Accreditation Standards: A Look Back and a Look Around

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ABSTRACT: As the ATS Commission membership contemplates another major redevelopment of the Standards (a quarter century since the last one), Tom Tanner, Commission staff liaison to the proposed redevelopment process, presents a double look at our Standards: (1) a look back at where we've been over the last 80 years since the first Standards were implemented in 1938, and (2) a look around at the current state of accrediting standards (both ours and others), to see where that might lead us as we look to the future.

Among the many monikers given to Dan Aleshire during his 27 years at The Association of Theological Schools (ATS), the title of "accreditor in chief" may be one of the most fitting. For a quarter century, no one knew ATS accreditation or the accrediting standards better than he. In fact, he was hired in 1990 to oversee *all* of ATS accrediting and for his first four years at ATS was the *only* ATS staff member doing that work—a role now handled by five ATS directors. As the sole accrediting staff member, it was not uncommon for him in those days to do three accreditation visits a week! He would assist one accrediting team in getting started on Sunday, support another team on Monday or Tuesday, help yet a third team finish on Wednesday or Thursday, and then do it all again at three different schools the next week. And undergirding all his hard work in accreditation were the ATS Commission Standards of Accreditation.

It is not surprising, then, that *Dan Aleshire once said that June 23, 1996, was his very best day at ATS*—and he had nearly 9,900 days at ATS. That was the day the ATS Commission membership voted almost unanimously (two schools abstained) to approve a completely redeveloped set of Standards of Accreditation, which remain mostly intact to this day. That day in Denver was the culmination of an intense, four-year project that was led by him and represented the first major redevelopment of the Standards in nearly a quarter century, since their last major revision in 1972. The vote was so overwhelming (not only numerically, but also emotionally) that after the final count was announced, the 330-some members in that ballroom rose to their feet and sang the Doxology in unison. That's a good day in accrediting.

As the ATS Commission contemplates another major redevelopment of the Standards in the next few years (a quarter century later), it seems fitting to take a double look: *(1) a look back* at where we've been over the last 80-plus-year history of our Standards, and *(2) a look around* at the current state of accrediting standards (both ours and others), especially to see where that might lead our membership in the future. This article will spend the most time looking back, which seems fitting for an association that will celebrate its 100th anniversary in June 2018—and fittingly, back in Denver. We hope it is another good day in accrediting.

A look back: A brief history of the ATS Commission Standards of Accreditation

The early years (1918–1938)

In August 1918, 101 delegates from 50-some schools met at Harvard University for the first Conference of Theological Seminaries and Colleges in the United States and Canada to "consider the problems of theological education, especially as affected by the war . . . "[1]. The delegates at that very first conference [later ATS] "recognize[d] that after the war there will be many men [sic] looking to the Ministry whose experience in the National Service will have given them great advantages of training and character" and concluded that "great care should be exercised in maintaining a high standard of qualifications for the Ministry . . . in view of the many common problems confronting all seminaries, such as the decrease in the number of candidates . . . "[2] Some things never change.

For its first 16 years, the Conference met primarily "to promote intercourse amongst the institutions which compose its membership," including ways "to advance the highest ideals of training for the Christian Ministry."[3] That focus on "the highest ideals" became the subject of some debate among ATS schools in the 1920s, especially following the 1924 publication of Robert Kelly's *Theological Education: A Study of 161 Theological Schools in the United States and Canada*. That classic study was modeled on Abraham Flexner's pioneering study in 1910, *Medical Education in the United States*, which called for stricter standards for training physicians. As Glenn Miller reports in his 2008 history of ATS, many ATS presidents were not pleased with Kelly's conclusions in 1924 that "there were too many theological schools, operating with too low standards and too few resources."[4] Consequently, a study was commissioned in 1929 that many ATS presidents hoped might soften Kelly's conclusions. That study, funded by John D. Rockefeller Jr., resulted in William Brown and Mark May's four-volume magnum opus, *The Education of American Ministers*. "In exchange for funding the study, Rockefeller's staff insisted [however] that the Conference [ATS] become an accrediting agency [because] something had to be done to improve seminary standards."[5]

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[1] 1918 *ATS Bulletin* 1, 11.

[2] Ibid, 12.

[3] 1921 *ATS Bulletin* 2, 2.

In July 1934, shortly after Brown and May's work was published, the ATS delegates voted "that a commission on Accrediting Institutions of Theological Education be appointed [to recommend] standards or criteria by which it would be proposed to rate institutions."[6] To expand a voluntary conference of conversation partners into an accrediting agency was a fairly radical idea at the time—during the Depression. After all, in the 1930s "accreditation was a relatively new idea" and "designed for colleges and universities," not seminaries, as Miller points out.[7] It would be another 30 years before the large regional accreditors began admitting seminaries in the 1960s.

Two years later, in June 1936 at the Association's tenth Biennial Meeting, the very first ATS accrediting Standards were published.[8] The Standards were prefaced with two important statements that have helped define the Association's philosophy of accreditation ever since: (1) "the Association does not treat its standards as definite rules and specifications to be applied in an exact and mechanical fashion," and (2) "there is no desire to enforce these standards in an arbitrary fashion [but] are to be administered by the Commission on Accrediting Institutions by way of stimulus and encouragement."[9] The Commission consisted of the four officers of the Association, plus six others appointed by the Executive Committee, which consisted of the officers and six others elected by the membership.[10] Interestingly, the initial Standards never mentioned the words *evaluation* or *assessment*—two areas of critical importance today, that did not appear in ATS Standards until 1972 and 1996, respectively, with the 2012 revision especially highlighting assessment. Yet, the focus on student outcomes was clear from the very beginning, as made clear in this opening statement to the 1936 Standards:

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[4] Glenn Miller, *A Community of Conversation: A Retrospective of [ATS] and Ninety Years of North American Theological Education* (Pittsburgh: The Association of Theological Schools, 2008), 4.

[5] Ibid.

[6] 1934 *ATS Bulletin* 9, 16.

[7] Miller, 5.

[8] 1936 *ATS Bulletin* 11, 42–43.

> [ATS] regards as the chief ground for the inclusion of an institution in the list [of accredited schools] evidence that the institution is effective in preparing students for a successful ministry. It believes that this evidence is most plainly to be found in the extent to which graduates of these institutions do in actual practice render a successful ministry.[11]

However, the Commission confessed that "such evidence in itself alone is, in the first place, difficult to secure, and in the second place, difficult to interpret satisfactorily."[12] Consequently, the Commission relied instead on "certain factors in the life and work of particular institutions"[13] such as faculty resources, library resources, and financial resources—all focused on inputs rather than outcomes.

The initial nine Standards in 1936 were only two pages long (compared to today's 19 Standards covering 98 pages). The first standard on "Standards of Admission" was only one sentence, requiring "for admission . . . the degree of A.B." The last standard on "Inspection" said only institutions "inspected and approved by the Commission shall be accredited." The longest standard was the fourth one on faculty, "which should include at least four full-time professors" in biblical, historical, theological, and practical areas. The only degree program recognized was the "B.D. or its equivalent," which was not renamed the MDiv until the first major revision in 1972. Perhaps the most interesting standard was the eighth one on "General Tone," which required that in accrediting an institution "regard should be had for the quality of its instruction, the standing of its professors, the character of its administration [though a standard on administration did not appear until 1962], the efficiency of its offices of record, and its proved ability to prepare students for efficient professional service or further scholarly pursuits."[14] The emphasis on "efficient professional service" grew out of Brown and May's 1934 work, which Miller describes this way: ". . . much of the work's power came from its definition of theological education as professional education. Ministers were trained to do a job, and the churches that hired them had a right to expect their employees to be competent and efficient."[15]

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[9] Ibid., 41.

[10] Ibid., 39 and 41.

[11] Ibid., 41.

[12] Ibid.

[13] Ibid.

In 1938, the ATS Commission on Accrediting issued its very first report.[16] That report described the "procedure in accrediting," which relied on schools completing 18 "schedules" (the precursor to today's ATS Annual Report Forms). If those submissions were deemed satisfactory, then a single member of the Commission visited the school for a one-day inspection.[17] The "inspector" then "checked" off on a list whether the school did or did not meet each standard. The Commission used that checklist, along with the inspector's report and the school's schedules, to make an accreditation decision. In 1938, 61 of 79 ATS members applied for accreditation, which was granted to 46 of them (75%). Of the 15 schools denied accreditation, 12 were judged to have too few faculty.[18] Among the 46 schools granted accreditation, 35 (76%) were accredited with a "notation," which was "a way of referring to footnotes appended to the list of accredited schools . . . to indicate that while a school is being accredited, it does not yet adequately safeguard [certain] standards."[19] Among the 22 possible notations, the first three were the most common (imposed on 26 schools), all of which dealt with the percentage of seminarians without a baccalaureate degree, which ranged from 10–24% (Notation 1) to 50–74% (Notation 3). The total enrollment of those 46 charter members of the Commission was 5,102, with a median of 90 students (compared to today's total of 73,400 students and a median of 140 for 270 ATS members).

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[14] 1936 *ATS Bulletin* 11, 43.

[15] Miller, 5.

[16] 1938 *ATS Bulletin* 12.

[17] Ibid., 7–8.

[18] Ibid., 9.

[19] Ibid., 13.

The middle years (1939–1995)

The original set of nine Standards from 1936 stayed fairly intact until 1946, when a new standard was added for "Theological Degrees beyond the B.D." Until then, the BD (which became the MDiv in 1972) was the only degree approved by the ATS Commission. To be sure, 1936's Standard 2 on the "Length of Course and Standards for Graduation" mentioned the PhD and MA degrees, but it stipulated that they could only be offered by seminaries affiliated with a university with "the degree to be given by the university," not the seminary. The shift in 1946 brought these academic degrees under the purview of the ATS Commission, though a new notation was added for schools that conferred the PhD degree that were "not an integral part of a university."[20] The next significant revision came in 1954, when the library standard was expanded from one sentence to three pages. The expansion of the library standard, no doubt, was due to the founding of the American Theological Library Association in 1946, virtually all of whose members at the time were from ATS schools.

One of the most profound changes in accreditation came in 1956, though not in the Standards themselves. It was the first year that the Commission began to replace its one-and-done accreditation process (i.e., a one-time, one-day, one-person "inspection" based on questionnaires or "schedules" completed by applicant schools) with a regular, decennial review process. That ongoing process required an institution-wide self-study report at least every 10 years, which was reviewed by a committee of peer evaluators who visited the campus for several days. Begun in 1956, this new review process was not fully implemented until the mid-1960s. It was the combination of these two requirements (self-study reports and peer evaluators) that heralded a new era in accreditation for ATS. In his 2008 history of ATS, Glenn Miller describes quite well the profound implications of these two new requirements:

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[20] 1946 *ATS Bulletin* 16, 18.

> For the first time, broad cross sections of the schools were involved in reaching conclusions about the state of the institution and its future. In time, of course, trustees and other publics would become involved as well. If one of the goals of accreditation was to set a standard for what would later be called a 'good theological school,' then more people were aware of what might constitute such an institution. *In effect, the self-study process created, both in theory and often in practice, a community of improvement.* As the standards progressively developed, the existence of this community supported each subsequent attempt to improve the educational quality of the seminaries. The other effect of the self-study process was the creation of a broader and better-networked community of theological educators. *As the visiting teams crossed the continent, they learned much about the problems and opportunities of other theological institutions.* This increased the awareness of common problems and raised the possibility that they might have common solutions . . . As the Association came to include evangelical, Catholic, and orthodox schools, *the self-study process [with peer review] was an invaluable way of providing exchanges of perspective across confessional boundaries*.[21]

The next revision of the Standards came in 1962 with a new standard on "Administration and Controls," the first ever to focus on administration and governance. The 1962 revision also added a standard on "Student Life and Work," the first to focus on students. A revision in 1966 saw the first reference to the MDiv, though MDiv did not become the official nomenclature until 1972, replacing the BD. In 1966, the first Eastern Orthodox and Roman Catholic seminaries were admitted to the Association, Maryknoll Seminary and St. Vladimir's Orthodox Theological Seminary. In 1968, Maryknoll was the first Roman Catholic seminary to become accredited, the same year that 15 more Roman Catholic seminaries entered as Associate Members. In 1968, guidelines for the new Doctor of Ministry degree were appended to the Standards, but they were not officially added as a standard until 1972. In 1970, the Association first allowed Jewish schools to join, with references to the church and synagogue in the 1972 revision discussed below. So few joined (only one—Hebrew Union of Cincinnati—and only as an Associate member from 1970 to 1979) that references to synagogue were omitted in the 1996 revision.

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[21] Miller, 14, emphases added.

The first major redevelopment of the Standards came in 1972—36 years after their first publication. The "Preamble" to the Standards made it clear that this revision was focused on resources, a term used eight times on one page. Yet, resources did not necessarily come with "bright-line" minimums. For example, the standard on faculty removed for the first time a minimum number, which had increased from the initial four in 1936 to six in 1958. The 1972 revision represented quite a number of firsts, including the first references to women, to race and ethnicity, to institution-wide evaluation, to placement (called employment), and to officially prescribed nomenclatures for degree programs, including the first references to the MDiv, the DMin, the EdD, and the MRE. In fact, the new standard on the MRE was the first for what we now call a professional MA degree. Until then, only the MDiv was approved for professional ministry. The standard on students moved from sixth on the list to first on the list (it moved back down to seventh in the 1996 revision). The 1972 revision also introduced the use of "General Institutional Standards," followed by degree program standards—a two-part structure that stayed until 2012, when the Commission added a third tier, the Educational Standard.

Six fairly minor revisions came between 1972 and 1996, beginning in 1982. In that year, the Preamble added a focus on mission to the 1972 focus on resources; mission (purpose) did not become a standard until two years later in 1984. The 1982 revision also added standards on "Responsiveness to Minority and Women's Concerns" and on "Educational Programs Conducted Off-Campus." The latter represented the first time in its nearly 50-year history that the Commission approved any educational offerings outside a school's main campus. Thirty-five years later, nearly 100 ATS schools now have more than 300 extension sites, including 100 sites offering a complete degree and 50 sites offering at least half of a degree. Some things do change. In the 1984 revision, the focus on mission was heightened with a new standard on "Institutional Purpose," placed first in the list. A tenth standard was added on "Institutional Policies Regarding Placement." The MDiv standard also introduced for the first time four content areas; those were different, however, from the current four areas ecognized beginning in 1996.

The 1986 revision included a standard on the Doctor of Missiology degree for the first time, as well as one on the specialized professional MA

(MA in ___). The 1990 revision introduced a new standard on "Globalization of Theological Education." In 1992, the Commission expanded its 1982 standard on off-campus programs to "Criteria for Extension and Distance Learning Programs," though the latter term referred to audiovisual materials, not to online learning. A standard on online education did not come until 2000. The last revision before the major redevelopment in 1996 (see next section) was in 1994, when a standard on "U.S. Higher Education Act, Title IV Participation" was added. It was the shortest-lived standard in ATS Commission history, being replaced in 1996 with a paragraph in Standard 2 on Integrity, where it still stands.

The most recent years (1996–2018)

Only twice in the 80-some-year history of the ATS Commission have the Standards undergone a major revision or redevelopment. The first one was in 1972, which saw many firsts, as described in the previous section. However, the revision that began in 1992 and resulted in the 1996 Standards was arguably the most comprehensive ever, with a nearly start-from-scratch approach. This article will not spend too much time on that revision, as it has been documented quite thoroughly in earlier issues of *Theological Education*. The most thorough documentations of the 1992–1996 revision were published in the Spring 1994 issue that was dedicated to "The Good Theological School" and in the Spring 1996 issue on "Quality and Accreditation: Final Report of the Redeveloped Accrediting Standards." "The Good Theological School" referenced the overall framing question: *What is the good theological school?* That question guided the entire four-year process, to which two Biennial Meetings were devoted: June 1994 in Atlanta and June 1996 in Denver. Suffice it to say that the redevelopment process was highly participatory and—in an era before emails and websites—very labor intensive. One anecdote attesting to the prodigious output of this process concerns a meeting of the accrediting staff when Dan Aleshire brought in a four-foot tall stack of documents; they were the papers and notes produced over that four-year process. No wonder he viewed June 23, 1996—the day the membership approved those revised standards nearly unanimously after four long, hard years of work—as his very best day at ATS. And it was fitting that the members sang the Doxology to conclude that hard but holy process.

As Dan documented in the fiftieth anniversary issue of *Theological Education* in 2014, the 1996 Standards introduced the third of four movements in the history of the Commission Standards.[22] The first movement focused on resources, which was true from the first Standards in 1936, but especially so in the 1972 revision—the first major revision, with a preamble that used the word "resources" eight times on one page. The second movement focused on mission, with the first standard on mission or purpose introduced in 1984 and set in a privileged first place. The focus on mission did not replace the focus on resources, but simply added another emphasis. The third movement focused on evaluation, especially assessment of student learning outcomes in 1996, and, again, not as a replacement to the earlier two, but as yet another addition. To be sure, evaluation was introduced in the 1972 revision, but it was not until the 1996 revision that the full impact of this third movement became clear. The 1996 Standards introduced the importance of assessing the outcomes for every single degree program, an emphasis that received even more focus in the last revision in 2012 (see later in this section).

As Dan Aleshire indicated in his 2014 *Theological Education* article, the first two movements were driven internally, for the most part by member schools, who wanted an emphasis on resources and on mission.[23] The third movement, however, was driven mostly by external factors, primarily from public and political calls for more accountability in demonstrating the value of higher education. Some of those calls were concentrated in the US Department of Education, which over the last two decades has introduced what Aleshire called yet a fourth movement in accreditation. That movement emphasizes an increasingly regulatory approach to accreditation by the US government.

While it has been involved in accreditation since the "GI Bill" of 1944, the US government increased its influence under the Veterans Readjustment Assistance Act of 1952, which required the government to publish a list of "recognized accrediting agencies" that it would deem as "a reliable authority as to the quality of training offered by an educational institution." That was the year (1952) that the ATS Commission on Accrediting was first recognized by the US government and put on the list as a "reliable authority" on educational quality. The Higher Education Act of 1965 escalated the US government's influence considerably by making available federal grants and loans only to students enrolled in schools "accredited by an agency recognized" by the US government. With that 1965 Act, accrediting agencies became the "gatekeepers" for federal funds available to students. That gatekeeper role remained a fairly cordial and collaborative one between accrediting agencies and the US government until the 1990s, when it began to be a bit more adversarial with two reauthorizations of the Higher Education Act in that decade. That combative role became readily apparent a decade later in the 2006 Spellings Report[24] under the US Secretary of Education Margaret Spellings, which viewed accrediting agencies with considerable suspicion. That adversarial role reached a peak in 2015 with the Department of Education releasing a Transparency Agenda for Accreditation[25] that viewed accrediting agencies as "watchdogs that rarely bite." Especially disconcerting to accrediting agencies and educators in general are recent regulations that for the first time in US history include such things as a "federal definition of credit hours," "gainful employment" rules, and "state authorizations" for online education. Still, as Dan Aleshire acknowledged in 2014, this fourth movement seems to be where we might be for some time, with significant implications for accrediting standards now and in the future.

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[22] Daniel O. Aleshire, "Fifty Years of Accrediting Theological Schools," *Theological Education* 49, no. 1 (2014).

[23] Ibid., 69.

Five revisions followed the last major revision of the Standards from 1992 to 1996. The first came in 1998, when a requirement about "completions and placements" was added to each degree program—in response to new regulations from the US Department of Education and the 1996 reauthorization of the Higher Education Act. The next minor revision came in 2000, when a five-page Standard 10 on "Distance Education" was added—the first to reference online education. That was a significant expansion of the standard on "Extension Education," first introduced in 1982, regarding "Educational Programs Conducted Off-Campus," which was updated in the 1996 revision as "Extension Education." The Commission had not approved any online courses until 1999 and none for the MDiv until 2002.

The third minor revision, which ended up being quite significant, was the addition of only one sentence to the 2002 Standards. That sentence allowed up to two years of the MDiv (and one year of professional and academic MA programs) to be completed "by means of distance learning," which meant online learning. As noted earlier, until 1982 the MDiv (and, in fact, all degree programs) had to be completed on a school's main campus. The 1982 revision permitted "extension education," allowing degree programs to be completed off campus, though such sites had to be approved as complete-degree-granting sites. While the 2000 revision was the first to allow some online courses, the 2002 revision was the first to allow substantial online offerings (i.e., up to two-thirds of the MDiv and up to half of professional and academic MA programs). Between 2002 and 2012 (when the Standards permitted completely online programs), 110 ATS schools went online. Some 85 of those (a third of the membership) offered a significant number of online courses, with the result that ATS online enrollment jumped from very few in 2002 to around 12,000 in 2012.

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[24] https://www2.ed.gov/about/bdscomm/list/hiedfuture/reports/pre-pub-report.pdf.

[25] https://www.ed.gov/news/press-releases/department-education-advances-transparency-agenda-accreditation.

The fourth minor revision came in 2005, when the ATS Standards and Procedures began using a new name: the Commission on Accrediting of The Association of Theological Schools. The Commission at that point became a distinct legal entity separate from the Association. That move was in response to a new requirement from the US Department of Education that accrediting agencies be "separate and independent" of any parent, professional association.

The fifth and final revision came between 2010 and 2012 when the Standards introduced a new Educational Standard, part of a three-tiered wedding cake structure: General Institutional Standards, the Educational Standard, and the Degree Program Standards.[26] The new Educational Standard, approved in 2012, placed particular emphasis on the assessment of student learning outcomes, a topic that had become the number one reason for required reports following comprehensive evaluation visits. One of the most significant changes in the 2012 revision was the allowance for "exceptions and experiments" (summarized in Educational Standard, section ES.1.6.1), including exceptions to residency. While the 2002 revision allowed up to two-thirds of the MDiv and up to half of professional and academic MA programs to be completed online, the 2012 revision made offering the academic MA completely online a routine option and enabled schools to petition for an exception to offer the MDiv and professional MA completely online.

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[26] http://www.ats.edu/uploads/accrediting/documents/accrediting-standards-architecture.pdf.

Since the first ones were granted in August 2013, more than 70 schools (one-fourth of the accredited members) have submitted nearly 200 petitions for one or more exceptions and experiments, with almost 180 of them approved—150 petitions for online programs. ATS now has more than 50 schools that offer the MDiv completely or almost completely online, more than 50 schools that offer about 80 professional MA programs completely or almost completely online, and another 80-plus academic MA programs at about 50 schools that are also offered completely online. That's more than 200 ATS degree programs being offered online—all since the 2012 revision. In addition, about a dozen schools have been approved for three- to five-year experiments, including eight mostly online PhD programs, four completely online DMin programs, and three schools offering competency-based MDiv degrees. That amount of innovation comes in no small part from the guiding principle behind the 2010–2012 revision: *rigor with flexibility*. It is a principle that may well guide the next major revision of the Standards, as described in the next section.

A look around: A brief review of current accrediting standards (ours and others)

In February 2017, the ATS Board of Commissioners authorized a "Preparatory Committee for the Redevelopment of the Standards and Procedures to proceed with its work of designing a plan for [their] redevelopment." In February 2018, the Board approved a motion on authorizing the redevelopment that is to be brought to the membership at the June 2018 Biennial Meeting in Denver, along with a rationale, timeline, workplan, and input process that involves widespread membership engagement. While this article focuses on the Standards, the other document that is inextricably linked and also can be changed only by the membership is the Procedures. In taking these actions in February of 2017 and 2018, the Board assumed that the next revision would be a major one, reminiscent of the 1996 revision—requiring a thoughtful plan, careful research, broad-based participation from the membership, and multiple drafts for feedback. It also assumed that process would take at least two years (2018–2020). In that context, it seems fitting to look around not only at our current Standards but also at trends in other accrediting standards in the higher education landscape.

This first section will look at our current Standards, especially in terms of their ongoing effectiveness. One observation made by Commission staff—who work constantly with our current Standards—is that while they are clearly not broken, they are starting to show their age. That is not surprising, given that they were built on work done a quarter century ago during the last major revision (1992–1996). Much has changed among ATS member schools since then. For example, the plurality (45%) of the 230 ATS member schools were mainline Protestant in 1996, two-thirds were freestanding, only 16 offered courses off campus and none were offered online. Two decades later, the plurality (44%) of today's 270 members are evangelical Protestant, barely half (56%) are freestanding, nearly 40% offer courses off campus, and two-thirds now offer courses or programs online.

The "typical" student in 1996 was a Caucasian man in his 20s pursuing the MDiv. Soon, the typical ATS student—if such exists anymore—could be a person of color, older than 30, taking most classes online or offsite or in ways still emerging. In addition, the number of professional MA programs has jumped from 100 to more than 250 since 1996. In a few years, the MA could replace the MDiv as the primary degree for many ATS schools, given current cultural, denominational, and enrollment trends. As noted by the Association's "Preparing for 2040" project, students at ATS schools are not only far more racially and ethnically diverse now than they were 20 years ago (one-fourth of ATS schools have a minority majority enrollment, and within the next five years more than half could), but they are also serving an increasingly diverse world. Similarly, as the ATS projects on global awareness and engagement have indicated, the center of gravity in Christianity has moved from the Global North and West to the Global South and East, and our schools are engaging these realities in new and significant ways. It is not surprising that the Standards may no longer serve our schools as well as they once did.

Ongoing evaluations of the Standards since the 2012 revision show a variety of areas needing attention, which, when taken together, suggests that *more than a minor revision is needed*. As examples, some of the comments gathered during these evaluations include: (1) many of the standards seem overly detailed or too granular and often overly de-limiting (i.e., focused more on specific practices than on overarching principles); (2) the literary approach to the text of the tandards can be confusing (e.g., shall vs. should language); (3) the standard on strategic planning seems overly vague; (4) the standard on libraries reflects primarily a resource approach with little reference to electronic resources, evaluation, or learning outcomes; (5) the standard on faculty may need a broader definition; (6) the standard on students offers more of a collection of practices than an overarching philosophy or educational principle for student services; (7) the standard on governance may benefit from more clarity on what shared governance means today; (8) the standards on financial resources and on clusters may not accurately reflect present realities; (9) the educational standard seems overly prescriptive in areas (extension and distance education) and privileges certain educational models over others; (10) the standards addressing assessment sometimes use confusing language (e.g., degree programs goals vs. learning outcomes); (11) some of the academic guidelines seem unclear (e.g., shared credit); and (12) the Degree Program Standards seem overly duplicative in places and at times overly prescriptive, which raises the question of whether we still need 48 pages covering ten different degree programs. The Board of Commissioners has observed some of the "age" of certain sections of the Standards (particularly regarding residency) in the nearly 200 petitions for exceptions and experiments submitted since the 2012 revision. More generally, the membership indicated in a 2016 survey (by the Executive Director Search Committee) that one of its highest priorities is "a revision of accrediting standards to be relevant and flexible and to encourage innovation."

> “*The framing question from 1992 to 1996 was:* What is the good theological school? *The framing question now may be:* What is good (graduate) theological education? *Or,* What do we want to see in the good theological school graduate? *Or,* What are the key principles undergirding good theological education?

In addition to the revision of particular sections of the Standards, the increasing diversity of our membership (e.g., regarding new institutional structures and innovative educational models and practices) suggests that the current framing of the Standards as a whole may no longer be adequate. The framing question from 1992 to 1996 was: *What is the good theological school?* The framing question now may be: *What is good (graduate) theological education?* Or, *What do we want to see in the good theological* *school graduate?* Or, *What are the key principles undergirding good theological education?* The former frame tends to focus on institutional inputs with rather prescriptive standards, while the others focus more on educational outcomes with somewhat flexible standards. Whatever the framing question(s) or even whether there will be a single framing question, it still seems clear that the next revision will be substantive.

This second section will look at trends in other accrediting standards in the higher education landscape. While our Standards must always remain our Standards, we do not operate in a vacuum. In fact, three-fourths of our member schools are also accredited by another agency. It seems appropriate then to take a quick look at what other accrediting agencies have done recently with their standards. One trend is that current standards for other accreditors tend to be briefer (15–25 pages vs. our nearly 100 pages) and broader, being based more on generally stated quality educational *principles* than on specifically delineated best educational *practices*. They also tend to make explicit their underlying assumptions and core values, something that may be increasingly necessary in order for us to clarify our distinctively theological focus and our long-standing emphasis on improvement over compliance or consumer protection (see earlier discussion on the “fourth movement” in accreditation: increasing regulation).

Another trend is that accrediting standards are written in simple declarative sentences. Current standards tend not to use “shall” or “should” statements or “must” language. One accrediting agency, for example, in describing its recent revision process affirmed that it was committed to revised standards that “are written as declarative sentences [that] contain no ‘must’ or ‘should’ statements” but rather “describe the functioning of an institution worthy of accreditation . . . [and] represent aspirational goals that should be met at least minimally.” The 446 “shall” statements and 231 “should” statements in our current Standards sometimes confuse our member schools as to whether or not something is “required.”

One final trend noted here is that other standards require educational programs to demonstrate quality, regardless of delivery. Recent standards of other agencies tend not to privilege any particular educational model, but instead prefer language like “wherever and however this program is delivered” or “faculty (full-time or part-time)” or “learning resources (however they are provided).” The trend is not only to permit innovation and flexibility but also to encourage it. In revising its standards, one agency aptly noted:

> Because the accreditation decision is prospective and because the goal is to develop Standards that will be in effect for a decade, the Standards should reflect, insofar as is possible, those expectations that are likely to be important not just now but also for the next several years" and will "value innovation supported by evidence of effectiveness [since] the ability to innovate and change, done responsibly, is a treasured hallmark of [North] American higher education."[27]

The "prospective" nature of accrediting standards and their openness to innovation are two key areas being explored by ATS schools through the Lilly-funded Educational Models and Practices Project.[28] That four-year project (2015–2018) constitutes a major research resource examining the effectiveness of our current Standards and provides a broad "look around" at what is going on among our member schools. As noted earlier, since the last revision of the Standards in 2012, about a fourth of our member schools have submitted nearly 150 petitions for one or more exceptions or experiments, with almost all of them approved—mostly for exceptions to residency. Among the nearly dozen experiments granted, two address MDiv programs that are offered entirely as competency-based education—with no traditional courses, no residency (but not online), and an expanding definition of faculty that involves significant involvement from constituent churches. Such emerging models surely have ramifications for the next revision of the Standards.

A look ahead: A few concluding remarks

The future is uncertain, but standards of accreditation always carry assumptions, including assumptions about their purpose and their role, not only for member institutions but also for the larger public. The future purpose of accreditation itself is increasingly being viewed with suspicion—at least in the United States—by politicians and policymakers who question its ongoing role in assuring quality education. Countering this emerging attitude of suspicion is this statement by Judith Eaton, president of the non-governmental Council for Higher Education Accreditation (CHEA): "*Accreditation is a trust-based, standards-based, evidence-based, judgment-based, peer-based process*." Standards form the written basis for assuring (and advancing) quality, but they do not do that in a vacuum. Standards are always subject to interpretation, which ATS places in the hands of peers and their professional judgment, based on evidence provided by member institutions. That approach to accrediting and standards is fundamental to the trustworthiness of the entire accreditation process. The ATS Commission has consistently focused on how its Standards can help all member schools achieve their individual missions—in a spirit of encouragement and improvement, not of compliance and discouragement. To quote again from the 1936 Standards, "there is no desire to enforce these standards in an arbitrary fashion; [they] are to be administered by the Commission on Accrediting . . . by way of stimulus and encouragement." That was true then, is true now, and will be true until Jesus returns.

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[27] https://cihe.neasc.org/sites/cihe.neasc.org/files/downloads/Standards_Revision_Process/StandardsRevisionDiscussionPaperJanuary2015.pdf.

[28] http://www.ats.edu/resources/current-initiatives/educational-models-and-practices-theological-education.

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