiction. Institutional name changes (including any new “doing business as” designations) require official notification to the Board of Commissioners and may be addressed by the Officers Committee on behalf of the Board.
- c. All changes in ownership or governing control of an institution, including mergers, require substantive change petition and board approval. A restructuring of governance, including revising of institutional bylaws, without a change of ownership or governing control, does not require a substantive change petition.
- d. A change of physical location for the main campus or extension site requires a petition to the Board of Commissioners if the new location offers at least half a degree and a petition to ATS Commission staff if it offers less than half a degree. A change of postal address, without a change of physical location, requires notification to the Board of Commissioners but does not require a substantive change petition.
- e. As noted in 2 above, schools considering a major revision to an approved degree program that could affect its continued adherence to Commission Standards should consult with ATS Commission staff to determine if the revision constitutes a change significant enough to require formal approval by the Board of Commissioners (or by one of its reader panels; see Appendix 7, section 1), for example, changing the curriculum of a Standard D degree in such a way that it more closely aligns with a Standard B degree or adding specializations in an approved degree without adequate educational resources. A reduction in total degree program hours does not necessarily constitute a substantive change, unless the reduction means the program no longer meets the duration requirements in the applicable degree program standard (typically interpreted as at least 72 semester hours for an MDiv and at least 36 semester hours for an MA). In such cases, a petition for an exception is required.
- f. A change in degree program nomenclature is a significant but not substantive change that requires a petition to and approval from ATS Commission staff and can be submitted at any time.
- g. Terminating a degree program, including the suspension of admissions to a degree program or a hiatus in offering a degree program for more than one year (at any location), does not require a petition or teach-out plan to the Board of Commissioners, but it does require

notification, including how the educational needs of current students in that program will be met, and subsequent notice when the last student graduates from the program. If a program is suspended for more than a year at any location, the school must notify ATS Commission staff of that fact, which will be treated as a closure.

- h. Approval of any petition for change is effective with the date specified in the official action. Such approval expects the change will be implemented within a year of that approval date. If the change cannot be implemented within that time frame, the school must submit a satisfactory explanation for the delay and a modified time line for implementation. Absent implementation of the change or granting a request for additional time, the approval will expire one year after the initial grant date. In such cases, the school would need to submit a new petition seeking permission to implement the change after that one-year period. In addition, any contingency attached to an approved petition must be satisfied before the change can be implemented, typically within a year, unless the school provides a satisfactory explanation for the delay and additional time is granted.

Appendix 4

Evaluative Guideline for Special Comprehensive Evaluations

When considering the possibility of requiring a special comprehensive evaluation, the Board of Commissioners shall use this guideline to determine if such an evaluation may be warranted. The Board of Commissioners in its determination should give particular attention to any dynamic educational changes calling into serious question the institution's ability to maintain conformity to the Standards of Accreditation. When a special comprehensive evaluation is required within 12 months of a regularly scheduled comprehensive evaluation visit, the Board of Commissioners may consolidate the comprehensive reviews.

When a special comprehensive evaluation is required, a prospectus for the evaluation will be issued to the institution stating the reasons for the special comprehensive evaluation and the date for an evaluation committee site visit, and requiring the institution to provide evidence the institution is operating in conformity to the Standards of Accreditation prior to the site visit.

Criteria for authorizing a special comprehensive evaluation:

1. **Change of governing control or ownership** (in combination with any two of the following): change of legal status, change of fundamental mission/purpose, change of location, change of educational unit, establishment of two or more extension sites, establishment of a comprehensive distance education program, acquisition of another institution or any program or location of another institution, or declaration of financial exigency.
2. **Multiple concurrent substantive changes** (when any three of the following substantive changes occur within 12 months): change of legal status, change of fundamental mission/purpose, change of location, acquisition of any other institution or of any program or location of another institution, or new contract or major changes in existing contracts for educational or administrative services that would affect the school's conformity to the Standards of Accreditation.
3. **Dynamic concurrent changes in the indicators of educational conditions or effectiveness in association with substantive changes** (when any two of the following unanticipated significant changes and one substantive change noted in item 2 above occur within 12 months): unanticipated significant enrollment increases or decreases (more than ± 25 percent), unanticipated significant changes in unrestricted fund balances (-25 percent or more), unanticipated significant changes in distance education enrollment (more than ± 25 percent), unanticipated significant changes in the placement of graduates (-25 percent or more), unanticipated significant reductions in the number of the full-time faculty (50 percent or more), or declaration of financial exigency.

Appendix 5

Criteria for Evaluating Teach-Out Plans and Agreements

Whenever a member school decides to close a campus (cease operations entirely at a main or branch campus) or close a location that offers 100 percent of a degree program, it is required to submit a teach-out plan for approval in order to ensure the welfare of enrolled students affected by that decision (see Policy Manual, II.C.3; see also Note below). The teach-out plan by the institution may also include a teach-out agreement with another institution. The teach-out plan must provide at least three essential elements: (1) equitable treatment for all affected students, (2) reasonable opportunity for those students to finish, and (3) notification to those students of any additional charges that may result from the teach-out arrangements. The teach-out plan must be submitted to and approved by the Board of Commissioners ("Board") prior to its implementation. If the campus or location being closed is also accredited by another agency, the Board will notify that agency of its approval of the member school's teach-out plan. Teach-out plans must address the following items:

1. **Counsel and Communication:** The plan must describe how students are informed of the planned closure, their options for completing the closed program(s), and the length of time such options might take. The plan must include evidence (i.e., examples) of how the closure decision is communicated to all affected parties, especially students, but also faculty, staff, and other key constituents.
2. **Completion Options:** The plan must further delineate the various options available for students to complete their program with a minimum of disruption and how those options will be implemented, including such options as continuing to offer all the necessary courses at the location to be closed until students finish (provide projected course schedules), offering courses at an approved nearby location, offering online courses if appropriate and if approved to do so, helping students transfer to equitable programs, and/or establishing a teach-out agreement with an institution with comparable offerings accredited by an agency recognized by the US Secretary of Education for US schools, or another appropriate authority for Canadian schools.
3. **Student Plans:** The plan should append a list of all affected students with a brief note as to how the educational needs of each student will be met, (i.e., which option[s] described above will be used by which students [e.g., Jones will graduate before closure, Smith will finish all required courses at that location before closure, Ortiz has chosen to transfer, etc.]). If the list of students is excessively long, it can be summarized by category (e.g., 20 students will graduate before closure, 30 students will finish courses before closure, and the remaining 50 will participate in a teach-out agreement).

4. **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.
5. **Anticipated Time Line:** The plan must specify the dates for how the closure will unfold, including these dates: the last students admitted, the first students will finish, the last students will finish, and the effective date of closure. If applicable, the time line should also include when the institution or location will lose degree granting authority and/or access to Title IV funds.
6. **List of Other Agencies:** 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 provide contact information for any state agency to which the institution is accountable.

The Board will also consider any additional information provided by the school in its petition. If the site closure means the school ceases to operate completely and permanently, the plan must indicate where all existing student records will be stored, being sensitive to any state-required regulations.

NOTE: In addition to a school's decision to close a campus or location that offers a complete degree program, a teach-out plan is also required under three other conditions: (1) whenever the Board acts to withdraw, terminate, or suspend a member school's accreditation; (2) if a state licensing or authorizing agency notifies the Board of Commissioners that a school's license or legal authorization to provide an educational program has been or will be revoked; or (3) if the US Secretary of Education notifies the Board that the Secretary has initiated an emergency action against an institution, in accordance with section 487(c)(1)(G) of the HEA, or an action to limit, suspend, or terminate an institution participating in any Title IV, HEA program, in accordance with section 487(c)(1)(F) of the HEA, and that a teach-out plan is required (see ATS Commission Policies and Procedures, III.E).

A teach-out plan may also include a teach-out agreement with another accredited institution. 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 four 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 institutions) will not allow some students to complete their program even if the institution itself remains open, (3) if the Board, upon review of the teach-out plan, decides a teach-out agreement is also needed, or (4) if any of the three conditions described in the previous paragraph will result in the school or location closing before all affected students have completed their program.

A teach-out plan is not required if a school is closing an extension site that offers less than a complete degree program, and no other condition listed below obtains. However, the school must still notify ATS Commission staff about the exact closing date and provide a brief summary of how it will meet the educational needs of affected students. If a school is relocating a campus or an extension site that offers a complete degree program, it must submit a Petition for Relocating an Approved Extension

Site (or Campus), which includes a teach-out plan since the former campus or location is still closing. A teach-out plan is not required if a school is simply terminating an existing degree program on its main campus or on a branch campus, provided all students in the program being terminated will be allowed to finish at that campus. Schools terminating a degree program on campus must still notify ATS Commission staff of that decision, since the Commission maintains a record of all approved degree programs for each approved location. The notification must indicate the name of the degree program being terminated, the date the last student enrolled, the number of students still enrolled, an indication of how those students will finish, and the projected date at which the last student will finish. The school must later notify ATS Commission staff when the last student has finished. Until then, the Commission will continue to list that program as approved, but with the designation of “discontinued,” until notified of the last student to finish and under the condition that no new students may be admitted. A school may suspend a program for up to a year without notification, but anything longer than one year will be considered a termination with notification required.

Appendix 6

Policy on Approving New Extension Sites

The Board of Commissioners has adopted the following policy on approving new extension sites, including which approved degree programs can be offered at those sites.

1. Petitions for new extension sites offering less than half a degree can be approved by ATS Commission staff, if the petition documents that all applicable standards are met. No site visit is required. Approval of such sites permits the school to offer less than half of any approved degree within the same category of degrees as in the original petition—without any further approval of the site. For example, if staff approves a school's petition to offer less than half of a degree within the category of "basic programs oriented toward ministerial leadership," it may offer less than half of any degree program in that category without any further petitions or approvals. Categories of degrees are described in *Educational Standard*, sections ES.1.2–5.
2. Petitions for new extension sites offering half or more of a degree, including a complete degree, can be approved only by the ATS Board of Commissioners. A site visit is required within six months of the first course(s) offered, unless the school includes in its petition a request for an exemption to the site visit, based on meeting the four exemption criteria described in section III.A.1(e) of the *Policy Manual*. If the school is petitioning to offer a complete degree, then the approval is limited to that particular degree. If the school is petitioning to offer less than a complete degree, then the approval will include any degree within that category (as described in the previous paragraph).

Appendix 7

Policy on Board Reader Panels and Reports to Staff

The Board of Commissioners has adopted the following policy on how it does its work.

1. The Board of Commissioners meets twice per year in person in plenary sessions and other times per year via conference call in committees called “reader panels.” Reader panels may act on certain kinds of reports and certain kinds of petitions, though actions on petitions that constitute substantive changes must be ratified by the full Board. The reports on which reader panels may act include any whose final action does not impact membership status (e.g., reader panels cannot remove or impose a notation, place a school on probation, withdraw or deny accreditation, or issue a show cause order). The petitions on which reader panels may act include (1) new extension sites, (2) new master’s programs in a degree category already approved for that school (e.g., another professional master’s), (3) revisions to an approved degree program that require a petition (see Appendix 3, section 3.e), and (4) any teach-out plans or agreements for a closed location (other than closing a main campus).
2. The Board of Commissioners delegates to ATS Commission staff action on any nonsubstantive change petitions (see Appendix 3, section 2, above) and any reports that fall into one of these three categories deemed routine:
 - a. Reports that do not affect membership status (e.g., staff cannot impose notations)
 - b. Reports that do not deal with substantive or controversial issues (e.g., serious financial concerns, difficult governance issues, or contentious issues in the media)
 - c. Reports that do not require further Board action (e.g., staff cannot require follow-up reports or visits)

Appendix 8

Guidelines for Candidacy Petitions

The process for petitioning for candidacy status with the ATS Commission on Accrediting is described in [Guidelines for Petitioning for Candidate Accredited Member Status](#). The criteria and policies related to “Candidate for Accredited Status” are described in the ATS Commission [Policies and Procedures](#), II. The guidelines the ATS Board of Commissioners normally follow in granting petitions for candidacy are these:

Grant candidacy on “fast track” (within 2 years of receiving Associate Member status) if a school . . .

- is established for more than five years and/or accredited by another recognized agency;
- demonstrates institutional vitality and educational quality with ample resources and established assessment efforts; and
- seems to meet or be close to meeting all Commission Standards of Accreditation.

Grant candidacy on “normal track” (within 2–5 years of receiving Associate Member status) if a school . . .

- is established for five or fewer years and/or not accredited by another recognized agency;
- demonstrates institutional and educational capacity with sufficient resources and promising assessment efforts; and
- meets most Commission Standards of Accreditation and can meet all within two years.

Not grant candidacy, but extend Associate Member status “beyond usual track” (another 5 years) if . . .

- few of the factors above are present, but school making good progress; and
- if the school formally applies for renewal of Associate Member status (see [guidelines](#)).

The normal period of candidacy is two years, from either February through February or June through June, the two months in which the Board typically meets. That two-year period actually extends until the next meeting of the Board that follows the last month listed (i.e., through the following June for a February to February candidacy and through the following February for a June to June candidacy). Candidate schools who cannot meet that two-year time line may petition for an extension, per ATS Commission [Policies and Procedures](#), II.A.

If a school does not petition for and achieve Candidate for Accredited Membership status within five years of being granted Associate Membership status, the policies described in the ATS [Procedures](#), II.C.4 and II.E apply.

Appendix 9

Policy on Use and Release of Data from the Institutional Database

I. Preamble on Data Sharing Principles and Practices

- A. The Commission on Accrediting of the Association of Theological Schools (“Commission”) maintains a comprehensive institutional database on theological schools in North America. These data are provided by the member schools on Annual Report Forms in the fall of each year as a condition of membership. The database contains information related to a range of educational and accrediting issues, and it supports the mission of the Commission “to promote the improvement and enhancement of theological schools.” In addition, it provides data central to the administrative and programmatic work of The Association of Theological Schools in the United States and Canada (“Association”). As appropriate, it also serves as a valuable resource for researchers and organizations that share an interest in theological education, church and denominational bodies, representatives of the media, and the general public. The Commission shares all data in the institutional database with the Association for its use.
- B. The information in the database that is considered public information is published in individually or institutionally identifiable forms in the Commission’s Annual Data Tables and in the *Membership List*, as published on the ATS website. The only individual school data published by the Commission or Association includes Annual Data Table 1.2 “Significant Institutional Characteristics of Each Member School,” Table 2.15 “Head Count and Full-Time Equivalent Enrollments by Degree Category in All Member Schools,” and individual contact information, selected statistics, and the accreditation status of each member institution in the *Membership List*.
- C. The Commission collects, protects, and shares data based on key principles and practices, as described below. This policy applies to all data collected as described in “I.A” above.

II. Principles of Data Sharing

- A. The Commission provides data to member schools and others for the following purposes:
 1. improving theological education;
 2. promoting appropriate openness and transparency, as well as cultivating more substantive and diverse conversations, among member schools, their constituencies, researchers, and the broader public; and
 3. addressing key issues in theological education.
- B. Recognizing data can be used for multiple purposes, the Commission, the Association, and others shall use the data only for purposes stated in “II.A.1-3”.
- C. The Commission protects the confidentiality of sensitive data (e.g., individual salaries, school and individual names, data that are not already public).

III. Practices of Data Sharing

- A. Honoring of requests for data is contingent upon adequate resources of ATS, including financial and human resources. Charges for data may apply: see ATS website's Research page for current list of fees. The Commission shares the following data with the following constituencies under the following conditions (see Addendum to Appendix 9 for approval requirements):
1. Individual constituents at ATS member schools
 - Raw data from own school—per approval each year from chief administrative officer(s) of school
 - Raw data from peer schools, up to 15—per approval from each requested school's chief administrative officer(s)
 - Digested data from peer schools, minimum 5, maximum 15
 2. ATS-affiliated groups (e.g., ADME, ATLA, HTIC, etc.) & Lilly ecology partners (e.g., FTE, Wabash, InTrust, etc.)
 - Email/contact information only; no charge
 3. Individual researchers (e.g., doctoral students)
 - Select datasets—de-identified raw data from a set of schools, per request and approval
 4. Research organizations (e.g., Auburn Center, Center for Applied Research in the Apostolate, etc.)
 - Select datasets—de-identified raw data from a set of schools, per request and approval
 5. Religious groups (e.g., PCUSA, ELCA, SBC, etc.)
 - Digested data about particular schools, per request and approval
 - Select datasets—de-identified raw data from a set of schools, per request and approval
 6. News media (e.g., Christian Century, Christianity Today, journalists, etc.)
 - Digested data about particular schools or the association of schools, per request and approval
 7. Broader public
 - Digested data about particular schools or the association of schools, per request and approval
- B. Data Use
- Data that are provided according to "II.A" above must be used in the following ways:
1. Data are for one-time use (e.g., one news article, one research project);
 2. Data must be used solely for the purpose(s) named in the request and consistent with the principles outlined in "II" above;
 3. Data in the original form as provided by ATS may not be shared with any other organization(s) or individual(s);
 4. When data are reported, the Commission is to be identified in the following manner as the source of any published data: "Source: The Commission on Accrediting of the Association of Theological Schools, Pittsburgh, PA". Also, the following disclaimer notice is to be included whenever data are reported: "Analyses and interpretations of the Commission's data are the researcher's and may not reflect those of the Commission on Accrediting or the Association of Theological Schools". The Commission reserves the right to clarify

analyses or interpretations when it perceives that data have been used incorrectly or have led to misleading inferences, and such data misuse will be taken into account for all future requests from this individual, researcher, or research organization.

5. All reasonable steps must be taken to protect the confidentiality of the database as a whole and the data that are provided. In the event of a breach of confidentiality, the requesting individual or organization must notify ATS in writing within 15 calendar days of knowledge of the likely breach, with a description of the extent, and potential effects, of the breach;
6. Access to the data must be limited to staff who are qualified to carry out the sole purpose stated in the request;
7. Additional data-use requirements stated in the request protocol must be followed.

C. Appeals

Any appeals of denials for access to the Commission's data should be directed to the Appeals Panel of the Commission on Accrediting.

IV. Glossary

The following are definitions of terms used in this document:

Dataset	Collection of raw data pulled from a database, with multiple cases (e.g., individuals, schools) and multiple variables (e.g., administrative role, student headcount, individual's denomination, school's structure); defining of datasets involves identifying the type of cases and specifying the variables being requested.
De-identified	At the most basic level, removal of names and titles (of individuals or organizations) for purposes of confidentiality; other forms of de-identification may include removal of variables beyond names and titles
Digested data	Database information that has been collated to identify counts, frequencies, percentages, and averages (mean, median, or mode) or interpretations about the population inferred from the sample dataset (e.g., predictions, statistically significant differences) and reported most commonly in table or graph form
Raw data	Non-digested information that is pulled straight from a database and most commonly provided in an Excel sheet, SPSS file, or other comma-separated value (csv) file
Variables	Factors, quantities, conditions, and other characteristics that are liable to vary and that are identified for purposes of study or research

Addendum to Appendix 9: Approval Requirements by Type of Data and Category of Data Users

Category of Data User

Types of Data	Category of Data User					
	ATS Research Staff/ Consultant	Individual from ATS School	Individual Researcher (ATS- or non-ATS school)	Research Organization	Religious Groups	Media or General Public
Publically available raw data ¹ (collations from ATS' or schools' websites)	None	Level 1	Level 1	Level 1	Level 1	Level 1
Data from Selected Schools						
Raw data for a particular school (select variables, one school)	None/ Contract	Level 3	Level 3	Level 3	Not available	Not available
Raw data for selected schools (select variables, up to 15 schools)	None/ Contract	Level 3 (Request protocol)	Level 3 (Request protocol)	Level 3 (Request protocol)	Not available	Not available
Digested data for selected schools—commonly requested data (frequencies, averages, inferential statistics, minimum 5 schools)	None/ Contract	Level 1	Level 1	Level 1	Level 1	Level 1
Digested data for selected schools—new types of data (frequencies, averages, inferential statistics, minimum 5 schools)	None/ Contract	Level 1 (two ATS staff)	Level 1 (two ATS staff)	Level 1 (two ATS staff)	Level 1 (two ATS staff)	Level 1 (two ATS staff)
Data from All or Sets of ATS Schools						
De-identified <i>school</i> -level raw datasets (select variables, per school, school de-identified)	None/ Contract	Level 2	Level 2	Level 2	Level 2	Not available
De-identified <i>individual</i> -level raw datasets (select variables, per individual, school and individual de-identified)	None/ Contract	Level 2	Level 2	Level 2	Level 2	Not available
Institutional raw data connected to other ATS data (institutional variables attached to Qs, survey data)	None/ Contract	Level 2	Level 2	Level 2	Level 2	Not available

Approval Levels and Requirements:

- Level 1 Written or email request and approval by any ATS research staff
- Level 2 Submission of request protocol and approval by ATS director of research, in conjunction with one other ATS research staff
- Level 3 Written or email request and approval by ATS executive director and requested school's chief administrative officers

¹ Data per school that are already publically available on the Association's website include variables found in Annual Data Tables 1.2 and 2.15: school's accreditation status, embeddedness, predominant racial composition, state, denominational affiliation, total expenditures, long-term investments, faculty full-time and FTE, library holdings, student enrollment by headcount and FTE, and MDiv tuition and fees. Additional data per school are available publically through organizations such as the National Center for Education Statistics (through the IPEDS process, which is required of all institutions of higher education receiving Title IV funding), regional accrediting agencies, and the American Association of University Professors (average faculty salaries per school).