

ATS Commission on Accrediting begins renewal process

BY JAMES R. MOORE

Similar to a member school's comprehensive evaluation self-study process, the Commission on Accrediting of The Association of Theological Schools (COA) must complete a process for renewal of recognition by the US Department of Education (DOE).

The Commission's petition for renewal of recognition is due to the DOE in July 2024. Following submission of the petition, the DOE staff begins a two-year analysis review process to ensure compliance with the Code of Federal Regulations (CFR §602). During the review period, the DOE staff will observe at least one on-site school evaluation and one ATS Board of Commissioners' meeting. The COA staff will also submit additional files for a comprehensive analysis by the DOE staff.

In spring 2026, the DOE staff will make a recommendation to the National Advisory Committee on Institutional Quality and Integrity (NACIQI) before which Commission staff will appear for an interview. The NACIQI committee, composed of peer educators and congressional members, will subsequently make a recommendation relative to the COA's petition for renewal to the Secretary of Education who will render a final decision.

Like Board of Commissioner (BOC) decisions on length of accreditation and any required follow-up reports, the Secretary of Education will determine if the COA is fully compliant, substantially compliant (requiring further reporting), or not compliant. The maximum period of renewal is five years—one-half the length of a stellar ATS school comprehensive visit for reaccreditation!



Commission staff, led by ATS Director of Accreditation James R. Moore, have begun assembling the required petition. The previous two renewal petitions submitted by the COA have been "focused petitions" requiring response to only 20 of the compliance criteria. Changes in the federal government have led to agencies currently being required to submit evidence for all 110 compliance matters. The 2021 petition included 103 exhibits for compliance; however, the 2026 petition will clearly require more because of it being a full petition.

How might ATS schools participate in this process?

Commission *Procedure* (V.A.3) calls for a review of Commission-approved *Standards, Policies, and Bylaws* "not less than every five years." This *Procedure* is rooted in the requirement of CFR §602.21 that agencies maintain a systematic review of their own standards of

accreditation. Thus, one component of the 2024 ATS/COA Biennial Meeting in June will be an opportunity for participants to review the 2020 *Standards of Accreditation*. While schools have strongly affirmed and embraced the new *Standards*, this will provide an opportunity for the membership to speak directly into the review of the 2020 *Standards*.

The DOE recognizes 37 institutional accrediting agencies (five faith-based—COA of ATS, the Association for Biblical Higher Education, the Association of Advanced Rabbinical and Talmudic Schools, the Association of Institutions of Jewish Studies, and the Transnational Association of Christian Colleges and Schools) that it determines as “reliable authorities concerning the quality of education

or training offered by the institutions of higher education or higher education programs they accredit.” Only institutions and programs accredited by a federally recognized agency

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can provide students with access to Title IV federal student aid monies, including student loans, under the Higher Education Act (HEA).

Why be a recognized accrediting agency?

Perhaps the initial response is allowing students to access federal monies at institutions participating in federal HEA student aid programs. Approximately 62 ATS schools have selected the COA as their “gateway” to these monies. Other ATS schools are also participants but may also have accreditation from a (formerly) regional accreditor—perhaps, because they are an embedded school—or from another faith-based accreditor who serves as their gateway. ATS gateway schools access about \$43 million in student aid annually, critical to their student enrollments.

Recognition also affirms, as noted above, that the accreditation offered by the COA is a mark of quality theological

education that facilitates transferring among institutions, enables recognition for graduates entering both military and institutional chaplaincy, provides mutual accountability, resources, and data access, and opens doors to conversations among diverse communities of faith in the common cause of theological education. Schools applying for ATS membership regularly indicate the desire to participate as members in the “gold standard” of theological education on their applications.

What is the benefit for Canadian or non-Title IV schools?

The mission of ATS remains, “To promote the improvement and enhancement of theological schools to the benefit of communities of faith and the broader public.”

The recognition process is an assurance of the quality of ATS membership whose accountability is to an external agency. Unlike in Canada,

where there is a link to provincial authorities who grant the ability to offer degrees to institutions, this authority in the US is granted by federal authorities to accrediting agencies who serve in that role. In either case, the objective is to assure the broader publics that the education received at a particular institution is a quality education that has been externally evaluated.

What might be some concerns in the review process?

The primary concern is to ensure that the Commission and its board are following their own established *Standards of Accreditation* and *Policies and Procedures*. Evidence of this is presented in the petition and further documented in the follow-up file review. Onsite evaluation committees will continue to carefully examine the alignment of Title IV matters as described in the *Self-Study Handbook* (Appendix B for schools participating in

HEA student aid). Evaluation (both of a programmatic and institutional nature) that includes stakeholder (particularly faculty) analysis and demonstration of educational and institutional improvements (Standard 2.6) continue to be a concern for committees and is the evaluation item requiring more follow-up reports than any other from schools. (More than one-third of visited schools are required to submit a follow-up report on evaluation and/or planning [Standard 2].)

In addition, with the large movement toward distance education delivery among ATS schools, attention to student learning and formation that attends to all aspects of Standard 3.6-9 in the distance education modality are important for schools to clearly articulate in their self-studies.

Commission staff encourages schools to continue to do their good work with integrity as they engage the

self-study process. Do not be surprised if an additional, perhaps unannounced, visitor from the Department of Education is present with the evaluation committee at your school. They will come at their own expense, as an observer, to watch the work of the evaluation committee. They will also see the good representation you bring as a member of the ATS community.

Thank you in advance for your continued contributions to our common work in affirming quality theological education through the renewal process. Our voluntary peer work together demonstrates accountability to one another and to our external publics and it confirms the value of accreditation to the students we serve and the donors who support our work.



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